Fourth Program Year CAPER

The CPMP Fourth Consolidated Annual Performance and Evaluation Report includes Narrative Responses to CAPER questions that CDBG, HOME, HOPWA, and ESG grantees must respond to each year in order to be compliant with the Consolidated Planning Regulations. The Executive Summary narratives are optional.

The grantee must submit an updated Financial Summary Report (PR26).

GENERAL

Executive Summary

This module is optional but encouraged. If you choose to complete it, provide a brief overview that includes major initiatives and highlights that were proposed and executed throughout the first year.

Program Year 4 CAPER Executive Summary response:

The FY2010 Consolidated Annual Performance and Evaluation Report (CAPER) describes Cumberland County’s Housing & Community Development program accomplishments for the period July 1, 2010 through June 30, 2011. The Program is funded solely by an annual entitlement allocation of Community Development Block Grant (CDBG) funds from the U.S. Department of Housing & Urban Development.

In 2007 Cumberland County completed its first ever Consolidated Housing & Community Development Plan. The Plan guides the Community Development Program for a five-year period ending June 30, 2011. The Plan was developed through a series of public meetings, public hearings and the work of the program’s Municipal Oversight Committee.

The Cumberland County program is three programs in one. The City of South Portland operates its own independent program identifying and selecting projects to meet its community priorities and needs. The Town of Bridgton has a special set-aside of funds that, for program year’s 2007-2009, addressed a singular community priority – wastewater disposal in the downtown neighborhood. In program year 2010, Bridgton completed the wastewater project and began a series of community development initiatives. The 2010 Cumberland County program funded activities in the remaining 23 participating member communities with region-wide and community based projects and programs. Beginning in 2009, the Town of Chebeague Island joined the program and in 2010 the City of Westbrook became the 25th member community.

In the 4th year of the Cumberland County program, projects included housing rehabilitation, public facilities, public infrastructure, public services and planning.

Highlights of South Portland’s activities included a range of Public Service activities undertaken by both non-profit organizations and various South Portland municipal departments. Activities undertaken by non-profit organizations included the Boys and Girls Club of South Portland’s Early Care Program; Southern Maine Agency on
Aging’s (SMAA’s) Meals-on-Wheels program; Peoples Regional Opportunity Program’s (PROP’s) Senior Companion and Foster Grandparent program; Community Counseling Center’s Trauma Intervention program; Therapeutic Recreation program offered by the Center for Therapeutic Recreation; and a scholarship program for Home Energy Auditor Training through Green South Portland’s Warm Home Cool Cities. Activities undertaken by various municipal departments included the South Portland School Department’s English as a Second Language (ESL) program; the Transportation Department’s Free Bus Pass program; Recreational Scholarships through the Departments of Parks and Recreation and Public Works; and funding for the Redbank Neighborhood Resource Hub’s personnel. South Portland also provides CDBG funding for a comprehensive home energy efficiency and rehabilitation program for income qualified residents; the program is spear-headed by the local non-profit group, Green South Portland.

Notable Public Improvements in South Portland included improvements to Mill Creek Park and commencement of sidewalk reconstruction in the Knightville neighborhood.

Total program allocation County-wide for Federal Fiscal Year 2010 = $1,849,093

Total program funds expended during 2010 = $1,419,939.95

- 2007 program funds expended = $0.00
- 2008 program funds expended = $128,132.61
- 2009 program funds expended = $357,583.13
- 2010 program funds expended = $934,224.21

General Questions

1. Assessment of the one-year goals and objectives:
   a. Describe the accomplishments in attaining the goals and objectives for the reporting period.
   b. Provide a breakdown of the CPD formula grant funds spent on grant activities for each goal and objective.
   c. If applicable, explain why progress was not made towards meeting the goals and objectives.

2. Describe the manner in which the recipient would change its program as a result of its experiences.

3. Affirmatively Furthering Fair Housing:
   a. Provide a summary of impediments to fair housing choice.
   b. Identify actions taken to overcome effects of impediments identified.

4. Describe Other Actions in Strategic Plan or Action Plan taken to address obstacles to meeting underserved needs.

5. Leveraging Resources
   a. Identify progress in obtaining “other” public and private resources to address needs.
   b. How Federal resources from HUD leveraged other public and private resources.
   c. How matching requirements were satisfied.
Program Year 4 CAPER General Questions response:

1. **Assess one-year goals and objectives**

1.0) **Goal:** Provide Decent Affordable Housing
    **Action:** Funding of Six Housing Rehabilitation/Weatherization Activities

Goal 1.0 Accomplishments, Funding Breakdown, and Progress Notes:

1.1) Regional Housing Rehabilitation Program
    Program Goal: 13 single-family units and 1 multi-family unit.

    Funded Amount: $100,000 (2010)
    Funds Expended: $89,466 (2010); $21,652 (2009); $31,429 (2009-R);
    $9,900 (2008)

PROP completed 20 single-family rehabilitation projects in program year 2010 and
one 20-unit multi-family rehabilitation project. Many of these projects met specific
rehabilitation needs including: well and/or septic system replacements;
weatherization; rehabilitation to support weatherization; or general rehabilitation.

1.2) Alpha One, Critical Access Ramp Program
    Program Goal: 7 ramps

    Funded Amount: $50,000
    Funds Expended: $32,277

Six critical access ramp projects were completed during the past program year. The
program will exceed its projected goal of 7 completed units.

1.3) Town of Freeport – Housing Rehabilitation Program (2008)
    Program Goal: 4

    Funded Amount: $40,000
    Funds Expended: $40,000 ($22,514 expended in 2010)

After considerable delay the Freeport Housing Rehabilitation/Replacement Program
completed two home replacement projects in program year 2010 fulfilling the overall
program target of four completed projects.

1.4) Town of Harpswell – Weatherization of Homes of Elderly or Low-Income
    Residents (2009)
    Original Program Goal: 4; Accomplishment: 1

    Funded Amount: $10,000
    Funds Expended: $10,000

The project completed one significant project at the home of an extremely low-
income resident. The Town conducted five energy audits, providing extensive
information to five homeowners and selected the resident most in need for a critical weatherization project.

1.5) South Portland Home Energy Efficiency Program
Program Goal: 25 units
Funded Amount: $40,000
Funds Expended: $23,297 (2010); $14,258 (2009)

Building on last fiscal year’s work, through the Warm Home Cool City non-profit, 21 audits/weatherization activities were performed (24 units). In addition, two comprehensive repairs were completed: (1) a deficient furnace was replaced for a low income household and (2) a new roof was installed on a second low income household. Continued linkage with the LIHEAP program and PROP’s weatherization program were achieved.

1.6) Town of Sebago – Weatherization of Homes of Elderly
Program Goal: 6
Funded Amount: $25,000
Funds Expended: $16,697

Five projects have been completed to date and two additional projects are to be completed in the summer/fall 2011 for a total of seven projects exceeding the original goal by one project.

NOTE: Additional housing rehabilitation and homeownership activities are conducted within the boundaries of the Cumberland County Entitlement Jurisdiction with funds provided by the Cumberland/Portland HOME Consortium. These activities are reported in the CAPER completed by the City of Portland.

2.0) Goal: Provide & Expand Community Facilities
Actions: New and/or improved Community Center facilities; Food Pantry; Recreational Facilities; and Handicapped Access at Town Office.

Goal 2.0 Accomplishments, Funding Breakdown, and Progress Notes:

2.1) Action – Funding for One Food Pantry Facility

Town of Sebago – Warming Hut Facility (Food pantry & clothing distribution)
Funded Amount: $36,575
Funds Expended: $36,575

This activity was essentially completed as reported in the 2009 CAPER. Final completion and payment occurred in September 2010.

2.2) Action – Improvements at One Playground

Town of Standish – Steep Falls, Mill Street Playground
Funded Amount: $59,910
Funds Expended: $56,043.21
Installation of new playground equipment and re-surfacing of the basketball court and parking area are complete. Final payment is to be made in August 2011.

2.3) Action - Funding for Bath House at Town Beach

Town of Naples – Bath House & Changing Facility at Town Beach, Long Lake
Funded Amount: $56,000
Funds Expended: $56,000

The bath house and changing facility was substantially completed November 2010. Final landscaping and painting occurred in May 2011. The six-unit bathroom/changing facility is now completed and well utilized.

2.4) Action – Funding for Energy Improvements at Two Community Centers

2.4.1) City of Westbrook – Wescott Community Center Energy Improvements
Funded Amount: $212,400
Funds Expended: $212,400

The project installed new energy efficient windows and doors at the Wescott Community Center. The facility houses social service offices, General Assistance, food pantry, a clothing bank, as well as community recreational facilities. This is an adaptive re-use of the former Wescott Jr. High School.

2.4.2) City of Westbrook – High Lake Grange Hall Renovations
Funded Amount: $20,344
Funds Expended: $13,586

Three of four aspects of the project have been completed: New roof installed, insulation installed, new storm windows installed. Installation of new heating furnace will occur in August – September 2011.

2.5) Action – Renovation and Expansion of Senior Community Center

Town of Yarmouth – Bartlett Circle Senior Housing Community Center
Funded Amount: $165,000
Funds Expended: $165,000

The community building at the 28-unit Bartlett Circle Senior Housing complex was dramatically expanded and renovated. The building is now handicap accessible, energy efficient and has become a pleasant, inviting space for residents to socialize, share meals and wash laundry. The project leveraged a $140,000 loan from the USDA Rural Development program.

