

City of Dubuque Consolidated Annual Performance and Evaluation Report

FISCAL YEAR 2025 | HUD PROGRAM YEAR 2024

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CR-05 - Goals and Outcomes

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

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

The Consolidated Annual Performance and Evaluation Report (CAPER) provides an end-of-year performance report of federally-funded activities and accomplishments to the U.S. Department of Housing and Urban Development (HUD) and the community. The City of Dubuque Consolidated Plan Year 5 CAPER covers the City's progress in carrying out the Fiscal Year (FY) 2025 Annual Action Plan for the use of HUD Program Year 2024 Community Development Block Grant (CDBG) funds. This CAPER covers the period of July 1, 2024 through June 30, 2025. The City of Dubuque is an entitlement City and is eligible to receive CDBG funds on an annual basis. The CAPER focuses on federally funded activities. When appropriate, this report provides information on activities supported by local and federal funds.

The City of Dubuque expended \$1,862,465.11 in CDBG entitlement funds in FY2025/PY2024. The City, the City of Dubuque Community Development Advisory Commission, local not-for profit organizations and neighborhood associations partner to implement programs delivered with the funds. In FY2025/PY2024, CDBG funds were used to make investments in economic development, public infrastructure, housing rehabilitation, and neighborhood and public services. All funds were used to meet the priority housing, economic development, neighborhood, and administration needs identified in the Consolidated Plan and Annual Action Plan for FY2025/PY2024 as amended. The City of Dubuque did a substantial job in spending down funds and providing activities to our community. For example, during FY2025/PY2024, under Housing Rehabilitation, the 5 homeowners received lead paint hazard reduction, 1 single family home that houses 4 individuals with disabilities received rehabilitation, 2 first time homebuyers receive loans to support their dream of owning a home, and 1 multi-unit housing buildings received rehabs. Under economic development, 8 small businesses were provided with microenterprise loans. Under neighborhood and public services, 3 recreation programs were supported. In addition to these services a substantial renovations occurred at public facilities including a massive park renovation completed at Lincoln Outdoor Wellness Center. This park serves low and moderate areas of our community and have brought new life to the area.

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

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

Goal	Category	Source / Amount	Indicator	Unit of Measure	Expected – Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected – Program Year	Actual – Program Year	Percent Complete
AFH: Advance Equity with Fair Housing Activities	Affordable Housing Homeless Non-Homeless Special Needs Non-Housing Community Development	CDBG: \$	Other	Other	5	5	100.00%	2	2	100.00%
Assist Special Needs Populations	Affordable Housing Non-Homeless Special Needs	CDBG: \$	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	25000	0	0.00%	4500	0	0.00%
Assist Special Needs Populations	Affordable Housing Non-Homeless Special Needs	CDBG: \$	Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit	Households Assisted	15	0	0.00%			

Assist Special Needs Populations	Affordable Housing Non-Homeless Special Needs	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	26675	29187	109.42%	5000	0	0.00%
Assist Special Needs Populations	Affordable Housing Non-Homeless Special Needs	CDBG: \$	Public service activities for Low/Moderate Income Housing Benefit	Households Assisted	100	0	0.00%	5	0	0.00%
Assist Special Needs Populations	Affordable Housing Non-Homeless Special Needs	CDBG: \$	Businesses assisted	Businesses Assisted	55	33	60.00%			
Assist the Homeless and At-Risk of Homelessness	Homeless	CDBG: \$	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	0	0		5000	0	0.00%
Assist the Homeless and At-Risk of Homelessness	Homeless	CDBG: \$	Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit	Households Assisted	10	2055	20,550.00%			

Assist the Homeless and At-Risk of Homelessness	Homeless	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	12500	0	0.00%	500	0	0.00%
Assist the Homeless and At-Risk of Homelessness	Homeless	CDBG: \$	Other	Other	5	0	0.00%			
Develop New Affordable Housing units	Affordable Housing Homeless Non-Homeless Special Needs	CDBG: \$	Public service activities for Low/Moderate Income Housing Benefit	Households Assisted	0	0		10	0	0.00%
Develop New Affordable Housing units	Affordable Housing Homeless Non-Homeless Special Needs	CDBG: \$	Homeowner Housing Added	Household Housing Unit	10	0	0.00%			
Develop New Affordable Housing units	Affordable Housing Homeless Non-Homeless Special Needs	CDBG: \$	Homeowner Housing Rehabilitated	Household Housing Unit	45	29	64.44%			

