

**\*AMENDED**  
**SEPTEMBER/OCTOBER 2016**

**2014-  
2018**

**CDBG Consolidated Plan**



City of Rome  
Community Development Department  
607 Broad Street  
Rome, GA 30161

# Strategic Plan

## SP-05 Overview

### Strategic Plan Overview

**The City of Rome amended its 5 year plan in September 2016 to add the Unsafe Structures Demolition Program. This program will address the need of slum and blight removal in urban neighborhoods across the City. Targeted homes will those that have been vacant for a long period of time and are unfit for human habitation.**

The Strategic Plan must identify the priority needs of the jurisdiction and describe strategies that the jurisdiction will undertake to serve the priority needs. The 2014 calendar year will be the City of Rome's eleventh year as a CDBG Entitlement community. CDBG funding is an important source of funds in Rome's efforts to address the priority needs of its low and moderate income citizens and in the revitalization of distressed urban neighborhoods. CDBG funds are providing, on average, \$400,000 per year for use on housing and public improvements, primarily in older neighborhoods with concentrations of low income persons. The 2012 award was \$383,844 and the 2013 allocation was \$406,803. CDBG focuses on three facets within the low and moderate income community: Housing, Public Facilities (buildings, infrastructure and services and Economic Development (job creation/retention. Rome has concentrated its previous CDBG awards in public facilities and housing areas and continues to do so in the 2014 program year with the addition of funding for code enforcement activities. Following is the specific 2014 budget: Project/Activity- Budget Minor Repair- \$100,000 North Rome Sidewalk Improvements-\$174,847 General Administration/Planning-\$81,200 Code Enforcement \$50,000 Total \$406,047. Geographic Priorities The geographic allocation of the City's CDBG funds is guided by the determination that these funds can have the greatest impact when targeted to specific areas and leveraged with other local, state and federal investments when possible. The CDBG LMI target area map is attached. As provided for at 24 CFR Part 570.208(a)(1), the City may elect to use these target areas to meet National Objective requirements for selected projects that specifically meet the Area Benefit category of activities. Priority Needs Based on the Needs Assessment completed and the data gathered as part of the Consolidated Plan process, priority needs identified are public improvements, housing rehabilitation, code enforcement and economic development activities which create new jobs.

Anticipated Resources The City anticipates that the only funds available for 2014 for the selected

projects will be CDBG funds. These funds will be used to design and construct new sidewalks and safe routes to schools in the North Rome area (census tract 6); enhanced and specific code enforcement efforts in the low income neighborhoods of Rome and continuation of the Minor Repair Program for elderly homeowners. Other topics to be discussed include: Influence of Market Conditions; Institutional Delivery Structure; Goals; Public Housing; Homeless Strategy; Lead-based paint hazards; Anti-Poverty Strategy and Monitoring.

## SP-10 Geographic Priorities – 91.215 (a)(1)

### Geographic Area

Table 1 - Geographic Priority Areas

1	<b>Area Name:</b>	51% and greater LMI Census Tracts
	<b>Area Type:</b>	Local Target area
	<b>Other Target Area Description:</b>	
	<b>HUD Approval Date:</b>	
	<b>% of Low/ Mod:</b>	
	<b>Revital Type:</b>	Comprehensive
	<b>Other Revital Description:</b>	
	<b>Identify the neighborhood boundaries for this target area.</b>	
	<b>Include specific housing and commercial characteristics of this target area.</b>	
	<b>How did your consultation and citizen participation process help you to identify this neighborhood as a target area?</b>	
	<b>Identify the needs in this target area.</b>	
	<b>What are the opportunities for improvement in this target area?</b>	
	<b>Are there barriers to improvement in this target area?</b>	
2	<b>Area Name:</b>	City-wide Effort
	<b>Area Type:</b>	Direct Benefit Activities (Economic Development and Housing Rehabilitation)
	<b>Other Target Area Description:</b>	Direct Benefit Activities (Economic Development and Housing Rehabilitation)
	<b>HUD Approval Date:</b>	
	<b>% of Low/ Mod:</b>	
	<b>Revital Type:</b>	
	<b>Other Revital Description:</b>	

