

Grantee: State of Delaware

Grant: B-08-DN-10-0001

January 1, 2009 thru March 31, 2009 Performance Report

Grant Number:

B-08-DN-10-0001

Obligation Date:**Grantee Name:**

State of Delaware

Award Date:**Grant Amount:**

\$19,600,000.00

Contract End Date:**Grant Status:**

Active

Review by HUD:

Reviewed and Approved

QPR Contact:

Victoria Powers

Disasters:

Declaration Number

NSP

Plan Description:

This document is a substantial amendment to the FY2008 Action Plan submitted by the State of Delaware to HUD for the NSP. The Action Plan is the annual update to the Consolidated Plan for FY2008 2012. This amendment outlines the expected distribution and use of \$19,600,000 allocated to the State of Delaware through the NSP authorized by HERA. The State of Delaware is the only designated recipient of the NSP funds within Delaware. The purpose of the NSP is to assist communities that have been, or are likely to be, affected by foreclosed and abandoned properties, while providing affordable rental and homeownership opportunities to households at or below 120 percent of Area Median Income (AMI) in areas of greatest need. Further, 25 percent of the total NSP funds must be targeted to provide homeownership or rental housing to households whose incomes do not exceed 50 percent of AMI. The Delaware State Housing Authority (DSHA) will implement the NSP funds and ensure they are delivered expeditiously to the areas of greatest need across the entire State. DSHA will use the NSP funds for the purposes intended to promote neighborhood stabilization where subprime lending, foreclosure and housing vacancies have negatively affected the housing market. Eligible uses of the NSP funds must meet a Community Development Block Grant (CDBG) national objective as stated in Title 1 of the Housing and Community Development Act of 1974, which states the eligible activities must benefit low- and moderate-income persons. For the purposes of these funds, HUD also created a middle-income category for households between 80% and 120% of AMI. In Delaware, foreclosures have had an impact on many neighborhoods throughout the State. In some older neighborhoods, in more urban areas, foreclosures have been a result of long-term decline in the neighborhood, while other newer suburban communities foreclosures have increased due to overbuilding of homes not affordable to many residents of that community and recent loose lending practices. In addition, there is some indication that many foreclosures on moderate-cost housing in low-income neighborhoods may be related to people using the equity in their home during a time of increasing home values. This practice led to no resources for homeowners to fall back upon once the home values stopped increasing and they had little or no equity in their homes.

Recovery Needs:

A. AREAS OF GREATEST NEED

Provide summary needs data identifying the geographic areas of greatest need in the grantees jurisdiction.

Note: An NSP substantial amendment must include the needs of the entire jurisdiction(s) covered by the program; states must include the needs of communities receiving their own NSP allocation. To include the needs of an entitlement community, the State may either incorporate an entitlement jurisdictions consolidated plan and NSP needs by reference and hyperlink on the Internet, or state the needs for that jurisdiction in the States own plan. The lead entity for a joint program may likewise incorporate the consolidated plan and needs of other participating entitlement jurisdictions consolidated plans by reference and hyperlink or state the needs for each jurisdiction in the lead entitys own plan.

HUD has developed a foreclosure and abandonment risk score to assist grantees in targeting the areas of greatest

need within their jurisdictions. Grantees may wish to consult this data, in developing this section of the Substantial Amendment.

Response:

DSHA prioritized the geographic areas of greatest need by zip code using the criteria in the HUD HERA regulations:

- A. The number and percentage of home foreclosures in each unit of general local government;
- B. The number and percentage of homes financed by a subprime mortgage-related loan in each State or unit of general local government; and
- C. Data indicating areas likely to face a significant rise in the rate of home foreclosures.

Since October 2007, Delaware has had a Foreclosure Task Force, chaired by Lieutenant Governor John Carney. To assist this Task Force, DSHA identified data sources and created maps of the foreclosure filings and subprime loans in May of 2008. DSHA used this data to develop foreclosure information that accompanied the Request for Proposal (RFP) that was issued in draft on 10/14/08. This data came from the following sources:

1. LexisNexis.com provided the number of Delaware court filings from January 2008 to August 2008;
2. First American Loan Performance Software provided subprime loans data as of the end of March 2008; and
3. Census 2000 provided the number of owner-occupied units.

DSHA updated this information to include information through August 2008 and did some analysis to create a ranking of zip codes of greatest need. In the initial analysis, areas with a high foreclosure history and a high percentage of sub-prime loans were considered areas likely to have a high rate of future foreclosures. This data was ranked by zip code and posted on the DSHA NSP web page with the RFP. This chart is attached as appendix 1-a. A map identifying zip codes addressed in our plan is attached as appendix 1-b. Maps showing foreclosure filings, subprime loan activity and seriously delinquent subprime loans are attached as appendix 2.

DSHA also reviewed HUD data and found it to be consistent with the data developed for the Foreclosure Taskforce. On 10/23/08, we were notified that the HUD data, along with other data, was available and mapped on www.Policymaps.com. We reviewed this source as well, which also mapped information about second mortgages and piggy-back loans. High concentrations of these loans may also be an indicator of future foreclosures. Further, DSHA reviewed data on www.housingpolicy.org and found the data consistent with other sources reviewed.

All of the data ure problems and likely future problems can be found throughout the State; however, two trends seem evident. The first trend is that foreclosures are most concentrated in older neighborhoods in urban areas. These neighborhoods have high density with many small-attached units and the housing in these areas is also older. This housing also tends to be some of the most affordable housing in Delaware; for example the 2009 City of Wilmington Action Plan to HUD cited an average housing price of under \$150,000. Often the households who have purchased these homes are one-income households, and/or low-income households. With disruptions in income due to sickness, unemployment or other unanticipated events, these households may face foreclosure. In Kent and Sussex Counties, a similar trend is seen with foreclosure problems being concentrated in some of the older towns with smaller, older and more affordable housing.

The other trend is increasing foreclosures in newer high-end neighborhoods in southern New Castle County, and northern and central Kent County. These areas have grown explosively in recent years with large, high cost houses. Many of these homes have lost value in recent month leaving people with little or no equity in their homes. Many of the piggy back loans also known as 80/20 loans are concentrated in these areas. In addition, the labor markets in these areas generally do not pay wages that would enable families to afford these homes. Therefore, many of those buying these homes were commuting to more urban areas in northern New Castle County, and the Philadelphia metro areas. As fuel cost increased, and the housing market declined, some of these households were unable to sell their homes closer to their workplaces and decided to sell the newer home farther from employment centers. With fewer potential buyers for these homes, a number of these homes have gone to foreclosure. In other cases, people were provided loans they could not maintain on their incomes, once they realized that they could not afford the home they put it up for sale only to find that there were few buyers and the house was not appreciating as fast as they anticipated. Unable to refinance or sell, these families face foreclosure.