2.6) Action – Handicap Accessibility at the Town of Sebago’s Town Office

Town of Sebago – Town Office Handicap Accessibility
Funded Amount: $8,000
Funds Expended: $ -0-

This project will be completed in the fall 2011.
**Status updates for prior program years’ community facilities projects:**

Town of Long Island – Community Center Renovations  
Funded Amount: $19,200  
Funds Expended: $ 0  
The project will remediate lead based-paint hazards & install life safety improvements at island’s community center. Work was to start October 2010, but has yet to begin. If progress is not made by the fall/winter 2011 funds will be re-allocated to another activity.

Town of Casco – Community Center – New Kitchen Installation  
Funded Amount: $47,402  
Funds Expended: $22,983  
Project was moving toward completion when the contractor was removed from the project for poor workmanship and malfeasance. The remainder of the project has been re-bid and will be completed in the fall of 2011.

**3.0) Goal:** Provide & Upgrade Public Infrastructure  
**Action:** Funding for 5 infrastructure projects

Goal 3.0 Accomplishments, Funding Breakdown, and Progress Notes:

3.1) Town of Bridgton – Sewage Pre-Treatment & Leach Field Reconstruction & Expansion  
Funded Amount: $81,852 (2010)  
Funds Expended: $81,852 (2010)  
The multi-year reconstruction & expansion of the Town of Bridgton’s Downtown Neighborhood sewage pre-treatment & leach/septic fields was completed in 2009. The total project cost was $661,181 and utilized CDBG funding over multiple years: 2007 - $200,793; 2008 - $192,467; 2009 - $186,368; 2010 $81,852. The $81,852 paid in the 2010 program year represents final payment and reimbursement to the Town for funds previously advanced.  
This project is the most ambitious undertaken by the Cumberland County program to date. Its completion provides the catalytic opportunity to transform Downtown Bridgton and the entire community over the next decade.

3.2) Town of Gorham – Village Sidewalk Reconstruction  
Funded Amount: $150,000  
Funds Expended: $ 0  
The reconstruction of sidewalks, curbing and storm drainage in Gorham Village was completed June – July 2011. Funds will be paid out in one lump sum in early August 2011.

3.3) Town of Harpswell – Road to Affordable Housing Subdivision  
Funded Amount: $40,000  
Funds Expended: $40,000
The project, Benequist Way, was completed in October 2010 and reported in the 2009 CAPER, a small retainage had been held against completion of the final landscaping. Four affordable homes have been constructed on the road and sold to low/moderate income households.

3.4) South Portland Infrastructure and Public Facilities Projects

3.4.1) Mill Creek Park Improvements

Funded Amount: $100,000
Funds Expended: $12,217

This activity is part of a multi-phase project to improve the Mill Creek Neighborhood Park. The park is located in a low/moderate income target area. The project, once completed in full, will improve the ecological integrity of the park resulting in greater compatibility with its surroundings. The project also entails many aesthetic improvements including plantings, pedestrian paths, and installation of a pedestrian bridge. During the past program year, landscaping activities were begun including landscape architectural and design work in coordination with site engineering.

3.4.2) Knightville Sidewalk Reconstruction

Funded Amount: $306,987
Funds Expended: $28,961

This project is part of a multi-year, multi-department sidewalk, storm sewer, street reconstruction, and installation of a new Transit Hub in the City’s downtown. The project was engineered this year, and is slated to commence in August, 2011.

3.4.3) Redbank Neighborhood Streetscape Improvements (2009)

Funded Amount: $2,935
Funds Expended: $2,935

The scope of the work to be completed with 2009 CDBG funds was down-sized due to poor economy. Fencing was purchased and installed around the Redbank Community Center Playscape in the low/mod income neighborhood of Redbank. The Redbank neighborhood is a low/moderate income target neighborhood located in the Maine Mall area of South Portland. The project was occurring in conjunction with the Redbank Neighborhood Playground Equipment project.

3.4.4) Redbank Neighborhood Playground Equipment (2009)

Funded Amount: $49,891
Funds Expended: $49,891

The project consisted of demolishing an unsafe and inaccessible (ADA) playground structure, refurbishment of the site to meet current recreation standards, and installation of new playground structures for neighborhood use in the Redbank low/moderate income target neighborhood. Materials, including playground equipment and playground surfacing, have been purchased, and installed. The facility is adjacent to the neighborhood center.
3.4.5) Mill Creek Park Benches (2009)
    Funded Amount: $5,912
    Funds Expended: $5,912

The South Portland Parks Department purchased four benches for installation within the Mill Creek Park. Two benches were installed during 2010 and the final two benches were installed in early 2011.

3.4.6) South Portland Historical Society Handicapped Accessibility (2009)

    Funded Amount: $18,000
    Expended Amount: $18,000 (all in 2010)

The project, begun in 2009 and completed in 2010, provided parking and handicapped accessibility to the South Portland Historical building (an historic structure) to permit ADA compliant access to the public building.

3.4.7) Hutchins School Renovations (2009)

    Funded Amount: $93,090
    Expended Amount: $27,425 ($2,649 in 2010)

The Hutchins School is a municipally owned building eligible for listing on the National Register and located in the Ferry Village low/moderate income target neighborhood. The project consists of life safety and handicapped accessibility improvements in the building and restoration of the exterior. The project is currently under contract and work has begun. The project completion date is September 1, 2011.

3.4.8) Mill Creek Park Gazebo (2008)

    Funded Amount: $44,690
    Funds Expended: $44,690 ($41,877 in 2010)

Installation of a new public gazebo in Mill Creek Park was completed in August 2010. In addition to construction of a new gazebo, work included the demolition and disposal of the aging and structurally unsound gazebo formerly at the site.

3.4.9) Knightville Bus Shelter and Transit Hub (2008)

    Funded Amount: $39,460
    Funds Expended: $39,460 (all in 2010)

Program funds paid for project engineering completed in December 2010. The bus shelter and the Transit Hub will be located in the low/moderate income Knightville/Mill Creek neighborhood. Once completed, the glass enclosed bus shelter will be energy efficient and meet ADA accessibility requirements. The transit hub will have space for three buses concurrently and possible future expansion.
4.0) **Goal:** Provide Access to Public Services

**Actions:** Funding for recreation programming, child care, free bus passes, senior programs, education, abused spouses, and trauma intervention.

4.1) **Action – Funding for Recreation Programming, Adults with Developmental Disabilities**

4.1.1) Center for Therapeutic Recreation (County-Wide)
- Funded Amount: $8,000
- Funds Expended: $8,000

The program provided aquatic recreation sessions to 13 clients from the communities of Cape Elizabeth (2), Falmouth (2), Scarborough (6), Westbrook (1), Windham (1), and Yarmouth (1).

4.1.2) Center for Therapeutic Recreation (South Portland)
- Funded Amount: $8,000
- Funds Expended: $7,831

The emphasis is on therapeutic adaptive aquatics for adults with developmental and physical disabilities. The program is now operated under the auspices of the Easter Seals program. Seven severely disabled adults were served during the 2010 program year.

4.2) **Action – Education for non-native English language speakers in South Portland**

English as a Second Language ("21 Club")
- Funded Amount: $10,000
- Funds Expended: $0.00

The ESL program is run by the South Portland School Department and is designed to meet five broad program goals: (1) improving students’ academic achievement in literacy and math; (2) improving students’ health, wellness and social skills; (3) improving students’ participation in the arts and their understanding of America’s multi-cultural society; (4) improving parents’ participation in their children’s education; and (5) sustaining the program through partnerships and funding from other organizations. Over the course of the school year, 102 individuals were enrolled in the ESL program. Of the 102 people, 85 (83%) were from households below the 80% of median income threshold. The funds will be drawn down in August 2011.

4.3) **Action – Scholarship program for City of South Portland recreation programming**

Recreation Scholarship Program
- Funded Amount: $10,000
- Funds Expended: $0.00

109 individuals received scholarships enabling them to participate in South Portland’s summer recreation programs. All 109 individuals (100%) were from a household at or below the 80% of median income threshold. Funds for the 2011 program year were drawn down July 2011.
4.4) **Action – Expansion of summer child care hours at the Boys & Girls Club of South Portland**

Boys & Girls Club  
Funded Amount: $5,000  
Funds Expended: $5,000

These funds were used to expand the Summer Early Care program at the Boys & Girls Club in the Ferry Village. The Club serves the neighborhoods that occupy the boundary areas of census tracts 31 & 32 with 44.87% low/moderate income residents; the exception rule threshold for 2010 is 43% low/moderate income. For the 2010 Summer Early Care program, 655 children were enrolled of which 426 (65%) were from low/moderate income households.

4.5) **Action – Provision of free bus passes in the City of South Portland**

Bus Pass Program  
Funded Amount: $4,000  
Funds Expended: $4,000

The South Portland Bus Service provided 2,890 free bus passes to help 92 low/moderate income residents obtain transportation to work, medical appointments, school and shopping. South Portland Bus Service has worked closely with Ingraham Volunteers, STRIVE, Day One Services, Division for the Blind and Visually Impaired, South Portland General Assistance, and South Portland School Department, as well as other organizations whose clients use public transportation.

4.6) **Action – Senior Services in the City of South Portland**

4.6.1) **PROP Senior Companion & Foster Grandparents**  
Funded Amount: $10,062  
Funds Expended: $7,458

The Foster Grandparents Program assigned senior volunteers to elementary schools to provide valuable academic support that strengthened learning through participation in classroom activities. The Senior Companion Program enabled senior volunteers to visit and provide companionship for other, homebound, seniors. 102 seniors were served through the programs of which 98 (96%) were from a household at or below the 80% of median income threshold.

