

2021

Community Development Block Grant Program Annual Action Plan



Municipality of Princeton

Affordable Housing Department

1 Monument Drive, Princeton, NJ 08540

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Executive Summary

AP-05 Executive Summary - 24 CFR 91.200(c), 91.220(b)

1. Introduction

The Municipality of Princeton was notified in July 2019 by the U.S. Department of Housing & Urban Development (HUD) that it is was recognized as a "metropolitan city" based on the Census Bureau's 2018 population estimates and the Office of Management and Budget's September 2018 Metropolitan Statistical Area updates. As a metropolitan city, Princeton was invited to become an "entitlement community" or grantee of the Community Development Block Grant (CDBG) Program giving it the ability to receive annual allocations from HUD. This Second Year Action Plan serves as the Municipality's "application" to receive its second annual allocation of CDBG funds.

A key feature of the CDBG Program is the grantee's ability to choose how the funds will be used. Via regulations, HUD provides a broad range of eligible activities and allows grantees to determine which of the eligible activities will best serve the needs of their community. In order to determine the most pressing needs and develop effective, place-based market-driven strategies to meet those needs, HUD requires grantees to develop a Consolidated Plan. This Annual Action Plan was heavily educated by the Consolidated Planning process.

This Annual Action Plan programs the Municipality's allocation of Program Year 2021 entitlement funds:

- \$225,797 in Program Year 2021 Entitlement Funds

In preparing the 2021 Annual Action Plan for this year's allocation of \$225,797, the Municipality identified a series of COVID-19 response projects to help low and moderate income families (i.e., utility assistance, day care, health screenings). Most of the projects are recognized by the CDBG program as "public services." Entitlement communities are permitted to allocate up to fifteen percent (15%) of the annual allocation to public services. The proposed projects represented almost 75% of the allocation. However, the 15% limit on public service spending was waived by the CARES Act for Program Year 2020.

By exercising the Municipality's right to substantially amend prior Plans, several newly identified public service projects will be moved into the 2020 Annual Action Plan and offset those funds by moving a 2020 project that was not related to the CARES Act (and does not take advantage of the waivers) into the 2021 Annual Action Plan.

PR-05 Lead & Responsible Agencies – 91.200(b)

1. Agency/entity responsible for preparing/administering the Consolidated Plan

Describe the agency/entity responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

Agency Role	Name	Department/Agency
CDBG Administrator	PRINCETON	Department of Affordable Housing

Table 1 – Responsible Agencies

Narrative (optional)

The Municipality's Department of Affordable Housing is responsible for management and administration of the CDBG Program. The Department is supported by the Finance Department with fiscal management of the Program.

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AP-10 Consultation – 91.100, 91.200(b), 91.215(I)

1. Introduction

The 2021 Annual Action Plan was informed by consultations with various Municipal Departments as well as key stakeholders in the community. The overwhelming sense need identified was to continue to support the Princeton Housing Authority with needed capital improvements and to help low and moderate income families impacted by the COVID-19 pandemic.

As series of additional public service projects were also identified to assist families impacted by the pandemic. However, without a waiver to exceed fifteen percent of the annual allocation on public services, the Municipality was unable to include them in this Annual Action Plan. Instead, a Substantial Amendment of the 2020 Annual Action Plan is being prepared -- a program year that was granted a waiver of the public service cap -- to make the excess public service projects part of the 2020 Annual Action Plan.

Provide a concise summary of the jurisdiction's activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies (91.215(I))

Princeton continues to enjoy a strong relationship with the Princeton Housing Authority and other privately operated housing projects and social service agencies.

Describe coordination with the Continuum of Care and efforts to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans, and unaccompanied youth) and persons at risk of homelessness.

Princeton has reviewed and considered several Trenton-Mercer CoC planning documents and reports in the development of this Plan. A significant amount of CDBG resources available in this Annual Action Plan is dedicated to persons at risk of homelessness.

Describe consultation with the Continuum(s) of Care that serves the jurisdiction's area in determining how to allocate ESG funds, develop performance standards for and evaluate outcomes of projects and activities assisted by ESG funds, and develop funding, policies and procedures for the operation and administration of HMIS

The Municipality of Princeton is not a recipient of Emergency Solutions Grant funds to serve the homeless.