Throughout the State, jurisdictions indicated that major employers were being lost or reducing their workforce and that with increased unemployment, foreclosure rates may increase beyond their current historically high levels.

For more detailed information about housing needs and plans in Delaware please see the following:

Delaware State Housing Authority Statewide Housing Needs Assessment

<http://www.destatehousing.com/information/pubs.shtml>

Select Delaware State-wide Housing Needs Assessment 2008-2012 Executive Summary

Delaware's Five-Year Consolidated Plan 2008-2012

www.destatehousing.com/information/informationmedia/consol_action_plan2008.pdf

City of Wilmington FY2009 Action Plan

[www.ci.wilmington.de.us/redocuments/fy2009-consolidated-](http://www.ci.wilmington.de.us/redocuments/fy2009-consolidated-action-plan-final.pdf)

[action-plan-final.pdf](http://www.ci.wilmington.de.us/redocuments/fy2009-consolidated-action-plan-final.pdf)

New Castle County Consolidated Five-Year Plan

[www.co.new-](http://www.co.new-castle.de.us/housing/home/webpage1.asp)

[castle.de.us/housing/home/webpage1.asp](http://www.co.new-castle.de.us/housing/home/webpage1.asp)

Select link to Consolidated Five-Year Plan 2005-2010 (on left side of web page under helpful links)

City of Dover Consolidated Five-Year Plan

<http://www.cityofdover.com/information/documents/>

Select Community Development Office of 08A to Inundration eto eto

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rdv narrative describing how the distribution and uses of the grantees NSP funds will meet the requirements of Section 2301(c)(2) of HERA that funds be distributed to the areas of greatest need, including those with the greatest percentage of home foreclosures, with the highest percentage of homes financed by a subprime mortgage related loan, and identified by the grantee as likely to face a significant rise in the rate of home foreclosures. Note: The grantees narrative must address these three stipulated need categories in the NSP statute, but the grantee may also consider other need categories.

Process

DSHA utilized a competitive RFP process to allocate the States funds. This process began with the development of a Draft Delaware NSP RFP. This Draft RFP was distributed at a NSP Open Forum held on October 14, 2008; advertised through a Legal Notice in a newspaper of general circulation throughout the State of Delaware; a DSHA Highlights e-mail direct mailing to over 3,000 parties and individuals interested in housing in Delaware; and on the DSHA website. DSHAs NSP Open Forum was open to all interested parties and explained the NSP and DSHAs NSP RFP process. All parties that attended the NSP Open Forum were invited to participate in a NSP Question and Answer Conference Call on October 16, 2008, hosted by a panel from DSHA. The final Delaware Neighborhood Stabilization Program Request for Proposals and Application package was posted on DSHAs website on October 17, 2008. Applications were due to DSHA at 4:00 on Friday, October 31, 2008 at the DSHA offices in either Dover or Wilmington. Eligible applicants included units of local government and nonprofits.

DSHA strongly suggested that applicants join together and submit a single application using a strong lead applicant and partners with experience in the areas of expertise that would lead to a strong comprehensive NSP. DSHA received nine applications totaling \$60,485,250.00, of which one application did not meet the minimum threshold requirements.

The eight eligible applications were reviewed and ranked by DSHA staff and interested parties by the following criteria:

- 25 points Areas of greatest need;
 - 15 points Impact on communities;
 - 15 points Management capacity and partnerships;
 - 10 points Low-income targeting;
 - 15 points Promoting long-term affordability;
 - 10 points Program description;
 - 5 points Budget and leveraging; and
 - 5 points Performance measurements.
- 100 points Total Points

Areas of greatest need was given the most weight to ensure that need was the primary factor in recommending

funding and the following three areas were considered: (A) the number and percentage of home foreclosures in each unit of general local government; (B) the number and percentage of homes financed by a subprime mortgage related loan in each State or unit of general local government; and (C) data indicating areas likely to face a significant rise in the rate of home foreclosures. For (C) data indicating areas likely to face a significant rise in the rate of home foreclosures, DSHA considered that areas of high sub-prime lending and a history of high foreclosures would be areas already destabilized by foreclosure problems and likely to have declining property values and increasing foreclosures without assistance from the NSP.

While the following areas were considered: (A) the number and percentage of home foreclosures in each unit of general local government; (B) the number and percentage of homes financed by a subprime mortgage related loan in each State or unit of general local government; and (C) data indicating areas likely to face a significant rise in the rate of home foreclosures. For (C) data indicating areas likely to face a significant rise in the rate of home foreclosures, DSHA considered that areas of high sub-prime lending and a history of high foreclosures would be areas already destabilized by foreclosure problems and likely to have declining property values and increasing foreclosures without assistance from the NSP.

The following chart indicates the funding recommendations and recommended distribution of funds:

Applicant	Funding Recommended
City of Dover	\$1,500,000
City of Wilmington	\$5,600,000
New Castle County	\$7,000,000
Kent County	\$2,500,000
Sussex County	\$2,000,000

DSHA's NSP RFP allows the above subgrantees to each use five percent of their NSP funds for general administration of their NSP. DSHA has reserved \$1,000,000 of Delaware's \$19,600,000 in NSP funds for State General Administration of the Program.

On October 11, 2008, DSHA published a Notice of Availability of Draft Delaware Neighborhood Stabilization Program Action Plan Substantial Amendment to the Delaware FY2008 Annual Action Plan in the two main Delaware newspapers of general circulation. The Draft Action Plan Amendment was available on the DSHA website www.destatehousing.com, and at the locations listed under section F. Public Comment, below, on November 12, 2008.

C. DEFINITIONS AND DESCRIPTIONS

(1) Definition of blighted structure in context of state or local law.

Response:

According to HUD, a structure is blighted when it exhibits objectively determinable signs of deterioration sufficient to constitute a threat to human health, safety, and public welfare. Further, DSHA considers a structure to be blighted if it does not meet the Delaware State Housing Code or the local building code for each subgrantee.

(2) Definition of affordable rents. Note: Grantees may use the definition they have adopted for their CDBG program but should review their existing definition to ensure compliance with NSP program specific requirements such as continued affordability.

Response:

For any NSP-funded rental activity, affordable rents are defined as 30 percent of the households monthly gross income, less utility allowances. Total monthly costs (rent plus tenant-paid utilities) cannot exceed 30 percent of the HUD AMI for the appropriate County, household size, bedroom size, and target income group.

DSHA annually prepares and updates Utility Allowance Charts for Kent and Sussex Counties that show the applicable utility allowance for each tenant-provided utility. New Castle County prepares a similar chart for New Castle County utility allowances.

(3) Describe how the grantee will ensure continued affordability for NSP assisted housing.