4.6.2) **Southern Maine Agency on Aging – Meals-on-Wheels**  
Funded Amount: $10,000  
Expended Amount: $8,336

Southern Maine Agency on Aging (SMAA) delivers hot meals to low-income, home bound seniors. During the past year, 13,080 meals were delivered to 124 seniors all of which were at or below 80% of the median income threshold.
4.7) **Action – Personnel for low/moderate income neighborhood resource center in the City of South Portland**

Redbank Community Center – Personnel  
Funded Amount: $24,300  
Funds Expended: $0.00

This public service project covers the cost of the personnel for the Redbank Neighborhood Center aka the “Redbank Resource Hub.” The hours of the personnel were extended during this past fiscal year, due to the level of need for the neighborhood. The balance of these funds will be drawn down in September & October 2011.

4.8) **Action – Assistance for persons undergoing traumatic events in the City of South Portland**

Community Counseling Services – TIP Program  
Funded Amount: $15,000  
Funds Expended: $11,250

The Trauma Intervention Program (TIP) was designed to provide support to South Portland residents in the immediate aftermath of a traumatic event, allowing Police & Fire personnel to focus on and complete their primary duties. 66 residents of the city’s low/moderate income target neighborhoods were served.

4.9) **Action – City of South Portland scholarships for Southern Maine Community College building certification preparatory course**

Green South Portland – Home Energy Auditor Training Scholarships  
Funded Amount: $40,000  
Expended Amount: $3,490

Building Science and Energy Auditing scholarships were provided to three individuals from low/moderate income households. The building science and energy auditing class, offered at Southern Maine Community College, was designed to prepare students to pass the BPI Building Analyst certification, the energy auditing professional designation recognized by Efficiency Maine and Maine State Housing. Due to economic circumstances, thus far only three student scholarships have been funded.

2. **Change As A Result of Experience**

Learning from experience is a critical component of Cumberland County’s Community Development program for two important reasons. First, the County’s program is the first ever Urban County CDBG Entitlement Program located in New England. Second, the County’s program, which is in its fourth year, is relatively new.

Several programmatic changes were instituted after the 2007 program year and then implemented in 2008. These changes included:

- Require 20% cash or in-kind matching funds for community based projects
- Review Planning Grant applications separately from Project Applications
Establish a two-tier application process with pre-applications due 6 weeks prior to final application submission

- Limit applications as follows:
  - Per community: 2 project grants and 1 planning grant
  - County-Wide: 4 project grants* and 2 planning grants
    *The number of project grants was later changed from 4 to 5

- Require a clear demonstration of financial need with applications
- Require endorsement of applications by elected officials, not simply the Town or City Manager
- Application Review Committee constituted to limit conflicts of interest.

Few substantive programmatic policy changes were implemented from 2008 to 2009, but, beginning with applicants for 2010 program funding, a community “distress score” factor was added to the review of project applications. The distress score provided some advantage during the application review to communities with relatively larger low/moderate income populations. Another program change implemented in 2010 was the adjustment of allowed County project grants from 4 to 5.

An extensive and broad based outreach effort to regional non-profit social service providers was undertaken in late 2010 and early 2011 in order to increase awareness of the County’s program and funding opportunities contained therein. The outreach effort was a success resulting in a greater number of social service applications and ultimately a greater number of social service projects awarded funding for the 2011 program year.

New for the 2011 program year was the opportunity for program applicants to meet face-to-face with the Application Review Team to present their projects and answer questions. Applicants had 4-5 minutes each to answer a “master” question formulated by the Application Review Team, to which they were given advanced notice, as well as to answer questions from the ART specific to their projects. All 2011 program year applicants took advantage of the opportunity to present their projects and provided positive feedback about the experience.

3. **Affirmatively Furthering Fair Housing**

Cumberland County completed its inaugural “Analysis to Impediments to Fair Housing Choice” September 1, 2010 report. The report identified eight impediments to fair housing choice:

1. Barriers faced by persons with disabilities
2. Lack of awareness of fair housing laws by landlords
3. Lack of awareness of fair housing laws and rights granted under the law by renters
4. Racial, ethnic and cultural barriers
5. Language barriers for immigrants
6. Discrimination based on source of income
7. Discrimination based on familial status and sex (most often sexual harassment)
8. Limited rental & affordable ownership opportunities in many communities of the Cumberland County Entitlement Jurisdiction; opportunities are limited by zoning requirements and other factors.
Actions taken by the County during the 2010 program year to address the above Fair Housing Choice impediments included the original analysis, educational outreach, and increased funding for affordable housing. Educational outreach was in the form of written materials provided to landlords and tenants reminding them of their respective obligations and rights under non-discrimination law. Written information was provided to landlords and tenants on the provision of reasonable accommodations for persons with disabilities. Brochures outlining the rights of homebuyers and renters under non-discrimination, Fair Housing laws were also distributed with special emphasis on distribution within the Cities of South Portland and Westbrook and the larger suburban and rural towns.

The County also continued to expand funding for affordable housing in the region.

Throughout the 2010 program year, the “Analysis” and the issue of Fair Housing became a component of an ongoing dialogue with our member communities. Recognizing the role that financial resources plays in the provision of affordable housing the County spearheaded the development of a HUD HOME Program Consortium. The Consortium, begun in July 2009, aligns all the communities of Cumberland County, including the City of Portland in a partnership to address affordable housing.

The County’s Community Development Director and Grants & Special Projects Coordinator played a significant role in procuring a $1.5 million HUD Sustainable Communities Planning Grant for the region. A major component of the planning program will focus on economic equity, housing choice, and fair housing.

4. Actions to Address Obstacles to Meet Underserved Needs

In every possible program activity, available funding is the primary obstacle to meeting underserved needs. To address this issue Cumberland County joined with the City of Portland and the Town of Brunswick to form the City of Portland/Cumberland County HOME Consortium. The HOME Consortium is bringing approximately $500,000 in new funds to the region each year to address affordable housing issues. This will also permit a portion of our CDBG resources currently funding housing rehabilitation activities to be realigned to finance public services, public infrastructure, public facilities, downtown revitalization or economic development.

5. Leveraging Resources

The Cumberland County Community Development program leveraged the following resources in 2010:

Regional Housing Rehabilitation Program - $203,727
Alpha One, Critical Access Ramp Program - $2,792
Town of Sebago Weatherization Program - $6,055.28
Gorham – Village Sidewalk Reconstruction - $96,014
Naples - Beach, Bath House - $22,933
Westbrook – Wescott Community Center - $47,100
Yarmouth – Bartlett Circle Community Center - $170,000
South Portland – South Portland Housing Authority Trail Access - $46,925

Total Funds Leveraged - $595,546
Although the decision was made locally by the County’s Municipal Oversight Committee to require a 20% matching for community-based projects, there are no HUD “matching requirements” that the County must satisfy for the CDBG program. Match is required for the HOME program.

Managing the Process

1. Describe actions taken during the last year to ensure compliance with program and comprehensive planning requirements.

Program Year 4 CAPER Managing the Process response:

As outlined in the 5-year Consolidated Plan and 2010 Annual Action Plan, the Cumberland County Community Development Office is the lead agent for the implementation of the CDBG program. The Office coordinates the effort with an Oversight Committee composed of one representative of our 25 member communities. The County Commissioners are the County’s legislative body and hold ultimate authority over the program’s operation.

The selection of projects and activities to receive funding followed the plan and process outlined in the 2010 Annual Action Plan. All projects and activities address one of three primary objectives: (1) Suitable living environments; (2) decent housing; and (3) economic opportunity. All projects and activities address one of three outcomes: (1) Improve availability/accessibility; (2) improve affordability; and/or (3) improve sustainability.

Citizen Participation

1. Provide a summary of citizen comments.

2. In addition, the performance report provided to citizens must identify the Federal funds made available for furthering the objectives of the Consolidated Plan. For each formula grant program, the grantee shall identify the total amount of funds available (including estimated program income), the total amount of funds committed during the reporting period, the total amount expended during the reporting period, and the geographic distribution and location of expenditures. Jurisdictions are encouraged to include maps in describing the geographic distribution and location of investment (including areas of minority concentration). The geographic distribution and expenditure requirement may also be satisfied by specifying the census tracts where expenditures were concentrated.

*Please note that Citizen Comments and Responses may be included as additional files within the CPMP Tool.

Program Year 4 CAPER Citizen Participation response:

1. Citizen Comments

No comments received. A notice of the 15-day CAPER comment period was posted in the September 6, 2011 Portland Press Herald. An outline of the report was
presented at the September 12, 2011 County Commissioner’s meeting and the September 14, 2011 Municipal Oversight Committee meeting.