2. Describe Agencies, groups, organizations and others who participated in the process and describe the jurisdiction's consultations with housing, social service agencies and other entities

Table 2 – Agencies, groups, organizations who participated

1	Agency/Group/Organization	Princeton Housing Authority
	Agency/Group/Organization Type	PHA
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Non-Homeless Special Needs Economic Development Market Analysis Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The Princeton Housing Authority was consulted several times in the development of this Plan. Initially, the PHA participated in the Municipality's Focus Group held on July 14, 2020. In addition, the PHA has been a part of ongoing discussions with Princeton about the needs, strategies and priorities of the PHA.
2	Agency/Group/Organization	PRINCETON
	Agency/Group/Organization Type	Other government - Local Grantee Department
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Lead-based Paint Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs Economic Development Market Analysis Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Both elected officials and key staff participated in a focus group held on July 14, 2020. Guidance and information was also provided throughout the development of this Plan.
3	Agency/Group/Organization	Housing Initiatives of Princeton
	Agency/Group/Organization Type	Services - Housing Services-homeless

<p>What section of the Plan was addressed by Consultation?</p>	<p>Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs</p>
<p>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</p>	<p>Housing Initiatives of Princeton is a strong partner in the implementation of a rental assistance project funded by the 2020 Annual Action Plan. On multiple occasions virtual meetings were held to discuss new and emerging needs of tenants impacted by the pandemic. These consultations helped identify the need for utility assistance and other public service projects.</p>

Identify any Agency Types not consulted and provide rationale for not consulting

N/A

Other local/regional/state/federal planning efforts considered when preparing the Plan

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	City of Trenton	Princeton's Strategic Plan is consistent and support of the goals of the Trenton/Mercer CoC.

Table 3 – Other local / regional / federal planning efforts

AP-12 Participation – 91.105, 91.200(c)

**1. Summary of citizen participation process/Efforts made to broaden citizen participation
Summarize citizen participation process and how it impacted goal-setting**

The citizen participation process consisted of two public hearings and a public display period. The initial public hearing advertised on July 8 and held on August 3. An additional public hearing and notice of a public display period was advertised on August 6. The 2nd public hearing was held on August 9.

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Public Meeting	Non-targeted/broad community	No members of the public attended the initial public hearing on August 3. [update with text about August 9 hearing]	No comments were received at the August 3 public hearing [update with Aug 9]	N/A	

Table 4 – Citizen Participation Outreach

Expected Resources

AP-15 Expected Resources – 91.220(c)(1,2)

Introduction

The Municipality of Princeton has been allocated \$225,797 in CDBG Entitlement funds for the Program Year 2021 (September 1, 2021 to August 31, 2022). Public services are therefore capped at \$33,870 (15% of award) and Administration is capped at \$45,159 (20% of award).

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder 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	225,797	0	0	225,797	675,000	
Other	public - federal	Other	0	0	0	0	0	

Table 5 - Expected Resources – Priority Table

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

The Municipality's proposed projects will leverage state and federal funds. Investment into capital improvements at the Princeton Housing Authority will leverage the U.S. Department of Housing & Urban Development's investment the PHA's affordable housing units. The proposed Utility Assistance program will also leverage State and Federal COVID-response investments designed to help tenants and homeowners remain in place during the pandemic.

Princeton is not subject to any match requirements with its annual Community Development Block Grant allocation.

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

A Priority Need of the Municipality's 2020-2024 Consolidated Plan addressed the preservation of existing affordable housing. As the owner and operator of the oldest affordable homes in Princeton, the Princeton Housing Authority is an obvious priority for CDBG funding. The U.S. Department of Housing and Urban Development is the owns Princeton Housing Authority's rental units, common areas and offices.