Response:

HUD requires that States ensure, to the maximum extent practicable and for the longest feasible term, that the sale, rental or redevelopment of abandoned and foreclosed upon homes and residential properties remain affordable to

individuals or families whose incomes do not exceed 120 percent of AMI. Additionally, for units originally assisted with funds to meet the requirement, that 25 percent of the funds be used to assist households with incomes at or below 50 percent of AMI, and that these units remain affordable to households with incomes at or below 80 percent of AMI.

If the proposal submitted and accepted by DSHA includes at least one minimum long-term affordability restriction as set forth in the RF. The following are the minimum criteria:

NSP Subsidy Amount Minimum Affordability Control Period Minimum Restriction

- Less than \$10,000 5 Years Subsidy recapture, reduced by 20% each year
- \$10,001 - \$20,000 10 Years Subsidy recapture, reduced by 15% each year
- \$20,001 - \$40,000 15 Years Subsidy recapture, reduced by 10% each year
- \$40,001 - \$60,000 20 Years Subsidy recapture, reduced by 5% each year
- \$60,001 and above 30 Years Subsidy retention during control period

DSHA has established the affordability control guidelines above as minimums, but expects that where market conditions allow, many of the properties assisted with significant subsidy will become a part of Delaware's permanently-affordable housing stock through management by the Diamond State Community Land Trust.

Properties may be made affordable using multiple subsidy resources. The above minimum standards will only apply to the amount of subsidy provided by the NSP.

(4) Describe housing rehabilitation standards that will apply to NSP assisted activities.

Response:

NSP-funded housing rehabilitation must bring substandard housing units into compliance with the Delaware State Housing Code and/or the local building code.

D. LOW INCOME TARGETING

Identify the estimated amount of funds appropriated or otherwise made available under the NSP to be used to purchase and redevelop abandoned or foreclosed upon homes or residential properties for housing individuals or families whose incomes do not exceed 50 percent of area median income:

Response:

At least \$4,900,000 of the NSP funds will be utilized for housing individuals and families whose incomes do not exceed 50 percent of area median income. The following is a projected breakdown by subgrantees:

Subgrantee Total Units = or < 50 percent of AMI	
Dover	22 6
Wilmington	65 13
New Castle County	55 11
Kent County	25 7
Sussex County	25 7

Our current estimate of funds to be used for assisting households with incomes at 50% of the AMI and under would be \$5,407,925 (about 28% of NSP funds). However, this is an estimate and actual use of funds may be higher or lower, but will be no less than \$4,900,000 or 25% of the funds provided to Delaware under the NSP. While DSHA commits to using 25% of the funds for housing for people at or below 50% AMI, we may not be able to deliver 25% of the total units to people in those income ranges due to the higher subsidy needed to serve people with lower incomes.

E. ACQUISITIONS & RELOCATION

Indicate whether grantee intends to demolish or convert any low- and moderate-income dwelling units (i.e., = or < 80% of area median income).

If so, include:

· The number of low- and moderate-income dwelling units i.e., = or < 80% of area median income reasonably expected to be demolished or converted as a direct result of NSP-assisted activities.

DSHA expects that nine units of housing in New Castle County (including the City of Wilmington) will be demolished and redeveloped as a direct result of NSP-assisted activities. These units are likely to be in older more urban areas. DSHA will work with the subgrantees to ensure that the demolition activity is limited to those areas identified as redevelopment areas. Units to be demolished will be standard, vacant units and would not require relocation.

Subgrantee	Total Units	0% AM and Under	5% AMI-12% AI
New Castle County	55	1	4
Wilmington	65	3	2
Kent County	25	7	18
Dover	22	6	16
Sussex	25	7	18
TOTAL	192	44	148

· The number of NSP affordable housing units made available to low-, moderate-, and middle-income households i.e., < 120% of area median income reasonably expected to be produced by activity and income level as provided for in DRGR, by each NSP activity providing such housing (including a proposed time schedule for commencement and completion).

The proposed time schedule for commencement and completion are defined in the activity section for each local jurisdiction awarded funds.

F. PUBLIC COMMENT

This section provides a summary of public comments received to the proposed NSP Substantial Amendment.

DSHA provided an opportunity to comment on the draft plan from November 12, 2008 through November 26, 2008. DSHA posted the NSP Substantial Amendment on the Agency web-site and provided it at several public locations. DSHA published the notice of the NSP amendments comment period in the States two main Newspapers. Those notices provided the following information:

Persons who would like to comment on this substantial amendment may send those comments to Andy Lorenz, Delaware State Housing Authority, 18 The Green, Dover, DE 19901 or andy@destatehousing.com. Comments must be received by 4:00 p.m. on November 26, 2008.

The Substantial Amendment to the Delaware FY 2008 Annual Action Plan is available on DSHA's website at www.destatehousing.com and at the following locations:

Kent County

Delaware State Housing Authority
18 The Green
Dover, DE 19901

Kent County Community Development Section
Kent County Complex
555 Bay Road
Dover, DE 19901

City of Dover Public Library
45 South State Street
Dover, DE 19901

Sussex County

Sussex County
Sussex County Administrative Building West Complex
P.O. Box 589
Georgetown, DE 19947

Seaford Public Library
402 North Porter Street
Seaford, DE 19973

New Castle County

Delaware State Housing Authority
Carvel State Office Building
820 North French Street
Tenth Floor
Wilmington, DE 19801

New Castle County Department of Community Services
Community Development and Housing Division
New Castle County Government Center
87 Reads Way
New Castle, DE 19720-1603

Wilmington Public Library
Central Library
10th & Market Streets
Wilmington, DE 19801

DSHA received comment on 11/25/08 from Van Temple at the Diamond State Community Land Trust, Representative Daniel B. Short, 39th District, State Representative and Ralph W. Peters Jr., President of Sussex County Habitat for Humanity Board of Directors. Copies of the letters are attached as appendix 3. The comments are in italics below, with DSHAs responses:

Comments from Van Temple, Diamond State Community Land Trust

Comment:

Thanks for the opportunity to comment on the Substantial Amendment developed to include the Neighborhood Stabilization Program funding that is to be made available to Delaware. From our telephone conversations since the Substantial Amendment was posted I understand that DSHA intends to submit an NSP plan to HUD that will allow entities like Diamond State CT to continue in the interim period to pursue financial innovations that may expand the size and scope of not only permanently affordable owner-occupied housing but also other initiatives as well. A time goes by, we are seeing more groups across the country work on financing mechanisms that go well beyond the typical leveraging of FHLB funds, for instance. We strongly encourage DSHA to look at ways to expand this one-time NSP funding stimulus into something much

bigger for statewide implementation. The best point along the funding stream to implement serious leveraging is at the state level with the entire \$19.6 million before it has been distributed to the County/City sub-recipients. Leveraging at the sub-recipient level in smaller dollar amounts is not likely to yield the overall expansion of the funds that are possible at the state level.

