CITY OF READING, PENNSYLVANIA

PY2015 CDBG, ESG, AND HOME ACTION PLAN
Executive Summary

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

1. Introduction

This section will summarize the objectives and outcomes identified in the City of Reading’s 2015 Annual Action Plan. It will also summarize the citizen participation and consultation process used to develop the plan.

2. Summarize the objectives and outcomes identified in the Plan

This could be a restatement of items or a table listed elsewhere in the plan or a reference to another location. It may also contain any essential items from the housing and homeless needs assessment, the housing market analysis or the strategic plan.

The City of Reading, Pennsylvania has prepared the 2015 Action Plan in order to strategically implement federal programs that fund housing, community development, and economic development activities within the City. The 2015 Action Plan is the second action plan of the City of Reading and the County of Berks 2014 to 2018 Consolidated Plan. The City and the County have undertaken an effort to increase cooperation between the two community development offices due to the need to have more efficiency in implementing the various HUD and non-HUD funded programs. This cooperation enables the sharing of administrative duties, pooling of resources and joint decision-making. Through a collaborative planning process involving a broad range of public and private agencies, the County and the City have developed a single, consolidated planning and application document for the use of available federal entitlement funds.

The federal funds made available to the City through the Community Development Block Grant (CDBG), HOME Investment Partnership Program (HOME) and Emergency Solutions Grant (ESG) programs will be used to address the needs outlined in the Strategic Plan.

The three overarching objectives guiding the proposed activities are to:
• Provide Decent Affordable Housing
• Create Suitable Living Environments
• Create Economic Opportunities

Outcomes show how programs and activities benefit a community or the individuals served. The three outcomes that will illustrate the benefits of each activity are:
• Improving Availability/Accessibility
• Improving Affordability
• Improving Sustainability

All activities support at least one objective and one outcome. The framework for realizing the objectives and outcomes include the following goals:
• Providing decent, affordable housing
• Increasing homeownership
• Providing a suitable living environment
• Expanding economic opportunities
• Supporting County-wide efforts to end homelessness
3. Evaluation of past performance

This is an evaluation of past performance that helped lead the grantee to choose its goals or projects.

The City has had CDBG, ESG and HOME funded projects that have taken much longer to complete than expected. The City now selects projects that it believes can be completed within a reasonable time.

4. Summary of Citizen Participation Process and consultation process

Summary from citizen participation section of plan.

The Citizen Participation Process for the Annual Action Plan included multiple steps.

Notification: The Needs Hearing Announcement was published in the Reading Eagle newspaper.

Public Hearings: The City held two public hearings to obtain citizens’ views and to respond to proposals and questions. These hearings were held at two different stages of the program planning process.

Initial Public Hearing: The purpose of this initial hearing is to obtain the views of citizens and organizations regarding overall community development and housing needs. Since it also includes specific needs for the Annual Plan, discussion of proposed activities is encouraged. Information on the estimated amount of funding that will benefit persons of low and moderate income and a review program performance in the past year are incorporated. This hearing was held on May 8, 2014. This hearing is conducted jointly by the County of Berks and the City of Reading Community Development Department.

Second Public Hearing: A second hearing was held on October 21, 2014. The purpose of this hearing was to provide citizens an opportunity to comment on the Plan and the proposed 2015 Action Plan. A summary of the Plan and proposed activities was published. The notice appeared in the non-legal section of papers of the Reading Eagle on September 20, 2014, which is at least thirty (30) calendar days prior to the adoption of the Plan, and provided locations at which the Plan was made available for public review. This hearing was conducted by the County of Berks and the City of Reading Community Development Department.

Acceptance of Written Comments, Proposals, or Recommendations: All Citizens and Organizations within Berks County were provided with an opportunity to submit comments, proposals, or recommendations on the Plan for 2015. During the program year, any written statements received will receive a written response no later than fifteen (15) working days from the date of receipt, setting forth the action taken or to be taken with respect to the comment, proposal, or recommendation. Written statements that are intended to suggest modifications to the application can only be considered if they are received by the end of the thirty (30) day review period.

5. Summary of public comments

This could be a brief narrative summary or reference an attached document from the Citizen Participation section of the Consolidated Plan.

No public comments were received.

6. Summary of comments or views not accepted and the reasons for not accepting them

No public comments were received.
7. Summary

The City of Reading developed its 2015 Annual Action Plan's main objectives through a process of citizen participation and consultation.

The Action Plan has been developed using an estimate of the amount of 2015 CDBG, ESG, and HOME entitlement funding that the City plans to receive from HUD. Funding amount revisions will be made to the activities in the Action Plan should the exact amount of funding awarded by HUD differ from the estimate. The activities with the highest funding amounts are the highest priority activities. Those priorities will remain the same irrespective of the amount of funding received from HUD. An activity funding amount revision will be based on the priorities and each entitlement program’s funding caps. The City will adhere to the Citizen Participation Plan amendment requirements if an activity will be added to or cancelled from the Action Plan.

Also, the City may deobligate funds from previous year Action Plan activities that are not underway in order to fund 2015 activities if HUD does not make the 2015 entitlement funding available in the line of credit.
PR-05 Lead & Responsible Agencies - 91.200(b)

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

The following are the agencies/entities responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

<table>
<thead>
<tr>
<th>Agency Role</th>
<th>Name</th>
<th>Department/Agency</th>
</tr>
</thead>
<tbody>
<tr>
<td>Lead Agency</td>
<td>READING</td>
<td></td>
</tr>
<tr>
<td>CDBG Administrator</td>
<td>Community Development Department</td>
<td></td>
</tr>
<tr>
<td>HOPWA Administrator</td>
<td>Community Development Department</td>
<td></td>
</tr>
<tr>
<td>HOME Administrator</td>
<td>Community Development Department</td>
<td></td>
</tr>
<tr>
<td>ESG Administrator</td>
<td>Community Development Department</td>
<td></td>
</tr>
<tr>
<td>HOPWA-C Administrator</td>
<td>Community Development Department</td>
<td></td>
</tr>
</tbody>
</table>

**Table 1 – Responsible Agencies**

**Consolidated Plan Public Contact Information**

Lenin Agudo  
Community Development Director  
City Hall, Room 3-12  
815 Washington St.  
Reading, PA 19601
AP-10 Consultation - 91.100, 91.200(b), 91.215(l)

1. Introduction

This section will provide a summary of the City of Reading's consultation with several agencies, including the City of Reading/County of Berks Continuum of Care.

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(l)).

The City of Reading and its subrecipient agencies coordinate with public and assisted housing providers, health, and mental health service agencies when appropriate in order to provide optimum assistance to citizens in need of housing and other services that are funded through HUD programs.

The City has opportunities for regular dialogue with a wide range of community groups. These groups have regular access to representatives of the City including the Mayor. The City’s participation in the HUD programs are widely and regularly advertised and discussed in public forums. Many local organizations participate in the funding programs as subrecipients or through the Berks Coalition to End Homelessness and similar organizations. These forums provide additional opportunity to learn about the federal funding programs.

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.

The CoC that serves the County of Berks and the City of Reading is consulted annually regarding how to allocate ESG funds. Each year, applications are received and reviewed by Community Development Staff for eligibility, then sent to the CoC to evaluate and make recommendations for funding. This is done in a committee, which is exclusively made up of members of the CoC who are not applying for ESG funding, but are active members of the CoC.

Performance standards were developed in consultation with our CoC in 2012, with the implementation of the HEARTH Act. Leadership from the CoC met with City Community Development staff to outline performance standards based on those already used. These performance standards were then taken back to CoC membership for review and comment.

Procedures for the operation and administration of HMIS were also developed in consultation with the CoC back in 2012 with the implementation of the HEARTH Act. In order to develop procedures for the operation and administration of HMIS, the City and its Continuum of Care leadership reviewed procedures for operation and administration of HMIS that existed at the time and made changes where necessary.

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 CoC that serves the County of Berks and the City of Reading is consulted annually regarding how to allocate ESG funds. Each year, applications are received and reviewed by Community Development Staff for eligibility, then sent to the CoC to evaluate and make recommendations for funding. This is done in a committee, which is exclusively made up of members of the CoC who are not applying for ESG funding, but are active members of the CoC.
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2. Agencies, groups, organizations and others who participated in the process and consultations

Table 2 – Agencies, groups, organizations who participated

<table>
<thead>
<tr>
<th>Agency/Group/Organization</th>
<th>Berks Coalition to End Homelessness</th>
</tr>
</thead>
<tbody>
<tr>
<td>Agency/Group/Organization Type</td>
<td>Services-homeless</td>
</tr>
</tbody>
</table>
| What section of the Plan was addressed by Consultation? | Homeless Needs - Chronically homeless  
Homeless Needs - Families with children  
Homelessness Needs - Veterans  
Homelessness Needs - Unaccompanied youth  
Homelessness Strategy  
Anti-poverty Strategy |
| Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination? | The Berks Coalition to End Homelessness, our City/County CoC was consulted on all sections pertaining to homeless needs and strategies for providing shelter, essential services, street outreach, re-housing, and homelessness prevention. They were also consulted in order to develop an anti-poverty strategy. |

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

The City has made an effort to consult the public and all types of agencies by providing the opportunity for comment and input and making a draft of the plan available for review and comments.