<b>Identify the neighborhood boundaries for this target area.</b>	All neighborhoods within the City limits of Rome fall under this target area. Activities attached to this area will offer a direct benefit per income of the person and/or household.
<b>Include specific housing and commercial characteristics of this target area.</b>	
<b>How did your consultation and citizen participation process help you to identify this neighborhood as a target area?</b>	
<b>Identify the needs in this target area.</b>	The City of Rome as a whole has a need for homeowner housing rehabilitation for low income seniors, and there are varying economic development opportunities that could create jobs for low income persons throughout the City.
<b>What are the opportunities for improvement in this target area?</b>	
<b>Are there barriers to improvement in this target area?</b>	

**General Allocation Priorities**

Describe the basis for allocating investments geographically within the jurisdiction (or within the EMSA for HOPWA)

The geographic allocation of the City's CDBG funds is guided by the determination that these funds can have the greatest impact when targeted to specific areas and leveraged with other local, state and federal investments when possible. The CDBG LMI target area map is attached. As provided for at 24 CFR Part 570.208(a)(1), the City may elect to use these target areas to meet National Objective requirements for selected projects that specifically meet the Area Benefit category of activities. Activities such as Economic Development and/or housing rehabilitation will be administered city-wide, but will have a direct benefit to a household or job created/retained.

## SP-25 Priority Needs - 91.215(a)(2)

### Priority Needs

Table 2 – Priority Needs Summary

1	<b>Priority Need Name</b>	Public Improvements and Infrastructure
	<b>Priority Level</b>	High
	<b>Population</b>	Extremely Low Low Moderate Large Families Families with Children Public Housing Residents Persons with Physical Disabilities Non-housing Community Development
	<b>Geographic Areas Affected</b>	51% and greater LMI Census Tracts
	<b>Associated Goals</b>	Grant Planning and Administration Public Infrastructure Improvements
	<b>Description</b>	The Public Improvement and Infrastructure category is listed as a high need and will improve, rehab and/or replace sidewalks in neighborhoods within low-mod income census tracts of Rome. This could also include the construction of new sidewalks in areas that need them along with curb cuts for handicap accessibility. Many existing sidewalks located in the target areas have fallen into sub-standard condition.
	<b>Basis for Relative Priority</b>	The Public Improvement and Infrastructure category is listed as a high need and will improve, rehab and/or replace sidewalks in neighborhoods within low-mod income census tracts of Rome. This could also include the construction of new sidewalks in areas that need them along with curb cuts for handicap accessibility. Many existing sidewalks located in the target areas have fallen into sub-standard condition.
2	<b>Priority Need Name</b>	Housing Rehabilitation
	<b>Priority Level</b>	High

	<b>Population</b>	Extremely Low Low Moderate Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities
	<b>Geographic Areas Affected</b>	Direct Benefit Activities (Economic Development and Housing Rehabilitation)
	<b>Associated Goals</b>	Grant Planning and Administration Housing Rehabilitation
	<b>Description</b>	The Minor Repair Program (elderly and/or disabled, owner occupied housing rehabilitation) is offered city-wide to low income residents. Qualified applicants must meet the age and income restrictions. Due to the age of the local housing stock, and the lack of affordable housing options, this program is essential to addressing both of these needs inside the City of Rome.
	<b>Basis for Relative Priority</b>	This need is listed as a high need in the community due to the overwhelming popularity of the program, the continue need of the program and the age of the housing stock.
<b>3</b>	<b>Priority Need Name</b>	Economic Development Activities
	<b>Priority Level</b>	Low
	<b>Population</b>	Extremely Low Low Moderate Large Families Families with Children Elderly Public Housing Residents Non-housing Community Development
	<b>Geographic Areas Affected</b>	Direct Benefit Activities (Economic Development and Housing Rehabilitation)
	<b>Associated Goals</b>	Economic Development Activities Grant Planning and Administration
	<b>Description</b>	This activity will assist local business with creation of new jobs or retention of currently held jobs for low-mod income persons.