DSCLT is continuing to develop its New Markets Tax Credits Leveraging plans. We are very close to having NMTC commitment letters and we already have the key players for our approach in place. Over the next few weeks we intend to present this plan to the County/City sub-recipients and other implementation partners to seek their support. Our intent in pursuing this initiative is to help make the pie bigger for the whole of Delaware and take full advantage of this much needed foreclosure recovery stimulus.

Response:

DSHA encourages all jurisdictions recommended for funding to continue to discuss creative ways to use NSP funds to leverage additional funds to address the needs of neighborhoods impacted by foreclosures. To the extent that jurisdictions would like to work together to use New Market Tax Credits to make a greater impact, DSHA will be supportive and as flexible as possible.

Comment:

From our telephone conversations I understand that DSHA expects a substantial portion of the homes for sale to become a part of the states permanently affordable housing stock. When I read the Amendment I see that reflected in the language. However, Im not sure that the groups are understanding that same intent. Since the Amendment was issued I have had conversations with two of the five successful sub-recipients and neither one has that understanding.

Diamond State CLT.

Response:

DSHA has revised the sections in each of the activities and in the narrative to try and make it more clear that we expect a portion of the homes for sale to become part of the States permanently-affordable housing stock.

Comment:

Permanent Affordability Intent. Part of what makes the Amendment not as clear as it could be is the wording inconsistency between the Threshold Criteria table and the NSP Information by Activity for each County/City group. The Threshold Criteria indicates that for subsidy amounts of \$60,001 and above the subsidy retention period is 30 years. At the same time in each County/City Section G. 11, For housing related activities states - "A subsidy of \$60,000 or more would require that the home become a part of Delaware's permanently affordable housing stock." This appears to be an internal inconsistency that should be resolve.

Response:

There was an internal inconsistency within the document as identified above, DSHA has resolved this inconsistency by adding language to section C-3 and revising the language in County/City Section G.11, Duration of term of assistance.

Comment:

A second question within the Section G. 11 word in - "A subsidy of \$60,000 or more.." I assume that this is referring to the net amount of NSP funding that goes into a particular house after the sales proceeds are accounted for and of the total of all subsidy sources going into the house. Is this the proper understanding? I am sure there will be other non-NSP subsidies going into many of these homes so it will be important to make this requirement precise.

Response:

This is correct; the affordability restrictions would only apply to the net NSP funding provided to support the home being moved from foreclosure to productive use. The wording has been revised to make it clear that these restrictions only apply to the NSP portion of the subsidy.

Comment:

Zip Code Duplication. Some zip codes that are duplicated in the different jurisdictions. These include 19904, 19802 and 19963. If the allocations for these zip codes could be split based on the percentage of population served by one jurisdiction or another, or be allocated, in full to a single jurisdiction - this would enable the state to expand the program into other areas that are in need, but not currently represented in the plan.

Response:

Several zip codes cross jurisdictions, in the case of 19802, Wilmington and New Castle each indicated that they would be working in the part of the zip code within their jurisdiction. In the case of other zip codes, this was not

detailed in the applications, but DSHA will ensure that Governments awarded the NSP funding will work only in those areas that fall within their jurisdiction, unless agreements dictating otherwise are developed between jurisdictions.

Comment:

Opportunity to Review. We request that the RFP applicants are given an opportunity to review their scoring, as well as the proposals and scoring of the other jurisdictions. While the plan submitted to HUD is flexible in nature, it does not detail how each jurisdiction specifically plans to do the work. I would assume that the jurisdictions would like the opportunity to share best practices and ideas as this will be a state-wide effort.

Response:

DSHA would be willing to provide individual feedback on scoring to applicants requesting a debriefing. Applicants are aware of other jurisdictions that have been recommended for funding and are welcome to share information about planned implementation efforts. DSHA does plan to offer opportunities for jurisdictions planning to participate in the NSP to discuss how they plan to implement their activities through future conference calls and meetings.

Comment:

Miscellaneous. Sussex County Consolidated Plan is not listed as an appendix like the other jurisdictions. It would also be helpful if Appendix 1 were made available to the public and the jurisdictions to further understand DSHA's allocation process.

Response:

Sussex County does not prepare a Consolidated Plan for HUD, but is included in the Consolidated Plan submitted by DSHA for Kent and Sussex Counties. It is located at:

www.destatehousing.com/information/informationmedia/consol_action_plan2008.pdf

Appendix 1 is the zip code information that was provided to all applicants at the public forum held on 10/14/08 and provided on the DSHA web-site as a data source for applicants to use. This is the first data that DSHA had, but is not the only data used in making funding recommendations. On 10/23/08, we were notified that the HUD data, along with other data, was available and appended to www.Poicymaps.com. We reviewed this data as well as data on www.housngpoliy.org and found the data fairly consistent.

Comments from Representative Daniel B. Sort, State Representative 39th District

Comment:

Using the data provided by DSHA for foreclosure filings in Delaware, the Sussex County zip code in the State action plan represents 1.45% of the foreclosure filings represented in the plan, yet the county was only allocated 10.75% of the funding. While the subprime lending numbers were less, just 9.82%, a median allocation would be 11.64% or \$2,165,040.

Comparatively, the City of Wilmington's median foreclosure filing and subprime scoring percentage is 17.34% yet they were allocated 30.11% of the resources allocated.

Response:

Throughout the NSP process, Congress, HUD and DSHA have been clear that NSP funding must be targeted to areas of greatest need. As DSHA staff prepared for developing our Substantial Amendment for NSP funding, staff attended a number of meetings and conference calls to get direction on how to allocate funding and consistently received direction that assistance was to be targeted to stabilizing neighborhoods as the name of the program implied. While data was not available at a neighborhood level in all cases, Delaware had good data by zip code. DSHA repeatedly encouraged Sussex County and other applicants to target areas of greatest need where impact could be demonstrated on how NSP assistance improved the current and likely future stability of neighborhoods. We asked that they not try to do one house in every zip code or neighborhood, but concentrate activity in areas of greatest need. Sussex County began their application: Sussex County, although largely rural, has not escaped the foreclosure crisis that is pelting the nation. In fact, as the maps reveal, there does not appear to be an area of the County that has not been impacted by foreclosures. Normally, the west and east sides of the County have drastically different real estate markets due to the primarily agricultural nature of the west side and the resort attractiveness of the east. However, the foreclosure crisis is unbiased when it comes to subprime lending, adjustable rate mortgages, and the ripples of an economy going sour. Sussex continued to make an argument that the whole County was an area of greatest need, while other applicants targeted zip codes and neighborhoods and laid out plans as to how NSP funding would stabilize those areas and thereby strengthen the greater community.