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Annual Goals and Objectives

AP-20 Annual Goals and Objectives

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Support households impacted by COVID-19	2020	2022	Affordable Housing		Respond to the Economic Impacts of COVID-19 Address Structural and Systematic Racism	CDBG: \$33,870	Public service activities for Low/Moderate Income Housing Benefit: 40 Households Assisted
2	Preserve and protect existing affordable housing	2020	2024	Affordable Housing Public Housing		Maintain and Create Affordable Housing	CDBG: \$172,927	Rental units rehabilitated: 25 Household Housing Unit

Table 6 – Goals Summary

Goal Descriptions

1	Goal Name	Support households impacted by COVID-19
	Goal Description	Princeton's low and moderate income residents continue to be economically impacted by the COVID-19 pandemic. Without continued financial assistance, households are at risk of homelessness.
2	Goal Name	Preserve and protect existing affordable housing
	Goal Description	A goal of this Annual Action Plan is to support reinvestment and modernization efforts of the Princeton Housing Authority.

Projects

AP-35 Projects – 91.220(d)

Introduction

The Municipality of Princeton has been allocated \$225,797 in CDBG Entitlement funds for the Program Year 2021 (September 1, 2021 to August 31, 2022). Public services are therefore capped at \$33,870 (15% of award) and Administration is capped at \$45,159 (20% of award).

Describe the reasons for allocation priorities and any obstacles to addressing underserved needs

The public service cap of 15% of the annual allocation is a severe limitation in addressing underserved needs -- specifically resulting from the pandemic.

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AP-38 Project Summary

Project Summary Information					
No.	Project	Goals Supported	Geographic Areas	Needs Addressed	Funding
1	Princeton Housing Authority Capital Improvements	Preserve and protect existing affordable housing		Maintain and Create Affordable Housing	CDBG : \$172,927
	Description	These funds will allow the Princeton Housing Authority to make necessary upgrades to existing affordable housing units in the PHA's portfolio. A Substantial Amendment of the 2020 Annual Action Plan cancelled a similar project in the amount of \$72,000. This 2021 project intends to capture that cancelled project and provide additional funding beyond.			
	Target Date for Completion	08/31/2022			
	Estimate the number and type of families that will benefit from the proposed activities (additional information for this discussion may be available on the AP-36 Project Detail screen)	Twenty five (25) existing low income tenants of the Princeton Housing Authority are expected to benefit from the project.			
	Location Description (additional information for this discussion may be available on the AP-36 Project Detail screen)	Clay Street, Princeton, NJ			
	Planned Activities (additional information for this discussion may be available on the AP-36 Project Detail screen)	Activities will include soft costs related to the design, bidding and oversight of the project as well as construction (hard) costs to complete the upgrades.			
2	Utility Assistance	Support households impacted by COVID-19	Municipal-Wide - Local Target area		CDBG : \$33,870
	Description	This project will help low and moderate income tenants and homeowners that have realized an economic impact from the COVID-19 pandemic. Specifically, income eligible applicants can receive assistance with unpaid utility bills.			

	Target Date for Completion	08/31/2022		
	Estimate the number and type of families that will benefit from the proposed activities (additional information for this discussion may be available on the AP-36 Project Detail screen)	It is anticipated that up to forty (40) low and moderate income households will be assisted by the project.		
	Location Description (additional information for this discussion may be available on the AP-36 Project Detail screen)	Municipal wide.		
	Planned Activities (additional information for this discussion may be available on the AP-36 Project Detail screen)	Activities include direct payment of unpaid utilities directly to utility companies on behalf of eligible applicants. A portion of funding will also be used for "program delivery" (administration) of the project.		
	Administration			CDBG : \$19,000
	Description	This project will fund expenses associated with overall administration of the CDBG program, including drafting of Plans, reports, and project oversight. CDBG regulations cap this activity at 20% of the annual award.		
	Target Date for Completion	08/31/2022		
3	Estimate the number and type of families that will benefit from the proposed activities (additional information for this discussion may be available on the AP-36 Project Detail screen)	Not applicable.		
	Location Description (additional information for this discussion may be available on the AP-36 Project Detail screen)	Not applicable.		
	Planned Activities (additional information for this	Planned activities include the cost of consultants and other costs such as advertising.		

discussion may be available on the AP-36 Project Detail screen)	
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AP-50 Geographic Distribution – 91.220(f)

Description of the geographic areas of the entitlement (including areas of low-income and minority concentration) where assistance will be directed

The Municipality has established a "municipal-wide" target area. It is anticipated that municipal-wide public service programs funded in this year’s Annual Action Plan will be concentrated in existing affordable housing developments, including the Princeton Housing Authority, and the Witherspoon-Jackson Neighborhood.

