



FY24-25 CAPER

Consolidated Annual Performance and Evaluation Report (CAPER)

City of Raleigh
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Raleigh
Housing

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Introduction

The FY 2024-2025 Consolidated Annual Performance and Evaluation Report (CAPER) highlights the results and benefits produced by the City of Raleigh as projected in the City's FY 2024-2025 Annual Action Plan.

The CAPER covers July 1, 2024, to June 30, 2025, and represents the fourth year of reporting within the City's Five-Year Consolidated Plan period (2021-2025). The Consolidated Plan (ConPlan) serves as a five-year road map and includes comprehensive goals and coordinated strategies to address the housing and community needs of low- and moderate-income residents. The 2021-2025 ConPlan specifies three priorities for the City's use of federal and local housing funds:

- 1) Increasing the Supply of Affordable Housing
- 2) Enhancing the Homeless to Housing Continuum
- 3) Increase Services to Build Self-Sufficiency & Sustainability

Programs described in the CAPER are funded by both federal and local funds. The federal funds include:

- Community Development Block Grant (CDBG)
- HOME Investment Partnership (HOME)
- Emergency Solutions Grant (ESG)

The local funds include:

- Program Income from past local Housing Bonds
- City of Raleigh's General Fund
- 2020 Housing Bond Funds

Programs offered by the City of Raleigh positively impacted the lives of homeowners, homebuyers, renters, people experiencing homelessness, job seekers, and those assisted by nonprofits. The City continued using CDBG funds for neighborhood revitalization, housing rehabilitation, homebuyer assistance, infrastructure upgrades, emergency shelter operations, white flag emergency shelter support, and public service grants to nonprofits. HOME funds were used for housing rehabilitation, homebuyer assistance, and loans for affordable housing developers. ESG funds were awarded to nonprofits to assist those experiencing or at risk of homelessness.

FY 2024-2025 Results-At-A-Glance	
Activity	Quantity Served
Houses Repaired and Rehabilitated	30
New or Preserved Affordable Rental Units	972
Households Provided Homebuyer Assistance	81
Individuals Benefited by Community Enhancement Grants	2,784
Individuals Provided Emergency Shelter	744
Households Receiving Rapid Rehousing Services	86

During the pandemic, the City also received special supplemental allocations of CDBG-CV and ESG-CV to assist impacted low-income households. This allocation was authorized by the Coronavirus Aid, Relief, and Economic Security Act (CARES Act) to respond to the growing effects of this historic public health crisis. In addition, the City received funding from the U.S. Department of Treasury for the Emergency Rental Assistance (ERA) program to assist renters affected by the pandemic.

CR-05 - Goals and Outcomes

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

The FY 2024-2025 Consolidated Annual Performance and Evaluation Report (CAPER) describes the results and benefits produced by the City of Raleigh as projected in the City's FY 2024-2025 Annual Action Plan, which is the fifth year of the 2021-2025 ConPlan. The ConPlan specifies three priorities for the City's use of federal and local housing funds:

- 1) Increasing the Supply of Affordable Housing
- 2) Enhancing the Homeless to Housing Continuum
- 3) Increase Services to Build Self-Sufficiency & Sustainability

Programs offered by the City of Raleigh provided assistance to homeowners, homebuyers, renters, people experiencing homelessness, job seekers, as well as households impacted by COVID-19. Specific geographic areas were chosen for neighborhood revitalization and focused funding. While most programs are available to income-eligible residents citywide, the geographic focus areas are the College Park Neighborhood Revitalization Strategy Area (NRSA) and downtown neighborhoods. The City has also invested resources, particularly the 2020 bond funds, to provide targeted homebuyer downpayment assistance and housing rehabilitation programs to areas along the proposed Bus Rapid Transit (BRT) corridors.

These investments addressed the priorities of increasing the supply of affordable housing, enhancing the homeless –to housing continuum, and increasing services to build self-sufficiency and sustainability. The following Table 1 provide a summary of activities completed to address each priority. The table lists the goal (priority), activity categories, funding sources, outcome indicators, accomplishments expected and achieved during the Consolidated Plan period, and the accomplishments expected and achieved during the program year.

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

91.520(g) - Table 1 - Accomplishments

Goal	Category	Source / Amount	Indicator	Unit of Measure	Expected – Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected – Program Year	Actual – Program Year	Percent Complete
Enhance the Homeless to Housing Continuum	Homeless	ESG: \$1,363,706	Tenant-based rental assistance / Rapid Rehousing	Households Assisted	51	220	431%	40	86	215%
			Homeless Person Overnight Shelter	Persons Assisted	2,858	3,985	139%	1,035	744	72%
Increase & Preserve Supply of Affordable Housing	Affordable Housing	CDBG: \$16,148,578 / HOME: \$10,449,707 / Affordable Housing Fund/Bond: \$31,693,000 / Other: \$665,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	2,322	0	0%	0	0	0%
			Rental units constructed	Household Housing Unit	2,250	2,088	93%	450	972	216%
			Homeowner Housing Rehabilitated	Household Housing Unit	250	100	40%	61	30	49%
			Direct Financial Assistance to Homebuyers	Households Assisted	250	206	82%	28	81	133%
			Buildings Demolished	Buildings	6	27	450%	6	12	200%
			Other	Other	5	0	0%	0	0	0%
Increase Services to Build Self-Sufficiency & Sust	Homeless Non-Homeless Special Needs Non-Housing Community Development	CDBG: \$ 2,750,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	0	0	0%	0	0	0%
			Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	3,655	10,921	299%	2,641	2,784	105%

			Facade treatment/business building rehabilitation	Business	20	53	265%	0	9	100%
			Homeowner Housing Added	Household Housing Unit	0	41	100%	0	0	100%
			Homeless Person Overnight Shelter	Persons Assisted	6,000	1,374	23%	0	0	0%
			Overnight/Emergency Shelter/Transitional Housing Beds added	Beds	0	0	0%	0	0	0%

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

Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit – The goal for this category was to include improvements primarily in East College Park through the creation of a park and street surfacing. The new Fisher Street Park was completed, and the number of residents served was included in the Public Service Activities instead, due to a technical difference in definitions. The 2026-2030 Consolidated Plan and 25-26 Annual Action Plan will provide a more accurate picture by matching the HUD definitions with the accomplishments on the ground.

Facade treatment/business building rehabilitation – The City has utilized local funding to complete more than 53 building upfit grants for local small businesses during the 5-year span of the Consolidated Plan, including 9 in 24-25

Homeless Person Overnight Shelter under Increase Services to Build Self-Sufficiency & Sustainability – These numbers are included under the Homeless Person Overnight Shelter under the Enhance the Homeless to Housing Continuum goal instead. In addition, the COVID-19 pandemic has negatively impacted shelter capacity.

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

The City used federal and local funds to address the three priorities identified in its 2021-2025 Consolidated Plan and met its goals in most categories. Summaries of the City's FY 2024-2025 funding activities are:

- **Increase and Preserve the Supply of Affordable Housing**

The City's Affordable Housing Improvement Plan set a goal of increasing the pace and volume of affordable housing development. This goal was addressed through City-sponsored creation and preservation of affordable housing units as well as down payment assistance to eligible homebuyers.