2. **Identified Federal Funds**

2009 CDBG Allocation - $1,476,223  
2009 CDBG Allocation – Total Funds Committed - $1,471,300  
2009 CDBGAllocation – Total Funds Drawn Down - $1,058,592  
Total Funds Expended in 2010- $ 357,583

2010 CDBG Allocation - $1,849,093  
2010 CDBG Allocation – Total Funds Committed - $1,842,956  
2010 CDBG Allocation – Total Funds Drawn Down - $ 993,646  
Total Funds Expended in 2010- $ 993,646

Program Income - $49,500  
PI Committed - $49,500  
PI Expended - $49,500

**Location of expenditures for 2010**

1) Town of Bridgton  
   Program Administration - $40,000  
   Critical Access Ramp, 1 project - $6,408  
   Single Family Housing Rehabilitation (2) - $15,139  
   Inflow-Infiltration Project - $8,156  
   Sewer, Leach Field Project Final Payment - $81,852

2) Cape Elizabeth  
   Single Family Housing Rehabilitation - $8,551

3) Town of Casco  
   Kitchen Renovation at Community Center - $22,983  
   Single Family Housing Rehabilitation - $1,058

4) Town of Freeport  
   Freeport Community Services Building Renovation - $5,349  
   Housing Replacement - $33,301  
   Single Family Housing Rehabilitation – $10,595  
   Historical Society Planning - $15,000

5) Town of Gorham  
   Village Sidewalk Reconstruction - $150,000 (to be paid August 2011)  
   Single Family Housing Rehabilitation (2) - $18,446

6) Town of Gray  
   Monument Square Planning - $20,000  
   Single Family Housing Rehabilitation - $3,903  
   Façade Improvement Program - $428.00

7) Town of Harpswell  
   Housing Weatherization - $10,000  
   Mitchell Field Planning - $13,522
Benaquest Way, Road to Affordable Housing Subdivision - $2,000 (final payment on $40,000 grant)

8) Town of Harrison
   Playground Improvements - $20,000

9) Town of Naples
   Town Beach Bath House - $56,000
   Critical Access Ramp, 1 project - $2,239
   Single Family Housing Rehabilitation (3) - $22,008

10) Town of New Gloucester
    Water Line Planning - $4,500
    Single Family Housing Rehabilitation - $1,764

11) Town of Sebago
    Home Weatherization for Elderly - $16,697
    Critical Access Ramp, 1 project – $4,437
    Food Pantry – Final Payment - $4,438

12) City of South Portland
    Program Administration - $59,537
    Mill Creek Park
      2010 - $12,217
      2009 - $5,912
      2008 - $41,877
    Knightville Sidewalk Reconstruction - $28,961
    Home Energy Audits and Weatherization
      2010 (5) - $23,297
      2009 (20) - $14,258
    Fort Preble Restoration Planning - $1,065
    Library (primary location) Site Planning - $2,662
    Redbank Streetscape Improvements - $2,935
    Redbank Playground Equipment - $49,891
    Former Hutchins School Renovations - $2,649
    Historical Society Handicap Accessibility - $18,000
    E St LLC Condominiums - $500
    Knightville Neighborhood Bus Shelter - $39,460
    Various Public Service Activities
      2010 - $47,365
      2009 - $52,121
      2008 - $13,954

13) Town of Standish
    Mill Street Park, Steep Falls Neighborhood - $4,620
    Critical Access Ramp, 1 project – $4,419

14) City of Westbrook
    Westcott Community Center Renovations - $212,400
    Highland Lake Grange Renovations - $13,586
15) Windham
   Critical Access Ramp – 1 project - $5,041
   Multi-Family Housing Rehabilitation - $17,923
   Single Family Housing Rehabilitation - $10,544

16) Town of Yarmouth
   Bartlett Circle Community Center - $165,000
   Handicap Access Ramp, 1 project - $5,030

17) Regional Activities
   Program Administration - $105,291
   Center for Therapeutic Recreation - $8,000
   Global Engagement Planning – $2,984

**Institutional Structure**

1. Describe actions taken during the last year to overcome gaps in institutional structures and enhance coordination.

**Program Year 4 CAPER Institutional Structure response:**

The Cumberland County Community Development program, in its fourth program year, is still relatively new. While some modest changes have already been made to the program application and review process no significant changes have been made or proposed to the program’s institutional structure.

The County’s Community Development Office is an integral partner in the City of Portland/Cumberland County HOME Program Consortium. This initiative has led to significantly enhanced cooperation among Consortium members.

With the initiation of the new Homelessness Prevention Rapid Re-Housing Program the County continues to work more cooperatively with the City of Portland and the State Homelessness Prevention Programs.

**Monitoring**

1. Describe how and the frequency with which you monitored your activities.

2. Describe the results of your monitoring including any improvements.

3. Self Evaluation
   a. Describe the effect programs have in solving neighborhood and community problems.
   b. Describe progress in meeting priority needs and specific objectives and help make community’s vision of the future a reality.
   c. Describe how you provided decent housing and a suitable living environment and expanded economic opportunity principally for low and moderate-income persons.
   d. Indicate any activities falling behind schedule.
   e. Describe how activities and strategies made an impact on identified needs.
   f. Identify indicators that would best describe the results.
g. Identify barriers that had a negative impact on fulfilling the strategies and overall vision.
h. Identify whether major goals are on target and discuss reasons for those that are not on target.
i. Identify any adjustments or improvements to strategies and activities that might meet your needs more effectively.

Program Year 4 CAPER Monitoring response:

1. Describe how and the frequency with which you monitored your activities

Monitoring of projects and activities was conducted on a frequent and regular basis:

1.1) The Alpha One Critical Access Ramp program was monitored on June 8, 2011. All client files, financial records and program documents were thoroughly examined. The project completed during the 2009 program year was visited while construction was in progress.

1.2) The Regional Housing Rehabilitation Program was formally monitored on June 13, 2011. Each project file was thoroughly examined. Individual project sites were visited every month throughout the year for a random assessment of program operations. Three projects were reviewed at initial inspection, during construction and upon completion.

1.3) The Town Sebago Home Weatherization Program was monitored on April 10, 2011. Every project file was thoroughly examined and every project site was visited and inspected. The Town’s progress on its ongoing planning grant and handicap accessibility project was reviewed.

1.4) Community visits were made to The Town of Bridgton to support their Economic/Community Development Director and review projects in 2010 on July 9, July 30, and October 21 and in 2011 on March 13 and May 26.

1.5) South Portland’s activities are overseen by its professional Community Development Director. Public facilities and infrastructure projects are regularly monitored and inspected by the City’s Public Works Department. The County Community Development Director visited project sites in South Portland on May 29, 2011 and monitored the program on June 1, 2011. The County CD Director meets with the City of South Portland quarterly and communicates regularly by phone and e-mail.

1.6) Community site visits were conducted for ongoing projects in Casco, Freeport, Gorham, Freeport, Naples, Standish (Steep Falls Neighborhood), Westbrook and Yarmouth. The County’s Community Development Director was present at pre-construction, construction inspection and fund draw down meetings for community facility/infrastructure projects in Freeport, Gorham, Naples, Westbrook and Yarmouth.
2. **Describe the results of your monitoring including any improvements**

Monitoring revealed that programs are being well managed. Suggestions made to the City of South Portland to improve operations are being implemented including expanding the work hours of their Community Development Assistant.

3. **Self Evaluation**

3a. **Describe the effect programs have in solving neighborhood and community problems.**

In its fourth year the County Community Development program has now completed a number of projects that address community problems. Public facility and infrastructure projects include:

1. The new food pantry, clothing closet and warming hut in Sebago. The final payment for this project was made in the 2010 program year.
2. New Bath House at Naples’ Town Beach. This facility is coupled with the new Singer Community Center located directly across from it (Rt. 302) providing much improved facilities for the town.
3. New community playground on Mill Street in the Steep Falls Village neighborhood of Standish. This neighborhood did not have any recreational or playground facilities.
4. Long anticipated repairs and upgrades to the failed septic/leach fields that serve downtown Bridgton were completed in October 2009, with final payment made in the 2010 program year
5. Completion of new sidewalks in Gorham Village, Gorham. This is a major upgrade in this compact, well-populated village
6. Renovation and expansion to the Bartlett Circle Senior Housing Community Center, Yarmouth. This represents a significant and necessary upgrade for this affordable senior housing community.
7. The installation of new windows and doors at the Wescott Community Center in Westbrook. Without these improvements the facility would be too costly to heat. The facility represents a significant upgrade in the provision of social and recreational services for low income residents of Westbrook.

The City of South Portland continues to address its communities’ needs through a number of neighborhood projects including:

1. Extensive improvements to Mill Creek Park.
2. Sidewalk reconstruction and streetscape improvements in the Knightville and Redbank target neighborhoods.
3. Construction of the Knightville Bus Shelter and design of the Knightville Transit Hub.
4. Renovations to the former Hutchins Elementary School.
5. Handicapped accessibility to the South Portland Historical Society.

Types of housing projects completed throughout Cumberland County include housing rehabilitation, handicap access ramps, and home replacement and weatherization. The homeless prevention project, now funded by Homelessness Prevention Rapid Re-Housing (HPRP) program funds has been extremely successful at reducing the number of non-Portland Cumberland County residents migrating to Portland’s
homeless shelter system. The road serving Harpswell’s new affordable housing subdivision facilitates home ownership for families that otherwise would not have such opportunities.

The City of South Portland in partnership with Green South Portland/Warm Home Cool City has been proactive in increasing home energy efficiency of low/moderate income households thereby reducing energy costs and enabling many, often elderly, residents to live somewhat more comfortably through Maine’s long winters. Home weatherization projects such as purchase and installation of furnaces/burners and of home “envelope” insulation have been completed in homes for which standard winterization practices would not have been effective as stand-alone activities.

Social service activities were widely supported by the City of South Portland. Low-income elderly residents were aided through PROP’s Senior Companion and Foster Grandparents program and Southern Maine Agency on Aging’s Meals-on-Wheels program. South Portland’s Transportation Department provided free bus passes enabling residents to travel to work, school, doctor’s appointments, and shopping. The School Department ran an English-as-a-Second-Language (ESL) program for immigrants improving their ability to assimilate into U.S. culture while also providing an opportunity to share aspects of their native cultures. The Boys and Girls Club Early Care Program meant working parents wouldn’t have to cut back on work hours to care for their children during the summer. Handicapped adults were able to engage in aquatic physical recreation under close supervision though the Center for Therapeutic Recreation. Residents undergoing a traumatic event received support from the Community Counseling Center. Residents of the Redbank neighborhood benefited from the support services offered through the Redbank Resource Hub.