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

<table>
<thead>
<tr>
<th>Name of Plan</th>
<th>Lead Organization</th>
<th>How do the goals of your Strategic Plan overlap with the goals of each plan?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Continuum of Care</td>
<td>Berks Coalition to End Homelessness</td>
<td>The goals of the City of Reading’s annual plan overlap with the CoC’s strategic plan.</td>
</tr>
</tbody>
</table>
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 City of Reading’s citizen participation process included two public hearings, one held prior to creating the Action Plan and one held after the Action Plan was drafted. The City made the Action Plan available to citizens for more than 30 days so that citizens could review the proposed Action Plan and provide comments to the City through the Community Development Department. Citizen comments were considered in preparing the final version of the Action Plan.

Expected Resources

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

Introduction

The following are the amounts of the CDBG, ESG, and HOME funds that are expected to be made available to the City of Reading in 2015.

Anticipated Resources

<table>
<thead>
<tr>
<th>Program</th>
<th>Source of Funds</th>
<th>Uses of Funds</th>
<th>Expected Amount Available Year 1</th>
<th>Expected Amount Available Remainder of ConPlan $</th>
<th>Narrative Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>CDBG</td>
<td>public - federal</td>
<td>Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services</td>
<td>Annual Allocation: $2,456,385, Program Income: $ 0, Prior Year Resources: $0</td>
<td>Total: $2,456,385</td>
<td>Amount available remainder of ConPlan assumes we will receive the same amount of CDBG funding each year.</td>
</tr>
</tbody>
</table>
## Program

<table>
<thead>
<tr>
<th>Program</th>
<th>Source of Funds</th>
<th>Uses of Funds</th>
<th>Expected Amount Available Year 1</th>
<th>Expected Amount Available Reminder of ConPlan</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>HOME</strong></td>
<td>public - federal</td>
<td>Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Annual Allocation: $756,936</td>
<td>Program Income: $0</td>
</tr>
<tr>
<td><strong>ESG</strong></td>
<td>public - federal</td>
<td>Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Annual Allocation: $223,211</td>
<td>Program Income: $0</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Narrative Description</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Amount available remainder of ConPlan assumes we will receive the same amount of HOME funding each year.</td>
<td></td>
</tr>
<tr>
<td>Amount available remainder of ConPlan assumes we will receive the same amount of ESG funding each year.</td>
<td></td>
</tr>
</tbody>
</table>

### Table 3 - 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**

**CDBG** - The CDBG funding does not require a match. Some of the park and playground projects are funded by the Commonwealth of Pennsylvania. The Code Enforcement and Community Policing activities will also be funded by the City’s General Fund. Some of the Commercial and Residential Facade Programs require the applicant to inject private funds into their projects.
ESG - The match will be provided partially with CDBG funds, but mostly with private funds and clients providing the match.

HOME - In PY2015 the City of Reading is receiving a 100% reduction of the matching contribution requirement.

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

NA

Discussion

The City of Reading has been allocated to receive $2,456,385 in CDBG EN, $756,936 in HOME funds, and $223,211 in ESG funds in PY2015.
## Goals Summary Information

<table>
<thead>
<tr>
<th>Sort Order</th>
<th>Goal Name</th>
<th>Start Year</th>
<th>End Year</th>
<th>Category</th>
<th>Geographic Area</th>
<th>Needs Addressed</th>
<th>Funding</th>
<th>Goal Outcome Indicator</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Public facilities/infrastructure improvements</td>
<td>2014</td>
<td>2018</td>
<td>Non-Housing Community Development</td>
<td>City of Reading - Citywide</td>
<td>Public Facilities Public Improvements &amp; Infrastructure</td>
<td>CDBG: $220,000</td>
<td>Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 2 Persons Assisted</td>
</tr>
<tr>
<td>2</td>
<td>Commercial Facade Improvements</td>
<td>2014</td>
<td>2018</td>
<td>Non-Housing Community Development</td>
<td>City of Reading - Citywide</td>
<td>Commercial Facade Improvements</td>
<td>CDBG: $80,000</td>
<td>Facade treatment/business building rehabilitation: 4 Business</td>
</tr>
<tr>
<td>3</td>
<td>Retain existing housing stock</td>
<td>2014</td>
<td>2018</td>
<td>Affordable Housing</td>
<td>Code Enforcement Area Historic Districts</td>
<td>Rehabilitation of existing units. Code Enforcement - City of Reading Residental Facade Improvement</td>
<td>CDBG: $481,000</td>
<td>Housing Code Enforcement/Foreclosed Property Care: 2700 Household Housing Unit Other: 6 Other</td>
</tr>
<tr>
<td>4</td>
<td>Public Information Dissemination</td>
<td>2014</td>
<td>2018</td>
<td>Public Information Dissemination</td>
<td>City of Reading - Citywide</td>
<td>Public Information Dissemination</td>
<td>CDBG: $40,500</td>
<td>Public service activities other than Low/Moderate Income Housing Benefit: 79073 Persons Assisted</td>
</tr>
<tr>
<td>5</td>
<td>Crime Prevention</td>
<td>2014</td>
<td>2018</td>
<td>Non-Housing Community Development</td>
<td>Community Policing Area</td>
<td>Community Policing</td>
<td>CDBG: $226,000</td>
<td>Public service activities other than Low/Moderate Income Housing Benefit: 49073 Persons Assisted</td>
</tr>
<tr>
<td>6</td>
<td>Code Enforcement Area Building Improvements</td>
<td>2014</td>
<td>2018</td>
<td>Code Enforcement Area</td>
<td>Code Enforcement Area</td>
<td>Code Enforcement - City of Reading</td>
<td>CDBG: $170,000</td>
<td>Other: 100 Other</td>
</tr>
<tr>
<td>7</td>
<td>Expansion of economic opportunities</td>
<td>2014</td>
<td>2018</td>
<td>Economic Development</td>
<td>Downtown Reading</td>
<td>Economic Development</td>
<td>CDBG: $100,000</td>
<td>Businesses assisted: 10 Businesses Assisted</td>
</tr>
<tr>
<td>8</td>
<td>Demolition of deteriorated buildings</td>
<td>2014</td>
<td>2018</td>
<td>Non-Housing Community Development Demolition and Clearance</td>
<td>City of Reading - Citywide</td>
<td>Demolition of hazardous buildings</td>
<td>CDBG: $330,000</td>
<td>Buildings Demolished: 8 Buildings</td>
</tr>
<tr>
<td>Sort Order</td>
<td>Goal Name</td>
<td>Start Year</td>
<td>End Year</td>
<td>Category</td>
<td>Geographic Area</td>
<td>Needs Addressed</td>
<td>Funding</td>
<td>Goal Outcome Indicator</td>
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<tr>
<td>10</td>
<td>Fair Housing</td>
<td>2014</td>
<td>2018</td>
<td>Housing Availability and Housing Discrimination</td>
<td>City of Reading - Citywide</td>
<td>Fair Housing</td>
<td>CDBG: $13,000</td>
<td>Public service activities other than Low/Moderate Income Housing Benefit: 350 Persons Assisted</td>
</tr>
<tr>
<td>11</td>
<td>Youth Services</td>
<td>2014</td>
<td>2018</td>
<td>Non-Housing Community Development</td>
<td>City of Reading - Citywide</td>
<td>Youth services</td>
<td>CDBG: $75,000</td>
<td>Public service activities other than Low/Moderate Income Housing Benefit: 65 Persons Assisted</td>
</tr>
<tr>
<td>12</td>
<td>Development of additional affordable housing</td>
<td>2014</td>
<td>2018</td>
<td>Affordable Housing</td>
<td>City of Reading - Citywide Downtown Reading</td>
<td>Rehabilitation of existing units.</td>
<td>HOME: $797,601</td>
<td>Homeowner Housing Rehabilitated: 16 Household Housing Unit</td>
</tr>
<tr>
<td></td>
<td>Goal Name</td>
<td>Goal Description</td>
<td></td>
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<tr>
<td>1</td>
<td>Goal Description</td>
<td>Public facilities/infrastructure improvements</td>
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<tr>
<td>2</td>
<td>Goal Name</td>
<td>Commercial Facade Improvements</td>
<td></td>
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<tr>
<td>3</td>
<td>Goal Name</td>
<td>Retain existing housing stock</td>
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<tr>
<td>4</td>
<td>Goal Name</td>
<td>Public Information Dissemination</td>
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<tr>
<td>5</td>
<td>Goal Name</td>
<td>Crime Prevention</td>
<td></td>
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<tr>
<td>6</td>
<td>Goal Name</td>
<td>Code Enforcement Area Building Improvements</td>
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<td>7</td>
<td>Goal Name</td>
<td>Expansion of economic opportunities</td>
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<td>8</td>
<td>Goal Name</td>
<td>Demolition of deteriorated buildings</td>
<td></td>
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<tr>
<td>9</td>
<td>Goal Name</td>
<td>Homeless and Special Needs</td>
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<tr>
<td>10</td>
<td>Goal Name</td>
<td>Fair Housing</td>
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<tr>
<td>11</td>
<td>Goal Name</td>
<td>Youth Services</td>
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<td></td>
</tr>
<tr>
<td>12</td>
<td>Goal Name</td>
<td>Development of additional affordable housing</td>
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</tbody>
</table>

Table 5 – Goal Descriptions
AP-35 Projects - 91.220(d)

Introduction

The following are the PY2015 projects.