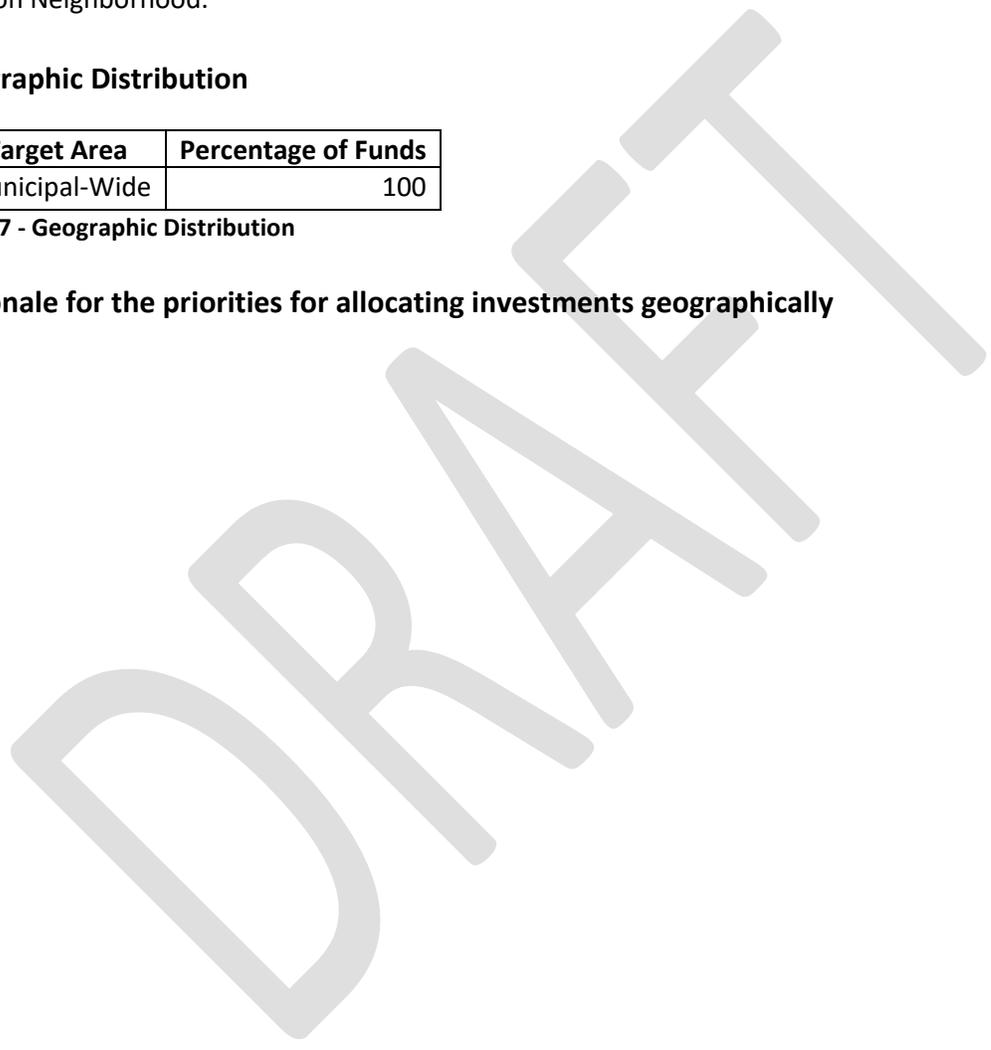
Geographic Distribution

Target Area	Percentage of Funds
Municipal-Wide	100

Table 7 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

N/A



Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

Both projects identified in this Annual Action Plan address affordable housing. Specifically, the Plan's proposed investment into the Princeton Housing Authority is expected to benefit up to twenty five (25) tenants through the replacement of aging major system. In addition, the utility assistance program is intended to help the Municipality's low and moderate income households that have been impacted by the pandemic address outstanding utility bills and prevent utilities from being shut off -- forcing the household to seek emergency shelter.