Comment:

It is my understanding that Sussex County was restricted to focusing on just five zip codes, while other jurisdictions were allowed to focus on as many as seven. Given that 20% of foreclosure filings in the State are in Sussex County, an expanded geographic focus may have constituted a greater need during the DSHA scoring process.

Response:

DSHA did not restrict Sussex County to five zip codes, but encouraged them to target zip codes of greatest need and tried to provide assistance by identifying the zip codes that appeared to be areas of greatest need. Recognizing that Sussex County has areas of significant need, DSHA staff did strongly suggest that Sussex County target zip codes so that their application would meet threshold criteria, which included that the applicant targeted areas of greatest need. Other areas have zip codes that had been much more impacted by the foreclosure crisis and therefore were able to identify more zip codes as areas of highest need.

Comment:

There are a number of zip codes that we duplicate in full in the different jurisdictions. These include 19904, 19802 and 19963. It is my thought that the allocations for these zip codes could be split based on the percentage of population served by one jurisdiction or another.

Response:

Several zip codes cross jurisdictions, in the case of 19802, Wilmington and New Castle each indicated that they would be working in the part of the zip code within their jurisdiction. In the case of other zip codes this was not detailed in the applications, but DSHA will ensure that the Government's awarded the NSP funding will work only in those areas that fall within their jurisdiction, unless agreements dictating otherwise are developed between jurisdictions.

Comment:

According to the Delaware Housing Coalitions Who Can Afford to Live in Delaware, the average home price in Kent County is \$205,000, compared to \$279,000 in Sussex County, yet the States NSP plan assumes that both counties will complete 32 total units. This is particularly concerning considering that Kent County received an allocation that is \$500,000 more than Sussex County.

Response:

The chart in Section E assumes that both Kent and Sussex Counties will address a total of 25 units with 7 of them being for people earning 50% of AMI or less and 18 being for people earning between 50% and 120% of AMI. DSHA used information in the Sussex and Kent County Plans to develop targets based on costs and activities in their applications. Sussex County provided information indicating an average subsidy of \$57,500 per unit. With a total actual allocation of \$2,000,000, and with \$100,000 set aside for administration, the estimated units would now be 33 units. Kent's cost estimates included several units of special needs housing that were to have significant NSP investments and reduced the overall number of homes that would be assisted.

Comment:

I would also like to request that the RFP applicants are given an opportunity to review their scoring, as well as the proposals and scoring of the other jurisdictions. While the plan submitted to HUD is flexible in nature, it does not detail how each jurisdiction specifically plans to do the work. I would assume that the jurisdictions would like the opportunity to share best practices and ideas as this will be a state-wide effort.

Response:

DSHA would be willing to provide individual feedback on scoring to applicants requesting a debriefing. Applicants are aware of other jurisdictions that have been recommended for funding and are welcome to share information about planned implementation efforts. DSHA does plan to offer opportunities for jurisdictions planning to participate in NSP to discuss how they plan to implement their activities through future conference calls and meetings.

Comment:

Please note that Delaware's Plan exceeds the maximum 10% allowance for administration and that Sussex County Consolidated Plan is not listed as an appendix like the other jurisdictions. I also think that it would be helpful if Appendix 1 were made available to the public and the jurisdictions to further understand DSHA's allocation process.

Response:

	Award Amount	Admin 5%
New Castle County	7,000,000.00	350,000.00
Wilmington	5,600,000.00	280,000.00
Kent County	2,500,000.00	125,000.00
Dover	1,500,000.00	75,000.00
Sussex	2,000,000.00	100,000.00
TOTAL	18,600,000.00	930,000.00
DSHA State admin.		1,000,000.00
	19,600,000.00	1,930,000.00
10% Admn		1,960,000.00

The allowable administration for Delaware program would be \$1,960,000; DSHA intends to use \$1,930,000 for

administrations indicated in the chart above. This would be approximately 9.8% of the NSP allocation

Appendix 1 is the zip code information that was provided to all applicants at the public forum held on 10/14/08 and provided on the DSHA web-site as a data source for applicants to use. This is the first data that DSHA had, but is not the only data used in making funding recommendations. On 10/23/08, we were notified that the HUD data, along with other data, was available and mapped on www.Policymaps.com. We reviewed this data as well as data on www.housingpolicy.org and found the data fairly consistent.

Comments from Mr. Ralph W. Peters Jr., President of Sussex County Habitat for Humanity Board of Directors.

** Please see Mr. Peters letter attached

Response:

Mr. Peters comments center around the great affordable housing needs in Sussex County including foreclosures, cost burdened homeowners and substandard housing and how those needs appear to be a greater issue in Sussex than in Kent County, but Kent County received more NSP funding than Sussex County. While DSHA would agree that Sussex County has affordable housing needs, the NSP is directed towards making an impact in neighborhoods by moving foreclosed properties back into the occupied inventory in a way that stabilizes neighborhoods. Sussex County, either by the facts of foreclosure patterns or in an effort to spread the NSP funds around, did not provide an application that demonstrated a plan to use NSP funds to stabilize communities in a strategic way. Sussex County asked for a large percentage of the NSP State allocation to purchase and resale properties throughout the County. DSHA provided adequate funding to allow Sussex County to make a major impact in a few areas of greatest need. Comments from Brandy A. Bennett, Sussex County Housing Coordinator

** Please see Ms. Bennetts letter attached

Response:

Many of the issues identified in Ms. Bennetts letter have been addressed elsewhere in the comments. Our clear understanding is that NSP funding needs to be targeted to areas of greatest need and directed to pockets of critical need. While we understand Sussex County's desire for flexibility in targeting the funding based on actual foreclosure activity at the time the funding is available, we need to target the funds in our Plan to HUD due December 1, 2008 to a much more local level than Countywide.

Our Request for Proposals specifically indicated that targeting areas of greatest need was a priority and was the factor receiving the most points in our scoring process. DSHA staff encouraged Sussex County to target the zip codes with high foreclosures and subprime loans and even provided direction as to which zip codes in Sussex appeared to have significant need. Using Housingpolicy.org information on foreclosures which has a rating of relative need Statewide, Sussex County has no zip codes in the top 10 areas of need for Delaware and only one zip code in the top 15 areas of need. However, DSHA considered other data including foreclosure data provided by Sussex County and elected to fund additional zip codes beyond the two that appear to have greater relative need using HUD's methodology for establishing relative need.

Comments from Kevin Gilmore, Executive Director, Sussex County Habitat for Humanity

* Please see Mr. Gilmore's letter attached

Response:

All of the issues identified in Mr. Gilmore's letter have been addressed elsewhere in the comments.

G. NSP INFORMATION BY ACTIVITY (COMPLETE FOR EACH ACTIVITY)

CITY OF DOVER

1. Activity Name: Purchase and Rehabilitation of Residential Properties for Resale, Rent, or Redevelopment and Establish Financing Mechanisms.