Oak Forest Pointe - 120 Rental Units of Senior Affordable Housing

In FY 2024-2025, an additional 972 rental units were completed and made available to low-income residents. These developments would not have been possible without the city's investment of nearly \$25 million. The City committed more than \$41 million in FY 2024-2025 toward the future creation and preservation of 1,070 units of affordable rental opportunities, including units set aside for supportive housing.

A summary of the City's investments in completed or preserved subsidized apartment communities follows:

Rental Development	City Assistance \$	Number of Units	Funding Source
Thrive at South End	\$2,100,000	90	Local – General Fund & Local – Bond Revenue
Rock Quarry Landing	\$0	188	
Aspen Spring	\$3,000,000	84	Local – Bond Revenue
Summit at Sawyer	\$3,000,000	154	
Milner Commons	\$5,900,000	156	Local – General Fund & Federal – HOME
Toulon Place	\$744,727	200	Local – Bond
King's Ridge	\$10,024,467	100	Local – General Fund
Total	\$24,769,194	972	

Table 2 - Accomplishments – Program Year Rental Units Created

In addition to these investments, the following projects were approved for City financing for new construction and preservation during the FY2024-2025 fiscal year:

Rental Development	City Assistance \$	Number of Units	Funding Source
Barton Oaks	\$4,000,000	152	Local – General Fund
Maple Ridge	\$3,100,000	146	Local - General Fund
Moore Square Apartments	\$15,700,000	160	Local – Bond, Local – Bond Revenue
Cottages of Idlewild	\$1,260,000	4	Local – Bond
Chapanoke	\$4,500,000	200	Local – General & Local - Bond
Fisher Grove	\$4,980,000	166	Local – General & Federal – HOME
Garner Station	\$4,000,000	141	Local – General & Local – Bond Revenue
Heritage Park	\$1,000,000	51	Local – Bond Revenue
New Construction Subtotal	\$38,540,000	1,020	
Biltmore Hills	\$1,600,000	50	Local - Bond
Grosvenor Garden	\$1,200,000	0 (62)	Units already counted in FY22-23
Preservation Subtotal	\$2,800,000	50	
Total	\$41,340,000	1,070	

Table 3 - Accomplishments – Program Year Rental Units Funded

Homebuyer Assistance Program

Purchasing a home helps families and individuals invest in their future. The City's homebuyer assistance programs help low- and moderate-income households who want to purchase a home but require additional funding. FY24-25 saw a significant increase in the number of first-time homebuyers assisted by the City of Raleigh's Homebuyer Assistance Program and Enhanced Homebuyer Assistance Program. In the previous fiscal year, the City assisted a total of 81 households in purchasing an affordable home.

The Homebuyer Assistance Program provides up to \$45,000 to qualified, low-income, first-time homebuyers purchasing a home anywhere in the City of Raleigh. Even with the City's financial assistance, high interest rates, and Raleigh's hot

housing market have presented challenges, and many first-time homebuyers have been unable to find homes at a price they can afford. The Enhanced Homebuyer Assistance Program, which is funded by the 2020 Affordable Housing Bond, provides up to \$60,000 in financial assistance to income-eligible first-time homebuyers purchasing a home in targeted geographic areas within Raleigh. These targeted neighborhoods surround the planned Bus Rapid Transit (BRT) routes to create affordable homeownership opportunities near transit. 81 households received \$3,465,000 in financial assistance to purchase their homes.

Homeowner Rehabilitation Program

The City offers three homeowner repair programs to meet the diverse repair needs of Raleigh's low-income homeowners.

The City's Homeowner Rehabilitation Program provides financial assistance to eligible households to make critical repairs to their homes, enabling them to maintain ownership. Not only does this program help prevent homeowners from needing more expensive home repairs in the future, it also provides them with safe and healthy homes. \$128,182.10 in HOME funds and \$96,400.67 in CDBG funds assisted 1 low-income homeowner with substantial repairs (at least 3 systems failing). Note: expenditures include rehabilitations that are not finished and will be counted towards the production totals in future CAPERS.

The Raleigh Home Revitalization Program provides additional bond-funded home repair assistance for the transit-targeted neighborhoods for income-eligible homeowners. Seventeen homes were repaired in the fiscal year, utilizing \$580,307.47 in City bond funds for this program.

In addition, four households benefited from the City's Limited Repair Program, which provides forgivable loans to very low-income homeowner households. This program is targeted towards homes with one failing system.

Funding Source	Amount Spent	Homes Completed
HOME-funded Homeowner Rehabs	\$128,182.10	1
CDBG-funded Homeowner Rehabs	\$96,400.67	0
CDBG-funded Limited Repair Rehabs	\$111,875.83	4
City-funded Home Revitalization Rehabs	\$580,307.47	17
City Funded Substantial Rehabs	\$767,781.30	8
Total	\$1,684,547.37	30

Table 4 - Accomplishments – Program Year Rehabilitations Completed

- **Enhance the Homeless to Housing Continuum:**

The City provided a total of \$255,440 in Emergency Solutions Grants (ESG) funding to provide rapid re-housing assistance (through Triangle Family Services), and to support the Wake County Homeless Management Information System (HMIS - through interim HMIS lead, Haven House). The City also provided \$200,000 in Community Development Block Grant (CDBG) funds to the South Wilmington Street Men's Shelter for shelter operations and \$100,000 in local funds to Healing Transitions for drop-in emergency shelter support. \$68,000 in local funds were awarded to Catholic Charities for their Support Circle program, which provides rapid re-housing and homelessness prevention assistance.

Funding Recipient	Activity	Quantity Served
Triangle Family Services	Rapid Re-housing	50 households
Healing Transitions	Emergency Shelter	487 individuals
South Wilmington Street Men's Shelter	Emergency Shelter	744 individuals
Catholic Charities	Homelessness Prevention	12 households

Table 5 - Accomplishments – Program Year Homeless Individuals Served

Additionally, this past year the City piloted a new initiative to address homelessness. The Unsheltered Homelessness Response Pilot focuses on connecting people experiencing homelessness to permanent housing through flexible financial assistance and follow-along services. A key goal was to decommission an encampment that posed significant health and safety risks. Fifty households (45 from the encampment + 5 living unsheltered downtown) were enrolled and are now receiving two years of rental assistance, intensive case management, and peer support.

In early 2025, the City also launched a program to prevent, divert, and rapidly exit residents from the homeless response system, funded with \$855,000 of local dollars. Of this amount, \$75,000 is allocated specifically to assist residents in the downtown district. The program focuses on evidence-based, cost-effective interventions to make homelessness rare, brief, and non-reoccurring. Following a competitive Request for Proposals, five agencies were selected for funding based on high-quality responses and their ability to strengthen Raleigh's homeless response system. Allocations are as follows:

- Triangle Family Services: \$407,000 for prevention, diversion, and rapid exit
- Family Promise of the Triangle: \$63,000 for prevention, diversion, and rapid exit
- Families Together: \$180,000 for prevention, diversion, and rapid exit
- Oak City Cares: \$100,000 for diversion
- Urban Ministries of Wake County: \$105,000 for prevention, diversion, and rapid exit



Oak City Cares

• **Increase Services to Build Self-Sufficiency and Sustainability:**

The City of Raleigh continues to administer its CDBG-funded Community Enhancement Grant program which awards funding to nonprofits to provide essential public services to low- to moderate-income households, such as providing afterschool tutoring and support services for 1,906 low-income students, and housing opportunities and wrap-around services for 72 foster youth transitioning out of the program when turning 18 years of age.