Direct Home Ownership Assistance	Affordable Housing	CDBG: \$	Public service activities for Low/Moderate Income Housing Benefit	Households Assisted	0	0		10	2	20.00%
Direct Home Ownership Assistance	Affordable Housing	CDBG: \$	Direct Financial Assistance to Homebuyers	Households Assisted	95	35	36.84%			
Encourage Self-Sufficiency-Public/Human Services	Non-Housing Community Development	CDBG: \$	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	0	0				
Encourage Self-Sufficiency-Public/Human Services	Non-Housing Community Development	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	60	39999	66,665.00%			
Encourage Self-Sufficiency-Public/Human Services	Non-Housing Community Development	CDBG: \$	Public service activities for Low/Moderate Income Housing Benefit	Households Assisted	0	0				
Encourage Self-Sufficiency-Public/Human Services	Non-Housing Community Development	CDBG: \$	Facade treatment/business building rehabilitation	Business	0	0				

Encourage Self-Sufficiency-Public/Human Services	Non-Housing Community Development	CDBG: \$	Tenant-based rental assistance / Rapid Rehousing	Households Assisted	250	1	0.40%			
Encourage Self-Sufficiency-Public/Human Services	Non-Housing Community Development	CDBG: \$	Businesses assisted	Businesses Assisted	0	30		10	8	80.00%
Encourage Self-Sufficiency-Public/Human Services	Non-Housing Community Development	CDBG: \$	Other	Other	5	0	0.00%			
Maintaining Existing Affordable Housing	Affordable Housing Non-Homeless Special Needs	CDBG: \$	Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit	Households Assisted	125	0	0.00%			
Maintaining Existing Affordable Housing	Affordable Housing Non-Homeless Special Needs	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	0	36				

Maintaining Existing Affordable Housing	Affordable Housing Non-Homeless Special Needs	CDBG: \$	Public service activities for Low/Moderate Income Housing Benefit	Households Assisted	0	0		50	0	0.00%
Maintaining Existing Affordable Housing	Affordable Housing Non-Homeless Special Needs	CDBG: \$	Rental units rehabilitated	Household Housing Unit	0	181				
Maintaining Existing Affordable Housing	Affordable Housing Non-Homeless Special Needs	CDBG: \$	Homeowner Housing Rehabilitated	Household Housing Unit	100	91	91.00%	0	6	
Maintaining Existing Affordable Housing	Affordable Housing Non-Homeless Special Needs	CDBG: \$	Direct Financial Assistance to Homebuyers	Households Assisted	150	0	0.00%			
Maintaining Existing Affordable Housing	Affordable Housing Non-Homeless Special Needs	CDBG: \$	Homelessness Prevention	Persons Assisted	0	67				

Maintaining Existing Affordable Housing	Affordable Housing Non-Homeless Special Needs	CDBG: \$	Housing for Homeless added	Household Housing Unit	0	0				
Maintaining Existing Affordable Housing	Affordable Housing Non-Homeless Special Needs	CDBG: \$	Housing for People with HIV/AIDS added	Household Housing Unit	0	0				
Neighborhood Youth Services and Aftercare	Non-Housing Community Development	CDBG: \$	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	0	0		1000	0	0.00%
Neighborhood Youth Services and Aftercare	Non-Housing Community Development	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	37400	7125	19.05%	5730	333	5.81%
Neighborhood Youth Services and Aftercare	Non-Housing Community Development	CDBG: \$	Facade treatment/business building rehabilitation	Business	1	0	0.00%			
Provide Inspection and Code Enforcement	Affordable Housing	CDBG: \$	Housing Code Enforcement/Foreclosed Property Care	Household Housing Unit	825	708	85.82%	70	69	98.57%

Support Neighborhood Development and Improvements	Non-Housing Community Development	CDBG: \$	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	42500	10978	25.83%	3500	1520	43.43%
Support Neighborhood Development and Improvements	Non-Housing Community Development	CDBG: \$	Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit	Households Assisted	45	0	0.00%			
Support Neighborhood Development and Improvements	Non-Housing Community Development	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	50000	18945	37.89%			

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

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

CDBG funds were used to address the priorities, needs, and goals identified in the Consolidated Plan. The proposed budget for the FY2025/PY2024 Annual Action Plan was adopted into the City Budget by the Dubuque City Council.