	<b>Basis for Relative Priority</b>	The needs assessment showed that citizens are interested in using funds to assist new and/or existing businesses to expand, start up or improve their local business to increase number of available jobs in the area.
4	<b>Priority Need Name</b>	Code Enforcement Activities
	<b>Priority Level</b>	High
	<b>Population</b>	Extremely Low Low Moderate Large Families Families with Children Elderly
	<b>Geographic Areas Affected</b>	51% and greater LMI Census Tracts
	<b>Associated Goals</b>	Code Enforcement Activities
	<b>Description</b>	Code enforcement is the beginning step in many neighborhoods in the redevelopment process. The City of Rome has determined, with citizen and staff input, that in order to have a sustainable change in the low/mod neighborhoods the slum and blighted properties have to be addressed on a more focused effort.
	<b>Basis for Relative Priority</b>	
5	<b>Priority Need Name</b>	Unsafe Structures Demolition Program
	<b>Priority Level</b>	High
	<b>Population</b>	Extremely Low Low Moderate Middle Large Families Families with Children Elderly
	<b>Geographic Areas Affected</b>	Direct Benefit Activities (Economic Development and Housing Rehabilitation)

<b>Associated Goals</b>	Unsafe Structures Demolition Program
<b>Description</b>	The demolition program is designed to use Community Development Block Grant funds as a means of last resort to remove dilapidated structures in order to eliminate specific conditions of blight or physical decay within the City of Rome. Demolition of a structure mandated by local ordinance and enforced through an administrative or environmental court order is the primary focus of this program; however the program also assists with owner consent demolitions, non-profit owned properties and municipal owned properties obtained through tax foreclosure or through private donation.
<b>Basis for Relative Priority</b>	The City of Rome decided to amend in Consolidated Plan in September 2016 to add this activity for CDBG funding. After many years of redevelopment activities in specific low income neighborhoods, including code enforcement and housing rehabilitation is was apparant that abandoned blighted structures continue to be an influence in these neighborhoods with no resolution for removal. The City believes adding this program to the redevelopment efforts will provide an immediate impact to the area.

**Narrative (Optional)**

Resources will be allocated to maximize the benefits to residents within the targeted areas of Rome. Public infrastructure improvements, typically thought of as brick and mortar projects will be exclusively within these targeted census tracts. Other expenditures include grant administration, housing rehabilitation, code enforcement and economic development activities which will be utilized to assist low/mod income individuals throughout the City.

The City amended the 2014-2018 Consolidated Plan to add the Unsafe Structures Demolition Program in September 2016 to assist with blight removal from low-mod income neighborhoods.