CR-10 - Racial and Ethnic composition of families assisted

Describe the families assisted (including the racial and ethnic status of families assisted). 91.520(a)

Race	CDBG	HOME	ESG
White	773	2	11
Black or African American	2,462	12	72
Asian	35	0	0
American Indian or American Native	38	0	1
Native Hawaiian or Other Pacific Islander	3	0	0
Other/Multi	252	0	2
Total	3,563	14	86
Hispanic	363	1	8
Not Hispanic	3,200	13	78

Table 26 – Table of assistance to racial and ethnic populations by source of funds***To be reported via SAGE****Narrative**

The majority of program beneficiaries were members of racial minority groups. The largest group served was “Black or African American.” A small but growing percentage of those assisted were of Hispanic ethnicity.

CR-15 - Resources and Investments 91.520(a)**Identify the resources made available**

Source of Funds	Source	Resources Made Available	Amount Expended During Program Year
CDBG	public - federal	\$3,504,282.00	\$2,962,940.19
HOME	public - federal	\$2,923,924.09	\$1,336,870.87
ESG	public - federal	\$250,440.00	\$208,572.75
Other – Local (Bond and tax rate)	public - local	\$28,858,287.00	\$27,094,898.44

Table 37 - Resources Made Available**Narrative**

The City made available nearly \$29 million in City funds during the past program year, which accounted for the majority (86%) of the money spent on programs for low- and moderate-income households and individuals.

Identify the geographic distribution and location of investments

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description
CITYWIDE	80%	100%	Most of the housing and community development programs the City of Raleigh offers are available to low-income residents throughout the city
Downtown Neighborhoods	5%	0%	No activities with FY24-25 federal funds
NRSA 2016 - College Park/ECP	15%	0%	All funds spent were citywide. With the single-family homes in College Park built out, the townhomes will be the next phase. The redevelopment of the Zack's Grocery site at the corner of New Bern Avenue and Raleigh Boulevard will be another phase, with a Request for Proposals issued for mixed-use development including an affordable housing element.

Table 48 – Identify the geographic distribution and location of investments

Leveraging

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

City of Raleigh: The City of Raleigh has prioritized investing in affordable housing and community development programs. In the past year, federal dollars were leveraged with local funding.



Fisher Street Park in College Park

As the City invests in affordable housing within its borders using federal grant funds, it also tapped local City of Raleigh funds for projects and programs such as:

- Lending to private builders of affordable apartments;
- Repairing older owner-occupied houses;
- Assisting the NC 507 Wake County Continuum of Care;
- Providing ongoing support to Oak City Cares multi-service facility;
- Providing rapid re-housing and homelessness prevention funds to Catholic Charities for those who are homeless or at-risk of becoming homeless;

- Supporting nonprofit organizations engaged in affordable housing development and providing other services directed at low-income populations.



Ripley Station - 48 Rental Units of Preserved Affordable Rental Units

Affordable Apartments: Increasing the supply of rental apartments for low-and-moderate-income residents is an overwhelming need in the City of Raleigh. Using federal and local funds, the City partners with other funders (such as Wake County and the NC Housing Finance Agency) and affordable housing developers to create and preserve rental housing. Most of the affordable apartment loans provided by the City are a portion of the entire investment package to create new affordable apartments, with low-income housing tax credits and private loans being the other major sources of funds.

The City's rental units are City-owned properties that provide housing for low-income renters under 50% AMI. As mentioned in previous sections, the College Park program utilized land acquired by the City to create homeownership opportunities for low-to-moderate-income buyers.

Fiscal Year 2024 Summary – HOME Match	
1. Excess match from prior Federal fiscal year	\$33,202,556.15
2. Match contributed during current Federal fiscal year	\$9,001,791.04
3. Total match available for current Federal fiscal year (Line 1 plus Line 2)	\$42,204,347.19
4. Match liability for current Federal fiscal year	\$648,899.23
5. Excess match carried over to next Federal fiscal year (Line 3 minus Line 4)	\$41,555,447.96

Table 59 – Fiscal Year Summary - HOME Match Report

HOME Match Report

U.S. Department of Housing and Urban Development
Office of Community Planning and DevelopmentOMB Approval No. 2506-0171
(exp. 12/31/2012)

Part I Participant Identification						Match Contributions for Federal Fiscal Year (yyyy) 2024		
1. Participant No. (assigned by HUD) 54077		2. Name of the Participating Jurisdiction City of Raleigh		3. Name of Contact (person completing this report) Kirsten Larson				
5. Street Address of the Participating Jurisdiction 421 Fayetteville St., Suite 1200				4. Contact's Phone Number (include area code) 919-996-4330				
6. City Raleigh		7. State NC		8. Zip Code 27601				
Part II Fiscal Year Summary								
1. Excess match from prior Federal fiscal year				\$ 33,202,556.15				
2. Match contributed during current Federal fiscal year (see Part III.9.)				\$ 9,001,791.04				
3. Total match available for current Federal fiscal year (line 1 + line 2)						\$ 42,204,347.19		
4. Match liability for current Federal fiscal year						\$ 648,899.23		
5. Excess match carried over to next Federal fiscal year (line 3 minus line 4)						\$ 41,555,447.96		
Part III Match Contribution for the Federal Fiscal Year								
1. Project No. or Other ID	2. Date of Contribution (mm/dd/yyyy)	3. Cash (non-Federal sources)	4. Foregone Taxes, Fees, Charges	5. Appraised Land / Real Property	6. Required Infrastructure	7. Site Preparation, Construction Materials, Donated labor	8. Bond Financing	9. Total Match
Milner Commons	11/15/2023						1,475,000.00	1,475,000.00
Milner Commons	03/08/2024						1,475,000.00	1,475,000.00
Kings Ridge	11/14/2023						2,620,676.25	2,620,676.25
Kings Ridge	02/23/2024						1,133,555.32	1,133,555.32
Kings Ridge	03/13/2024						681,496.20	681,496.20
Kings Ridge	04/12/2024						188,000.00	188,000.00
Oak Forest Pointe	02/08/2024	396,250.00						396,250.00
The Summit at Sawyer	04/02/2024	600,000.00						600,000.00
The Summit at Sawyer	06/30/2024	121,145.57						121,145.57
The Summit at Sawyer	08/09/2024	10,667.70						10,667.70
Booker Park South	01/29/2024	300,000.00						300,000.00

