

**City of Cranston**  
**Department of Community Development**  
**Consolidated Annual Performance**  
**and**  
**Evaluation Report**  
**(CAPER)**

**DRAFT**



**Period of July 1, 2018 to June 30, 2019**

**Allan W. Fung**  
**Mayor**

**Stephanie M. Susi**  
**Interim Director**

## **CR-05 - Goals and Outcomes**

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

This could be an overview that includes major initiatives and highlights that were proposed and executed throughout the program year.

All of the projects executed during program year were of 'High' priority and addressed many populations of the strategic plan. Cranston made excellent progress in carrying out its strategic plan and action plan.

The 'Owner Occupied Housing' priority was addressed by these projects: Affordable Housing Acquisition, Closing Cost Assistance, Down Payment Assistance, and Housing Rehabilitation which also addressed Rental Housing.

The Public Facilities priority was addressed by the Senior Center Air Conditioning Replacement project, by Street Improvements, and by the Head Start Tot Park project.

The Public Services priority was addressed by these projects: Hope Alzheimer's Ctr., Senior Services Adult Day Services, CCAP Family Life Resources and Family Health/Minority Outreach, Heating Assistance, St. Vincent dePaul Food Ctr., Senior Services Nursing, Day One, Scholarship, Elizabeth Buffum Chace Ctr., After School Remedial Classes, Sstarbirth, and YMCA. These projects served many different populations, such as persons with physical or mental disabilities, the frail elderly, victims of domestic violence, youths, and non-housing community development. In addition, Sstarbirth provided transitional housing for those potentially homeless.

### **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)**

Categories, priority levels, funding sources and amounts, outcomes/objectives, goal outcome indicators, units of measure, targets, actual outcomes/outputs, and percentage completed for each of the grantee's program year goals.

Goal	Category	Source / Amount	Indicator	Unit of Measure	Expected – Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected – Program Year	Actual – Program Year	Percent Complete
Acquisition for Rehabilitation	Affordable Housing	CDBG: \$	Homeowner Housing Rehabilitated	Household Housing Unit	5	6	120.00%	1	1	100.00%
Economic Development	Non-Housing Community Development	CDBG: \$	Jobs created/retained	Jobs	50	0	0.00%			
Economic Development	Non-Housing Community Development	CDBG: \$	Businesses assisted	Businesses Assisted	5	0	0.00%			
First Time Homebuyers Assistance	Affordable Housing	CDBG: \$	Direct Financial Assistance to Homebuyers	Households Assisted	60	25	41.67%	10	5	50.00%
Homeless	Homeless		Housing for Homeless added	Household Housing Unit	5	0	0.00%			
Homeless	Homeless		Other	Other	0	0				
Housing Rehabilitation	Affordable Housing	CDBG: \$	Rental units rehabilitated	Household Housing Unit	5	17	340.00%	0	1	
Housing Rehabilitation	Affordable Housing	CDBG: \$	Homeowner Housing Rehabilitated	Household Housing Unit	195	79	40.51%	20	18	90.00%
Housing Rehabilitation	Affordable Housing	CDBG: \$	Housing for Homeless added	Household Housing Unit	0	0		0	0	

Housing Rehabilitation	Affordable Housing	CDBG: \$	Housing for People with HIV/AIDS added	Household Housing Unit	0	0		0	0	
Public Facilities/Infrastructure/Revitalization	Non-Housing Community Development	CDBG: \$	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	5000	8583	171.66%	1000	1040	104.00%
Public Facilities/Infrastructure/Revitalization	Non-Housing Community Development	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	0	0				
Public Services	Non-Homeless Special Needs Non-Housing Community Development	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	9000	5575	61.94%	1800	1622	90.11%

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

**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.**

As stated above, all of the projects for program year 2018 were of 'High' priority and served many populations within the city. All were funded 100% by CDBG funds. Housing - a major priority - accounted for 44% of funds for low/mod activities disbursed.