<table>
<thead>
<tr>
<th>#</th>
<th>Project Name</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>2015 CDBG Program Administration</td>
</tr>
<tr>
<td>2</td>
<td>Code Enforcement - PMI</td>
</tr>
<tr>
<td>3</td>
<td>Code Enforcement - Trades</td>
</tr>
<tr>
<td>4</td>
<td>Commercial Building Improvements</td>
</tr>
<tr>
<td>5</td>
<td>ADA Curb Ramps</td>
</tr>
<tr>
<td>6</td>
<td>Emergency Demolition</td>
</tr>
<tr>
<td>7</td>
<td>Microenterprise Technical Assistance</td>
</tr>
<tr>
<td>8</td>
<td>Rehabilitation Historic Preservation</td>
</tr>
<tr>
<td>9</td>
<td>Residential Facade Improvement</td>
</tr>
<tr>
<td>10</td>
<td>Schlegel Park Pool Improvements</td>
</tr>
<tr>
<td>11</td>
<td>Special Economic Development Job Creation Grant Program</td>
</tr>
<tr>
<td>12</td>
<td>Special Economic Development Job Creation Loan Program</td>
</tr>
<tr>
<td>13</td>
<td>Clean City Program</td>
</tr>
<tr>
<td>14</td>
<td>Community Policing</td>
</tr>
<tr>
<td>15</td>
<td>Hispanic Center Parental Engagement Program</td>
</tr>
<tr>
<td>16</td>
<td>Hispanic Center Safety Net Program</td>
</tr>
<tr>
<td>17</td>
<td>Human Relations Commission Fair Housing</td>
</tr>
<tr>
<td>18</td>
<td>Human Relations Commission Homelessness Prevention</td>
</tr>
<tr>
<td>19</td>
<td>Human Relations Commission Landlord Tenant Mediation</td>
</tr>
<tr>
<td>20</td>
<td>2015 HOME CHDO Set-Aside (NHS)</td>
</tr>
<tr>
<td>21</td>
<td>HOME 2015 City-Wide Revitalization (Habitat)</td>
</tr>
<tr>
<td>22</td>
<td>2015 HOME Program Administration</td>
</tr>
<tr>
<td>23</td>
<td>2015 Homeownership Asst (NHS HOP)</td>
</tr>
<tr>
<td>24</td>
<td>2015 ESG City of Reading</td>
</tr>
<tr>
<td>25</td>
<td>HOME 2015 City-Wide Revitalization (OCR)</td>
</tr>
<tr>
<td>26</td>
<td>2015 Homeownership Asst (NHS Loan Loss)</td>
</tr>
<tr>
<td>27</td>
<td>Rental Rehab (Skyline)</td>
</tr>
<tr>
<td>28</td>
<td>Rental Construction (DVDC)</td>
</tr>
</tbody>
</table>

Table 6 – Project Information

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

The City’s biggest obstacle to address underserved needs is the lack of state and federal funding.
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

According to the American Community Survey 72% of City residents are low and moderate income level persons

Geographic Distribution

<table>
<thead>
<tr>
<th>Target Area</th>
<th>Percentage of Funds</th>
</tr>
</thead>
<tbody>
<tr>
<td>City of Reading - Citywide</td>
<td>30</td>
</tr>
<tr>
<td>Community Policing Area</td>
<td>7</td>
</tr>
<tr>
<td>Code Enforcement Area</td>
<td>17</td>
</tr>
<tr>
<td>Historic Districts</td>
<td>3</td>
</tr>
<tr>
<td>Downtown Reading</td>
<td>15</td>
</tr>
</tbody>
</table>

Table 7 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

Most of the activity's beneficiaries reside in low-income and minority concentrated areas.

Discussion

The City of Reading is comprised primarily of low-income residents. Almost all of the activities are designed to serve low-income persons.
Affordable Housing

AP-55 Affordable Housing - 91.220(g)

Introduction

Affordable housing will be developed primarily with HOME program funds, though ESG funds will serve to prevent homelessness and transition homeless individuals to permanent housing. HOME program funds will primarily be used to acquire and rehab existing units for the purposes of homeownership. Homeless persons may be assisted with affordable housing through the HOME program.

<table>
<thead>
<tr>
<th>One Year Goals for the Number of Households to be Supported</th>
</tr>
</thead>
<tbody>
<tr>
<td>Homeless</td>
</tr>
<tr>
<td>Non-Homeless</td>
</tr>
<tr>
<td>Special-Needs</td>
</tr>
<tr>
<td>Total</td>
</tr>
</tbody>
</table>

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

<table>
<thead>
<tr>
<th>One Year Goals for the Number of Households Supported Through</th>
</tr>
</thead>
<tbody>
<tr>
<td>Rental Assistance</td>
</tr>
<tr>
<td>The Production of New Units</td>
</tr>
<tr>
<td>Rehab of Existing Units</td>
</tr>
<tr>
<td>Acquisition of Existing Units</td>
</tr>
<tr>
<td>Total</td>
</tr>
</tbody>
</table>

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

Discussion

It is anticipated that 16 low and moderate income households will be supported through the acquisition and rehab of units with HOME funds.

Neighborhood Housing Services of Greater Berks Inc. estimates that they will receive $35,000 in CDBG program income funds in 2015. NHS plans to re-use the funds for their HOP Program, a home buyer assistance activity. NHS anticipates that they will issue 35,000 loans to low and moderate income level households in 2015.
AP-60 Public Housing - 91.220(h)

Introduction

The Reading Housing Authority provides public housing in Reading. The Authority meets the HUD guidelines for income targeting as a means of serving the lower income residents of the City. The Reading Housing Authority uses work and education preferences for public housing and for Section 8 Vouchers.

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

The Reading Housing Authority maintains the public housing units on an on-going basis utilizing the Capital Fund Program. Housing units are in very good condition. Implementation of the HUD required Asset Management Plans is underway. The Resident Services Department provides an array of services for residents, as described below.

Service Coordination: Short-term, intermittent casework services designed to help residents of affordable housing programs meet acute needs, improve their quality of life and increase the likelihood of a successful tenancy. Includes the provision of direct service, information and referral, crisis intervention, mediation and internal and external advocacy. Services are delivered to meet needs associated with physical and mental health, substance abuse, finances, daily living tasks, employment and continuing education, parenting support and child welfare, domestic violence, access to insurances and entitlements, and basis needs such as food or clothing. Services are voluntary and confidential.

Chore Services Program: Through assistance with a contracted provider, elderly residents or adult residents with disabilities may be assisted with housekeeping needs. Services are provided when the resident is ineligible for mainstream programs and when they are willing and able to meet the remaining requirements of the lease and the program.

Wellness Program: Through collaboration with a partner agency, the county Office of Aging and the local United Way, wellness services are provided to residents to enhance their health and improve their ability to remain in their home environment. Services are delivered by a nurse in areas of direct intervention, individual and group education, preventative screenings and coordination with community medical providers. The program utilizes more than 20 partners per year in the delivery of its group education, including serving as a training site for nursing students from a local community college and university.

Reasonable Accommodations Program: Reasonable Accommodations are provided in accordance with Section 504 of the Rehabilitation Act of 1973, as amended. Reading Housing Authority will modify policies, rules, and procedures, or make a structural change to a common area or dwelling, in order to accommodate persons with disabilities so that such individuals can have an equal opportunity to use and enjoy the housing program.

Food Pantries: Through collaboration with the regional food bank, pantry services are delivered on-site, and in some cases, to the home, in each public housing development. Monthly distributions are conducted in cooperation with two area churches and volunteers from the respective resident councils.

Youth Programs: An after-school and summer camping program are offered to youth residents of Oakbrook and Glenside Homes. In partnership with the local boys and girls club, programming is offered to meet the needs of development youth in areas of character and leadership development, the arts, education and career development, sports, fitness and recreation, and health and life skills. The summer camping program provides opportunities for urban youth to travel to a rural camping lodge for activities such as hiking, fishing, and boating.
Actions to encourage public housing residents to become more involved in management and participate in homeownership

Reading Housing Authority operates under a Memorandum of Understanding with the RHA Citywide Resident Council, which serves as the umbrella organization for seven development-based resident councils that are charged with promoting quality of life and resident satisfaction, and participating in self-help initiatives to enable residents to create a positive environment for families living in RHA programs. The CWRC and development-based resident councils assist RHA during the Annual Planning process, and on an ongoing basis, in making decisions related to the budgetary process, occupancy, general management, maintenance, security, resident training, resident employment, social services and modernization.

Resident Councils function as the ‘united voice’ for each public housing development. Council membership is open to all residents of the respective development. Monthly general meetings are held in each location, with agenda items focused primarily upon housing-based issues and planning for recreational activities. Duly elected council officers chair monthly meetings, manage council finances, record meeting minutes and represent the membership at large in agency policy and procedures. Staff attend monthly general meetings, monthly executive planning meetings, committee meetings as appropriate, and provide ongoing support and assistance. The RHA Citywide Resident Council (CWRC) serves as the umbrella organization for all development-based resident councils, and is comprised of the elected officers of each location. An integral responsibility of the CWRC is to function as the agency’s Resident Advisory Board in the preparation and review of the agency’s 5-year and Annual Plans.

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

The RHA is not designated as a troubled agency.