## SP-30 Influence of Market Conditions – 91.215 (b)

### Influence of Market Conditions

Affordable Housing Type	Market Characteristics that will influence the use of funds available for housing type
Tenant Based Rental Assistance (TBRA)	Northwest Georgia Housing Authority in Rome, GA manages the TBRA funding for public housing residents. There are currently over 1400 individuals on the waiting list for housing assistance. This number indicates that there is a need for the housing authority to request additional vouchers to help the need and construct more public housing. The City of Rome does not plan to utilize the CDBG funding for this purpose, however will partner with NWGHA in any way possible to increase the supply of affordable housing.
TBRA for Non-Homeless Special Needs	Northwest Georgia Housing Authority in Rome, GA manages the TBRA funding for public housing residents. There are currently over 1400 individuals on the waiting list for housing assistance. This number indicates that there is a need for the housing authority to request additional vouchers to help the need and construct more public housing. The City of Rome does not plan to utilize the CDBG funding for this purpose, however will partner with NWGHA in any way possible to increase the supply of affordable housing. Per the 2009-2011 American Community Survey 3 year estimates, the City had approximately 6,249 residents with a disability (or 17.7%).
New Unit Production	Due to the high demand for subsidized affordable housing units, and the fact that all of the apartment complexes contacted during the plan phase, it appears that new unit production is needed. The City of Rome will seek and encourage affordable housing developers to continue adding quality units to this area and assist by leveraging funds when possible.
Rehabilitation	More than half of the city's current housing stock was constructed prior to 1970 and older housing, which typically carries greater maintenance costs, is more likely to fall into substandard condition. The city will continue to prioritize a portion of its federal funds to assist low income homeowners with housing rehabilitation.
Acquisition, including preservation	There was no data reviewed to indicate a need to acquire and or preserve housing other than through the rehabilitation program which we currently administer.

**Table 3 – Influence of Market Conditions**

**SP-35 Anticipated Resources - 91.215(a)(4), 91.220(c)(1,2)**

**Introduction**

The City anticipates that the only funds available for 2014 for the selected CDBG projects will be CDBG funds. These funds will be used for the design and construction of sidewalks and improved walkways and access to schools located in LMI Census tracts, focused code enforcement efforts in the low income census tracts of Rome and housing rehabilitation for elderly and/or disabled persons 55 years old or older that have a household income at or below 80% AMI.

**Anticipated Resources**

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Reminder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	406,047	0	0	406,047	1,535,376	

**Table 4 - Anticipated Resources**

**Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied**

For 2014, CDBG funds will not be leveraged with other City, state or Federal funds. There are no matching requirements for the CDBG program. There are plans to work with the City of Rome Street Department in years 2015-2018 and leverage additional sidewalk funds received from the State of Georgia and local City of Rome funds to further the sidewalk efforts in the low income census tracts.

**If appropriate, describe publically owned land or property located within the jurisdiction that may be used to address the needs identified in the plan**

The proposed sidewalk improvements will take place in the current public right-of-way, meaning land acquisition is not anticipated.

**Discussion**

For 2014, CDBG funds will not be leveraged with other City, state or Federal funds. There are no matching requirements for the CDBG program.

## SP-40 Institutional Delivery Structure – 91.215(k)

Explain the institutional structure through which the jurisdiction will carry out its consolidated plan including private industry, non-profit organizations, and public institutions.

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
ROME	Government	Planning neighborhood improvements public facilities	Jurisdiction

Table 5 - Institutional Delivery Structure

### Assess of Strengths and Gaps in the Institutional Delivery System

The Consolidated Plan's regulations require the City to describe the institutional structure in place to deliver the projects, programs and services outlined in the 5-year plan and assess the strengths and gaps in that delivery system. The City will undertake the execution of the projects described in the 2014 Action Plan through the procurement and contracting of construction services. The City of Rome is the lead agency and will be responsible for said procurement of services from outside vendors to design and construct any sidewalk improvements and for rehabilitation of owner occupied homes. The city has qualified on staff to administer the CDBG program and manage all projects.

### Availability of services targeted to homeless persons and persons with HIV and mainstream services

Homelessness Prevention Services	Available in the Community	Targeted to Homeless	Targeted to People with HIV
<b>Homelessness Prevention Services</b>			
Counseling/Advocacy	X	X	
Legal Assistance	X		
Mortgage Assistance	X		
Rental Assistance	X		
Utilities Assistance	X		
<b>Street Outreach Services</b>			
Law Enforcement	X		
Mobile Clinics			
Other Street Outreach Services			
<b>Supportive Services</b>			
Alcohol & Drug Abuse	X	X	

Supportive Services			
Child Care	X		
Education	X		
Employment and Employment Training	X		
Healthcare	X		
HIV/AIDS	X		
Life Skills	X	X	
Mental Health Counseling	X	X	
Transportation	X		
Other			

**Table 6 - Homeless Prevention Services Summary**

**Describe how the service delivery system including, but not limited to, the services listed above meet the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth)**

Services are provided to the local homeless population through the Salvation Army of Rome, the William S. Davies Homeless Shelter, Highland Rivers (mental health provider), Free Clinic (health center), Floyd Medical Center (health center) and the Community Kitchen (free lunch daily). All of the services providers indicate that many of the homeless population actively seek and participate in the services they provide.