One Year Goals for the Number of Households to be Supported	
Homeless	0
Non-Homeless	65
Special-Needs	0
Total	65

Table 8 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through	
Rental Assistance	0
The Production of New Units	0
Rehab of Existing Units	25
Acquisition of Existing Units	0
Total	25

Table 9 - One Year Goals for Affordable Housing by Support Type

AP-60 Public Housing – 91.220(h)

Introduction

The Municipality of Princeton recognizes the Princeton Housing Authority as its primary partner in the programming of Community Development Block Grant funds.

Actions planned during the next year to address the needs to public housing

The Municipality has dedicated \$172,927 from this 2021 Annual Action Plan for capital improvements at the Princeton Housing Authority.

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

Most residents of the Princeton Housing Authority are below 50% of area median income by household size. This level of income makes it extremely difficult to transition to homeownership in Princeton. However, as part of the Municipality's efforts to meet its affordable housing obligation under the Mount Laurel Doctrine, the Municipality is required to develop twenty (20%) of its ownership opportunities for households earning less than 30% of area median income by household size. As those units become available for initial sale or resale, the Municipality will outreach to residents of the Princeton Housing Authority.

If the PHA is designated as troubled, describe the manner in which financial assistance will be provided or other assistance

The PHA is not designated as a "troubled" by HUD.

AP-65 Homeless and Other Special Needs Activities – 91.220(i)

Introduction

The Municipality is part of the Trenton/Mercer Continuum of Care. The Trenton/Mercer Continuum of Care has a comprehensive a Coordinated Assessment System that targets and prioritizes the most vulnerable persons experiencing homelessness in the community. The CoC Program interim rule (24 CFR 578) released by HUD in 2012 requires that CoCs establish and operate a “centralized or coordinated assessment system,” hereafter referred to as a coordinated entry system. The rule defines coordinated entry as a centralized or coordinated process designed to coordinate program participant intake assessment and provision of referrals. [Such a] system covers the [CoC’s] geographic area, is easily accessed by individuals and families seeking housing or services, is well advertised, and includes a comprehensive and standardize assessment tool.

Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including

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

The Trenton/Mercer Coordinated Assessment System has a process for homeless individuals and families.

For individuals unaccompanied by children, CoC has a Coordinated Entry and Assessment System (CEASe) for individuals experiencing homelessness. This system operates as the point of entry to access housing and community services for homeless individuals. Through a coordinated assessment process, the needs of the homeless are identified and prioritized and a plan to move from homelessness to housing is developed. The goal of this system is to prioritize chronically homeless individuals and families with the longest history of homelessness and with the most severe service needs.

For homeless households with children, a centralized intake is in place at the Mercer County Board of Social Services that seeks to mediate/prevent homelessness whenever possible and reduce the length of time families are homeless through a rapid rehousing - a model that places a priority on moving a family experiencing homelessness into permanent housing as quickly as possible, ideally within 30 days of a family becoming homeless. A Universal screening Tool is used to identify and prioritize families for services with a primary goal of returning the family to permanent housing. The Trenton/Mercer CoC have been pursuing a system change planning and implementation process centered around Mercer County's Ten-Year Plan to End Homelessness. The City of Trenton, Department of Health and Human Services is the lead agency for planning and grant applications under the Trenton/Mercer Continuum of Care process. The Continuum is made up of over 40 social service providers; both governmental and non-profit organizations.

The Trenton/Mercer CoC coordinates a broad array of services that includes, but is not limited to:

- Outreach Assessments
- Prevention of Homelessness
- Emergency Shelter/Services
- Rapid Rehousing
- Transitional Housing
- Case management/Support Services
- Permanent Housing
- Education Resources

Addressing the emergency shelter and transitional housing needs of homeless persons

There are no large-scale, government-funded transitional housing projects in the Municipality. A local nonprofit, Housing Initiatives of Princeton provides transitional housing and temporary rental assistance. HIP equips families with tools for self-sufficiency, acting as a bridge between homelessness and hope. Within the region covered by the CoC, emergency shelters for individuals and youth are located in the City of Trenton. A family emergency shelter is located in Ewing Township.