3b. **Describe progress in meeting priority needs and specific objectives and help make community’s vision of the future a reality.**

Housing rehabilitation was and is a priority need. Twenty-one housing projects were completed through the Regional Rehabilitation Program, two through the Freeport Rehab/Replacement Program, and six through the Alpha One Critical Access Ramp Program during the fourth program year.

Community facilities have been a major component of the County CD program. Projects in Sebago (food pantry), Standish (Steep Fall Village – playground), and Harrison (basketball court) were largely completed last program year with final payments made in 2010. Facilities completed in the 2010 program year include the bath house at the Naples Town Beach; Bartlett Circle Senior Housing Community Center in Yarmouth; and new sidewalks in the Gorham Village (payment to be made late July/early August 2011).

The City of South Portland is working diligently to improve the streetscape, sidewalks and community park spaces. The overall theme is to foster continued community improvement and pedestrian oriented neighborhoods. A major sidewalk, curb reconstruction, storm drainage, road reconstruction, handicap access and transit facility project is currently under construction. CDBG funds are targeted toward the sidewalk, handicap access and transit facility components.

The new Homeless Prevention Rapid Re-housing program is making great strides in preventing homelessness and assisting those that are in locating and paying for housing.
3c. **Describe how you provided decent housing and a suitable living environment and expanded economic opportunity principally for low and moderate-income persons.**

The 2010 program completed 21 housing rehabilitation projects (40 housing units), 6 critical access ramp projects, and 6 weatherization projects (Harpswell, 1; Sebago, 5). The City of South Portland completed 21 audits and 2 weatherization projects and winterization projects. These activities brought significant and lasting improvements to the living environments of the affected low/moderate income households.

The Benequast Way road construction project in Harpswell supports homeownership for low/moderate income households. The County is also using HOME funds, reported in the CAPER of the City of Portland, for housing rehabilitation and homeownership assistance.

To date, the County program has not engaged in direct economic development activities. Given our limited CDBG resources and the complication of managing CDBG funded economic development, funds for job creation activities were not allocated in 2010. However, the program has funded three projects aimed at downtown revitalization: Gray (façade improvements, sidewalks, streetscape improvements); Gorham (Village sidewalk improvements); and Bridgton (sewage treatment/septic field reconstruction & façade improvements). These activities will lead to long-term benefits to the economic and environment of these communities.

The City of South Portland has not utilized CDBG funds for direct economic development activities. It has supported housing rehabilitation and homeownership assistance activities, and is currently re-constructing sidewalks in the Knightville neighborhood.

The County program has engaged in serious discussion concerning the utilization of CDBG funds for direct job creation activities. These discussions will continue as we development our 2012-2016 Five-Year Consolidated Plan.

3d. **Indicate any activities falling behind schedule**

Cumberland County:

1. The Gray Village Revitalization project initially funded at $200,000 in 2009 has been cancelled. The project had two components – $100,000 for public infrastructure & $100,000 for private property improvements. The funds have been re-allocated in 2011 with $154,000 being distributed back to the Town of Gray for sidewalk reconstruction from Rt. 115 north along the east side of Main Street to the new Town Offices at the Pennell Institute. This project is scheduled for construction in September 2011 bringing this funding well up-to-date.

2. The completion of the kitchen facility at the Casco Community Center was plagued by poor contractor performance, a minor theft, and fraud. The remainder of the project has been re-bid, July 2011. Completion is anticipated by December 1, 2011.
3. The Town of Casco’s Regional Services Planning Grant, a small $15,000 planning grant which also includes the Towns of Raymond and Naples has not been expended. The very problem the grant was intended to solve, namely the challenges inherent in intergovernmental cooperation, has proven a difficult obstacle. With luck, the project will be completed by December 31, 2011.

4. The Long Island Community Center Renovation project funded in 2009 has not yet begun. This is a small $19,000 grant for lead hazard control and life safety system improvements. The project is challenged by its remote off-shore location and reliance on volunteer staff. We’re giving it one more year, but funding may be rescinded if progress doesn’t occur.

South Portland:

1. Several public service agencies have been delayed in completely drawing down allocated funds. The agencies have been warned of a possible loss of funds if they are not drawn down in timely fashion.

2. Delays in project engineering and bidding have caused the continuation of the Mill Creek Park improvements project to spill over to program year 2012. The improvements are expected to be completed by June, 2012.

3. The Hutchins School renovations (initially funded in 2009) will be complete in the fall of 2011. Final exterior painting will be performed in the spring of 2012, based on available funding.

4. The High/Sawyer Park improvements funded in FY 2009 will be woven into another similar recreational facility upgrade in program year 11. Completion is expected in the spring of 2012.

Bridgton:

1. The community of Bridgton is weighing options for completing the 2010 Inflow/Infiltration Sewer Improvement project. A variety of smaller 2010 projects will be completed in the fall of 2011 and spring 2012.

3e. Describe how activities and strategies made an impact on identified needs

Cumberland County

• Homeless case management services:

  This program was initially funded with CDBG funds (2007 & 2008), but is currently funded with HPRP funds. It continues to be extremely effective in placing at risk county residents in permanent housing. HPRP is not reported in this CAPER.

• Housing rehabilitation:

  Rehab services have been funded in 2007, 2008, 2009 & 2010. In 2010 the program focused on emergency repairs, rehab in support of DOE weatherization
activities and direct weatherization activities. 42 projects (64 units) were completed in program year 2010.

- Services for handicap persons:

  Six critical access ramps were installed during the 2010 program year.

- Community focus on improving local community facilities:

  - Yarmouth (Bartlett Circle Senior Housing Community Center)
  - Westbrook (Wescott Community Center)
  - Naples (Town Beach, Bath House)

    All the above community facilities represent major upgrades to well-used facilities.

- Downtown/Village Revitalization:

  The new sidewalks in Gorham Village are designed to turn a rather tired, poorly used area into a bright, walkable, handicap accessible little downtown.

- Infrastructure to support affordable housing:

  Reported as 99% complete in the 2009 CAPER and now 100% complete, Benequist Way is a road to an affordable housing homeownership development in Harpswell.

**Town of Bridgton**

The greatest identified need for the use of 2007-2010 program funds was sewer system and septic/leach field improvements in downtown Bridgton. This has been coupled with investment in pedestrian and streetscape improvements (CDBG-R funds) and minor pocket park and façade improvement investments. Going forward the community will be addressing the needs of elders (new kitchen at community center) and dental care for low-income residents.

**City of South Portland**

The street, sewer, storm drainage and sidewalk reconstruction project in the western end of the Knightville/Mill Creek neighborhood will provide an important boost to the community. The area will become more pedestrian accessible and “friendly,” and-along with the construction of the Mill Creek Transit Hub- will further its role as a community center.

3f. **Identify indicators that would best describe the results of completed projects.**

Now fully completed, the playgrounds in Standish (Steep Falls Village) and Harrison are safe and healthy places for children to play and families to congregate.

Community residents using the Naples Town Beach on Long Lake have safe, sanitary changing and restroom facilities.

Six handicap persons can safely exit and enter their homes.
Cumberland County

The City of Westbrook is saving thousands of gallons of heating oil each year at the Wescott Community Center.

Five homeowners in the Towns of Sebago & Harpswell and 21 homeowners in the City of South Portland are saving thousands of dollars in heating costs through home weatherization and energy efficiency improvements.

3g. **Identify barriers that had a negative impact on fulfilling the strategies and overall vision.**

The greatest single factor in fulfilling the vision of the Cumberland County Community Development program is extremely limited program funds. The needs of the County are expansive particularly in the areas of affordable housing, housing rehabilitation and weatherization, provision of social services, and the creation of community facilities. However, CDBG resources, already exceptionally modest, are diminishing rather than increasing.

3h. **Identify whether major goals are on target and discuss reasons for those that are not on target.**

Major goals are on target. This is the 4th year of the five-year consolidated plan but at this juncture the program is working toward achieving its goals.

3i. **Identify any adjustments or improvements to strategies and activities that might meet your needs more effectively.**

At this time no significant adjustments or improvements are anticipated. A shared part-time staff person may be added that would assist the Community Development Directors of South Portland & Cumberland County

**Lead-based Paint**

1. Describe actions taken during the last year to evaluate and reduce lead-based paint hazards.

**Program Year 4 CAPER Lead-based Paint response:**

All housing rehabilitation projects comply with the lead based paint requirements.

The Cumberland County Community Development Office in partnership with the City of Portland received a Lead-Based Paint Hazard Control Program Grant in 2007. Unfortunately, the renewal application for the program was not successful. Thus no funds specifically designated for lead-based paint hazard control are currently available.

Activities for 2010: Total project costs: $71,542

Total projects completed and cleared: 8

Locations: Westbrook 4 Projects
Gorham 1 Project
Brunswick 3 Projects
HOUSING

Housing Needs

*Please also refer to the Housing Needs Table in the Needs.xls workbook.

1. Describe Actions taken during the last year to foster and maintain affordable housing.

Program Year 4 CAPER Housing Needs response:

The Year 3 program focused on Housing Rehabilitation activities including weatherization and rehabilitation in support of weatherization. High heating and energy costs, and thus home weatherization and improved energy efficiency, have become a critical issue for low income residents in our region.