**Describe the strengths and gaps of the service delivery system for special needs population and persons experiencing homelessness, including, but not limited to, the services listed above**

The City of Rome's current institutional structure includes many service agencies including the Rome/Floyd Housing Team, Habitat for Humanity, Action Ministries, NW Georgia Housing Authority, South Rome Redevelopment Agency/Corporation, Appalachian Housing Counseling Agency, Salvation Army, United Way of Rome, Hospitality House, Highland Rivers, Salvation Army and the William S. Davies Homeless Shelter. These agencies provide services for all the needs mentioned above. The City believes the current structure is strong and sufficient for community needs.

**Provide a summary of the strategy for overcoming gaps in the institutional structure and service delivery system for carrying out a strategy to address priority needs**

The City of Rome will continue to be involved with the numerous cooperative groups and agencies mentioned throughout the Consolidated Plan that offer a variety of services to the residents. The city will work in cooperation with these groups to identify and gaps in services that may arise.

## SP-45 Goals Summary – 91.215(a)(4)

### Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Public Infrastructure Improvements	2014	2018	Non-Housing Community Development	51% and greater LMI Census Tracts	Public Improvements and Infrastructure	CDBG: \$174,847	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 2000 Persons Assisted
2	Housing Rehabilitation	2014	2018	Affordable Housing	City-wide Effort	Housing Rehabilitation	CDBG: \$100,000	Homeowner Housing Rehabilitated: 17 Household Housing Unit
3	Economic Development Activities	2016	2018	Non-Housing Community Development	City-wide Effort	Economic Development Activities		Jobs created/retained: 5 Jobs  Businesses assisted: 2 Businesses Assisted
4	Grant Planning and Administration	2014	2018	Affordable Housing Non-Housing Community Development	City-wide Effort	Economic Development Activities Housing Rehabilitation Public Improvements and Infrastructure	CDBG: \$81,200	Other: 2 Other

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
5	Code Enforcement Activities	2014	2018	Non-Housing Community Development	51% and greater LMI Census Tracts	Code Enforcement Activities	CDBG: \$50,000	Housing Code Enforcement/Foreclosed Property Care: 35 Household Housing Unit
6	Unsafe Structures Demolition Program	2017	2018	Slum and blight removal	City-wide Effort	Unsafe Structures Demolition Program	CDBG: \$70,000	Buildings Demolished: 8 Buildings

**Table 7 – Goals Summary**

### Goal Descriptions

1	<b>Goal Name</b>	Public Infrastructure Improvements
	<b>Goal Description</b>	This goal will be to improve the current public infrastructure such as sidewalks, curb and gutter, handicap accessibility, etc in the low income census tracts of Rome.
2	<b>Goal Name</b>	Housing Rehabilitation
	<b>Goal Description</b>	This program assists elderly and/or disabled homeowners with minor repairs needed to their homes. This program targets those at or below 80% of the area median income.
3	<b>Goal Name</b>	Economic Development Activities
	<b>Goal Description</b>	This program will assist businesses with start up, expansion, facade improvements, etc which will be directly tied to job creation or job retention.
4	<b>Goal Name</b>	Grant Planning and Administration
	<b>Goal Description</b>	This goal outlines the efforts of the Community Development staff to administer the CDBG program each year.