2. Activity Type: NSP eligible use: 2301(c)(3)(A) Establish financing mechanisms for purchase and redevelopment

of foreclosed upon homes and residential properties, including such mechanisms as soft-seconds, loan loss reserves, and shared-equity loans for low- and moderate-income homebuyers. 2301(c)(3)(B) Purchase and rehabilitate homes and residential properties that have been abandoned or foreclosed upon, in order to sell, rent, or redevelop such homes and properties.

CDBG eligible activity: As part of an activity delivery cost for an eligible activity as defined in 24 CFR 570.206. Also, the eligible activities listed below to the extent financing mechanisms are used to carry them out. 24 CFR 570.201 (a) Acquisition, (b) Disposition, (i) Relocation, and (n) Direct homeownership assistance (as modified below); 570.202 Eligible rehabilitation and preservation activities for homes and other residential properties (HUD notes that rehabilitation may include counseling for those seeking to take part in the activity.)

3. National Objective: Meets national objective benefiting low-, moderate- and middle-income persons, as defined in the NSP Notice (< or = to 120 percent of area median income).

4. Projected Start Date: March, 2009

5. Projected End Date: March, 2013

6. Total Budget: \$1,500,000.00

7. Responsible Organization: City of Dover
15 E. Loockerman Street
Dover, DE 19901
Tracey Harvey, Community Development Manager

8. Location Description: 19901, 19904 (Part)

9. Activity Description: The City of Dover will utilize the NSP funds to purchase and rehabilitate residential properties for resale, rent or redevelopment, as well as establish financing mechanisms.

10. Performance Measures: See chart in Section E

11. Specific Activity Requirements:

For acquisition activities, include:

- Discount Rate: Each foreclosed-upon home or residential property shall be purchased at a discount of at least 5 percent from the current market-appraised value of the home or property. The average purchase discount for all properties purchased by the City of Dover with NSP funds shall be at least 15 percent.

For financing activities, include:

- Range of interest rates: To be determined.

Through homeownership counseling, individuals and families will be directed to institutions that provide the most competitive 30-year mortgage interest rates.

For housing-related activities, include:

- Duration or term of assistance:

DSHA established a recapture schedule based on the amount of subsidy provided to the homebuyer as outlined in Section C. A subsidy of \$60,000 or more would require at minimum that the full amount of the subsidy be returned if the property is sold within 30 years, however DSCLT was identified as a partner and we expect that many of the homes requiring significant subsidy will become part of Delaware's permanently-affordable housing stock through management by the DSCLT.

- Tenure of beneficiaries--rental or homeownership:

Rental units will only be allowed for special needs populations including persons with disabilities and people who are homeless or at risk of homelessness. All other units will be homeownership.

- A description of how the design of the activity will ensure continued affordability:

The City of Dover will utilize a variety of methods to insure continued affordability. These include, but are not limited to, Community Land Trusts (CLT), soft second mortgages, downpayment assistance, shared equity and liens on the properties.

G. NSP INFORMATION BY ACTIVITY (COMPLETE FOR EACH ACTIVITY)

CITY OF WILMINGTON

1. Activity Name: Purchase and Rehabilitation of Residential Properties for Resale, Rent, or Redevelopment and Establish Financing Mechanisms. Demolition.

2. Activity Type: NSP eligible use: 2301(c)(3)(A) Establish financing mechanisms for purchase and redevelopment of foreclosed upon homes and residential properties, including such mechanisms as soft-second, loan loss reserves, and shared-equity loans for low- and moderate-income homebuyers. 2301(c)(3)(B) Purchase and rehabilitate homes and residential properties that have been abandoned or foreclosed upon, in order to sell, rent, or redevelop such homes and properties. 2301(c)(3)(D) Demolish blighted structures.

CDBG eligible activity: As part of an activity delivery cost for an eligible activity as defined in 24 CFR 570.206. Also, the eligible activities listed below to the extent financing mechanisms are used to carry them out. 24 CFR 570.201 (a) Acquisition, (b) Disposition, (i) Relocation, and (n) Direct homeownership assistance (as modified below); 570.202 Eligible rehabilitation and preservation activities for homes and other residential properties (HUD notes that rehabilitation may include counseling for those seeking to take part in the activity). 24 CFR 570.201(d) Clearance for blighted structures only.

3. National Objective: Meets national objective benefiting low-, moderate- and middle-income persons, as defined in the NSP Notice (< or = to 120 percent of area median income).

4. Projected Start Date: March, 2009

5. Projected End Date: March, 2013

6. Total Budget: \$5,600,000.00

7. Responsible Organization: City of Wilmington
Department of Real Estate & Housing
Louis L. Redding City/County Building
800 North French Street, 7th Floor
Wilmington, DE 19801
Timothy G. Crawl-Bey, Director

8. Location Description: 19801, 19802 (Part), 19805 (Part)

9. Activity Description: The City of Wilmington will utilize the NSP funds to purchase and rehabilitate residential properties for resale, rent or redevelopment, as well as establish financing mechanisms. A small portion of the funds will be used for demolition.

10. Performance Measures See chart in Section E.

11. Specific Activity Requirements:

For acquisition activities, include:

- Discount Rate: Each foreclosed-upon home or residential property shall be purchased at a discount of at least 5 percent from the current market-appraised value of the home or property. The average purchase discount for all properties purchased by the City of Wilmington with NS funds shall be at least 5 percent.

For financing activities, include:

- Range of interest rates: To be determined.

Through homeownership counseling, individuals and families will be directed to institutions that provide the most competitive 30-year mortgage interest rates

For housing-related activities, include:

- Duration or term of assistance:

DSHA established a recapture schedule based on the amount of subsidy provided to the homebuyer as outlined in

Section C. A subsidy of \$60,000 or more would require that the full amount of the subsidy be returned if the property is sold within 30 years, however DSCLT was identified as a partner and we expect that a few of the homes requiring significant subsidy will become a part of Delaware's permanently-affordable housing stock through management by the DSCLT.

· Tenure of beneficiaries--rental or homeownership:

Rental units will only be allowed for special needs population including persons with disabilities and people who are homeless or at risk of homelessness. All other units will be homeownership.

· A description of how the design of the activity will ensure continued affordability:

The City of Wilmington will utilize a variety of methods to insure continued affordability. These include, but are not limited to, Community Land Trusts (CLT), soft second mortgages, downpayment assistance, shared equity and liens on the properties.

G. NSP INFORMATION BY ACTIVITY (COMPLETE FOR EACH ACTIVITY)

NEW CASTLE COUNTY

1. Activity Name: Purchase and Rehabilitation of Residential Properties for Resale, Rent, or Redevelopment and Establish Financing Mechanisms. Demolition.