Discussion

The Reading Housing Authority continues to work to address public housing needs through the implementation of various programs. They also work closely with a resident advisory group to address needs and develop strategies for addressing those needs.
AP-65 Homeless and Other Special Needs Activities - 91.220(i)

Introduction

This section discusses homeless needs that will be addressed with ESG funding.

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

Street outreach has been one of the biggest tasks undertaken by the Berks Coalition to End Homelessness, and one of the most effective ways of getting homeless individuals the help they need. New emphasis placed on street outreach by HEARTH will increase our ability to fund those activities.

Funds used for street outreach and emergency shelter activities will be limited to the greater of 60 percent of our total fiscal year grant for ESG or the hold-harmless amount established by the section 415(b) of the McKinney-Vento Act for such activities during fiscal year most recently completed before the effective date under section 1503 of the HEARTH Act.

Addressing the emergency shelter and transitional housing needs of homeless persons

The Berks Coalition to End Homelessness places a high priority on homeless families and individuals including those who are chronically homeless. Shelter, transitional and permanent housing are each valuable components of the overall Continuum of Care, and there are unmet needs for both transitional and permanent housing. The City of Reading strives to meet these needs by providing optimum support to agencies providing emergency shelter as well as transitional housing. These agencies include Opportunity House and Mary's Shelter. Each will be provided with funding in 2015.

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 Reading's homeless priorities revolve around a concentrated effort of both prevention and intervention. The Berks Coalition to End Homelessness places an emphasis on chronic homelessness and homeless families who are more episodically homeless. The locally developed plan to reduce homelessness details priorities. The priority needs relate to the Strategic Plan in that they center on the principles of prevention and intervention. The Prevention section consists of the following four (4) methods: (1) Emergency prevention: provides emergency services to percent loss of housing. (2) Systems prevention: examine and change institutional policies and regulations that adversely impact housing. (3) Outreach: identify Street homeless and at-risk persons and families. (4) The final prevention method consists of services and maximizing the utilization of mainstream resources. The intervention strategy consists of four components, they are: (1) Rapid Re-housing which is identified in The Housing First Model. (2) Supportive transitional housing for chemically-dependent homeless individuals. (3) The expansion of permanent housing revolving around the development of safe and affordable housing and finally (4) Income: Job training and services accessible for homeless individuals.

Reading and Berks County seek to reduce the number of homeless families/persons in Emergency shelters by 5% in the coming year (25% over five years).
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 activities include providing short-term subsidies to defray rent and utility arrearages for families that have received eviction or utility termination notices; security deposits or first month’s rent to permit a homeless family to move into its own apartment; mediation programs for landlord-tenant disputes; legal services programs for the representation of indigent tenants in eviction proceedings; payments to prevent foreclosure on a home; and other innovative programs and activities designed to prevent the incidence of homelessness. An ability to fund more of these activities will greatly assist in the elimination of chronic homelessness.

Homelessness prevention is based on working with mainstream resources to stop the flow of people toward homelessness. The Continuum of Care application identified one implementation strategy that would significantly decrease the homeless population.

The Plan to End Homelessness identified systems prevention strategies to pursue over the longer term:

1. Work with Berks County Prison officials to develop adequate facilities for on-site community involvement
2. Coordinate activities of County Prison, County Parole office, State Parole office and community providers
3. Provide post-release housing assistance and information to prisoners re-entering the community
4. Work with State mental health officials on community re-integration programs and funding
5. Coordinate with local hospitals on discharge planning for homeless persons
6. Encourage youth in foster care to take advantage of transitional and preparatory programs that prevent homelessness

The Continuum of Care applications provide an overview of the state of the discharge planning efforts in Berks County. The components consist of the following elements: Foster Care, Health Care, Mental Health and Corrections.

Foster Care: Formal Protocol Finalized - Berks County Department of Children and Youth Services (CYS) provides transitional living services for youth in foster care and those in out-of-county placement foster care returning to Berks County. Youth are to be screened for risk of becoming homeless and extended care provided until they are able to support themselves. Youth are not discharged to homeless shelters or facilities. CoC and CYS have implemented this policy that is understood and agreed upon by both parties.

Health Care: Reading and St. Joseph’s Hospitals are the primary health institutions in the county. We are working with the hospitals to identify homeless individuals and to find appropriate housing placement.

Mental Health: Persons hospitalized locally and at the state facility in Wernersville receive discharge planning from the Berks County Office of Mental Health and Retardation. Community treatment and housing assistance are provided to ensure a safe return to the community. Persons are not returned to the community through the homeless shelters or housing facilities supported by McKinney funds. The CoC and institutions providing treatment have agreed to and understand this protocol.
Corrections: Berks Connections/Pre-Trial Services, in cooperation with Berks County MH/MR, the Council on Chemical Abuse and the Berks County prison, provides discharge planning and screening. Persons with mental health and substance abuse problems will receive services from community providers before release with a plan for continued treatment after release. Integrating community services in the prison provides continuity and connectivity that follows inmates back into the community which results in a reduction in relapse, re-incarceration and homelessness. Persons returning to the community are not discharged to beds supported by McKinney funds. The CoC agencies and Berks Co. Prison have agreed to and understand this protocol.

Discussion

Funding will be provided to several agencies that will focus on providing emergency shelter, street outreach, and essential services to homeless families and individuals. Funding will also be provided to agencies for homelessness prevention and rapid re-housing.
AP-75 Action Plan Barriers to Affordable Housing - 91.220(j)

Introduction

This section will discuss the City of Reading's Action Plan 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

The Berks County Comprehensive Plan and the City of Reading Comprehensive Plan each cite objectives for the development of decent, affordable housing in order to remove or ameliorate negative effects of public policies:

- Encourage government officials to revise their local zoning ordinances to reflect more opportunities for affordable housing development. Using cost-benefit analyses, illustrate how family housing and clustered single-family development can be more cost-effective to local elected officials. Encourage local units of government to revise their ordinances to be consistent with the Berks County Comprehensive Plan
- Developers identified the insufficient supply of land zoned for multi-family housing as one of the factors driving up the cost of land acquisition and development. Lack of infrastructure is often the reason for limited multi-family zoning. Outreach initiatives focused on educating public officials and planning commissions on the benefits of affordable housing may encourage the rezoning of more land to multi-family zoning designations, as well as eliminate unnecessary and excessive development standards for multi-family housing.
- Educate and inform owners of tax-credit developments and County assessors about Act 39 of 2003 (HB 1854), a new law that instructs assessors to consider rent restrictions, affordability restrictions, and the income approach to value rather than comparable sales approach to value, when assessing affordable housing developments
- Encourage “streamlined” approaches to obtain permits and funding for affordable housing projects.
- Active and productive nonprofit housing developers need ready access to capital in order to finance the front-end soft costs associated with new development. Utilizing a less restrictive source of financing for this (such as Act 137 Housing Trust Fund resources) would enable nonprofits to seek out more development opportunities, and to fully investigate the financial feasibility of potential projects early on.
- Encourage land use policies that diversify the affordable housing stock to address needs of smaller families, people with disabilities needing supportive housing, and seniors; encourage multi-use residential development in commercial structures in business zones; and encourage mixed use development. Mixed use developments will contain a mix of stores, restaurants, and professional offices that would be appropriate settings for low to moderate-income housing at an increased density.
- Support the adoption of building codes that facilitate the rehabilitation of existing homes.
- Encourage the establishment of new residential uses and/or neighborhoods at appropriate locations including upper-story reuse.

Discussion

The City of Reading has a ready supply of affordable housing. Housing is particularly inexpensive in Berks County and Reading compared to neighboring municipalities and counties. However the low cost of housing is, at least in part, tied to several negative factors. Further exacerbating the problem is that the depressed housing market suppresses new housing development.
The impediments to housing are:

- Older housing stock that requires extensive modernization and rehabilitation.
- Shrinking state and federal funding sources to subsidize affordable housing projects and rehabilitation.
- The 2000 Comprehensive Plan for Reading cites density as a housing problem. Lack of parking, small yards, limited open space and privacy negatively impact housing.
- The 2000 Comprehensive Plan for Reading states that the City accommodates a disproportionate share of the county’s low income persons and special needs housing. The effect is to depress the tax base which results in a higher mil rate than surrounding municipalities.
- Developers frequently cite the problems of working through zoning issues in most as a cost factor that impedes development.
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 City of Reading 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

The following actions will be undertaken in the next year to foster and maintain affordable housing. They include strategies for acquiring and rehabbing existing units, providing fair housing discrimination education, landlord tenant mediation, and homelessness prevention services that will increase the availability and accessibility of decent, affordable housing.

Decent, Affordable Housing:

- Habitat For Humanity - Housing rehabilitation for 6 owner-occupied housing units. Outcome – Availability/Accessibility
- NHS CHDO (set-aside funding) – Single family development and homeownership assistance. Outcome - Availability/Accessibility.
- Reading Revitalization (OCR, Inc.) - Acquisition, rehabilitation, and resale of 10 housing units to low mod households. Outcome - Availability/Accessibility.

Fair Housing assistance:

- Human Relations Commission – Landlord Tenant Mediation. 50 persons. Outcome - Availability/Accessibility.