## 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)

	CDBG
White	1,296
Black or African American	156
Asian	120
American Indian or American Native	11
Native Hawaiian or Other Pacific Islander	4
<b>Total</b>	<b>1,587</b>
Hispanic	169
Not Hispanic	1,418

Table 2 – Table of assistance to racial and ethnic populations by source of funds

### Narrative

The above default table does not capture all of the race/ethnicity categories and data entered into IDIS for each activity during program year 2018. Complete data is the following:

White - 1296

Black - 156

Asian - 120

American Indian/Alaskan Native - 11

Native Hawaiian/Other Pacific Islander - 4

Asian and White - 1

American Indian/Native Alaskan and White - 4

Black/African American and White - 4

American Indian/Native Alaskan & Black/African American - 3

Other Multi-Racial - 47

Total Race is now 1646, of which 169 are Hispanic and 1477 Not Hispanic.

The Low/Mod breakdown for the new total is now:

Very low income - 491

Low income - 533

Moderate income - 611

Non Low/Moderate income - 11

Total = 1646

Low/Mod Percentage = 99.3%

The Street Improvements project resulted in a Low/Mod percentage of 65.9% for 1040 people served in the eligible areas, based on the Low Moderate Income Summary Data from the Census that is incorporated in IDIS. There is no race data available from the LMISD.

## 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	1,908,706	1,475,207

Table 3 - Resources Made Available

### Narrative

Grant = \$1,096,724

PI = \$406,600

Prior Year Funds = \$405,382

Total available = \$1,908,706

### Identify the geographic distribution and location of investments

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description

Table 4 – Identify the geographic distribution and location of investments

### Narrative

There was no geographic focus for the investment of CDBG funds. Assistance was available city-wide to income eligible beneficiaries, including eligible low/moderate income areas as determined by HUD.

The City believes that the program is best served by having the funds made available city-wide, rather than targeting a specific geographic area.

## **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.**

There are no matching requirements for CDBG funds. Public service subrecipients usually had other sources of funds from private, state, or local sources. CDBG funds subsidized their programs. Public facility projects for non-profits were generally subsidized by the non-profits' resources. The City's funds available for infrastructure, from bonds and taxes, varies annually.

The Cranston Housing Authority's funds for public housing, from HUD, varies annually.

No publicly owned land was used to address the needs identified in the plan. City-owned properties that were used to address the needs are as follows: the Cranston Senior Center - for the Adult Day Services and Nursing Supportive Services programs; the Hope Center - for the daycare program for those suffering from Alzheimer's Disease and dementia; and several schools for the 'After School Remedial Classes' program.

## 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 provided affordable housing units	0	0
Number of Non-Homeless households to be provided affordable housing units	30	19
Number of Special-Needs households to be provided affordable housing units	0	0
<b>Total</b>	<b>30</b>	<b>19</b>

Table 5 – Number of Households

	One-Year Goal	Actual
Number of households supported through Rental Assistance	0	0
Number of households supported through The Production of New Units	0	0
Number of households supported through Rehab of Existing Units	20	19
Number of households supported through Acquisition of Existing Units	1	1
<b>Total</b>	<b>21</b>	<b>20</b>

Table 6 – Number of Households Supported

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

It is impossible to predict accurately either the number of people to be served as a goal or the number of units as a goal. Based on historical data, one may reasonably estimate a potential future number served with the funds available, with the understanding that one cannot control the number of eligible people that actually accept the services offered or the availability of units for acquisition given the existing funding. The above goals were reasonable estimates, based on funding and past performance.

The goal for the First Time Homebuyers Assistance Program was ten (10) households, but only five (5) were actually served - five (5) receiving down-payment assistance.

One house was purchased for acquisition and rehabilitation, but was unsold during the program year, and two houses acquired in previous years were sold to an eligible household.

**Discuss how these outcomes will impact future annual action plans.**

The amount of available annual funds will be the determinate factor in the number of proposed units as annual goals. The City continues to emphasize the rehabilitation of existing owner-occupied housing stock, the availability of first time homebuyers assistance for eligible applicants, and the acquisition of vacant housing for rehabilitation and subsequent sale to eligible households.

**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.**

<b>Number of Households Served</b>	<b>CDBG Actual</b>	<b>HOME Actual</b>
Extremely Low-income	1	0
Low-income	5	0
Moderate-income	13	0
<b>Total</b>	<b>19</b>	<b>0</b>

**Table 7 – Number of Households Served**

**Narrative Information**

In order to foster and maintain affordable housing, and to preserve the existing housing stock, the City continued to offer a low-interest-loan housing rehabilitation program to low to moderate income homeowners in Cranston. This program is designed to help income eligible homeowners keep and maintain their homes. During program year 2018, this program resulted in the rehabilitation of 19 units, requiring a total disbursement of \$240,078 in CDBG funds for rehabilitation costs. Rehabilitation administration disbursements were an additional \$113,378 which resulted in total housing rehabilitation being \$353,456.