2. Activity Type: NSP eligible use: 2301(c)(3)(A) Establish financing mechanisms for purchase and redevelopment of foreclosed upon homes and residential properties, including such mechanisms as soft-second, loan loss reserves, and shared-equity loans for low- and moderate-income homebuyers. 2301(c)(3)(B) Purchase and rehabilitate homes and residential properties that have been abandoned or foreclosed upon, in order to sell, rent, or redevelop such homes and properties. 2301(c)(3)(D) Demolish blighted structures.

CDBG eligible activity: As part of an activity delivery cost for an eligible activity as defined in 24 CFR 570.206. Also, the eligible activities listed below to the extent financing mechanisms are used to carry them out. 24 CFR 570.201 (a) Acquisition, (b) Disposition, (i) Relocation, and (n) Direct homeownership assistance (as modified below); 570.202 Eligible rehabilitation and preservation activities for homes and other residential properties (HUD notes that rehabilitation may include counseling for those seeking to take part in the activity). 24 CFR 570.201(d) Clearance for blighted structures only.

3. National Objective: Meets national objective benefiting low-, moderate- and middle-income persons, as defined in the NSP Notice (< or = to 120 percent of area median income).

4. Projected Start Date: September 9, 2009

5. Projected End Date: June 30, 2014

6. Total Budget: \$7,000,000.00

7. Responsible Organization: NCC Department of Community Services

77 Reads Way

New Castle, DE 19720

Anne Farley, General Manager

8. Location Description: 19720 (New Castle), 19702, 19709, 19802 (Part), 19805 (Part), 19701 (Bear)

9. Activity Description: New Castle County will utilize the NSP funds to purchase and rehabilitate residential properties for resale, rent or redevelopment, as well as establish financing mechanisms. A small portion of the funds will be used for demolition.

10. Performance Measures: See chart in Section E.

11. Specific Activity Requirements:

For acquisition activities, include

· Discount Rate: Each foreclosed-upon home or residential property shall be purchased at a discount of at least 5 percent from the current market-appraised value of the home or property. The average purchase discount for all properties purchased by New Castle County with NSP funds shall be at least 15 percent.

For financing activities, include:

Range of interest rates: To be determined.

Through homeownership counseling, individuals and families will be directed to institutions that provide the most competitive 30-year mortgage interest rates.

For housing-related activities, include:

· Duration or term of assistance:

DSHA established a recapture schedule based on the amount of subsidy provided to the homebuyer as outlined in Section C. A subsidy of \$60,000 or more would require at minimum that the full amount of the subsidy be returned if the property is sold within 30 years, however DSCLT was identified as a partner and we expect that many of the homes requiring significant subsidy will become a part of Delaware's permanently-affordable housing stock through management by the DSCLT.

· Tenure of beneficiaries--rental or homeownership:

Rental units will only be allowed for special needs population including persons with disabilities and people who are homeless or at risk of homelessness. All other units will be homeownership.

· A description of how the design of the activity will ensure continued affordability:

New Castle County will utilize a variety of methods to insure continued affordability. These include, but are not limited to, Community Land Trusts (CLT), soft second mortgages, downpayment assistance, shared equity and liens on the properties.

G. NSP INFORMATION BY ACTIVITY (COMPLETE FOR EACH ACTIVITY)

KENT COUNTY

1. Activity Name: Purchase and Rehabilitation of Residential Properties for Resale, Rent, or Redevelopment and Establish Financing Mechanisms.

2. Activity Type: NSP eligible use: 2301(c)(3)(A) Establish financing mechanisms for purchase and redevelopment of foreclosed upon homes and residential properties, including such mechanisms as soft-second, loan loss reserves, and shared-equity loans for low- and moderate-income homebuyers. 2301(c)(3)(B) Purchase and rehabilitate homes and residential properties that have been abandoned or foreclosed upon, in order to sell, rent, or redevelop such homes and properties.

CDBG eligible activity: As part of an activity delivery cost for an eligible activity as defined in 24 CFR 570.206. Also, the eligible activities listed below to the extent financing mechanisms are used to carry them out. 24 CFR 570.201 (a) Acquisition, (b) Disposition, (i) Relocation, and (n) Direct homeownership assistance (as modified below); 570.202 Eligible rehabilitation and preservation activities for homes and other residential properties (HUD notes that rehabilitation may include counseling for those seeking to take part in the activity).

3. National Objective: Meets national objective benefiting low-, moderate- and middle-income persons, as defined in the NSP Notice (< or = to 120 percent of area median income).

4. Projected Start Date: March 1, 2009

5. Projected End Date: July 30, 2013

6. Total Budget: \$2,500,000.00

7. Responsible Organization: Kent County Levy Court
555 Bay Road
Dover, DE 19901
Michael Petit de Mange, Administrator

8. Location Description: 19934 (Camden/Wyoming), 19977 (Smyrna), 19904 (part), 19938 (Clayton), 19952 (Harrington), 19962 (Magnolia) 19963 (Part)

9. Activity Description: Kent County will utilize the NSP funds to purchase and rehabilitate residential properties for resale, rent or redevelopment, as well as establish financing mechanisms.

10. Performance Measures: See chart in Section E.

11. Specific Activity Requirements

For acquisition activities, include:

- Discount Rate: Each foreclosed-upon home or residential property shall be purchased at a discount of at least 5 percent from the current market-appraised value of the home or property. The average purchase discount for all properties purchased by Kent County with NSP funds shall be at least 15 percent.

For financing activities, include:

- Range of interest rates: To be determined.

Through homeownership counseling, individuals and families will be directed to institutions that provide the most competitive 30-year mortgage interest rates.

For housing-related activities, include:

- Duration or term of assistance:

DSHA established a recapture schedule based on the amount of subsidy provided to the homebuyer as outlined in Section C. A subsidy of \$60,000 or more would require at minimum that the full amount of the subsidy be returned if the property is sold within 30 years, however DSCLT was identified as a partner and we expect that many of the homes requiring significant subsidy will become a part of Delaware's permanently-affordable housing stock through management by the DSCLT.

- Tenure of beneficiaries--rental or homeownership:

Rental units will only be allowed for special needs population including persons with disabilities and people who are homeless or at risk of homelessness. All other units will be homeownership.

- A description of how the design of the activity will ensure continued affordability:

Kent County will utilize a variety of methods to insure continued affordability. These include, but are not limited to, Community Land Trusts (CLT), soft second mortgages, downpayment assistance, shared equity and liens on the properties.

G. NSP INFORMATION BY ACTIVITY (COMPLETE FOR EACH ACTIVITY)

SUSSEX COUNTY

1. Activity Name: Purchase and Rehabilitation of Residential Properties for Resale, Rent, or Redevelopment and Establish Financing Mechanisms.