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 Trenton/Mercer CoC, led by the City of Trenton, has made great strides in helping families and individuals move from homelessness to housing. The CEAS System prioritizes the most vulnerable persons experiencing homelessness in the community by utilization the prioritization policy established by the CoC. The goal is to move those designated with the highest priority to housing within 30 days. The CEAS Center serves as the single point of entry for homeless individuals and will collect information on homeless individuals and coordinate resources, services and outreach activities that facilitate housing for homeless singles. All individuals, both sheltered and unsheltered, are screened and assessed and a housing plan is developed based on the person's homeless history and level of need, with priority given to the chronically homeless.

The priority has been to move families to permanent housing through provision of rapid rehousing.

Families participating in the program have been very successful at remaining stably housed. Since the CoC transitioned to a rehousing service model 94% of families that were rehoused did not become homeless again. Pilot projects targeting the singles population, during the same period of time, show similar success with 98.5% of participants not returning to homelessness.

Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: 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); or, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs.

Homelessness prevention continues to be a significant need resulting from the COVID-19 pandemic among Princeton residents. This Annual Action Plan will fund a utility assistance program to help fill an underserved need in preventing homelessness.

AP-75 Barriers to affordable housing – 91.220(j)

Introduction:

This section will discuss the Municipality's efforts to reduce barriers to affordable housing.

Actions it planned 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

With the Municipality's recent settlement agreement to provide affordable housing under Round III of the Mount Laurel Doctrine, the Municipality is committed to providing new affordable housing and improve the homes of its existing low and moderate income homeowners through rehabilitation assistance.

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AP-85 Other Actions – 91.220(k)

Introduction:

This section will explain actions planned to address obstacles to meeting underserved needs, to foster and maintain affordable housing, reduce lead paint hazards, reduce the number of poverty level families, develop institutional structure, and enhance coordination between various types of agencies.

Actions planned to address obstacles to meeting underserved needs

The primary obstacle to meeting underserved needs is the limited resources available to address the identified priorities. The Municipality will partner with other agencies when feasible to leverage resources and maximize outcomes in housing and community development.

Actions planned to foster and maintain affordable housing

In February 2020, Mercer County Superior Court Judge Mary Jacobson approved a settlement agreement between the Municipality of Princeton and the Fair Share Housing Center. The settlement stipulates that the municipality will be required to meet an affordable housing rehabilitation obligation of 80 units through a local rehabilitation program for rental and for-sale housing administered by the Princeton Affordable Housing Office. Five units have already been rehabilitated since 2010, so 75 units still must be rehabilitated.

As part of the settlement, it has been agreed that the municipality has met its prior round obligation of 641 units. Princeton officials have agreed to adopt a new ordinance for the consolidated municipality that requires an on-site affordable housing set-aside of 20 percent for all new multi-family residential developments of five or more units that are developed at a density of six or more units per acre.

Actions planned to reduce lead-based paint hazards

While no specific activities have been planned in this Annual Action Plan that could help reduce lead-based paint hazards, the Municipality remains diligent in its support of any initiatives to identify children with elevated blood levels of lead and an opportunities to remove lead hazards from homes and public spaces.

Actions planned to reduce the number of poverty-level families

The vast majority of funding programmed in this Annual Action Plan are directed to extremely low income families. The Municipality will continue to look for opportunities to help poverty-level families

increase their incomes and housing stability.

Actions planned to develop institutional structure

2020 marked the first year for the Municipality of Princeton as an Entitlement Community. The local Affordable Housing Manager continues to administer the CDBG program locally with assistance and training from a private consultant. In addition, the Affordable Housing Manager will participate in HUD sponsored virtual "office hours" and trainings.

Actions planned to enhance coordination between public and private housing and social service agencies

The Municipality maintains an excellent relationship with the Princeton Housing Authority and local social service agencies. Both were very well represented throughout the development of this Plan and remain key partners in the implementation of this Annual Action Plan.

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Program Specific Requirements

AP-90 Program Specific Requirements – 91.220(I)(1,2,4)

Introduction:

The Municipality’s 2021 Community Development Block Grant annual allocation is \$225,797.

Community Development Block Grant Program (CDBG)

Reference 24 CFR 91.220(I)(1)

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out.

1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed	0
2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan.	0
3. The amount of surplus funds from urban renewal settlements	0
4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan	0
5. The amount of income from float-funded activities	0
Total Program Income:	0

Other CDBG Requirements

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	100.00%