Town of Freeport: 2 projects completed
Town of Harpswell: 1 rehab project completed. 5 energy audits completed
Town of Sebago: 5 weatherization projects completed
Regional Housing Rehabilitation Program: 21 projects (40 units) completed
Critical Access Ramp Program: 6 projects completed
City of South Portland: 21 projects (24 units) completed

Specific Housing Objectives

1. Evaluate progress in meeting specific objective of providing affordable housing, including the number of extremely low-income, low-income, and moderate-income renter and owner households comparing actual accomplishments with proposed goals during the reporting period.

2. Evaluate progress in providing affordable housing that meets the Section 215 definition of affordable housing for rental and owner households comparing actual accomplishments with proposed goals during the reporting period.

3. Describe efforts to address “worst-case” housing needs and housing needs of persons with disabilities.

Program Year 4 CAPER Specific Housing Objectives response:

1. Evaluate progress in meeting specific objective of providing affordable housing

During the July 1, 2010 to June 30, 2011 program year, 21 housing rehabilitation projects (40 units) were completed and 6 critical access ramp projects were completed. The projected 2010 unit goal was 20. Of these 46 units, 21 were occupied by households <30% AMI (extremely low-income); 13 were households between 30% & 50% LMI (very low income) and 12 were households between 50% & 80% LMI (low income).

During the same period as above, 21 home energy audits and weatherization activities (24 units) was completed in the City of the South Portland. Of these 21
projects, 4 were occupied by households <30% AMI (extremely low-income); 7 were households between 30% & 50% LMI (very low income) and 8 were households between 50% & 80% LMI (low income).

CDBG funds assisted with the construction of the road, Benequiest Way, at the Town of Harpswell’s new affordable housing subdivision. One home is owned and occupied by a household at <50% AMI. Three homes are occupied by households at <80% AMI.

2. **Evaluate progress in providing affordable housing that meets the Section 215 definition**

During the grant period, the program did not assist in the construction of new rental or ownership properties as defined under Section 215.

3. **Describe efforts to address “worst-case” housing needs and housing needs of persons with disabilities**

The 2010 Regional Housing Rehabilitation program focused on emergency repairs and rehabilitation to support housing weatherization efforts. Of 21 completed projects (40 units total), 19 clients (47.5%) had incomes below 30% AMI, 27.5% had incomes below 50% AMI, and the remaining 9 (22.5%) had incomes below 80% AMI. 17 projects addressed emergency repairs critical to maintaining the households in their homes.

The 2010 South Portland Warm Home Cool Cities Home Energy Efficiency program focused on home energy audits, emergency repairs, and rehabilitation to support housing weatherization/winterization efforts. Of these 21 completed projects, 4 were occupied by households <30% AMI (extremely low-income); 7 were households between 30% & 50% LMI (very low income) and 8 were households between 50% & 80% LMI (low income). Two projects addressed emergency repairs critical to maintaining the households in their homes.

Alpha One has completed 6 Critical Access Ramp projects during the past year. All of these serve persons with disabilities.

**Public Housing Strategy**

1. Describe actions taken during the last year to improve public housing and resident initiatives.

**Program Year 4 CAPER Public Housing Strategy response:**

No actions were taken by the program concerning Public Housing, per se. The City of South Portland completed one project at the Broadway Senior Housing complex to provide barrier free access to the parking area and shore way trail system.

**Barriers to Affordable Housing**

1. Describe actions taken during the last year to eliminate barriers to affordable housing.
Program Year 4 CAPER Barriers to Affordable Housing response:

The 2010 Cumberland County program devoted a significant percentage of its limited CDBG resources to housing rehabilitation. 13% of CDBG fund expenditures were devoted to housing program activities, primarily housing rehabilitation. All these funds contribute to making housing available and affordable to persons of low/moderate income.

The 25 member communities of the Cumberland County Community Development Program have formed a HOME Program Consortium Partnership with the City of Portland and the Town of Brunswick. The Cumberland County program’s communities now utilize HUD HOME program funds for housing rehabilitation and homeownership activities. These activities are reported in the CAPER of the City of Portland, lead entity of the HOME Consortium.

HOME/ American Dream Down Payment Initiative (ADDI)

1. Assessment of Relationship of HOME Funds to Goals and Objectives
   a. Evaluate progress made toward meeting goals for providing affordable housing using HOME funds, including the number and types of households served.

2. HOME Match Report
   a. Use HOME Match Report HUD-40107-A to report on match contributions for the period covered by the Consolidated Plan program year.

3. HOME MBE and WBE Report
   a. Use Part III of HUD Form 40107 to report contracts and subcontracts with Minority Business Enterprises (MBEs) and Women’s Business Enterprises (WBEs).

4. Assessments
   a. Detail results of on-site inspections of rental housing.
   b. Describe the HOME jurisdiction’s affirmative marketing actions.
   c. Describe outreach to minority and women owned businesses.

Program Year 4 CAPER HOME/ADDI response:

Not applicable to the Cumberland County Community Development Program for 2010. Match report for the Cumberland/City of Portland HOME Consortium completed by the City of Portland.
HOMELESS

Homeless Needs

*Please also refer to the Homeless Needs Table in the Needs.xls workbook.

1. Identify actions taken to address needs of homeless persons.

2. Identify actions to help homeless persons make the transition to permanent housing and independent living.

3. Identify new Federal resources obtained from Homeless SuperNOFA.

Program Year 4 CAPER Homeless Needs response:

1. Identify actions taken to address needs of homeless persons

The Cumberland County Community Development Office is currently administering a three-year $605,763 Homelessness Prevention Rapid Re-Housing Program (HPRP) grant. For the period 7/1/2010 – 6/30/2011, the program expended $237,939. Primary expenditures were for Social Workers and Case Managers (approx. $156,000) and for financial assistance ($75,000). The financial assistance to homeless persons was primarily in the form of security deposits.

The City of South Portland established a MOU with the City of Portland shelters to provide funds for South Portland residents that use Portland shelters, leveraging thousands of dollars of savings over the use of motels with limited oversight and cost controls.

2. Identify actions to help homeless persons make the transition to permanent housing and independent living

The HPRP program’s Homeless Prevention component served 445 persons (183 households) and placed 409 persons (92%) in permanent housing. The program’s Homeless Assistance component served 65 persons (37 households) and placed 50 persons (80%) in permanent housing.

South Portland’s General Assistance Director initiated a major policy change. Persons applying for GA Housing Assistance will no longer automatically receive a housing voucher, typically to pay for shelter at area motels. Past practice provided little impetus for homeless persons to transition to more permanent and independent living arrangements. Intake now requires first option for a shelter placement, typically in conjunction with City of Portland services. This has drastically reduced both the number and length of stay in shelters. More often than not, this has resulted in assistance from GA as a pathway to permanent housing.
3. **Identify new Federal resources obtained from Homeless SuperNOFA**

No resources were obtained from the Homeless SuperNOFA.

**Specific Homeless Prevention Elements**

1. Identify actions taken to prevent homelessness.

**Program Year 4 CAPER Specific Housing Prevention Elements response:**

In program years 2007 & 2008 Homeless Prevention Case Management was funded by the CDBG program. In 2009, 2010 & 2011 the Case Management was funded by the new Homelessness Prevention Rapid Re-Housing (HPRP) program. $237,939 in HPRP funds were expended for homeless prevention and homeless assistance activities.

The CDBG program has consistently funded housing rehabilitation activities for each of the past 4 years. In 2010 the program also funded the Critical Access Ramp program. Both of these programs play a small role in assisting households remain safely housed.

**Emergency Shelter Grants (ESG)**

1. Identify actions to address emergency shelter and transitional housing needs of homeless individuals and families (including significant subpopulations such as those living on the streets).

2. **Assessment of Relationship of ESG Funds to Goals and Objectives**
   a. Evaluate progress made in using ESG funds to address homeless and homeless prevention needs, goals, and specific objectives established in the Consolidated Plan.
   b. Detail how ESG projects are related to implementation of comprehensive homeless planning strategy, including the number and types of individuals and persons in households served with ESG funds.

3. **Matching Resources**
   a. Provide specific sources and amounts of new funding used to meet match as required by 42 USC 11375(a)(1), including cash resources, grants, and staff salaries, as well as in-kind contributions such as the value of a building or lease, donated materials, or volunteer time.

4. **State Method of Distribution**
   a. States must describe their method of distribution and how it rated and selected its local government agencies and private nonprofit organizations acting as sub-recipients.

5. **Activity and Beneficiary Data**
   a. Completion of attached Emergency Shelter Grant Program Performance Chart or other reports showing ESGP expenditures by type of activity. Also describe any problems in collecting, reporting, and evaluating the reliability of this information.

b. **Homeless Discharge Coordination**
i. As part of the government developing and implementing a homeless discharge coordination policy, ESG homeless prevention funds may be used to assist very-low income individuals and families at risk of becoming homeless after being released from publicly funded institutions such as health care facilities, foster care or other youth facilities, or corrections institutions or programs.

c. Explain how your government is instituting a homeless discharge coordination policy, and how ESG homeless prevention funds are being used in this effort.

Program Year 4 CAPER ESG response:

Cumberland County does not receive Emergency Shelter Grant funds.

COMMUNITY DEVELOPMENT

Community Development

*Please also refer to the Community Development Table in the Needs.xls workbook.

1. Assessment of Relationship of CDBG Funds to Goals and Objectives
   a. Assess use of CDBG funds in relation to the priorities, needs, goals, and specific objectives in the Consolidated Plan, particularly the highest priority activities.