The City's goals described in the Consolidated Plan are all high priority and were used as the basis for the budgetary priorities outlined in the FY2025/PY2024 Annual Action Plan. Each funded activity must demonstrate it helps achieve a goal identified in the Consolidated Plan and benefit low/moderate-income (LMI) persons and communities before it is recommended for approval. The City provides funding for some public service activities through a yearly grant process. When preparing the Consolidated Plan, estimates are used to project the level of funding and the number of persons or households to be served. Due to the varying nature and cost of administering different programs, estimating the cost and number to be served for public service activities can be very challenging. For example, job training activities have different costs, space, and

time requirements than programs providing emergency shelter. The City distinguishes between four areas of program development: Housing Development, Economic Development, Neighborhood and Community Development, and Planning and Administration. FY2025/PY2024 activities addressed all of the goals identified in the Consolidated Plan.

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CR-10 - Racial and Ethnic composition of families assisted

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

91.520(a)

	CDBG
White	251
Black or African American	75
Asian	0
American Indian or American Native	0
Native Hawaiian or Other Pacific Islander	6
Total	332
Hispanic	12
Not Hispanic	320

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

Narrative

The City of Dubuque focuses on serving racial minorities through direct outreach for participation in programs and funding non-profit organizations that provide services intended towards underserved populations. Outreach through partners such as Neighborhood Recreation Programs, specifically School Area Support Programs and Day Camp Program, allowed us to reach more racially diverse populations in the City.

CR-15 - Resources and Investments 91.520(a)

Identify the resources made available

Source of Funds	Source	Resources Made Available	Amount Expended During Program Year
CDBG	public - federal	3,084,635	1,862,465

Table 3 - Resources Made Available

Narrative

The CDBG resources available in FY2025/PY2024 include unexpended CDBG funds at the end of the previous year, 1,795,364.83, entitlement funds of 1,035,721.00, and program income, 253,549.14. Totally, 3,084,634.97. During FY2025/PY2024, the City expended \$225,754.32 in program income, \$1,636,710.32 in Entitlement funds, for a total of \$1,862,465.11. Funding was used to support housing, neighborhood and community development, and administrative programs.

Identify the geographic distribution and location of investments

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description
City Wide	87		
Low/Moderate Area Benefit	13		

Table 4 – Identify the geographic distribution and location of investments

Narrative

A majority of the activities identified in the Annual Action Plan are targeted to LMI populations, which could be city-wide, so specific geographical areas within the city were not identified for those activities. The Low/Moderate Area Benefit activities were services that are available for all residents living in the determined areas, which are all conducted in residential areas with 51% or greater low/moderate income residents according to Census data. A listing of activities and their locations is found in the attached PR-03 CDBG Activity Summary Report.

Leveraging

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

The City of Dubuque actively seeks out and leverages resources to meet goals identified in the consolidated plan. Partnerships with local organizations working to provide additional affordable housing, economic development, socioeconomic, and self-sufficiency resources ensure investments have lasting impact.

Through a State grant, the City of Dubuque provides Home Advocates to those that participate in CDBG funded programs and the Lead and Healthy Homes Program. These Home Advocates assess social and physical barriers to sustainable living in each individual home/unit and connects residents to agencies that can help eliminate the barriers (\$23,711.08).

The City of Dubuque also started to leverage Housing Tax Increment Financing funds to further the goals of rehabilitating dilapidated structures and making them available to low-moderate income person for purchase. This program is paired with the Purchase/Rehab/Resale and First-Time Homebuyer Programs to maximize access to homeownership for low-moderate income residents (\$98,000).

The City of Dubuque has a Lead and Healthy Homes grant which CDBG funds leveraged into the community as match funding. Additional funding is leveraged from the Lead and Healthy Homes grant, which assists households built before 1978 with children under the age of 6, with controlling lead-based paint hazards in the home (\$114,934).

The City of Dubuque uses other funds to accomplish the same goals as the CDBG Consolidated Plan such as Section 8 Housing, Shelter Plus Care Program, and the Rental Rehabilitation Program; however, they are not directly leveraged by CDBG fund support of those outcomes.

CR-20 - Affordable Housing 91.520(b)

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

	One-Year Goal	Actual
Number of Homeless households to be provided affordable housing units	60	0
Number of Non-Homeless households to be provided affordable housing units	5	0
Number of Special-Needs households to be provided affordable housing units	0	0
Total	65	0

Table 5 – Number of Households

	One-Year Goal	Actual
Number of households supported through Rental Assistance	0	0
Number of households supported through The Production of New Units	0	0
Number of households supported through Rehab of Existing Units	50	6
Number of households supported through Acquisition of Existing Units	0	0
Total	50	6

Table 6 – Number of Households Supported

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

The City of Dubuque has traditionally partnered with the Affordable Housing Network, Inc. and will continue to do so. However, we are looking to expand our partnerships in order to keep production moving. This year, the City of Dubuque did complete a multi-unit rehab for 87 units with Catholic Charities. The building is located downtown and has 100% of residents are LMI.