To encourage income eligible first-time homebuyers to purchase a home in Cranston, the Department of Community Development again offered its Closing Cost Assistance and Down Payment Assistance programs. A maximum of \$3,000 would be provided for eligible closing costs; and the Department would match the homebuyer’s personal down payment up to a maximum of \$5,000. During program year 2018, this First Time Homebuyers program aided five eligible households to purchase homes in Cranston - five (5) for for Down Payment Assistance. A total of \$25,000.00 in CDBG funds was disbursed for this program.

The City does not receive HOME funds, nor can CDBG funds be used for new construction. Affordable housing units are being planned by for-profit and non-profit developers in the renovation/conversion of a former mill complex. Additional affordable units are also proposed for a transit-oriented development in the Wellington/Elmwood area. Both of these projects, however, are in the early stages of discussion.

## **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 Cranston is not a recipient of HOME, ESG, HOPWA or other similar funds. The City of Cranston has been addressing homelessness through a cooperative Continuum of Care effort developed by the Rhode Island Housing Resources Commission's Office of Homelessness. The Office of Homelessness coordinates the statewide Continuum of Care planning process, working year-round to plan and to coordinate an effective response to homelessness. The small area of the State enables Rhode Islanders, including the homeless, to move readily between cities and towns to accomplish activities of daily living. Services tend to be centralized and most agencies have statewide or regional service delivery areas. Due to the unique geography and close relationship among service providers in Rhode Island, the Office of Homelessness and other community providers continue to promote a coordinated statewide Continuum of Care as the best system for addressing homelessness in the state. The Continuum of Care strategy is an outgrowth of initiatives that has been underway through statewide planning and funding entities such as the Rhode Island Housing Resources Commission, Rhode Island Housing, and the United Way since the early 1990's. The priorities and goals continue to be refined each year through the Office of Homelessness as well as through meetings of the shelter and housing provider's network and the Rhode Island Coalition for Homeless.

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

The City of Cranston is not a recipient of HOME, ESG, HOPWA or other similar funds. The City will, however, consider providing and does provide assistance to social services organizations that offer such supportive services to the underserved, such as Sstarbirth.

The State of Rhode Island's plan to end homelessness in ten years, renamed 'Opening Doors Rhode Island', addresses the needs of Rhode Island residents in five main areas: more affordable housing, sufficient income, service and treatment alongside housing, homelessness prevention strategies, and greater political will and community involvement.

**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**

The City of Cranston is not a recipient of HOME, ESG, HOPWA or other similar funds. Much direct work is done through the State's Continuum of Care.

The SSTARBIRTH program, with the support of CDBG funding this fiscal year, provided housing and supportive services to approximately 20 families, all of whom will be Cranston residents while they are at SSTARBIRTH. SSTARBIRTH is the only residential substance abuse treatment program in the State of Rhode Island specifically designed for pregnant and postpartum women and their children. The program allows for 6 to 9 months of treatment in a home environment with a capacity for 14 women and 26 children. By providing treatment in a safe and caring environment, SSTARBIRTH allows clients to strengthen their health, find recovery, and nurture their children.

1. CCAP's NOH (New Opportunity Homes) Program operates the Bradford House in Cranston, which is a pregnancy and parenting residential family home with 24/7 supervision and counseling.
2. The Cranston Housing Authority offers homeless people a place on the HCV (Section 8) housing list.

**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**

Again, much direct work is done through the State's CoC. The City of Cranston, however, does attempt to make housing affordable via its housing rehab and homebuyers' assistance programs.

A Discharge Planning service is administered by the Northern RI Community Mental Health Center. This program assists minimum security male and female inmates make the transition back to home and community. The OpenDoors Resource Center also offers discharge planning. Their program works with participants up to six months prior to release from prison. OpenDoors is contracted through the Rhode Island Department of Corrections to provide discharge plans to inmates in the Men's Minimum Security Facility at the DOC in both individual and group formats in order to reach as many as possible of the over 1200 discharges per year from that facility.