Actions planned to reduce lead-based paint hazards

The City of Reading requires all of the CDBG, ESG and HOME funded activities to comply with HUD’s Lead Rule. In addition the City of Reading has a lead ordinance that is enforced by the City’s Property Maintenance Division.

Actions planned to reduce the number of poverty-level families

The overall anti-poverty strategy implemented by the City of Reading will follow the Continuum of Care model set forth and discussed earlier. This model details a cohesive plan to combat chronic homelessness, identify and concentrate on key priority needs while recognizing the barriers to affordable housing.

Poverty is a function of income, which is related to education, job training and employment. Berks County and the City of Reading remain committed to addressing the needs of its citizens who live at or below the poverty level. It is also recognized that the presence of poverty and the related social and economic problems are a destabilizing element in our communities. The majority of impoverished households are located within the City of Reading with a few existing in adjacent townships and boroughs.
The Berks Coalition to End Homelessness is a key component within the anti-poverty strategy. Working together to achieve common ends brought the Coalition members together initially and is still a driving force behind all Coalition activities. The recognition that no one agency could address the problem of homelessness was the impetus behind formation of the Berks Homeless Coalition in 1995. It began with only a dozen or so members, most of whom represented the organizations that sheltered homeless people. In consultation with the City of Reading/County of Berks Continuum of Care (CoC), the City of Reading and County of Berks developed policies and procedures for effectively serving individuals with ESG funding.

The Berks Coalition to End Homelessness (BCEH) will remain key in implementing the upcoming year’s homeless prevention, essential and emergency shelter services for individuals who are currently homeless or those in imminent danger of being homeless. After consulting with the BCEH, the Community Development Department was able to better gauge the needs of organizations working to prevent homelessness throughout the community.

Several agencies will receive Emergency Solutions Grant (ESG) funding to operate emergency shelters and provide essential services such as those concerned with employment, health, and education to people living in shelters or emergency housing. Per HEARTH requirements, a percentage of the City’s total ESG allocation will be used for homeless prevention activities such as providing short-term subsidies to defray rent and utility arrearages for families that have received eviction or utility termination notices; security deposits or first month's rent to permit a homeless family to move into its own apartment; mediation programs for landlord-tenant disputes; legal services programs for the representation of indigent tenants in eviction proceedings; payments to prevent foreclosure on a home; and other innovative programs and activities designed to prevent the incidence of homelessness.

In addition to the City/County Homelessness Coalition, a number of different County agencies serve the population below the poverty line. Among them are the County Office of Aging, Children and Youth Services, Community Service, Domestic Relations, Employment and Training Office and Mental Health and Mental Retardation Office. These agencies in turn have many affiliations with private non-profit services who also serve the persons with incomes below the poverty line. A catalogue of activities of these agencies seems beyond the scope of this document. However a human services directory is available on the County website. Their collective efforts, however, constitute the County's anti-poverty strategy.

**Actions planned to develop institutional structure**

The City's Community Development Department has been assigned the task of carrying out the Consolidated Plan for the City. When appropriate, the Department will work with non-profit organizations and public institutions to implement the Plan.

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

The City's Community Development Department has been assigned the task of carrying out the Consolidated Plan for the City. When appropriate, the C.D. Department will work with non-profit organizations and public institutions to implement the Plan.

Reading-Berks Habitat for Humanity provides affordable housing, counseling and home-ownership education to families in Berks County and the City of Reading who are at or below 60% of the area median income. The Habitat program requires 400 hours of “sweat equity” from participants, and seeks to stabilize neighborhoods by providing an influx of committed, trained home-owner residents.

Neighborhood Housing Services of Reading, Inc. (NHS) has been certified as a CHDO for the City and the County. The agency provides a full range of housing services (from education, financing and single-family development to community organizing).
Our City Reading, Inc. has been the City of Reading’s primary developer-partner for more than 10 years, rehabilitating approximately 600 housing units during that time. They have also become involved in rental development through the construction of the GoggleWorks apartments, a mixed-income project where twelve of the 59 units are dedicated as affordable housing for low income individuals and families.

The City will continue to remain open to partnerships with other groups. However, the technical complexity of the development process, operating and start up costs, resource availability and the experience necessary to operate a non-profit housing corporation will inevitably limit the number of potential partners to those who are the most qualified. The City will encourage non-profit organizations that have little or no experience in housing development to “partner” with one of the more experienced development organizations.
Program Specific Requirements

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

Introduction

This section provides details pertaining to CDBG, HOME, and ESG program-specific requirements.

Community Development Block Grant Program (CDBG)
Reference 24 CFR 91.220(l)(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.
   87.50%

HOME Investment Partnership Program (HOME)
Reference 24 CFR 91.220(l)(2)

1. A description of other forms of investment being used beyond those identified in Section 92.205 is as follows:

   NA

2. A description of the guidelines that will be used for resale or recapture of HOME funds when used for homebuyer activities as required in 92.254, is as follows:

   NA
3. A description of the guidelines for resale or recapture that ensures the affordability of units acquired with HOME funds? See 24 CFR 92.254(a)(4) are as follows:

Units developed with HOME funds must remain affordable to income-qualified individuals for varying lengths of time depending upon the amount of HOME funds provided as assistance. All homebuyer assistance loans will be secured by a lien on the property coinciding with the HOME Period of Affordability. The City has such a high number of low-income households that we have a presumption of affordability that presumes subsequent buyers will also be low income.

4. Plans for using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds along with a description of the refinancing guidelines required that will be used under 24 CFR 92.206(b), are as follows:

The City of Reading does not plan to refinance any existing debt for multi-family housing that will be rehabilitated with HOME funds.

**Emergency Solutions Grant (ESG)**

**Reference 91.220(l)(4)**

1. Include written standards for providing ESG assistance (may include as attachment)

See City of Reading/County of Berks Policies and Procedures Manual, attached.

2. If the Continuum of Care has established centralized or coordinated assessment system that meets HUD requirements, describe that centralized or coordinated assessment system.

Sub-grantees are required to input HMIS client data as soon as feasibly possible, and at least on a bi-weekly basis.

3. Identify the process for making sub-awards and describe how the ESG allocation available to private nonprofit organizations (including community and faith-based organizations).

Over the past twenty (20) years, the City of Reading and the County of Berks have conducted a joint acceptance, review, and award process for the ESG Program. The process involves the publication of a joint ad for the 1st public hearing, joint ads for seeking applications, and a joint ad for the 2nd public hearing.

At the end of the application acceptance period, City and County staff review the requests and decide which seem most appropriate to be funded by each entitlement, which applications may lend themselves to be funded by both entitlements, and which applications may not be appropriate to fund. Factors for award include, but are not limited to, matching funds, number of clients to be served by the funding, performance of the provider in the past, monitoring results, etc. As one would expect, requests exceed the amount of funds available. Applications for funding by the City are ultimately decided by City Council. Applications for funding by the County are ultimately decided by the Board of County Commissioners.

4. If the jurisdiction is unable to meet the homeless participation requirement in 24 CFR 576.405(a), the jurisdiction must specify its plan for reaching out to and consulting with homeless or formerly homeless individuals in considering policies and funding decisions regarding facilities and services funded under ESG.

The City of Reading/County of Berks’ CoC actively works to involve currently and formerly homeless individuals in important decision-making elements of the Continuum including the ESG process and policy-making. Currently, the CoC has homeless and formerly homeless individuals serving on the board, and attending regular CoC meetings.
5. Describe performance standards for evaluating ESG.

The performance goals will be measured for each recipient as well as across the CoC. Performance goals are going to be the cornerstone of CoC funding as well, and HUD is encouraging CoCs to take steps now to develop and implement measurement systems.

**Performance measures:**

1. Targeting those who need the assistance most. Benchmark: There will be a reduction in first-time homelessness among individuals and families of 5%.

2. Reducing the number of people living on the streets or emergency shelters. Benchmark: There will be a reduction in the number of unsheltered persons counted during the Point-in-time from the previous year.

3. Shortening the time people spend homeless. Benchmark: The number of nights that an individual or family stays in shelter will be reduced by 5% from the prior year.

4. Reducing each program participant’s housing barriers or housing stability risks. Benchmark 1: Recidivism (return to shelter) will be reduced by 5% over 2 years. Benchmark 2: 10% of shelter clients will have an increase in income or resources from entry to exit.

5. Preventing and ending homelessness for Veterans. Benchmark: There will be a reduction of 5% per year in homeless Veterans.

6. Setting a path to end all types of homelessness. Benchmark: There will be an increase of 5% per year in the amount of community resources provided to prevent homelessness.
Citizen Participation Comments
No public comments were received.
Reading, PA
Market Value Analysis (MVA)
10/24/12
Profile of TRF

The Reinvestment Fund builds wealth and opportunity for low-wealth communities and low and moderate income individuals through the promotion of socially and environmentally responsible development.

We achieve our mission through:

**Capital**
- Grants, loans and equity investments

**Knowledge**
- Information and policy analysis; PolicyMap & Policy Solutions

**Innovation**
- Products, markets and strategic partnerships
Overview of 2012 MVA
• Process and Results
• Using the Data to Drive Public Action
• Question & Answer
In general

The Market Value Analysis (MVA) is a tool designed to assist the private market and government officials to identify and comprehend the various elements of local real estate markets. It is based fundamentally on local administrative data sources.