The City's Lead and Healthy Homes Program provides lead hazard control activities and healthy homes interventions in homes built before 1978. CDBG provides match funding to leverage these grant funds, with a focus on owner-occupied homes with children under the age of 6 years old. Production for this grant picked up during FY25/PY2 completing 5 rehabs (\$89,395).

Additional homes were rehabilitated through Tax Increment Financing and sold to low to moderate income first-time homebuyers.

Discuss how these outcomes will impact future annual action plans.

Affordable housing options continue to be limited within the City, and often restricted to certain geographic areas. The CDBG down payment assistance sometimes is not enough to reduce the price of the home to be affordable to low and moderate-income buyers, especially in the current housing market. The City started partnering with developers to create new, affordable homeownership opportunities outside of areas of high poverty concentration. The City's goals to increase income diversity in neighborhoods has a need for additional funding and programming designed to support these efforts. The production of Housing TIF to serve this purpose was created by the City of Dubuque, and is currently being used to rehabilitate homes that are affordable and sell them to low/mod income residents and paired with the First-Time Homebuyer Program to increase affordable housing access. This is being done through a partnership with Affordable Housing Network Inc.

The City's Lead and Healthy Homes Program provides lead hazard control activities and healthy homes interventions in homes built before 1978. CDBG provides match funding to leverage these grant funds, with a focus on owner-occupied homes with children under the age of 6 years old. Production for this grant will continue and increase in production as the supply chain and material costs stabilize. The City also received another Lead Hazard Control grant, and a Healthy Homes Production grant that will assist with rehabilitation of existing units in the City.

The City received funds secured from the Iowa Economic Development Authority to assist households with Rapid Rehousing needs. The City also continues to provide resources for sheltering related to the COVID-19 pandemic. This includes providing spaces for individuals to isolate and quarantine as needed, as well as the opportunity to minimize overcrowding, particularly for homeless shelters that typically have communal living arrangements.

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

Number of Households Served	CDBG Actual	HOME Actual
Extremely Low-income	1	0
Low-income	0	0
Moderate-income	5	0
Total	6	0

Table 7 – Number of Households Served

Narrative Information

CDBG funds were used for eligible housing activities, such as homeowner and rental rehabilitation, lead hazard reduction, rehabilitation services and staff costs, and direct financial assistance for homebuyers. Income eligible households have access to additional financial assistance through the Housing Trust Fund, funded by IFA, and other local sources. The First-time Homeowner program partners with the City's Section 8 Homeownership Program to provide housing counseling and financial assistance for voucher holders. The City encourages income diversity in neighborhoods by incentivizing purchase in low-mod areas for higher income households and providing additional financial resources for extremely-low, low, and moderate-income populations to increase affordability outside areas of high-poverty concentration. By leveraging multiple sources of funding to increase resources for lower-income households, more equitable outcomes are achieved. Program income generated from CDBG funded housing activities represents nearly 98% of the City's entire loan portfolio.

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

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

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

Dubuque is in the Balance of State for Iowa's Continuum of Care (CoC). Not-for-Profit service providers lead the coordination of services and housing for the homeless. The Community Development Specialist and Urban Development Manager assist local Continuum of Care applicants with the environmental review process and determining consistency with the Consolidated Plan. Staff from Housing & Community Development attend Continuum of Care meetings to assist in identifying and responding to the needs of homeless persons.

Over 50 individuals make up the membership of the Homeless Advisory Council, working to streamline and coordinate services and resources to meet the needs of homeless and near homeless community members. Non-profit organizations providing homeless services including but not limited to referrals, outreach, point-in-time count, coordinated entry, emergency & transitional shelter, and permanent supportive housing. Organizations providing family self-sufficiency, advocacy, employment, employment services & job training, substance abuse services, health, wellness, domestic violence, sexual assault, mental health and dental services are available, as well as representation from the City of Dubuque Police Department, Housing Authority, and Dubuque County Commission of Veteran's affairs.

The Homeless Advisory Council coordinates point-in-time homeless counts in July and January to evaluate capacity and need for services. Hillcrest Family Services provides outreach, in partnership with other organizations coordinating access for unsheltered persons. The City partners with East Central Development Corporation (ECDC) to provide permanent supportive housing, targeting homeless populations with mental health, HIV/AIDS related illness, and/or substance abuse.