The 2010 program focused on addressing the highest priority needs as identified in the Consolidated Plan – housing rehabilitation, homeless assistance (HPRP program), public service needs, public infrastructure and facilities, downtown revitalization, and planning. This is evidenced by the activities undertaken: three housing rehabilitation programs; renovations to two community centers - including the Wescott Community Center in Westbrook specifically serving low-income residents; construction of a town beach changing facility in Naples; two new community playgrounds; and a pre-treatment septic/leach field construction serving downtown Bridgton.

   b. Evaluate progress made toward meeting goals for providing affordable housing using CDBG funds, including the number and types of households served.

The program goal for the 2010 Cumberland County program funds was the completion of 13 housing rehabilitation projects. Through June 30, 2010, 21 housing rehabilitation projects (40 units) were completed. Income breakdown: 19 were extremely low-income households (<30% AMI); 12 was very-low income (>30<50% AMI) and; 9 were low-income >50<80% AMI).

South Portland’s program sought to address emerging energy efficiency issues, particularly in LMI households, where energy costs represent a large percentage of household expenditures. 21 energy audits and energy efficiency weatherization projects (24 units) were completed during the 2010 program year including two extensive home repairs (furnace and roof replacement).
c. Indicate the extent to which CDBG funds were used for activities that benefited extremely low-income, low-income, and moderate-income persons.

Yarmouth – Bartlett Circle Senior Housing. 4 residents – extremely low-income; 21 residents low-income; 3 residents moderate-income.

No data is collected or available for area-wide projects to determine the number of extremely low-income, low-income or moderate-income persons benefiting from a project. For the area-wide benefit projects in Gorham, Harrison, Naples, Standish (Steep Falls Village) and Westbrook data is available to determine that the projects qualify for CDBG assistance and meet the standard established.

Gorham – Gorham Village – 2,530 residents in census block groups for the portion of the village sidewalk reconstruction project funded by CDBG; 46% reside in households with incomes below 80% area median income

Harrison – 2,315 persons; 45.65% reside in households with incomes below 80% of area median income

Naples – 3,266 persons; 41.42% reside in households with incomes below 80% of area median income.

Steep Falls Village – 2,656 persons; 41% reside in households with incomes below 80% area median income

Westbrook – 15,972 persons; 47.78% reside in households with incomes below 80% of area median income.

South Portland has seven low/moderate income neighborhoods in which CDBG funds are targeted. Neighborhoods in which activities occurred during the 2010 program year are as follows:

- Mill Creek Park Improvements, Knightville Sidewalks, Knightville Transit Hub – Knightville/Mill Creek target area.
  - 776 persons of which 66.2% reside in households with incomes below 80% of the area median income.
- Redbank Resource Hub, Redbank Streetscapes, and Redbank Playscape – Redbank & Maine Mall target areas.
  - 1,214 persons of which 59.0% reside in households with incomes below 80% of the area median income.
- Former Hutchins Elementary School Renovations – Ferry Village target area.
  - 945 persons of which 45.8% reside in households with incomes below 80% of the area median income.
- Community Counseling Center – Low/moderate income target neighborhoods.
  - Pleasantdale Target Area – 745 persons of which 60.7% reside in households with incomes below 80% of the area median income.
  - Brown’s Hill/Ligonia Target Area – 845 persons of which 45.7% reside in households with incomes below 80% of the area median income.
  - Thorton Heights & Meadow Glen Target Areas – 1,793 persons of which 45.8% reside in households with incomes below 80% of the area median income.
Cumberland County

- Census Tract 30, Block Group 2: 1,106 persons of which 45.6% reside in households with incomes below 80% of the area median income.
- Ferry Village Target Area – 945 persons of which 45.8% reside in households with incomes below 80% of the area median income.
- Redbank neighborhood described above.
- Knightville/Millcreek target area described above.

For 2009 Cumberland County CDBG program funded projects, greater than 41% of residents within the area served by the project must reside in households with incomes below 80% of area median income (adjusted for household size). For 2010 funded projects, the standard was 43% of residents must reside in households with incomes below 80% of area median income.

2. Changes in Program Objectives
   a. Identify the nature of and the reasons for any changes in program objectives and how the jurisdiction would change its program as a result of its experiences.

   No changes in program objectives.

3. Assessment of Efforts in Carrying Out Planned Actions
   a. Indicate how grantee pursued all resources indicated in the Consolidated Plan.

   Cumberland County has sought and received (in partnership with the City of Portland) Lead Based-Paint Hazard Control funds, and has formed (in partnership with the City of Portland and the Town of Brunswick) the Cumberland County HOME Consortium to provide HUD HOME funds to the region. The program has leveraged funds from USDA Rural Development for the Town of Yarmouth, Bartlett Circle Community Center project. The CDBG grant to renovate the Freeport Community Services facility is leveraging a $370,000 loan from a local bank.

   b. Indicate how grantee provided certifications of consistency in a fair and impartial manner.

   Grantee did not receive any requests for certifications of consistency with the Consolidated Plan during the program year.

   c. Indicate how grantee did not hinder Consolidated Plan implementation by action or willful inaction.

   Grantee did not hinder Consolidated Plan implementation.

4. For Funds Not Used for National Objectives
   a. Indicate how use of CDBG funds did not meet national objectives.

   All CDBG funds met national objectives
b. Indicate how did not comply with overall benefit certification.

   Not applicable

5. Anti-displacement and Relocation – for activities that involve acquisition, rehabilitation or demolition of occupied real property

   a. Describe steps actually taken to minimize the amount of displacement resulting from the CDBG-assisted activities.

   No displacement was required for any CDBG-assisted activities.

   b. Describe steps taken to identify households, businesses, farms or nonprofit organizations who occupied properties subject to the Uniform Relocation Act or Section 104(d) of the Housing and Community Development Act of 1974, as amended, and whether or not they were displaced, and the nature of their needs and preferences.

   No displacement occurred during the 2010 CDBG program.

   c. Describe steps taken to ensure the timely issuance of information notices to displaced households, businesses, farms, or nonprofit organizations.

   No households, businesses, farms or nonprofit organizations were displaced during the implementation of the 2010 CDBG program.

6. Low/Mod Job Activities – for economic development activities undertaken where jobs were made available but not taken by low- or moderate-income persons

   a. Describe actions taken by grantee and businesses to ensure first consideration was or will be given to low/mod persons.

   No job creation activities undertaken.

   b. List by job title of all the permanent jobs created/retained and those that were made available to low/mod persons.

   No job creation activities undertaken.

   c. If any of jobs claimed as being available to low/mod persons require special skill, work experience, or education, provide a description of steps being taken or that will be taken to provide such skills, experience, or education.

   No job creation activities undertaken.
7. Low/Mod Limited Clientele Activities – for activities not falling within one of the
categories of presumed limited clientele low and moderate income benefit

   a. Describe how the nature, location, or other information demonstrates the
      activities benefit a limited clientele at least 51% of whom are low- and
      moderate-income.

Cumberland County Program:

- The Center for Therapeutic Recreation provided aquatic recreation services for 13
  handicapped adults. These individuals qualified as low/moderate income as a
  member of the “presumed group” – severely disabled adults. All clients served
  were developmentally disabled.

South Portland administered ten Public Service activities in 2010, eight of which were
limited clientele activities:

- The Boys and Girls Club of South Portland’s Summer Early Care Program
  provided service to 655 total children, 426 (65%) of whom were from a
  low/moderate income household.
- The Center for Therapeutic Recreation’s South Portland program provided aquatic
  recreation services for seven handicapped adults. All clients served were
  developmentally disabled and thus qualified as a member of a “presumed group”-
  severely disabled adults (presumed low income).
- PROP’s Senior Companion & Foster Grandparents program served 102 seniors all
  which are members of a “presumed group” - elderly persons. 96% (98/102) of
  clients were documented as residing in a low/moderate income household.
- The South Portland School Department’s 21st Century Community Learning
  Program is an English-as-a-Second-Language (ESL) program and primarily serves
  children residing in low/moderate income households. 102 children participated
  in the program during the 2010 program year, 85 (83%) of which were from
  low/moderate income households.
- Southern Maine Agency on Aging’s Meals-on-Wheels programs delivered meals to
  124 seniors. Elderly persons qualify as low/moderate income as a presumed
  group and, in addition, all 124 seniors were documented as residing in a low/moderate income household.
- The South Portland Transportation Department supplied free bus passes to 92
  South Portland residents. All 92 residents (100%) were from low/moderate
  income households.
- The South Portland Parks & Recreation and Public Works Departments provided
  recreational scholarships to 109 children all of which (100%) were from
  low/moderate income households.
- Green South Portland’s Home Energy Auditor Training scholarships were provided
  to three individuals during the 2010 program year. Individuals must reside in a
  low/moderate income household in order to qualify for the scholarships thus all
  three (100%) were HUD income eligible.
8. Program income received
   a. Detail the amount of program income reported that was returned to each individual revolving fund, e.g., housing rehabilitation, economic development, or other type of revolving fund.

   No program income received or expended from a revolving loan fund in 2010.

   b. Detail the amount repaid on each float-funded activity.

   Not applicable

   c. Detail all other loan repayments broken down by the categories of housing rehabilitation, economic development, or other.

   One loan repayment was received during 2010 program year from the E. Street Development Company, South Portland for $49,500. These funds were credited to South Portland and used to fund their next program draw down.

   d. Detail the amount of income received from the sale of property by parcel.

   No program income received.