By using an MVA, public sector officials and private market actors can more precisely craft intervention strategies in weak markets and support sustainable growth in stronger market segments.
TRF has done this work under contract to cities, states and foundations including:

- City of Philadelphia, PA
- City of Wilmington, DE
- City of Newark, NJ (and an additional 8 regions across the state)
- District of Columbia
- City of Baltimore, MD
- City of San Antonio, TX
- City of Pittsburgh, PA
- City of Detroit, MI
- City of New Orleans, LA (in process)
- City of Milwaukee, WI (in process)
Our Normative Assumptions when Analyzing Markets:

- Public subsidy is scarce and it alone cannot create a market;
- Public subsidy must be used to leverage, or clear the path, for private investment;
- In distressed markets, invest into strength (e.g., major institution of place, transportation hub, environmental amenities) – “Build from Strength”;
- All parts of a city are customers of the services and resources that it has to offer;
- Decisions to invest and/or deploy governmental programs must be based on objectively gathered data and sound quantitative and qualitative analysis.
What are the indicators of “strength” in markets?

- Hospital / University Complex
  - Large employer with a range of employment opportunities ranging from lower to higher skill
  - Committed to place
- Large prior public commitment
- Mix of housing stock and land uses
- Confluence of public transportation
- Natural amenities (public parks, great public spaces)
1. Take all of the data layers and geocode to Census block groups.
2. Inspect and validate those data layers.
3. Using a statistical cluster analysis, identify areas that share a common constellation of characteristics.
4. Map the result.
5. Visually inspect areas of the City for conformity with the statistical/spatial representation.
6. Re-solve and re-inspect until we achieve an accurate representation.
Components of the Reading MVA

- Median sales price 2010-2012 (February)
- Coefficient of variance for sales price
- Subsidized rental stock as a % of all rental units
- Vacant housing units as a % of all housing units
- Foreclosure filings as a % of residential parcels
- Ratio of commercial to developed area
- Owner-occupied as a % of all housing units
- New construction as a % of residential parcels
## Reading MVA 2012 Characteristics

<table>
<thead>
<tr>
<th>Market Types</th>
<th>Median Sales Price</th>
<th>Sales Price Variation</th>
<th>% of Rental Stock with HCV</th>
<th>% Commercial Area</th>
<th>% Vacant Housing Units</th>
<th>% of Housing Units OO</th>
<th>% New Construction</th>
<th>% of Residences with Foreclosure Filing</th>
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</thead>
<tbody>
<tr>
<td>A</td>
<td>$170,538</td>
<td>0.92</td>
<td>0.9%</td>
<td>27.9%</td>
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<td>81.0%</td>
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<tr>
<td>B</td>
<td>$145,160</td>
<td>0.40</td>
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<td>10.3%</td>
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<td>80.8%</td>
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<tr>
<td>C</td>
<td>$104,058</td>
<td>0.47</td>
<td>1.6%</td>
<td>32.6%</td>
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<td>60.1%</td>
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<td>4.4%</td>
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<tr>
<td>D</td>
<td>$97,560</td>
<td>0.45</td>
<td>14.4%</td>
<td>13.8%</td>
<td>4.7%</td>
<td>76.2%</td>
<td>0.9%</td>
<td>4.2%</td>
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<tr>
<td>E</td>
<td>$56,431</td>
<td>0.56</td>
<td>5.3%</td>
<td>37.7%</td>
<td>10.4%</td>
<td>52.2%</td>
<td>0.1%</td>
<td>6.1%</td>
</tr>
<tr>
<td>F</td>
<td>$23,705</td>
<td>0.70</td>
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<td>49.7%</td>
<td>0.0%</td>
<td>6.9%</td>
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<tr>
<td>G</td>
<td>$20,310</td>
<td>0.93</td>
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<td>16.0%</td>
<td>24.4%</td>
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<td>5.4%</td>
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<tr>
<td>H</td>
<td>$12,690</td>
<td>0.88</td>
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<td>19.1%</td>
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## Reading Study Area MVA Characteristics

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<td>% of Rental Stock with HCV</td>
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<td>-------------------</td>
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<td>-----------------------------</td>
</tr>
<tr>
<td>A</td>
<td>$170,538</td>
<td>0.92</td>
<td>0.9%</td>
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<th>% Commercial Area</th>
<th>% Vacant Housing Units</th>
<th>% of Housing Units OO</th>
<th>% New Construction</th>
<th>% of Residences with FF</th>
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<tr>
<td>B</td>
<td>$145,160</td>
<td>0.40</td>
<td>2.4%</td>
<td>10.3%</td>
<td>4.4%</td>
<td>80.8%</td>
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<td>2.6%</td>
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<th>% of Housing Units OO</th>
<th>% New Construction</th>
<th>% of Residences with FF</th>
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<td>1.6%</td>
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<td>60.1%</td>
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<td>Sales Price Variation</td>
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<td>% Vacant Housing Units</td>
<td>% of Housing Units OO</td>
<td>% New Construction</td>
<td>% of Residences with FF</td>
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<tr>
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<td>4.2%</td>
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</thead>
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<tr>
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<td>$56,431</td>
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<td>37.7%</td>
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<th>% Vacant Housing Units</th>
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<th>% of Residences with FF</th>
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</thead>
<tbody>
<tr>
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<th>% Vacant Housing Units</th>
<th>% of Housing Units Owner Occupied</th>
<th>% New Construction</th>
<th>% of Residences with Foreclosure Filings</th>
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</thead>
<tbody>
<tr>
<td>G</td>
<td>$20,310</td>
<td>0.93</td>
<td>3.5%</td>
<td>43.2%</td>
<td>16.0%</td>
<td>24.4%</td>
<td>0.0%</td>
<td>5.4%</td>
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# Market Type: H

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<th>% Vacant Housing Units</th>
<th>% of Housing Units OO</th>
<th>% New Construction</th>
<th>% of Residences with FF</th>
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<tbody>
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<td>H</td>
<td>$12,690</td>
<td>0.88</td>
<td>5.6%</td>
<td>26.0%</td>
<td>19.1%</td>
<td>38.2%</td>
<td>0.0%</td>
<td>4.5%</td>
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</table>
Philadelphia MVA Examples:

- NTI Program
- NSP2 Application Strategy
General Framework for Implementation

**Match Markets to Interventions**

- Understand market types
- Identify market intersection/transition areas
- Establish government role in each market
  - Define activities/interventions
- Assess and evaluate market changes

---

Capital at the point of impact.
<table>
<thead>
<tr>
<th>Activity</th>
<th>Regional Choice</th>
<th>High Value</th>
<th>Steady</th>
<th>Transitional</th>
<th>Distressed</th>
<th>Reclamation</th>
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</thead>
<tbody>
<tr>
<td>Demolition of Dangerous Properties</td>
<td></td>
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<td></td>
</tr>
<tr>
<td>Encapsulation: Acquisition/Rehab</td>
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</tr>
<tr>
<td>Dead Tree Removal</td>
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<tr>
<td>Land Assembly for Redevelopment</td>
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<tr>
<td>Selective Enhancement of Lots</td>
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<tr>
<td>Quality of Life Code Enforcement (broken window syndrome)</td>
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<tr>
<td>Nuisance Abatement</td>
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</tbody>
</table>

High Priority | Medium Priority | Low Priority | Some Activity

* These activities were deemed appropriate for the relevant market types when. For more information on the Philadelphia MVA, see: [http://www.trfund.com/planning/marketvalues.html](http://www.trfund.com/planning/marketvalues.html)
HUD’s Neighborhood Stabilization Program (NSP)

HUD prioritizes those activities “most likely to stabilize a community.”

- Specific attention is paid to the extent that proposed activities address the full extent of the problem.
- Example of one indicator HUD uses in determining NSP grants:
  
  \[
  \text{(units acquired & rehabilitated + units demolished)}
  \]

  Total vacant units in target area (USPS data)
### NSP Allocations and Universe of Properties

**Without highly strategic allocation, NSP funds will only be able to touch a tiny fraction of the affected properties in these markets.**

<table>
<thead>
<tr>
<th>NSP1 allocation</th>
<th>NSP1 allocation less 10% admin cost</th>
<th>Median sale price 2008</th>
<th>80% median sale price 2008</th>
<th>Median sale price (Q2) 2009</th>
<th>80% median sale price 2009</th>
<th>Number of properties touched (2008 prices)</th>
<th>Number of properties touched (2009 prices)</th>
<th>USPS vacancies 2009 (Q2)***</th>
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</thead>
<tbody>
<tr>
<td>Phoenix</td>
<td>$39,478,006</td>
<td>$35,580,236</td>
<td>$150,660</td>
<td>$122,938</td>
<td>$85,500</td>
<td>795</td>
<td>655</td>
<td>36,800</td>
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<tr>
<td>Sacramento</td>
<td>$18,605,460</td>
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<td>$190,560</td>
<td>$152,400</td>
<td>$164,000</td>
<td>128</td>
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<tr>
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<td>$12,063,702</td>
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<td>$140,000</td>
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<td>$87,000</td>
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<tr>
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<td>$185,000</td>
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<td>Detroit</td>
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<td>$20,500</td>
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<td>Las Vegas</td>
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<td>158</td>
<td>180</td>
<td>23,745</td>
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</tbody>
</table>

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**Source: Policymap.com**

***Source: USPS city-level vacancy estimates from Policymap.com**
Example: Philadelphia Foreclosure & Vacancy
High Value Appreciating Markets