Addressing the emergency shelter and transitional housing needs of homeless persons

The City of Dubuque supports organizations providing human service activities through Purchase of Services Grants. Not-for-profit organizations meeting a human service need in the community can apply for CDBG and General Funds on an annual basis. The City also delivers the Phoenix Housing program. Phoenix Housing provides permanent, supportive housing for homeless living with disabilities. Homeless outreach, emergency, transitional, permanent, and support services are coordinated with local providers. This is the City's only program serving the homeless using the housing first model for permanent supportive housing.

The City, in partnership with Community Solutions of Eastern Iowa, identified 40 individuals reported as being homeless in Dubuque County during the July 2025 point in time homeless count.

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

The City of Dubuque and State of Iowa require publicly funded institutions and facilities to have discharge plans that include adequate and stable housing; however, the follow-up on those plans is difficult in many situations. The City of Dubuque is also working with many community non-profits and business partners to establish a “one-stop shop” for assistance that is provided across multiple agencies, but can easily be accessed under the umbrella of one entity to help this vulnerable population access assistance.

The City of Dubuque also was awarded Family Unification Program housing assistance vouchers to serve those aging out of foster care, and families who have children placed in foster care that do not have stable housing with the goal of reunification.

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

A network of non-profit organizations provides a range of services from outreach to permanent supportive housing. These organizations collaborated during the program year to define and align resources for coordinated entry. Headed by the Iowa Continuum of Care, a network of local providers is working to streamline services for homeless to allow better access to shelter, mental health, health, dental, and substance abuse resources. The primary focus is to find people shelter or housing immediately, in their community of choice.

The City participates as the permanent supportive housing provider and partners with a local non-profit to coordinate outreach and manage the waiting list. The City continues to support requests to develop and rehabilitate accessible and affordable housing, with emphasis on programs willing to accept vouchers or provide subsidies for households under 30% AMI.

There are three permanent supportive housing programs offered in Dubuque. The City provides the Continuum of Care funded Phoenix Housing program, serving homeless individuals and families with disabilities. Hillcrest Family Services provides permanent supportive housing for children, and Opening Doors (Francis Apartments) provides permanent supportive housing opportunities for families.

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

Actions taken to address the needs of public housing

The City of Dubuque does not have public housing. The City monitors the number of affordable tax credit units and Housing Choice Voucher units within the City. The affordable housing stock is not high enough to meet needs of renters and homeowners at or below 80% of the area median income. This is supported by data in the Consolidated Plan showing more renters earning under 80% Area Median Income are cost burdened, meaning they pay more than 30% of their income for housing-related costs. The American Community Survey estimates verify nearly half of all renters experience cost burden. The City promotes CDBG funded programming to voucher participants in efforts to increase awareness and participation in activities.

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

The City uses the Section 8 Housing Choice Voucher program to provide affordable housing options. The Housing & Community Development Department is the PHA for the City. The City has 1,113 vouchers but is unable to issue to capacity due to budgetary constraints. The Family Self-Sufficiency Coordinator at City of Dubuque's Housing & Community Development works with Family Self-Sufficiency participants to increase awareness about homeownership options.

All Housing Choice Voucher participants are invited to join the City's Family Self-Sufficiency (FSS) program, which offers unique, person-centered coaching to support the individual's needs. Goal planning, resource coordination, job readiness, and family supports are all provided. The Community Development staff regularly visits with Family Self-Sufficiency Coordinator, and FSS-participating families. The programs coordinate resources to help buyers establish bank accounts, Individual Development Accounts (IDA), homeownership counseling, and resources to purchase a home.

Actions taken to provide assistance to troubled PHAs

This PHA is not troubled.

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

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

The City of Dubuque has taken steps toward removing barriers to affordable housing, especially when federal, state, or local funds are contributed toward housing improvements. All rental property owners who receive funding through CDBG Rehab programs, Lead Hazard Control, Bee Branch Healthy Homes (CDBG-NDR), are required to accept housing choice vouchers.

The City continues to work with community groups and stakeholders regarding adding source of income as a protected class to our local ordinances. The Housing & Community Development, Human Rights, and Planning Services Departments partnered with local stakeholders to better understand how source of income impacts tenants, particularly Housing Choice Voucher holders. Recent rental licensing data shows that only 33% of units in the City of Dubuque will accept Housing Choice Vouchers, and the majority of those are in high-concentrated poverty areas. To address this, the, "Source of Income" committee was formed. The Committee was made up of key city staff, board and commission members, housing providers, and housing advocacy groups. The group analyzed data, information, and organized a series of community dialogues to gain insight into the issues surrounding the impact of such an ordinance and other options to increase housing choice for voucher holders.