Table 610 – Match Contribution for the Federal Fiscal Year

HOME MBE/WBE Report

Program Income – Enter the program amounts for the reporting period				
Balance on hand at beginning of reporting period \$	Amount received during reporting period \$	Total amount expended during reporting period \$	Amount expended for TBRA \$	Balance on hand at end of reporting period \$
\$0	\$573,427.06	\$464,906.73	\$0	\$108,520.33

Table 711 – Program Income

Minority Business Enterprises and Women Business Enterprises – Indicate the number and dollar value of contracts for HOME projects completed during the reporting period						
	Total	Minority Business Enterprises				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
Contracts						
Number	1			1		0
Dollar Amount	\$109,568			\$109,568		\$0
Sub-Contracts						
Number	0			0	0	0
Dollar Amount	\$0			\$0	\$0	\$0
	Total	Women Business Enterprises	Male			
Contracts						
Number	1	1	0			
Dollar Amount	\$109,568	\$109,568	\$0			
Sub-Contracts						
Number	0	0	0			
Dollar Amount	\$0	\$0	\$0			

Table 812 - Minority Business and Women Business Enterprises

Minority Owners of Rental Property – Indicate the number of HOME assisted rental property owners and the total amount of HOME funds in these rental properties assisted						
	Total	Minority Property Owners				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
Number	0					
Dollar Amount	0					

Table 13 – Minority Owners of Rental Property

Relocation and Real Property Acquisition – Indicate the number of persons displaced, the cost of relocation payments, the number of parcels acquired, and the cost of acquisition						
Parcels Acquired		0		\$0		
Businesses Displaced		0		\$0		
Nonprofit Organizations Displaced		0		\$0		
Households Temporarily Relocated, not Displaced		0		\$0		
Households Displaced	Total	Minority Property Enterprises				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
Number	0					
Cost	\$0					

Table 14 – Relocation and Real Property Acquisition

CR-20 - Affordable Housing 91.520(b)

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

	One-Year Goal	Actual
Number of Homeless households to be supported	1,075	830
Number of Non-Homeless households to be supported	3,191	3,867
Number of Special-Needs households to be supported	2	155
Total	4,268	4,852

Table 15 – Number of Households

	One-Year Goal	Actual
Number of households supported through Rental Assistance	40	98
Number of households supported through The Production of New Units	450	972
Number of households supported through Rehab of Existing Units	61	30
Number of households supported through Acquisition of Existing Units	1	0
Total	552	1,100

Table 16 – Number of Households Supported

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

Table 15 describes the number of households assisted grouped by type of household (homeless, non-homeless and special needs). Table 16 describes the number of households assisted grouped by type of assistance, and only includes rental assistance, unit production, rehab of existing units and acquisition of existing units. The difference in total actuals between these 2 tables (3,752 households) indicates those households assisted through ESG-funded programs and CEG programs. These households are not included in Table 16.

More specifically, in Table 15 the number of homeless households supported included individuals provided ESG-funded rental assistance by Triangle Family Services and clients at the South Wilmington Street Men's Shelter.

Non-homeless households' support included homebuyer assistance, rental unit development, rehabilitation, and the Community Enhancement Grant program.

Special needs households included the Limited Repair Program and supportive housing units.

Raleigh met or exceeded all of the annual goals except two:

The City did not meet the goal for homeless households supported because funding originally purposed for white flag shelter was used instead to fill a funding gap for the South Wilmington Street Men's Shelter. _____

The City did not meet the goal for rehab of existing units because of difficulties in securing certified contractors at an affordable price, largely due to the limited number of contractors and high demand for their services. Despite these challenges in FY 2024-25, 17 low-income homeowners benefited from the Bond-funded Raleigh Home Revitalization Program. 13 households were assisted through the Homeowner Rehabilitation and Limited Repair programs.

The rise in interest rates has resulted in additional delays in multifamily construction due to the increase in lending costs for developers. Despite this, the City of Raleigh far exceeded the one-year production goals set in the Annual Action Plan with the completion of 972 affordable apartments, all of which were supported by local funds. Additional affordable apartment communities are still under construction (the units will be counted in future CAPERs once they are completed). Additionally, the City approved funding assistance for the construction of 1,020 affordable apartments and the preservation of 50 affordable units.

CDBG Community Enhancement Grant resources were provided to the Hope Center at Pullen, which worked with 72 Special Needs youth aging out of the foster care system to obtain housing vouchers, support, and set-aside units. Homeowner housing rehabilitation, downpayment assistance, and supportive rental units for the disabled and elderly also contributed to the City exceeding the goal for Special Needs households.

Though not included in the tables above, interest in the City of Raleigh's homebuyer assistance programs increased in FY24-25. While interest rates remained consistently high for many

homeowners, layering the City's homebuyer assistance programs with other downpayment assistance programs offered by the County, State, or other agencies has allowed lower-income first-time homebuyers to secure housing. This year, 81 households were assisted through these programs.

The City's rehabilitation, rental development, and financial homebuyer assistance programs experienced gains year-over-year from FY 23-24 to FY 24-25. The rental units created, and homebuyers assisted increased by 69% and 29% respectively.

Progress Snapshot FY 23-24 to 24-25		
Activity	2023 Served	2024 Served
Houses Repaired and Rehabilitated	28	30
New or Preserved Affordable Rental Units	576	972
Households Provided Homebuyer Assistance	63	81

Table 17 - Accomplishments – Program Year Rental Units Created

Discuss how these outcomes will impact future annual action plans.

The impacts of increased interest rates and inflation, including rising construction and material costs, may impact future affordable housing goals. City staff continue to monitor and will update if needed.

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

Number of Households Served	CDBG Actual	HOME Actual
Extremely Low-income (ELI)	2,785	5
Low-income (LI)	1	8
Moderate-income (MOD)	33	8
Total	2,819	14

Table 18 – Number of Households Served

Narrative Information

As reflected in the table above, the City of Raleigh addresses the needs of a variety of income groups below 80% of the area median income. 99% percent of people and households served using CDBG and 36% of HOME households were classified as Extremely Low-Income (0-30% of

area median income). CDBG funding provided homebuyer loans (33), CDBG Housing rehabilitations (4), one HOME rehabilitation, and a variety of services delivered through local nonprofit partners/subrecipients (2,784 persons assisted with the CDBG Community Enhancement Grant). The City focuses its local general fund and bond resources on helping create new affordable rental units and addressing severely-cost burdened renters, defined as a Worst Case Need by HUD. Additional HOME funds were spent on housing rehabilitation for homeowners and rental development of King's Ridge and The Summit at Sawyer.

Thirty-three (33) MOD buyers received Downpayment Assistance through CDBG. One ELI (Extremely Low Income) and one low-income homeowner received Homeowner Rehab assistance through CDBG, progressing efforts to address substandard housing, also defined as a Worst Case Need by HUD. 2,784 ELI individuals received Public Services assistance through the City's CDBG Community Enhancement Grant programs. The ELI, LI, and MOD homeowners and renters assisted met HUD's Sec. 215 definition of affordable housing.