Characterized by:
- High value housing
- Strong price appreciation
- Population stability and in some instances growth

Government Activity:
- Active code enforcement
- Enhance streetscape appeal
- Market neighborhood identity
- Remove barriers to new investment
Establish Government Role in Each Market

**Steady Markets**

**Characterized by:**
- Predominantly owner occupied
- Housing prices relatively high and stable
- Homes in good physical condition

**Government Activity:**
- Active code enforcement
- Undertake capital projects to smooth transitions between market types
- Rapid response to any vacant units or public nuisance
- Invest in public amenities
Establish Government Role in Each Market

**Transitional Markets**

**Government Role:**
Preserve housing stock and valued services.

**Characterized by:**
- Population shifts
- Home to a disproportionate share of the City’s aged people
- Dangerous properties are evident

**Government Activity:**
- Carefully balance market-rate with any subsidized housing
- Invest in schools, recreation centers, commercial corridors
- Programs focused on encouraging home-owner investment
- Rapid encapsulation & rehabilitation of all vacant units
- Respond to all broken window symptoms
Distressed Markets

Characterized by:
- Elevated vacancies - approx 7% of all housing stock
- Above average level of publicly assisted housing
- Some of the most substantial population losses in the City

Government Activity:
- **Invest in people**-crime prevention, youth programs, coordination of social services
- Facilitate strategic site acquisition and assembly
- Pursue investment partnerships with neighborhood anchors
- Rapid response encapsulation, acquisition, rehabilitation
Establish Government Role in Each Market

**Highly Distressed Markets**

**Characterized by:**
- Substantial population loss
- Low property values
- Elevated vacancy rates

**Government Activity:**
- Invest in people
- Large scale site acquisition & parcel marketing
- Landbank parcels
- Fund projects at critical scale
- Pursue investment partnerships with neighborhood anchors
- Preservation investments on strongest blocks
- Strategic site acquisition and assembly

---

OMB Control No: 2506-0117 (exp. 07/31/2015)
**SF 424**

The SF 424 is part of the CPMP Annual Action Plan. SF 424 form fields are included in this document. Grantee information is linked from the CPMP.xls document of the CPMP tool.

Complete the table fields (these fields) in the table below. The other items are populated with values from the Grantee Information Worksheet.

<table>
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<th>Application</th>
<th>2015</th>
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<th>Type of Submission</th>
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<td>Code Received</td>
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<tr>
<td>City Hall</td>
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<td>Housing Opportunities for People with AIDS</td>
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<td>Emergency Shelter Grants Program</td>
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CPMP Non-State Grantee Certifications

Many elements of this document may be completed electronically, however a signature must be manually applied and the document must be submitted in paper form to the Field Office.

NON-STATE GOVERNMENT CERTIFICATIONS

In accordance with the applicable statutes and the regulations governing the consolidated plan regulations, the jurisdiction certifies that:

Affirmative Further Fair Housing – The jurisdiction will affirmatively further fair housing, which means it will conduct an analysis of impediments to fair housing, disclose within the jurisdiction, take appropriate actions to overcome the effects of any impediments identified through that analysis, and maintain records reflecting that analysis and actions in this regard.

Anti-displacement and Relocation Plan – It will comply with the regulations and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, and implementing regulations at 49 CFR 244, and it has in effect and is following a residential anti-displacement and relocation assistance plan required under section 104(d) of the Housing and Community Development Act of 1974, as amended, in connection with any activity assisted with funding under the CDBG or HOME programs.

Drug Free Workplace – It will or will continue to provide a drug-free workplace by:
1. Publishing a statement notifying employees that the unlawful manufacturing, distribution, dispensing, or use of a controlled substance is prohibited in the grantee's workplace and specifying the actions that will be taken against employees for violations of such prohibition;
2. Establishing an employee drug awareness program to inform employees about:
   a. The dangers of drug abuse in the workplace;
   b. The grantee's policy of maintaining a drug-free workplace;
   c. Any available drug counseling, rehabilitation, and employee assistance programs; and
   d. The penalties that may be imposed upon employees for drug abuse violations occurring in the workplace;
3. Making it a requirement that each employee be examined to determine if the performance of the grant be given a copy of the statement required by paragraph 1;
4. Withholding the employee in the statement required by paragraph 1 that, as a condition of employment under the grant, the employee will:
   a. Abide by the terms of the statement, and
   b. Notify the employer in writing of his or her conviction for a violation of a criminal drug statute occurring in the workplace no later than five calendar days after such conviction;
5. Notifying the agency in writing, within ten calendar days of receiving notice under subparagraph 4(b) from an employee or otherwise receiving a notice of such conviction. Employers of convicted employees must provide notice, including position held, to every grant officer or other designee whose grant activity the convicted employee was working. Unless the Federal agency has designated a central point for the receipt of such notices. Notice shall include the identification number(s) of each affected grant;
6. Taking one of the following actions, within 30 calendar days of receiving notice under subparagraph 4(b), with respect to any employee who is so convicted:
   a. Taking appropriate personnel action against such an employee, up to and including termination, consistent with the regulations of the Rehabilitation Act of 1973, as amended; or
   b. Requiring such employee to participate satisfactorily in a drug abuse assistance or rehabilitation program approved for such purposes by a Federal, State, or local health, the enforcement, or other appropriate agency;
7. Making a good faith effort to continue to maintain a drug-free workplace through implementation of paragraphs 1, 2, 3, 4, 5 and 6.

CPMP Non-State Grantee Certifications 1

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Annual Action Plan

2015

OMB Control No: 2506-0117 (exp. 07/31/2015)
**Authority of Jurisdiction** — The consolidated plan is authorized under State and local law (as applicable) and the jurisdiction possesses the legal authority to carry out the programs for which it is seeking funding, in accordance with applicable HUD regulations.

**Consistency with plan** — The proposed activities to be undertaken with CDBG, HOME, ESG, and HOPWA funds are consistent with the strategic plan.

**Section 3** — It will comply with section 3 of the Housing and Urban Development Act of 1968, and implementing regulations at 24 CFR Part 135.

---

**Signature/Authorized Official**

Vaughn D. Spencer  

**Name**

**City/State/Zip**

Reading, PA 18601  

**Telephone Number**

510-655-6234
Specific CDBG Certifications

The Entitlement Community certifies that:

Citizen Participation — It is in full compliance and following a detailed citizen participation plan that satisfies the requirements of 24 CFR 91.105.

Community Development Plan — Its consolidated housing and community development plan identifies community development and housing needs and specifies both short-term and long-term community development objectives that provide decent housing, expand economic opportunities primarily for persons of low and moderate income. (See 24 CFR subpart B and 24 CFR part 570)

Following a Plan — It is following a current consolidated plan (or Comprehensive Housing Affordability Strategy) that has been approved by HUD.

Use of Funds — It has complied with the following criteria:

11. Maximum Feasible Priority — With respect to activities expected to be assisted with CDBG funds, it certifies that it has developed its Action Plan so as to give maximum feasible priority to activities which benefit low and moderate income families or aid in the prevention or elimination of slums or blight. The Action Plan may also include activities which the grantee certifies are designed to meet other community development needs having a particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community, and for which financial resources are not available.

12. General Benefits — The aggregate use of CDBG funds including section 108 guaranteed loans during program years 2013, 2014, 2015, (or periods specified by the grantee consisting of one, two or three specific consecutive program years) shall principally benefit persons of low and moderate income in a manner that ensures that at least 70 percent of the amount is expended for activities that benefit such persons during the designated period;

13. Special Assessments — It will not attempt to recover any capital costs of public improvements assisted with CDBG funds including section 108 loan guaranteed funds by assessing any amounts against properties owned and occupied by persons of low and moderate income, including any tax charges or assessment made as a condition of obtaining access to such public improvements.

However, if CDBG funds are used to pay the proportion of a fee or assessment that relates to the capital costs of public improvements (assisted in part with CDBG funds) financed from other revenue sources, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds.

The jurisdiction will not attempt to recover any capital costs of public improvements assisted with CDBG funds, including Section 108, unless CDBG funds are used to pay the proportion of such assessment attributable to the capital costs of public improvements financed from other revenue sources. In this case, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds. Also, in the case of properties owned and occupied by moderate-income (not low income) families, an assessment or charge may be made against the property for public improvements financed by a source other than CDBG funds if the jurisdiction certifies it is using CDBG funds to cover the assessment.

Excessive Force — It has adopted and is enforcing:

14. A policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in non-violent civil rights demonstrations and

15. A policy of enforcing applicable State and local laws against physically barring entrance to or exit from a facility or location which is the subject of such non-violent civil rights demonstrations within its jurisdiction.

CPHP Non-State Grantee Certifications

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Annual Action Plan

2015

OMB Control No: 2506-0117 (exp. 07/31/2015)
Jurisdiction

Compliance with Anti-discrimination laws — The grant will be conducted and administered in conformity with Title VI of the Civil Rights Act of 1964 (42 USC 2000d), the Fair Housing Act (42 USC 3601-3619), and implementing regulations.

Lead-Based Paint — The activities concerning lead-based paint will comply with the requirements of 42 USC 4858, subparts A, B, J, K, L, and R, or title 29.

Compliance with Laws — It will comply with applicable laws.