The City of Dubuque also formed a fees and charges equity committee to evaluate the impact fees have on low-income residents. The goal of this committee is to eliminate fees and charges that don't produce the desired outcomes and affect low-income residents more than others.

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

The City's Planning & Zoning, Economic Development, and Housing Departments coordinate to receive and process requests for development of affordable housing. The Housing & Community Development Department works closely with the City's Legal, Human Rights Department, and Office of Economic Mobility and Neighborhood Support to inform City staff, housing providers, developers, and the community at large about the barriers to fair housing and the strategic steps the City is taking steps to eliminate barriers as identified in the Analysis of Impediments. To encourage public support for affordable housing development, the City partners with organizations wishing to develop affordable housing to engage neighborhood residents about the proposed projects. Through a series of informational meetings, housing developers and residents can discuss the community needs, obtain facts about the need for affordable housing, and identify target populations and needs unique to the proposed location within the Dubuque community. These meetings have proven successful for

developers proposing Low Income Housing Tax Credit projects.

To help with the financial feasibility of these projects, the City offers developers the opportunity to request support from the City for the project. If the project aligns with the City's goals, Consolidated Plan, and Comprehensive Plan, the City facilitates a public engagement process where incentives for the project are presented to City Council. Projects seeking support must apply to the City for a review and the City Council makes final recommendations.

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

The Lead and Healthy Homes Program effectively delivers successful lead remediation activities for income eligible households. The grant provides additional funds to address health and safety hazards in the home, and coordinates with a Home Advocate to build social capacity for participating families.

The City of Dubuque has received another Lead and Healthy Homes Grant in 2024 for \$5.21 million that would continue lead hazard control efforts, and have a targeted focus on Dubuque's unique historic properties that traditionally fall through the cracks due to the costs associated with historic preservation. This grant will run from January 2025-January 2029 and complete interventions in 90 units city-wide.

All CDBG funded activities use the required level of lead assessment when performing rehab on homes. Homeowners and renters are provided information and resources about lead and lead poisoning, as well as information on where and when children should be tested. Code enforcement activities identify visible hazards from peeling paint and housing code to ensure the health and wellbeing of children living in these units. CDBG funding provided financial assistance for six units assisted by the Lead & Healthy Homes program during the program year.

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

The City of Dubuque funds, supports, and participates in a variety of projects that support goals to increase economic opportunities through business retention, expansion, job creation, and financial resources for low- and moderate-income small business owners. The City of Dubuque had a low unemployment rate pre-COVID, and many of the local manufactures have a demand for skilled workers. Project HOPE, which is supported by the City of Dubuque, coordinates with Dubuque Works, Opportunity Dubuque, and the local community college, NICC, to identify under-skilled workers, train them, and match them with employment opportunities.

Entitlement funds in the amount of \$50,000 were committed to Microenterprise development and expansion for low to moderate income business owners. These grants assisted microenterprise owners with costs associated with beginning a business, or expanding services.

The City has also taken significant strides in the areas of supporting housing for all income levels included working families. The lowest income households experience the most severe housing problems, and those problems disproportionately impact renters. Much of the City's historic housing stock is in the downtown. Several units are in mixed-use structures, with vacant store fronts on the first floor and deteriorated housing on the upper floors. The City has multiple programs to address the poor housing conditions in this area, in conjunction with efforts to revitalize owner occupied, local business, and infrastructure in the Central Avenue Corridor.

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

Within the institution, steps are being taken to encourage and promote high-performing, fiscally responsible government. This outcome-driven process is focused on data analysis, community engagement, and strategic initiatives designed to support and retain Dubuque's population. Employers in Dubuque are looking for a skilled workforce, and the Housing & Community Development Department has strategically partnered with the private sector to connect unemployed and underemployed populations to training and skills necessary to meet local employer's needs.

Multiple departments continue compiling a data library and develop uniform data collection and tracking systems across departments to more effectively address neighborhood, housing, and economic development concerns identified by citizens and staff. The work being completed by these departments focuses on equity and identifying how the institution can provide more equitable services.

To address housing discrimination, the City took steps to increase staff understanding of fair housing, discrimination, and the history of racism in the community. New employees, boards and commission members also receive fair housing training and education.