Percent of Area Median Income	Family Size							
	1	2	3	4	5	6	7	8
Extremely Low - 30%	\$25,700	\$29,400	\$33,050	\$36,700	\$39,650	\$42,600	\$45,550	\$48,450
Very Low - 50%	\$42,850	\$48,950	\$55,050	\$61,150	\$66,050	\$70,950	\$75,850	\$80,750
Low - 80%	\$68,500	\$78,250	\$88,050	\$97,800	\$105,650	\$113,450	\$121,300	\$129,100

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

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

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

The City of Raleigh partners with the NC 507 Wake County Continuum of Care (CoC), Wake County CoC Department (lead agency), Wake County Government, and nonprofit homeless service providers to ensure all community partners are working together to make homelessness rare, brief, and nonrecurring. In addition, a City staff member serves on the CoC governing board.

The CoC works closely with the City, County, and service providers and conducts the annual Point-in-Time (PIT) count and Housing Inventory Counts (HIC) for the Annual Homeless Assessment Report (AHAR), as required by HUD. The PIT is an annual snapshot in time of persons meeting HUD's definition of "homeless" on a single night in the last ten days of January.

In order to receive an ESG grant from the City, service providers must complete individualized assessments to identify the need for shelter, prevention, or rapid re-housing. Service providers and shelters currently use the VI-SPDAT tool to conduct uniform assessments in HMIS to identify acuity/vulnerability. The City also continues to support Oak City Cares, which serves as a centralized access point for connecting individuals and families who are at risk of, or are experiencing homelessness, to coordinated services.

Addressing the emergency shelter and transitional housing needs of homeless persons

Strengthening the homeless-to-housing continuum and the need for permanent supportive housing for those experiencing or at-risk of homelessness was identified as a top priority in the City of Raleigh's 2021-2025 Consolidated Plan. A City staff person has a seat on the NC 507 Wake County Continuum of Care (CoC) governing board and is actively involved with the CoC in enhancing the Coordinated Entry system, creating strategic plans, establishing priorities, and coordinating with service providers.

City ESG funds supported programs offered by Triangle Family Services (rapid re-housing) and the Haven House (interim HMIS Lead) to support HMIS. Additionally, the City provided \$200,000 of CDBG toward operating expenses for the Wilmington Street Shelter, the County-owned emergency shelter for homeless men, and \$100,000 in local funds to Healing Transitions and \$68,000 in local funds to Catholic Charities for homelessness prevention and re-housing.

Helping low-income individuals and families avoid becoming homeless, especially extremely

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

Every two years, the City issues a competitive Request for Proposals (RFP) solicitation for Emergency Solutions Grant (ESG) projects that serve those who are homeless or at risk of homelessness. This is done in coordination with Wake County. Both the City and County apply similar criteria communitywide, requiring a Housing First approach, the use of the Homeless Management Information System (HMIS), and participation in Coordinated Entry. All ESG subrecipients are required to use HMIS, so data can be tracked and shared, and connect clients to mainstream resources. By partnering on this initiative, the City and County can better strategically deploy funding to meet community needs.

The City also contributed \$100,000 in local funds to support weekend and holiday meal distribution at Oak City Cares, a multi-service center that holistically addresses the various needs of those experiencing or at-risk of homelessness, and \$100,000 in local funds to Healing Transition, and \$68,000 in local funds to Catholic Charities' "Support Circles" rapid rehousing and homelessness prevention program. With a combination of counseling and financial assistance, the Support Circles program helps re-house families.

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

- Since 2015, the City of Raleigh and Wake County have partnered on funding ESG-eligible activities by collaborating on a Request for Proposals (RFP) with a two-year funding cycle. The grants are funded with the City's ESG entitlement and the County's local Homeless Funds and will support the following ESG-eligible activities: Emergency Shelter, Street Outreach, Rapid Re-housing, Homelessness Prevention, and Homeless Management Information System (HMIS). This collaborative funding process streamlines the process and enables the CoC to provide consistent services according to adopted communitywide standards for consumers. The City, County, and CoC meet regularly and continue to work with grant recipients and help them adapt to the Combined RFP approach.

- Shortening shelter stays: The collaborative RFP requires all shelter providers to coordinate with Rapid Re-Housing providers. These purposeful connections are intended to decrease the number of days involved in an average shelter stay. Rapid Re-Housing programs are expected to operate on a Housing First model, where clients are placed in housing first and provided with the support services appropriate to their need. The Housing First model should eventually result in shorter stays at shelters and increase access to Rapid Re-Housing programs and permanent housing. The communitywide standard is no more than 45 days in shelter before being rehoused.
- Access to housing units: One priority in the City of Raleigh Consolidated Plan (Consolidated Plan) is to “Prevent and Reduce Homelessness.” One strategy for achieving this goal is to increase the production of affordable and permanent supportive housing. Additional affordable and permanent supportive housing will help those experiencing homelessness with the greatest need.
- Preventing those recently experiencing homelessness from becoming homeless again: The goal is to help individuals avoid becoming homeless after being discharged from a publicly funded institution or system of care. Community partner Alliance Behavioral Healthcare assures that services are provided to persons who are being discharged from mental healthcare facilities.

CoC NOFO Funding

In FY 2024, the Wake County NC 507 Continuum of Care (CoC) received \$6,179,781 from HUD in CoC NOFO funding for the following organizations and projects:

- CASA - McKinney: \$224,208
- Haven House Inc. - NC-507 CoC Planning Application FY 2024: \$323,424
- Haven House Inc. - RRH Homeless Youth 18-24 FY2024: \$114,661
- Passage Home, INC - Ruth House II- FY24: \$314,064
- PLM Families Together - Families Together Renewal Project Application FY2023: \$185,535
- InterAct - DV Bonus FY2024: \$562,772
- InterAct - DV Bonus New Project-FY 2024: \$667,368
- The Women's Center of Wake County - TWC Integrative, Permanent Community Supportive Housing: \$251,000
- Triangle Family Services - Renewal Project Application FY2024: \$284,526
- Wake County Continuum of Care, Urban Ministries - HMIS: \$161,730
- Wake County Continuum of Care, Oak City Cares - NC507 SSO-CE FY2024: \$177,685
- Wake County Housing Affordability & Community Revitalization - 2-1-2025 to 1-31-2026 Fully Consolidated Wake Rental Assistance NC0090L4F072316: \$2,912,808

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

Actions taken to address the needs of public housing.

The overall mission and operation of Raleigh Housing Authority (RHA) is to provide safe, decent, affordable rental housing for low- to moderate-income families. In addition to creating an affordable living environment, opportunities are offered to promote personal responsibility and self-sufficiency of residents and participants. Subsidized housing comes in all sizes and types, from scattered, single-family houses to high-rise apartments. Individuals may apply to be on multiple wait lists within the same housing program and across multiple programs concurrently. Raleigh Housing Authority owns and manages 1,248 subsidized public housing units.

Public Housing Program:

Each public housing property maintains its own site-based wait lists. Current site-based public waiting lists range from approximately 100 to 2,000 applicants. Most applications are seeking one- and two-bedroom units. Preferences are given to applicants who live or work in Wake County, are elderly (62+), or are disabled. Two mid- and high-rise communities provide designated housing to elderly and/or disabled individuals and families. RHA operates four site-based incentive public housing properties, which have additional criteria beyond conventional public housing. Public housing maintains a 95% occupancy rate and turns over a vacancy in line with HUD's required standards.