5	<b>Goal Name</b>	Code Enforcement Activities
	<b>Goal Description</b>	Funds will be used to pay the costs associated with hiring an additional Code Enforcement Officer to focus on the low income census tracts of Rome in order to assist in combating slum and blight.
6	<b>Goal Name</b>	Unsafe Structures Demolition Program
	<b>Goal Description</b>	The demolition program is designed to use Community Development Block Grant funds as a means of last resort to remove dilapidated structures in order to eliminate specific conditions of blight or physical decay within the City of Rome. Demolition of a structure mandated by local ordinance and enforced through an administrative or environmental court order is the primary focus of this program; however the program also assists with owner consent demolitions, non-profit owned properties and municipal owned properties obtained through tax foreclosure or those obtained through private donation.

**Estimate the number of extremely low-income, low-income, and moderate-income families to whom the jurisdiction will provide affordable housing as defined by HOME 91.315(b)(2)**

The City of Rome will assist approximately 17 low-mod households through the Minor Repair Program each year, and will seek additional funds through the CHIP (HOME) program at the Georgia Department of Community Affairs for Moderate Repair to assist eight homeowners.

## **SP-50 Public Housing Accessibility and Involvement – 91.215(c)**

### **Need to Increase the Number of Accessible Units (if Required by a Section 504 Voluntary Compliance Agreement)**

The Northwest Georgia Housing Authority is in compliance with Section 504.

### **Activities to Increase Resident Involvements**

The Northwest Georgia Housing Authority routinely offers services, programs and training to all the public housing residents. NWGHA is a top performer in the world of public housing and continues to use innovation and the most current programs to encourage involvement.

### **Is the public housing agency designated as troubled under 24 CFR part 902?**

No

### **Plan to remove the ‘troubled’ designation**

N/A

## **SP-55 Barriers to affordable housing – 91.215(h)**

### **Barriers to Affordable Housing**

#### **Strategy to Remove or Ameliorate the Barriers to Affordable Housing**

Based on the impediment listed above identified in the 2013 Analysis of Impediments to Fair Housing Choice, the City will convene a discussion among City leaders, city staff and the affected community stakeholders to review the effects and possible barriers the local zoning ordinances may have towards creation of affordable housing.

## **SP-60 Homelessness Strategy – 91.215(d)**

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

The City is not proposing to use any CDBG funds to combat or address homelessness at this time. The City drafted a plan in collaboration with many local service providers to break the cycle of homelessness in Rome and Floyd County in September 2009. The plan is titled “Breaking the Cycle of Homelessness One Person at a Time: The Rome and Floyd County Plan”. This plan identifies 22 specific action steps that can be taken locally to address the needs that were identified in 2008 and 2009 through a face to face survey process. The data used for the needs analysis of the Consolidated Plan were taken from the Georgia Balance of the State Continuum of Care and their 2011 homeless count.

The City of Rome’s strategy will be to re-form the group of service providers that were involved in the breaking the cycle planning process in 2008/2009 and start working through the action steps with the goal of maximizing the use of existing resources and developing new programs to meet any service gaps that are identified.

### **Addressing the emergency and transitional housing needs of homeless persons**

Rome Action Ministries is the local agency that addresses transitional housing needs in Rome and Floyd County. The City will continue to support this agency and assist them in any way possible to receive funds through the Georgia Balance of the State Continuum of Care program.

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

The City of Rome will continue to support public service agencies and providers within the City such as Salvation Army, William S. Davies Homeless Shelter, Action Ministries and others by offering support letters for federal or state funding and providing technical assistance whenever possible.

**Help low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families who are likely to become homeless after being discharged from a publicly funded institution or system of care, or who are receiving assistance from public and private agencies that address housing, health, social services, employment, education or youth needs**

The City of Rome will continue to support public service agencies and providers that assist low-income individuals and families who are likely to become homeless within the City such as Salvation Army, William S. Davies Homeless Shelter, Action Ministries and others by offering support letters for federal or state funding and providing technical assistance whenever possible.