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

The City has developed strategies to ensure housing developers relate to the community in which they plan to provide housing, as well as local service providers. Programs seeking City support must demonstrate active public engagement in the planning of the project and demonstrate what support services will be available to residents. Locations of projects are carefully considered to ensure residents will have access to areas of opportunity relevant to the target population being served. The City actively seeks out federal, state, local, and private sector partners that can meet the range of housing needs across the community.

The City continues its C.H.A.N.G.E. initiative (Comprehensive Housing Activities for Neighborhood Growth and Enrichment) to identify and rehabilitate downtown housing units. The program is designed to acquire, rehabilitate, and sell previously dilapidated properties to income eligible households, coordinate local, state, and federal resources to have the greatest impact for occupied properties, and support neighborhood and community development to ensure rich partnerships, programs, and

economic and social resiliency. Through a partnership with GT Investments, and Affordable Housing Network, Inc., multiple single-family homes have been rehabilitated into affordable homeownership opportunities.

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

- Any rental property participating in housing rehab activities through the City of Dubuque is required to accept Housing Choice Vouchers as a condition of their participation.
- City of Dubuque has increased landlord education about the HCV program as well as created a landlord education video to be shared among that specific group in hopes to dispel some of the HCV rumors while also providing information as to why/how HCV benefits the entire community. PHA also implemented a new, easier to use software that aides owners and tenants in communication and document transmittal, allowing the HCV program to progress with the times and provide ease of use. The City of Dubuque meets monthly with the Landlord Association to further connection and collaboration efforts. FY24 was a focus on recruitment of landlord participation through the Successful Property Maintenance Course and also through the networking of individuals through the Landlord Association.
- Efforts continue to translate all necessary documents into Spanish and Marshallese in order to break down communication barriers and allow easier accessibility to programs and information for the entire community. PHA is focusing efforts on translation services and interpreter needs and accessibility. Assessed & revised our HCV general forms for readability and adapted them all to a 6-7th grade level. We are also working on reducing our applications/forms of asking for unneeded information in order to make the processes less burdensome on participants.
- Efforts increased to create more social media presence to engage the community through education and awareness. A landlord education video was released in Spring of 2022. City staff are also researching the potential benefits of offering a tenant education course and other possible ways to lessen the burden of moving and unit damage.
- Inspections cycle has been reduced to 4 year between routine inspections and recently approved moving to a 2 year license inspection for properties in good standing.
- Adoption of the International Property Maintenance Code to hold units to a higher standard with the goal of providing quality, healthy, and safe environments for citizens to choose to live in.
- Partnered with Iowa Legal Aid to start a Fair Housing Testing Program.
- Continued community efforts to remove barriers to quality, affordable childcare options in the city.
- Updated the City website to make a reasonable accommodation request easier to find and more accessible to any resident.
- FY26/PY25 Annual Action Plan includes a rehabilitation housing project complaint with the accessibility requirements for covered housing.
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CR-40 - Monitoring 91.220 and 91.230

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

Pre-funding Preparedness: The Community Development Specialist provides one-on-one preparatory and program development meetings for new or expanded programs offered through the City of Dubuque. Technical assistance is provided to develop programs that deliver eligible activities in a timely manner. New subrecipients outside of the City are also provided one-on-one technical support prior to project implementation ensure contracting, eligibility, reporting, and national objective requirements are met. These are routinely completed virtually, but also have face to face meetings.

Contract Management: Most CDBG contracts are overseen by the Housing & Community Development Department, but some are assigned to a City project manager responsible for the execution and reporting related to the contract. Contracts include HUD, state, and local requirements, including related requirements such as environmental reviews, URA, 2 CFR 200, and Lead Based Paint requirements. Ongoing technical assistance is provided by the Community Development Specialist to subrecipients and project managers throughout the contract period. Most subrecipients do monthly draws where supporting documentation is verified.

Monitoring Compliance: The City completes monthly desk audits of reports and supporting documentation, onsite monitoring reviews, phone contacts, written communications (letters and email) and meetings. Each subrecipient has individualized reporting forms unique to their program, budgeted expenses, and activities. These individualized reporting forms allows for convenient management and monitoring for fraud, waste, mismanagement and other opportunities for potential abuse. Contract provisions allow for suspension of payment or termination of contract and reimbursement at any time during the program year based on performance deficiencies. Staff always works with subrecipients to correct identified deficiencies through discussion, technical assistance prior to imposing any sanctions. Subrecipients report on successes, challenges, and needs quarterly using an electronic form. City Departments using CDBG funds are monitored by their respective Department Managers and the Housing & Community Development Director.