Housing Choice Voucher (HCV) Program:

RHA administers 4,381 Housing Choice Vouchers and has a utilization rate of 97%. These tenant-based vouchers increase access to safe, affordable housing units and provide opportunities for low-income families to choose and obtain rental housing outside areas of poverty or minority concentration. Currently, there are approximately 3,500 applicants on the Housing Choice Voucher wait list. Availability is based on voucher turnovers and funding levels. There are local preferences for the elderly, disabled, and those who live or work in Wake County. RHA also provides special admissions to families through Coordinated Entry System, the Olmstead Act, to displaced families, and those covered by the Violence Against Women Act.

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

The Raleigh Housing Authority (RHA) recognizes successful management of its local public housing developments input from those served. To this end, the existence and recognition of viable, representative, and democratic resident councils exist in several public housing communities. These councils are critical for achieving participation and cooperation from RHA tenants. This organization knows the needs of its neighbors and coordinates the delivery of

community service programs primarily for public housing residents. It is from this organization that the Resident Advisory Board is chosen. RHA consults with the Advisory Board on all administrative and Agency Plans. These meetings provide an avenue for open dialogue between the residents and the agency. Resident input is important when considering changes to the operations, procedures, or regulations that directly affect residents or the services RHA provides. Additionally, resident input and feedback forms have been made available to all households. Incentive public housing residents participate in self-sufficiency and homeownership training programs annually.

Actions taken to provide assistance to troubled PHAs

The Raleigh Housing Authority continues to be rated as a high performer by HUD's management assessment system for public housing. RHA works efficiently and effectively to prevent misuse and waste of HUD resources. The Raleigh Housing Authority recognizes the growing need for affordable housing and seeks ways to protect and develop affordable housing for the citizens of Raleigh. RHA has a Strategic Plan that supports the Agency in meeting its goals and missions over a five-year period.

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

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

In the 2024-2025 fiscal year, CD staff continued to improve and increase outreach efforts to low-income residents. The 2024-2025 Annual Action Plan process included a survey in English and Spanish that had more than 700 responses. Increased media outreach, in-person open houses, and presentations to local stakeholders have also extended the City's efforts to bridge the digital divide.

Given the current political climate in North Carolina, it remains unlikely that any municipality will receive state legislative approval to implement local ordinances requiring private developers to provide affordable housing, however, new incentives in the rezoning approval process have been implemented. Duplexes, townhomes, and accessory dwelling unit housing unit types permitted by right in most of Raleigh are notable housing development options introduced through the City's development ordinance that hold the potential to incentivize private unsubsidized housing that is within reach of renters or owners of moderate means. Raleigh is also working on a pilot program with a new community land trust to add to/preserve the supply of affordable ownership housing units in the City.

The City Council approved a Transit-Oriented Development zoning category to provide density bonuses for residential developments along the planned Bus Rapid Transit (BRT) routes.

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

Last year, the City managed and operated 190 affordable rental housing units that it owns. The average rent was \$485.71, and 83% of the units were rented to households with incomes below 50% of the area median income. Ninety-two percent of occupants in City-owned rentals were racial minorities.

The City continued to work in partnership with NC-507 Wake County Continuum of Care (CoC), Wake County Human Services, and nonprofit homeless service providers to address the needs of those experiencing or at risk of becoming homeless. City staff also serves the CoC Governance Board.

In June 2016, the City Council approved a tax increase to support affordable housing in the City. The introduction of this funding source has resulted in over \$11 million annually in

commitments for affordable units through the preservation of existing affordable units, creation of new affordable units, and single-family housing rehabilitation. In November 2020, Raleigh voters approved an Affordable Housing bond of \$80 million with a bond ballot record of 72% of voters in approval. In 2024-2025, the City utilized bond funds to support property acquisition and gap financing for rental developments, particularly in areas in proximity to high-frequency transit.

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

Lead-based paint (LBP) remediation is an integral part of the City's housing rehab program. All rehabs of owner-occupied homes are tested for lead-based paint, and any LBP found is appropriately remediated.

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



The City received \$25,612,354 in funding from the U.S. Department of Treasury for the Emergency Rental Assistance (ERAP) program. The ERAP funding was distributed in two separate grants called ERA1 (14,298,567) and ERA2 (11,313,787). The ERA funds were allocated to the House Wake COVID-19 Financial Assistance Program (HWFAP), which provides emergency rental and utility assistance to residents in Raleigh and Wake County. The HWFAP was created through a partnership between the City and Wake County Government, and both agencies contracted with Telamon Corporation to serve as the program administrator.

The application period for HWFAP opened in March 2021 and closed in January 2022. Raleigh and Wake County residents could apply for a maximum of eighteen (18) months of rental and

utility assistance. ERA funds could be used to pay rental and utility arrears as well as current and future rent and utility expenses. To be eligible for the HWFAP, applicants had to demonstrate a financial hardship related to COVID-19 and have a household income at or below 80% of the Area Median Income (AMI).

Approximately 10,520 applications were received from city and county residents combined, and 5,366 applicants were approved for assistance. A total of \$23,372,961 in city ERA funds was used to provide direct assistance to 3,686 households in Raleigh. A total of \$2,239,393 in City ERA funds was not needed for direct assistance to residents. Federal regulation allows the City to use the remaining ERA funds for affordable rental housing purposes, and these funds have been added to the City's affordable rental development program. Thus far, \$1,536,000 in ERA funds have been allocated to three affordable rental development projects: Jeffries Ridge (\$384,000), Ripley Station (\$576,000), and Tryon Grove (\$576,000).

The City's approved HOME-ARP Allocation Plan, which was submitted as an amendment to the City's FY21-22 Action Plan, outlines how the City will spend the \$5.2 million in HOME-ARP funds it was awarded as part of the American Rescue Plan. These funds will be used to develop affordable rental housing and a non-congregate shelter.

During the pandemic, the City also received special supplemental allocations of CDBG-CV and ESG-CV to assist impacted low-income households. This allocation was authorized by the Coronavirus Aid, Relief, and Economic Security Act (CARES Act), which was officially created on March 27, 2020, to respond to the growing effects of the historic public health crisis. The City's use of these funds helped with rental assistance, emergency shelter beds, and long-term organizational support to increase capacity for people experiencing homelessness. The CARES Act funds have assisted more than 20,000 people affected by the impacts of the pandemic within the City of Raleigh.