## **SP-65 Lead based paint Hazards – 91.215(i)**

### **Actions to address LBP hazards and increase access to housing without LBP hazards**

The City of Rome is addressing lead based paint issues through both the Minor Repair Program and the Moderate Repair Program (funded by the Georgia Department of Community Affairs CHIP program). In 2011, an employee of the Rome/Floyd Building Inspection Department attended Lead Based Pain Training and received certification as a Lead Based Pain Inspector. We now have the ability to test the houses on a local level and bid out the required abatement or interim control work that is needed to each home prior to the regular rehabilitation work beginning. The majority of the homes assisted through our housing rehabilitation programs were built prior to 1978.

### **How are the actions listed above related to the extent of lead poisoning and hazards?**

The actions listed above will assist in reducing the lead based paint found in the homes assisted with federal funds through our rehabilitation program.

### **How are the actions listed above integrated into housing policies and procedures?**

HUD has issued regulations to protect persons from LBP hazards in housing built prior to 1978. The City of Rome is required to follow these Federal LBP regulations in implementing its housing rehabilitation programs. The requirements of the LBP regulations have been incorporated into the Policies and Procedures for the City's housing rehabilitation programs. The non-lead rehabilitation cost will determine what type of lead hazard reductions that must be addressed and the appropriate notices that must be given to the homeowner.

The Housing Rehabilitation Policies and Procedures includes the completion of accessibility improvements within units receiving assistance to the extent compatible with the rehabilitation work to be performed to enhance access and mobility for those homeowners who are disabled.

## **SP-70 Anti-Poverty Strategy – 91.215(j)**

### **Jurisdiction Goals, Programs and Policies for reducing the number of Poverty-Level Families**

The core premise of the anti-poverty strategy is that employment is the vehicle through which those who are impoverished can best achieve the goal of self-sufficiency. The most efficient method for reaching this goal is for the City to strive for an economic climate that leads to the availability of a wide range of possible jobs available for these individuals. The City of Rome joined with the Greater Rome Chamber of Commerce and Floyd County to draft the Rome-Floyd 2020 III Community and Economic Development Strategy which will assist in recruiting new businesses and industry, as well as expand existing businesses and industries. The City of Rome has an established Opportunity Zone which is an incentive for the creation of new jobs and has assisted in the construction of a new shopping center which is anchored by Publix. This shopping center is scheduled to open in October 2013 will add an additional 200 jobs to the area. A new full service hotel will also locate within the zone and should open by 2015. Any businesses located within the zone that create new jobs can apply to the state for a tax credit of \$3,500 per job. Another strategy would be to coordinate with the Northwest Georgia Regional Commission and their Workforce Development programs to determine if partnerships with service agencies could help the City achieve a reasonable anti-poverty strategy.

### **How are the Jurisdiction poverty reducing goals, programs, and policies coordinated with this affordable housing plan**

By directing resources to serve CDBG eligible areas, which are also those areas hardest hit by poverty in the following three ways. Human Capital: The City will invest in residents by enabling people at all income levels to lead healthier more productive lives by assisting with sustaining quality housing through the rehabilitation program and through code enforcement efforts in reducing slum and blight. Neighborhoods: By enhancing the quality of life in Rome's neighborhoods, including public places, infrastructures and housing stock. Ensuring that these targeted neighborhoods are good places to live and work. Economic Development: By expanding economic opportunities, especially employment opportunities, for low and moderate income residents through efforts to attract, retain and expand small businesses throughout the City.

## **SP-80 Monitoring – 91.230**

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

For 2014, the City does not anticipate using nonprofit or other subrecipients to deliver programs, projects or services funded with its 2014 CDBG allocation, which require clearly defined monitoring procedures. The City will evaluate where monitoring policies and procedures are needed over the course of the 2014-2018 Consolidated Plan and amend the plan should those arise.