9. Prior period adjustments – where reimbursement was made this reporting period for expenditures (made in previous reporting periods) that have been disallowed, provide the following information:
   a. The activity name and number as shown in IDIS;
   b. The program year(s) in which the expenditure(s) for the disallowed activity(ies) was reported;
   c. The amount returned to line-of-credit or program account; and
   d. Total amount to be reimbursed and the time period over which the reimbursement is to be made, if the reimbursement is made with multi-year payments.

   a-d – Not applicable.

10. Loans and other receivables
   a. List the principal balance for each float-funded activity outstanding as of the end of the reporting period and the date(s) by which the funds are expected to be received.
   b. List the total number of other loans outstanding and the principal balance owed as of the end of the reporting period.
   c. List separately the total number of outstanding loans that are deferred or forgivable, the principal balance owed as of the end of the reporting period, and the terms of the deferral or forgiveness.
   d. Detail the total number and amount of loans made with CDBG funds that have gone into default and for which the balance was forgiven or written off during the reporting period.
e. Provide a List of the parcels of property owned by the grantee or its sub-recipients that have been acquired or improved using CDBG funds and that are available for sale as of the end of the reporting period.

   a-e – Not applicable.

11. Lump sum agreements

   a. Provide the name of the financial institution.
   b. Provide the date the funds were deposited.
   c. Provide the date the use of funds commenced.
   d. Provide the percentage of funds disbursed within 180 days of deposit in the institution.

   a-d – Not applicable.

12. Housing Rehabilitation – for each type of rehabilitation program for which projects/units were reported as completed during the program year:

   a. Identify the type of program and number of projects/units completed for each program.

      Region-wide housing rehabilitation, 21 projects completed, 40 units
      Town of Freeport housing rehabilitation/replacement, 2 projects completed
      Town of Harpswell housing weatherization, 1 project completed
      Town of Sebago housing weatherization, 5 projects completed
      Alpha One Critical Access Ramps, 6 projects completed.
      South Portland home energy audits and housing rehabilitation/weatherization, 21 projects and 24 units completed

   b. Provide the total CDBG funds involved in the program.

      Regional Housing Rehabilitation:
      Total funds expended - $201,857.35

      Town of Freeport, Housing Rehabilitation
      Total funds expended - $32,558

      Town of Harpswell, Housing Weatherization
      Total funds expended - $10,000

      Town of Sebago, Housing Weatherization
      Total funds expended - $16,697

      Critical Access Ramps:
      Total funds expended - $27,573.69

      South Portland Weatherization:
      Total funds expended - $37,555
c. Detail other public and private funds involved in the project.

<table>
<thead>
<tr>
<th>Fund</th>
<th>Amount</th>
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</thead>
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<tr>
<td>Maine State Housing Authority</td>
<td>$72,054.54</td>
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<tr>
<td>Elder Independence of Maine</td>
<td>$2,792.00</td>
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<tr>
<td>Rural Development</td>
<td>$131,447.00</td>
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<tr>
<td>Private Funds</td>
<td>$225.00</td>
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<tr>
<td>Town of Sebago, Local Contribution</td>
<td>$6,055.28</td>
</tr>
<tr>
<td><strong>Total Other Funds</strong></td>
<td><strong>$212,573.82</strong></td>
</tr>
</tbody>
</table>

13. Neighborhood Revitalization Strategies – for grantees that have HUD-approved neighborhood revitalization strategies

a. Describe progress against benchmarks for the program year. For grantees with Federally-designated EZs or ECs that received HUD approval for a neighborhood revitalization strategy, reports that are required as part of the EZ/EC process shall suffice for purposes of reporting progress.

Program Year 4 CAPER Community Development response:

Not applicable.

**Antipoverty Strategy**

1. Describe actions taken during the last year to reduce the number of persons living below the poverty level.

Program Year 4 CAPER Antipoverty Strategy response:

The single most important antipoverty activity operated by the Cumberland County Community Development program is the Homelessness Prevention Rapid Re-Housing Program. Without safe, secure, permanent housing nobody can hope to rise out of poverty. By intensely working with 220 households (510 persons) the program has achieved permanent housing for 460 individuals, 90% of all persons served. This is a critical first step in the climb out of poverty.

The program has now funded physical improvements to three locally operated food pantries: Gorham (2008), Sebago (2009) and Windham (2009 CDBG Recovery Act) These facilities are a critical component in helping those individuals and families most in need to meet their basic food needs. Improvements to the Wescott Community Center in Westbrook will play a significant role in assisting low-income residents of that community.

The City of South Portland continues to recognize the role community development funds can play in reducing poverty. Two particular foci have been (1) crime prevention through provision of educational assistance to at-risk school children from low/ moderate-income households and (2) to assist people gain employment. The English as a Second Language (ESL) program funded in 2010 served 102 individuals. South Portland developed a program to provide bus passes enabling low-income residents to access work and medical appointments. Over the past five years the City has actively participated in the creation of hundreds of units of affordable housing at Brick Hill neighborhood. This neighborhood is near the Maine Mall, the
largest retail complex in Northern New England, and the location of thousands of jobs.

NON-HOMELESS SPECIAL NEEDS

Non-homeless Special Needs

*Please also refer to the Non-homeless Special Needs Table in the Needs.xls workbook.

1. Identify actions taken to address special needs of persons that are not homeless but require supportive housing, (including persons with HIV/AIDS and their families).

Program Year 4 CAPER Non-homeless Special Needs response:

The program provided funds to Alpha One in 2008 ($40,000) and 2010 ($50,000) to install handicap access ramps at the homes of persons with physical disabilities. Six ramps have been completed to date with 2010 funds. Both the City of South Portland and Cumberland County funded the Center for Therapeutic Recreation providing aquatic recreational opportunities to persons with mental and physical disabilities.

Officially reported by the City of Portland, $50,000 in 2009 & 2010 HOME CHDO set-aside resources were awarded to the Westbrook Development Corp. The funds will be used to renovate a two-family home as a group home for developmentally disabled adults.

Specific HOPWA Objectives

*Please also refer to the HOPWA Table in the Needs.xls workbook.

1. Overall Assessment of Relationship of HOPWA Funds to Goals and Objectives Grantees should demonstrate through the CAPER and related IDIS reports the progress they are making at accomplishing identified goals and objectives with HOPWA funding. Grantees should demonstrate:
   a. That progress is being made toward meeting the HOPWA goal for providing affordable housing using HOPWA funds and other resources for persons with HIV/AIDS and their families through a comprehensive community plan;
   b. That community-wide HIV/AIDS housing strategies are meeting HUD’s national goal of increasing the availability of decent, safe, and affordable housing for low-income persons living with HIV/AIDS;
   c. That community partnerships between State and local governments and community-based non-profits are creating models and innovative strategies to serve the housing and related supportive service needs of persons living with HIV/AIDS and their families;
   d. That through community-wide strategies Federal, State, local, and other resources are matched with HOPWA funding to create comprehensive housing strategies;
   e. That community strategies produce and support actual units of housing for persons living with HIV/AIDS; and finally,
   f. What community strategies identify and supply related supportive services in conjunction with housing to ensure the needs of persons living with HIV/AIDS and their families are met.
2. This should be accomplished by providing an executive summary (1-5 pages) that includes:
   a. Grantee Narrative
      i. Grantee and Community Overview
         (1) A brief description of your organization, the area of service, the name of each project sponsor and a broad overview of the range/type of housing activities and related services
         (2) How grant management oversight of project sponsor activities is conducted and how project sponsors are selected
         (3) A description of the local jurisdiction, its need, and the estimated number of persons living with HIV/AIDS
         (4) A brief description of the planning and public consultations involved in the use of HOPWA funds including reference to any appropriate planning document or advisory body
         (5) What other resources were used in conjunction with HOPWA funded activities, including cash resources and in-kind contributions, such as the value of services or materials provided by volunteers or by other individuals or organizations
         (6) Collaborative efforts with related programs including coordination and planning with clients, advocates, Ryan White CARE Act planning bodies, AIDS Drug Assistance Programs, homeless assistance programs, or other efforts that assist persons living with HIV/AIDS and their families.
      ii. Project Accomplishment Overview
         (1) A brief summary of all housing activities broken down by three types: emergency or short-term rent, mortgage or utility payments to prevent homelessness; rental assistance; facility based housing, including development cost, operating cost for those facilities and community residences
         (2) The number of units of housing which have been created through acquisition, rehabilitation, or new construction since 1993 with any HOPWA funds
         (3) A brief description of any unique supportive service or other service delivery models or efforts
         (4) Any other accomplishments recognized in your community due to the use of HOPWA funds, including any projects in developmental stages that are not operational.
      iii. Barriers or Trends Overview
         (1) Describe any barriers encountered, actions in response to barriers, and recommendations for program improvement
         (2) Trends you expect your community to face in meeting the needs of persons with HIV/AIDS, and
         (3) Any other information you feel may be important as you look at (4) providing services to persons with HIV/AIDS in the next 5-10 years
   b. Accomplishment Data
      i. Completion of CAPER Performance Chart 1 of Actual Performance in the provision of housing (Table II-1 to be submitted with CAPER).
      ii. Completion of CAPER Performance Chart 2 of Comparison to Planned Housing Actions (Table II-2 to be submitted with CAPER).
Program Year 4 CAPER Specific HOPWA Objectives response:
Cumberland County does not receive HOPWA Program funds.

OTHER NARRATIVE
Include any CAPER information that was not covered by narratives in any other section.

Program Year 4 CAPER Other Narrative response:
No additional narrative response.