CDBG-CV1&3		
Agency	Funded Amount	Activities
DHIC	\$234,051	Foreclosure prevention
Legal Aid	\$634,000	Eviction prevention
Oxford House	\$166,000	Emergency rental assistance
Passage Home	\$425,387	Emergency rental assistance and public facility improvements
Raleigh/Wake Partnership to End & Prevent Homelessness	\$199,000	Housing Navigation Unit & Access Hub
Telamon	\$640,000	Foreclosure/eviction prevention and housing transition services
Triangle Family Services	\$417,334	Eviction prevention and consumer credit counseling
Families Together	\$693,000	Emergency shelter and transitional housing improvements
Green Chair Project	\$444,291	Beds for formerly homeless families
InterAct	\$300,001	Emergency shelter operations and improvements
Oak City Cares	\$38,183	Laundry/shower facilities for persons experiencing homelessness
WakeMed	\$358,840	Emergency after-care shelter for homeless patients with COVID-19
TOTAL	\$4,550,087	

ESG-CV1 & 2		
Agency	Funded Amount	Activities
Catholic Charities	\$149,618	Rapid Re-Housing; Homelessness Prevention
Families Together	\$503,580	Rapid Re-Housing; Emergency Shelter
Healing Transitions	\$459,594	Emergency Shelter
InterAct	\$660,183	Shelter Operations and Rapid Re-Housing
Legal Aid	\$216,000	Homelessness Prevention
Passage Home	\$380,875	Rapid Re-Housing; Homelessness Prevention
Raleigh/Wake Partnership to End & Prevent Homelessness	\$360,850	HMIS
Salvation Army	\$69,800	Emergency Shelter
Triangle Family Services	\$1,039,706	Rapid Re-Housing; Homelessness Prevention; Emergency Shelter; Street Outreach
USCRI (U.S. Committee for Refugees and Immigrants NC Field Office)	\$98,952	Homelessness Prevention
Urban Ministries	\$514,293	Emergency Shelter
TOTAL	\$4,453,451	

Table 919 – CDBG-CV and ESG-CV Funding Totals

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

The institutional structure for delivering CDBG programs and services to low- and very low-income families and individuals involves public, private, and non-profit agencies. Partnerships are utilized internally as well.

Nonprofit organizations also play a key role in providing rapid re-housing and emergency shelter services to those experiencing homelessness. Several nonprofits are providing various services, including medical and mental health services, on the site of Oak City Cares. The City also distributes CDBG funds to nonprofits providing public services to low-income households. Last year, the City provided funds (CDBG, HOME, local) for local nonprofit developers and for-profit firms for site improvements and to build affordable housing in the City. The City also put parcels it owns in central downtown out for proposals to provide additional affordable rental units that will be captured in future performance reports.

The Community and Small Business Division and the Planning and Development Department have worked together over the past couple of years to review policies and procedures that identify and eliminate obstacles to producing affordable housing. The coordination has reduced plan review times and fees for affordable housing projects.

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

The City requires written commitments from nonprofit organizations applying for financial assistance to provide affordable housing for persons with disabilities. The written commitments require social service agencies to be involved with the non-housing needs of their residents.

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

Below are the City-related impediments identified in the regional Analysis of Impediments completed in 2020, followed by City actions to address them:

- **Lack of affordable housing in high-opportunity areas:** On September 3, 2015, the Raleigh City Council adopted the Affordable Housing Location Policy (AHLPP) which encourages the development of City-supported affordable housing in high-opportunity areas. The following year an affordable housing fund (>\$8 million per year) was created. In November 2020, Raleigh voters approved an \$80 million Affordable Housing Bond that includes funds for projects and acquisition opportunities near planned transit routes, such as the forthcoming Bus Rapid Transit

(BRT) lines.

In the spring of 2023, the City introduced the Enhanced Homebuyer Assistance Program. The Enhanced program, which is funded by the 2020 Affordable Housing Bond, provides up to \$60,000 in financial assistance to income-eligible first-time homebuyers purchasing a home in targeted geographic areas within Raleigh. These targeted neighborhoods surround the planned Bus Rapid Transit (BRT) routes in order to create affordable homeownership opportunities near transit. The City also increased the maximum assistance amount for the citywide Homebuyer Assistance Program from \$20,000 to \$45,000.

In addition to the updates to the homebuyer assistance programs, the City also introduced the Raleigh Home Revitalization program that provides additional bond-funded home repair assistance for the transit-targeted neighborhoods with up to \$30,000 for income-eligible homeowners.

- **Limited housing choice restricts access to community assets for members of the protected classes:** The Wake Transit Plan will increase the percentage of the County's jobs within $\frac{3}{4}$ mile of all-day transit service. The City of Raleigh completed the Equitable Development Around Transit (EDAT) initiative to guide development expected to spring up near Bus Rapid Transit (BRT) stations and routes. The City is seeking acquisition opportunities along proposed BRT lines for inclusion of affordable housing on City land. The City has created an excellent framework for advancing fair housing through its Comprehensive Plan, Raleigh 2030. Decision-making, particularly in rezoning matters, that is consistent with this document, will further the City's commitment to affirmatively further fair housing choice.

- **Fair Housing Hearing Board has no legal authority to enforce its ordinance:** Local complaints received by the City are referred to the Fair Housing Project of Legal Aid of North Carolina and the Fair Housing Justice Center, which have the resources and expertise to address fair housing complaints. In the future, the City may join with Wake County to establish a countywide human relations commission with adequate enforcement and investigative authority to resolve local complaints. The City may also explore expanding the Board's own legal authority and hiring additional staff assigned to the Board.

The City of Raleigh entered into an agreement with the Campbell University Law Clinic to expand the availability of legal resources for tenants facing eviction in a new City of Raleigh Housing Justice Project. The City has been using some of its American Rescue Plan Act (ARPA) funds to provide \$100,000 a year to assist with staffing costs. The City has also designated an additional \$200,000 to provide the Clinic with a fund to assist with settlements of eviction cases, which will further help in keeping more residents in their homes and their rental histories

free of evictions.

- **Racially Concentrated Areas of Poverty (RCAPs) are clustered in the City of Raleigh, found primarily where lower-income Black and Hispanic residents live.** All of these areas are located within very low and low-opportunity areas. In September 2015, the City adopted an Affordable Housing Location Policy (AHLP) to steer most of its affordable housing investments only to areas outside of RCAPs. City staff created an updated AHIP working draft with current housing tables to help launch the new Plan which will be updated with the assistance of consultants. The City continues to support homebuyer education, sponsors the building of affordable houses on City-owned sites, and provides low-interest second mortgages to make many sales within reach of lower-income families who otherwise may not be able to buy a house in the unsubsidized market. The number of RCAPs decreased from nine in 2015 to four in 2025.

CR-40 - Monitoring 91.220 and 91.230

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

Monitoring CDBG, CDBG-CV, ESG, and ESG-CV projects consists of five major components:

1. **Grant Applications:** Requests for funding applications are made on a standard form and are evaluated by a team. Points are given for each criterion covering community need, program effectiveness, financial record, and capacity of the organization. Recommendations for funding are based on the evaluation of the above criteria and presented to the City Council for approval and included in each Annual Action Plan.
2. **Pre-agreement meeting:** The project manager meets with each subrecipient to go over grant requirements, logistics for payments, record-keeping standards, future monitoring, and close-out.
3. **Agreements:** The City of Raleigh enters into standard grant agreements with each subrecipient that specify the amount, source, and use of funds, match requirements, reporting standards, record-keeping, results to be achieved, and other conditions specific to the project. A standard attachment of all federal standards (Executive Orders, Civil Rights Act, etc.) with which the agency must comply is included.
4. **On-site monitoring:** The project manager, based on a risk assessment, will visit each funded agency at least once in the 12-month term of the contract to assure compliance. Due to COVID-19, these visits may occur virtually.