2. Activity Type: NSP eligible use: 2301(c)(3)(A) Establish financing mechanisms for purchase and redevelopment of foreclosed-upon homes and residential properties, including such mechanisms as soft-second, loan loss reserves, and shared-equity loans for low- and moderate-income homebuyers. 2301(c)(3)(B) Purchase and rehabilitate homes and residential properties that have been abandoned or foreclosed upon, in order to sell, rent, or redevelop such homes and properties.

CDBG eligible activity: As part of an activity delivery cost for an eligible activity as defined in 24 CFR 570.206. Also, the eligible activities listed below to the extent financing mechanisms are used to carry them out. 24 CFR 570.201 (a) Acquisition, (b) Disposition, (i) Relocation, and (n) Direct homeownership assistance (as modified below); 570.202 Eligible rehabilitation and preservation activities for homes and other residential properties (HUD notes that rehabilitation may include counseling for those seeking to take part in the activity).

3. National Objective: Meets national objective benefiting

low-, moderate- and middle-income persons, as defined in the NSP Notice (120 percent of area median income).

4. Projected Start Date: March 1, 2009

5. Projected End Date: July 30, 2013

6. Total Budget: \$2,000,000.00

7. Responsible Organization: Sussex County

22215 DuPont Boulevard

P.O. Box 589

Georgetown, DE 19947

Brandy Bennett, Housing Coordinator

8. Location Description: Zip Codes: 19973 (Seaford), 19956 (Laurel), 19963 (Part), 19947 (Georgetown), 19950 (Greenwood)

9. Activity Description: Sussex County will utilize the NSP funds to purchase and rehabilitate residential properties for resale, rent or redevelopment, as well as establish financing mechanisms.

10. Performance Measures: See chart in Section E.

11. Specific Activity Requirements:

For acquisition activities, include:

· Discount Rate: Each foreclosed-upon home or residential property shall be purchased at a discount of at least 5 percent from the current market-appraised value of the home or property. The average purchase discount for all properties purchased by Sussex County with NSP funds shall be at least 15 percent.

For financing activities, include:

· Range of interest rates: To be determined.

Through homeownership counseling, individuals and families will be directed to institutions that provide the most competitive 30-year mortgage interest rates.

For housing-related activities, include:

· Duration or term of assistance:

DSHA established a recapture schedule based on the amount of subsidy provided to the homebuyer as outlined in Section C. A subsidy of \$60,000 or more would require at minimum that the full amount of the subsidy be returned if the property is sold within 30 years, however DSCLT was identified as a partner and we expect that many of the homes requiring significant subsidy will become a part of Delaware's permanently-affordable housing stock through management by the DSCLT.

· Tenure of beneficiaries--rental or homeownership:

Rental units will only be allowed for special needs population including persons with disabilities and people who are homeless or at risk of homelessness. All other units will be homeownership.

· A description of how the design of the activity will ensure continued affordability:

Sussex County will utilize a variety of methods to insure continued affordability. These include, but are not limited to, Community Land Trusts (CLT), soft second mortgages, downpayment assistance, shared equity and liens on the properties.

Overall	This Report Period	To Date
Total Projected Budget from All Sources	N/A	\$19,600,000.00
Total CDBG Program Funds Budgeted	N/A	\$19,600,000.00
Program Funds Drawdown	\$0.00	\$0.00
Obligated CDBG DR Funds	\$0.00	\$0.00
Expended CDBG DR Funds	\$0.00	\$0.00
Match Contributed	\$0.00	\$0.00
Program Income Received	\$0.00	\$0.00
Program Income Drawdown	\$0.00	\$0.00

Progress Toward Required Numeric Targets

Requirement	Required	To Date
Minimum Overall Benefit Percentage	99.99%	0.00%
Minimum Non-Federal Match	\$0.00	\$0.00
Limit on Public Services	\$2,940,000.00	\$0.00
Limit on Admin/Planning	\$1,960,000.00	\$0.00
Limit on State Admin	\$0.00	\$0.00

Progress Toward Activity Type Targets

Progress Toward National Objective Targets

Overall Progress Narrative:

NSP Grant Agreement has been signed and contracts with sub-recipients are in negotiation. Sub-recipient's have submitted their non site specific multi-year environmental reviews and have been awarded release of funds. DSHA is developing marketing plan to make awareness to critical mass about NSP.

Project Summary

Project #, Project Title	This Report Period	To Date	
	Program Funds Drawdown	Project Funds Budgeted	Program Funds Drawdown
9999, Restricted Balance	\$0.00	\$0.00	\$0.00
NSP #01-08-01, Finance Mechanisms	\$0.00	\$0.00	\$0.00
NSP #01-08-02, Purchase, Rehab, Resale	\$0.00	\$0.00	\$0.00
NSP #01-08-03, Administration	\$0.00	\$0.00	\$0.00
NSP #01-08-04, Low Income Rentals	\$0.00	\$0.00	\$0.00
NSP #02-08-01, Finance Mechanisms	\$0.00	\$0.00	\$0.00
NSP #02-08-02, Purchase, Rehab, Resale	\$0.00	\$0.00	\$0.00
NSP #02-08-03, Administration	\$0.00	\$0.00	\$0.00
NSP #02-08-04, Low Income Rentals	\$0.00	\$0.00	\$0.00
NSP #03-08-01, Finance Mechanisms	\$0.00	\$0.00	\$0.00
NSP #03-08-02, Administration	\$0.00	\$0.00	\$0.00
NSP #03-08-03, Finance Mechanisms	\$0.00	\$0.00	\$0.00
NSP #04-08-01, Finance Mechanisms	\$0.00	\$0.00	\$0.00
NSP #04-08-02, Purchase, Rehab, Resale	\$0.00	\$0.00	\$0.00
NSP #04-08-03, Demolition	\$0.00	\$0.00	\$0.00
NSP #04-08-04, Administration	\$0.00	\$0.00	\$0.00

NSP #04-08-05, Low Income Rentals	\$0.00	\$0.00	\$0.00
NSP #04-08-06, Redevelopment of Vacant and Abandon	\$0.00	\$0.00	\$0.00
NSP #05-08-01, Purchase, Rehab, Resale	\$0.00	\$0.00	\$0.00
NSP #05-08-02, Administration	\$0.00	\$0.00	\$0.00
NSP #05-08-03, Low Income Rentals	\$0.00	\$0.00	\$0.00
NSP #06-08-01, Administration	\$0.00	\$0.00	\$0.00

Monitoring, Audit, and Technical Assistance

Event Type	This Report Period	To Date
Monitoring Visits	0	0
Audit Visits	0	0
Technical Assistance Visits	0	0
Monitoring/Technical Assistance Visits	0	0
Report/Letter Issued	0	0