Audit Review: Subrecipients are required to submit an audit prior to funding (if available) and as part of the year-end requirements in the contract. Programs requiring a Single Audit are subject to a financial desk review to the CDBG program if there is a finding noted in the audit, regardless if the finding is related to CDBG funds.

The Housing and Community Development department maintains and updates the Section 3 plan for applicable contracts.

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

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

The Community Development Advisory Commission meets monthly and is open to the public. Meetings are at 5:30 pm in a Housing Conference Room, located in Dubuque's downtown on a bus route, but have been held both in person and may include a virtual platform. All public hearings have translation services for individuals with limited English proficiency, vision, hearing, or speech impairments. Agendas are posted in the Housing Department, City Hall, Public Library, Multicultural Family Center and distributed to a list serve where anyone can receive notification when agendas and reports are posted online. The commission provides citizens an opportunity to comment on proposed plans, performance, and reports. The Commission also welcomes partners to the meetings in order to share out any relevant information to the Commission. Comments can also be submitted in writing, by phone, or electronically through the City's website.

The Community Development Advisory Commission reviews the Citizen Participation Plan annual. Citizen Participation Plan was also amended in FY2025/PY2024 and describes the roles, responsibilities, and contact information of entities involved in administering, reviewing, and approving activities included in this report. The most impactful way to get this information out to the public has been through social media.

CR-45 - CDBG 91.520(c)

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

The City of Dubuque has been working hard to promote the use of the community development programs to marginalized community members and those with significant barriers to navigating systems. Targeted outreach was completed to test if that would encourage additional participants from marginalized neighborhoods, but that was not an outcome. The City changed its focus to being part of "in-group" activities and events to reach this community. This has been effective in increasing the number of marginalized groups participating in programs and even providing input for planning programs.

Through code enforcement efforts, it was discovered that many older rental units in the City, primarily

occupied by minority or low/moderate income community members, had windows in habitable rooms that did not meet emergency escape and rescue opening requirements as identified by City Code. This was a safety issue, so the City developed a program by which rental property owners could replace the non-compliant windows with properly sized egress windows to keep occupants safe in case of emergency.

Does this Jurisdiction have any open Brownfields Economic Development Initiative (BEDI) grants?

No

[BEDI grantees] Describe accomplishments and program outcomes during the last year.

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CR-45 - CDBG 91.520(c)

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Does this Jurisdiction have any open Brownfields Economic Development Initiative (BEDI) grants?

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[BEDI grantees] Describe accomplishments and program outcomes during the last year.

CR-58 – Section 3

Identify the number of individuals assisted and the types of assistance provided

Total Labor Hours	CDBG	HOME	ESG	HOPWA	HTF
Total Number of Activities	0	0	0	0	0
Total Labor Hours					
Total Section 3 Worker Hours					
Total Targeted Section 3 Worker Hours					

Table 8 – Total Labor Hours

Qualitative Efforts - Number of Activities by Program	CDBG	HOME	ESG	HOPWA	HTF
Outreach efforts to generate job applicants who are Public Housing Targeted Workers					
Outreach efforts to generate job applicants who are Other Funding Targeted Workers.					
Direct, on-the job training (including apprenticeships).					
Indirect training such as arranging for, contracting for, or paying tuition for, off-site training.					
Technical assistance to help Section 3 workers compete for jobs (e.g., resume assistance, coaching).					
Outreach efforts to identify and secure bids from Section 3 business concerns.					
Technical assistance to help Section 3 business concerns understand and bid on contracts.					
Division of contracts into smaller jobs to facilitate participation by Section 3 business concerns.					
Provided or connected residents with assistance in seeking employment including: drafting resumes, preparing for interviews, finding job opportunities, connecting residents to job placement services.					
Held one or more job fairs.					
Provided or connected residents with supportive services that can provide direct services or referrals.					
Provided or connected residents with supportive services that provide one or more of the following: work readiness health screenings, interview clothing, uniforms, test fees, transportation.					
Assisted residents with finding child care.					
Assisted residents to apply for, or attend community college or a four year educational institution.					
Assisted residents to apply for, or attend vocational/technical training.					
Assisted residents to obtain financial literacy training and/or coaching.					
Bonding assistance, guaranties, or other efforts to support viable bids from Section 3 business concerns.					
Provided or connected residents with training on computer use or online technologies.					
Promoting the use of a business registry designed to create opportunities for disadvantaged and small businesses.					
Outreach, engagement, or referrals with the state one-stop system, as designed in Section 121(e)(2) of the Workforce Innovation and Opportunity Act.					

Other.					
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Table 9 – Qualitative Efforts - Number of Activities by Program

Narrative

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