The City does provide funding for health and behavioral services administered by CCAP, which also operates a GED center for youths and adults so they may obtain the education and skills for better employment.

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

### **Actions taken to address the needs of public housing**

The Cranston Housing Authority continues to address annually the maintenance needs of its senior manners and scattered houses, and to upgrade the facilities.

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

The Cranston Housing Authority has no vehicle, other than participation in public meetings, to encourage residents of public housing to become involved in the management of the Authority-owned property, nor is it involved in any activities for the homeless. It does, however, offer homeless people a place on the Section 8 housing list. The Authority does contract with a Resident Services Coordinator to coordinate supportive services for the elderly, frail, and disabled.

### **Actions taken to provide assistance to troubled PHAs**

The Cranston Housing Authority is not designated as "troubled". No actions were necessary.

## **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)**

Cranston has no growth limitations, no tax policies affecting land, no zoning ordinances (other than those specifying lot sizes for lots that do not have public water service and/or public sewers), and no policies affecting the return on residential investment that are barriers to affordable housing.

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

The greatest obstacle to meeting underserved needs is the limited availability of funds. Given the approximately one million dollars of CDBG funds available to Cranston annually, the City believed that the best way to conform to the objectives of promoting a suitable living environment, providing decent housing, and economic development, primarily for low to moderate income beneficiaries is via its housing rehabilitation and homebuyers' assistance programs; subsidizing public services for health and wellness, especially in Medically Underserved Areas; subsidizing a neighborhood food bank located in and next to a high percentage low/mod area, youth services, a day care for the elderly/disabled and one for those suffering from dementia and Alzheimer's disease; funding a heating assistance program; subsidizing programs for battered and abused spouses and children; and funding public facilities such as street improvements, and the rehabilitation of a day care facility for those suffering from Alzheimer's disease and dementia, which was completed in program year 2018.

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

The City conforms to the Lead Safe Rule as part of the Housing Rehabilitation program and the Homebuyers' Assistance program. For each project, a lead clearance certificate is required. Also, a lead clearance certificate is required for any house acquired, rehabilitated, and subsequently sold to an income eligible household.

The State of Rhode Island requires testing for lead for children enrolling in elementary schools, and subsequent actions and treatments.

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

Education and job training are instrumental in helping reduce the number of poverty-level families. NetworkRI, part of the Workforce Investment Act, serves the entire state, and has a facility staffed by Providence and Cranston employees in the Providence office. This agency offers services such as, but

not limited to, workshops, training programs, and apprenticeships. Their programs deliver services to adults, displaced workers, and youths. In the past four years, NetworkRI has served about 800 Cranston residents.

CCAP's Skills Center offers GED classes and work readiness training for youths and adults. In the past three years, the center has served about 600 clients, of whom more than 200 have obtained their GED.

The City's housing rehabilitation program offered low interest loans to eligible households, to maintain and preserve the housing stock. For those under 50% of the median income, the loans were 0% deferred, thus enabling the rehab to be done at no cost to the owner-occupant.

The City's first time homebuyers' program provided funding for closing costs assistance and down payment assistance for low/moderate income households purchasing a house in Cranston.

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

There are organizations - whether public, private, non-profit, or local government - which provide the services necessary to carry out our consolidated plan such as, but not limited to, CCAP, Hope Alzheimer's Center, Cranston Senior Services, St. Vincent dePaul Emergency Food Bank, and the programs offered by the Cranston Department of Community Development, to name a few.

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

The many and various agencies, such as but not limited to those mentioned above, in addition to those subrecipients and projects in this CAPER and programs and services offered by the State comprise the institutional structure to carry out our consolidated plan. Moreover, other organizations involved in the delivery of housing, homeless, non-homeless special needs, and community development activities include many of the agencies consulted during the Consolidated Planning process. Their fields of interest include but are not limited to social services, youth services, elderly services, disability services, HIV/AIDS services, abused children services, health services, homeless services, and domestic violence assistance. Each agency contributes valuable resources and expertise to benefit low and moderate income people.

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

The City of Cranston participates in the recently released Rhode Island State's Regional Analysis of Impediments to Fair Housing, which was developed in the recognition that a statewide approach to addressing fair housing issues was preferred.