5. Progress reports: Written statements of benefits produced with the grants provided are required with each payment request as well as a summary at the end of the project.

HOME funds are provided annually in a competition that leverages low-income housing tax credits. Loan agreements are executed with each borrower that includes federal requirements and on-site monitoring consistent with the HOME regulations are conducted to review unit condition and programmatic compliance.

The FY 2022-2023 Action Plan included an updated HOME Monitoring Plan to guide City staff in assuring program compliance with federal requirements.

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

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

The Draft 2024-2025 CAPER was advertised for public comment in three local newspapers and the City's website on September 8th, 2025, providing 15 days for comments through September 24th. Comments received were included in the final report submitted to HUD.

CR-45 - CDBG 91.520(c)

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

The City received a special supplemental allocation of CDBG-CV to assist low-income households during the pandemic. This allocation was authorized by the Coronavirus Aid, Relief, and Economic Security Act (CARES Act), which was created on March 27, 2020, to respond to the growing effects of this historic public health crisis. The City awarded \$4,550,487 in CDBG-CV1 and CDBG-CV3 funds to nonprofits providing emergency rental assistance, eviction prevention, foreclosure mitigation counseling, emergency shelter operations and improvements, public facilities improvements, laundry/shower facilities for persons experiencing homelessness, emergency after-care shelter for homeless patients with COVID-19, and coordinated access support. The City continues to monitor the effects of COVID-19 and whether any programmatic adjustments will be needed.

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

No

CR-50 - HOME 91.520(d)

Include the results of on-site inspections of affordable rental housing assisted under the program to determine compliance with housing codes and other applicable regulations

Please list those projects that should have been inspected on-site this program year based on the schedule in §92.504(d). Indicate which of these were inspected and a summary of issues detected during the inspection. For those that were not inspected, please indicate the reason and how you will remedy the situation.

The results of the FY 24-25 monitoring are below.

Project Name	Developer	Fund Type	# of Units	Date Monitored	Results
Brookridge	DHIC	HOME	41	6/10/2025	Compliant
Elder's Peak	Pendergraph	HOME	48	7/25/2024	Compliant
Emerson Glen	DHIC	HOME	48	7/8/2025	Compliant
Lennox Chase	DHIC	HOME	37	6/17/2025	Compliant
Meadowcreek Commons	DHIC	HOME	48	4/29/2025	Compliant
Perry Hill	Evergreen Construction	HOME	48	7/22/2025	Compliant
Salisbury Apartments	CASA	HOME	10	10/9/2024	Compliant
Tryon Grove	DHIC	HOME	48	6/4/2025	Compliant
Village of New Hope	Evergreen Construction	HOME	45	4/30/2025	Compliant
Wakefield Hills	DHIC	HOME	80	8/19/2025	Compliant
Wakefield Manor	DHIC	HOME	96	5/6/2025	Compliant
Wakefield Springs	Evergreen Construction	HOME	80	4/16/2025	Compliant
Water Garden Park	DHIC	HOME	88	5/13/2025	Compliant
Water Garden Village	DHIC	HOME	60	5/20/2025	Compliant
Waterbrook	CASA	HOME	64	7/15/2025	Compliant
Windsor Spring	Evergreen Construction	HOME	39	5/7/2025	Compliant

Table 1020 – HOME Monitoring

Provide an assessment of the jurisdiction's affirmative marketing actions for HOME units. 92.351(b)

All HOME-supported rehabs underway are to minority borrowers. Every developer receiving HOME funds from the City is required to have and follow an Affirmative Marketing Plan. All

HOME borrowers are advised of the HOME requirements for affirmative marketing, and City staff monitor each HOME-financed apartment community to ensure compliance. Recent monitoring of these communities has found compliance with HOME regulations.

Each loan agreement signed between the City and organizations receiving development loans contains the following:

Affirmative Marketing: Borrower shall adopt affirmative marketing procedures and requirements for the rental housing project pursuant to 24 CFR Section 92.351, as may be amended. Affirmative marketing steps consist of actions to provide information and otherwise attract eligible persons in the housing market area to the available housing without regard to race, color, national origin, sex, religion, familial status, or disability.

The affirmative marketing requirements and procedures adopted must include:

1. Methods for informing the public, owners, and potential tenants about fair housing laws and the City of Raleigh's affirmative marketing policy.
2. Requirements and practices Borrower must adhere to in order to carry out the City's affirmative marketing procedures and requirements.
3. Procedures to be used by Borrower to inform and solicit applications from persons in the housing market area who are likely to apply for the housing without special outreach.
4. Records that will be kept describing actions taken by the City of Raleigh and by Borrower to affirmatively market units and records to assess the results of these actions; and
5. A description of how the City of Raleigh will annually assess the success of affirmative marketing actions and what corrective actions will be taken where affirmative marketing requirements are not met.

Refer to IDIS reports to describe the amount and use of program income for projects, including the number of projects and owner and tenant characteristics

There was a total of \$596,683.16 in HOME program income expended in FY-2024-2025 on projects. Of this, \$85,337.10 was expended on home rehabilitation assistance supporting 3 homeowners (2 households between 31-50% AMI, 1 HH below 30% AMI. Two African American households and one White household). A total of \$511,346.06 was expended on two joint-venture rental projects – The Summit at Sawyer and The Preserve at Gresham Lake. The Preserve at Gresham Lake activity remains open, so there is no beneficiary data to report at this time. Funding expended on The Summit at Sawyer activity supports 8 HOME-funded units, all

leased to African Americans with an area median income of 50-60%.

Describe other actions taken to foster and maintain affordable housing. 91.220(k) (STATES ONLY: Including the coordination of LIHTC with the development of affordable housing). 91.320(j)

Local funds have been made available for nonprofit developers to help create or preserve affordable housing in Raleigh. The City seeks to work with developers of affordable housing to purchase existing affordable apartment developments (sometimes unsubsidized) threatened with redevelopment to other uses in Raleigh's more attractive locations.

In June 2016, Raleigh City Council approved a one-cent tax increase for affordable housing, which generated nearly \$11 million in available funds for FY 2024-2025. In November 2020, Raleigh voters approved an Affordable Housing bond of \$80 million with 72% of voters in approval. The one-cent tax increase and affordable housing bond are major sources of local dollars with which the City can aggressively address its need for additional affordable units as well as preserve existing units into the future.

The City committed \$41,340,000 in local and federal funds to construct 1,070 rental units in FY 24-25, both records for the City. The City is working with the Raleigh Area Land Trust (RALT) on its first development in Raleigh utilizing the land trust model. \$2,582,000 in land and gap financing from the City will help RALT provide permanently affordable units for renters and first-time homeowners.

The City has increased its commitment to proactively purchase and or provide funding for rehabilitation to preserve existing affordable housing to counter significant market pressures on housing costs. The City recognizes that preservation of existing units is often a more effective method of keeping low-income tenants stably housed while reducing the high costs of constructing new units.