[Signature]
Signature/Authorized Official

[2/13/15]
Date

Vaughn D. Spencer
Name

Mayor
Title

815 Washington Street
Address

Reading, PA 19601
City/State/Zip

610-655-6234
Telephone Number

CPMP Non-State Grantee Certifications
Version 2.0

Annual Action Plan
2015
Optional Certification
CDBG

Submit the following certification only when one or more of the activities in the action plan are designed to meet other community development needs having a particular urgency as specified in 24 CFR 570.208(c):

The grantee hereby certifies that the Annual Plan includes one or more specifically identified CDBG-funded activities which are designed to meet other community development needs having a particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community and other financial resources are not available to meet such needs.

__________________________
Signature/Authorized Official

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Date

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Name

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Title

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Address

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City/State/Zip

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Telephone Number

CPMP Non-State Grantee Certifications   5

Version 2.0
Specific HOME Certifications

The HOME participating jurisdiction certifies that:

Tenant-Based Rental Assistance -- If the participating jurisdiction intends to provide tenant-based rental assistance:

The use of HOME funds for tenant-based rental assistance is an essential element of the participating jurisdiction's comprehensive plan for expanding the supply, affordability, and availability of decent, safe, sanitary, and affordable housing.

Eligible Activities and Costs -- It is using and will use HOME funds for eligible activities and costs, as described in 24 CFR § 92.205 through 92.209 and that it is not using and will not use HOME funds for prohibited activities, as described in § 92.214.

Appropriate Financial Assistance -- before committing any funds to a project, it will evaluate the project in accordance with the guidelines that it adopts for this purpose and will not invest any more HOME funds in combination with other Federal assistance than is necessary to provide affordable housing.

[Signature/Authorized Official]

[Date]

[Signature/Authorized Official]

[Date]

Name: Vaughn D. Spencer
Title: Mayor
Address: 815 Washington Street, Reading, PA 19601
City/State/Zip: 610-685-6433
Telephone Number:

GPMF Non-State Grantees Certifications 6

Annual Action Plan
2015
HOPWA Certifications

The HOPWA grantee certifies that:

Activities — Activities funded under the program will meet urgent needs that are not being met by available public and private sources.

Building — Any building or structure assisted under that program shall be operated for the purpose specified in the plan:

1. For at least 10 years in the case of construction, substantial rehabilitation, or acquisition of a facility;

2. For at least 3 years in the case of assistance involving non-substantial rehabilitation or repair of a building or structure.

__________________________
Signature/Authorized Official

__________________________
Name

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Title

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Address

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City/State/Zip

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Telephone Number

Annual Action Plan
2015
ESG Certifications

I, Mayor, Chief Executive Officer of the City of Reading, PA, certify that the local government will ensure the provision of the matching supplemental funds required by the regulation at 24 CFR 576.51. I have attached to this certification a description of the sources and amounts of such supplemental funds.

I further certify that the local government will comply with:

1. The requirements of 24 CFR 576.53 concerning the continued use of buildings for which Emergency Shelter Grants are used for rehabilitation or conversion of buildings for use as emergency shelters for the homeless; or when funds are used solely for operating costs of essential services.


3. The requirements of 24 CFR 576.56, concerning assurances on services and other assistance to the homeless.


5. The requirements of 24 CFR 576.59(a) concerning the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970.

6. The requirement of 24 CFR 576.59 concerning minimizing the displacement of persons as a result of a project assisted with these funds.


8. The requirements of 24 CFR 576.56(a) and 576.55(b) that grantees develop and implement procedures to ensure the confidentiality of records pertaining to any individual provided family violence prevention or treatment services under any project assisted with ESG funds and that the address or location of any family violence shelter project will not be made public, except with written authorization of the person or persons responsible for the operation of such shelter.

9. The requirement that recipients involve themselves, to the maximum extent practicable and where appropriate, homeless individuals and families in policymaking, renovating, maintaining, and operating facilities assisted under the ESG program, and in providing services for occupants of those facilities as provided by 24 CFR 75.56.

10. The requirements of 24 CFR 576.57(e) dealing with the provisions of, and regulations and procedures applicable with respect to the environmental review responsibilities under the National Environmental Policy Act of 1969 and related
Jurisdiction

authorities as specified in 24 CFR Part 59.

11. The requirements of 24 CFR 576.21(g)(4) providing that the funding of homeless prevention activities for families that have received eviction notices or notices of termination of utility services will meet the requirements that: (A) the inability of the family to make the required payments must be the result of a sudden reduction in income; (B) the assistance must be necessary to avoid eviction or termination of the services to the family; (C) there must be a reasonable prospect that the family will be able to resume payments within a reasonable period of time; and (D) the assistance must not supplant funding for preexisting homeless prevention activities from any other source.

12. The new requirement of the McKinney-Vento Act (42 USC 11362) to develop and implement, to the maximum extent practicable and where appropriate, policies and protocols for the discharge of persons from publicly funded institutions or systems of care (such as health care facilities, foster care or other youth facilities, or correction programs and institutions) in order to prevent such discharge from immediately resulting in homelessness for such persons. I further understand that state and local governments are primarily responsible for the care of these individuals, and that ESG funds are not to be used to assist such persons in lieu of state and local resources.

13. HUD's standards for participation in a local Homeless Management Information System (HMIS) and the collection and reporting of client-level information.

I further certify that the submission of a completed and approved Consolidated Plan with its certifications, which act as the application for an Emergency Shelter Grant, is authorized under state and/or local law, and that the local government possesses legal authority to carry out grant activities in accordance with the applicable laws and regulations of the U.S. Department of Housing and Urban Development.

Signature/Authorized Official

[Signature]

Name

[Name]

Title

[Title]

Address

615 Washington Street

Reading, PA 19601

City/State/Zip

610-655-5234

Telephone Number

[Signature]

Date

2/3/15

CPMP Non-State Grantee Certifications

Annual Action Plan

2015

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APPENDIX TO CERTIFICATIONS

Instructions Concerning Lobbying and Drug-Free Workplace Requirements

Lobbying Certification

The certification is a material representation of facts upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1552, Title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than $10,000 and not more than $100,000 for each such failure.

Drug-Free Workplace Certification

1. By signing and/or submitting this application or grant agreement, the grantee is providing the certification.
2. The certification is a material representation of facts upon which reliance was placed when the agency awarded the grant. If it is later determined that the grantee knowingly rendered a false certification, or otherwise violated the requirements of the Drug-Free Workplace Act, HUD, in addition to any other remedies available to the Federal Government, may take other authorized under the Drug-Free Workplace Act.
3. Workplaces under grants, for purposes other than individuals, need not be identified in the certification. If known, they may be identified in the grant application. If the grantee does not identify the workplace at the time of application, or upon award, if there is no application, the grantee must keep the identity of the workplace(s) on file in its office and make the information available for Federal inspection. Failure to identify all known workplaces constitutes a violation of the grantee's drug-free workplace requirements.
4. Workplaces (certifications must include the actual names of buildings or parts of buildings) or other sites where work under the grant is performed. Categorical descriptors may be used (e.g., all vehicles, etc. a mass transit authority or State Highway Department, etc.), or the site or remains unoccupied and unoccupied in any warehouse, etc.
5. If the workplace is not in the state of California, the grantee shall keep an inventory of the workplace(s). If it is a place of employment for Federal inspection (see section 3).
6. The grantee may assert in the space provided below the name(s) or the performance of work done in conjunction with the specific place of performance (street address, city, county, state, zip code). Check if there are workplaces on the that are not identified here. The certification with regard to the drug-free workplace is required by 24 CFR part 2.1.

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7. Definitions of terms in the non-compliance Suspension and Debarment common rule and Drug-Free Workplace common rule apply to the certification. "Controlled substance" means a controlled substance in Schedules I through V of the Controlled Substances Act (21 U.S.C. 812) and as further defined by regulation (21 CFR 308.1 through 308.65). "Conviction" means a finding of guilt (including a plea of nolo contendere) or imposition of sentence, or both, by any judicial body charged with the responsibility to determine violations of any Federal or State criminal drug statute. "Criminal drug statute" means a Federal or non-Federal criminal statute involving the manufacture, distribution, dispensing, use, or possession of any...
Jurisdiction

controlled substance; "Employee" means the employee of a grantee directly engaged in the performance of work under a grant, including:

a. All "direct charge" employees;

b. All "indirect charge" employees unless their impact or involvement is insignificant to the performance of the grant and the

temporary personnel and consultants who are directly engaged in the performance of work under the grant and who are on the grantee's payroll. this definition does not include workers not on the payroll of the grantee (e.g., volunteers, even if used to meet a matching requirement; consultants or independent contractors not on the grantee's payroll; or employees of subcontractors or subgrantees in covered workplaces).

Note that by signing these certifications, certain documents must be completed, in full, and on file for verification. These documents include:

1. Analysis of Impediments to Fair Housing
2. Citizen Participation Plan
3. Anti-bias and Displacement and Relocation Plan

[Signature] Authorized Official

[Signature/Authorized Official]

[Date]

Vauhn D. Spencer

Name

Mayor

Title

815 Washington Street

Address

Reading, PA 19601

City/State/Zip

510-555-5234

Telephone Number

Annual Action Plan
2015

OMB Control No: 2506-0117 (exp. 07/31/2015)