There were a number of themes that were common among the previous independent AIs of the Entitlement Communities, such as:

- Identifying impediments more broadly than just on fair housing, especially the barriers to affordable housing in general.

- Many of the identified impediments were beyond the authority of the participating jurisdiction to address, such as limited transportation options, insufficient state or federal resources for low income housing, or the lack of affordable housing options in suburban and rural parts of the state.

- Other impediments were beyond the jurisdiction's resources or were better addressed statewide, such as fair housing enforcement and outreach. Regional collaboration would be more efficient.

- Many of the impediments are regional issues because they impact or are present in all participating jurisdictions, thus requiring collaboration among the jurisdictions, state and federal funding agencies, fair housing service providers, real estate professionals, and other state agencies.

Impediments in the regional AI specifically for Cranston are Fair Housing Education, Access to affordable homes, and Access to healthy housing.

#### Fair Housing Education:

In addition to what is recommended at the State level, the City of Cranston places posters provided by the National Fair Housing Alliance defining housing discriminatory practices. Posters in all languages are placed in all municipal buildings throughout the City.

#### Access to affordable homes:

The Cranston Housing Authority, the Office of Constituent Affairs, Comprehensive Community Action Program (C.C.A.P.) and the Cranston Planning Department continue to encourage and promote collaboration with non-profit organizations, private developers, and the real estate industry to develop multi-family and single-family public housing units. CCAP, a large non-profit organization meets the State of Rhode Island's criteria of a Community Housing Development Organization. As the City's largest social service agency, CCAP has 19 units at St. Matthews Rectory, all for low/moderate income families.

#### Access to healthy housing:

Presence of lead paint in older homes creates a continuing need abatement programs need to be continued. Although lead poisoning rates in the city decreased significantly from 1999 to 2008 – from 4.7% to 1.1% - there remains a concern that landlords may not rent to families with children under 6 years old for fear of lead paint liability issues.

The City of Cranston continues to provide funds for first time homebuyer and housing rehabilitation programs. These programs have proven to be very successful. All Closing Cost and Down Payment recipients must provide a Lead Safe Certificate before funds are released, and all housing rehabilitation projects must pass a lead inspection and have a Lead Safe Certificate before final payment is made. Also, a Lead Safe Certificate is required for any house acquired, rehabilitated, and subsequently sold to an income eligible household.

## **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**

Projects are evaluated for eligibility for CDBG funding before being included in an Action Plan or added during the course of a program year. In addition, they must satisfy a National Objective and a priority requirement of our comprehensive plan.

For activities under the Low/Mod Income Housing National Objective (LMH), such as Housing Rehabilitation and First-Time Homebuyers Assistance, households must provide documentation of all household income in order to determine eligibility for the program. For the Affordable Housing Acquisition program, in which a vacant house is purchased and rehabilitated for sale to an income eligible household, the potential buyer must also provide income documentation to prove eligibility.

Housing rehabilitation projects are intensely monitored for compliance with contract specifications and code compliance. Final payments to contractors are not made until the project has passed final inspection by the City's buildings inspectors. Invoices are reviewed for compliance with the work specifications and for accuracy before payment.

Activities under the Low/Mod Income Area Benefit National Objective (LMA) occur only in areas of census tracts and block groups that are eligible according to HUD's current Low/Moderate Income Summary Data.

Activities under the Low/Moderate Income Limited Clientele National Objective, such as Public Service activities, require income documentation to prove eligibility, except for those that are presumed eligible. During the course of the year, subrecipients are monitored to ensure that the proper documentation and recordkeeping are being maintained not only for clients but also for expenditures that are subsidized with CDBG funds, and to confirm that the subrecipient is adhering to terms of the agreement, including the Scope of Work. Monitoring encompasses such areas as National Objective compliance, recordkeeping, financial management, insurance, program income and equipment and property if applicable, audits, and procurement if applicable.

Minority businesses are encouraged to participate in the bidding process for CDBG projects. As required by regulations, however, the low bidder wins the job, unless excluded, for example, by being ineligible to receive federal funds. The department continually solicits contractors to bid on housing rehabilitation projects. One cannot, however, force a minority business either to join the list or to submit a bid.

## **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.**

A public notice of the CAPER was placed in the Cranston Herald on September 5, 2019 to announce the comment period from September 12 through September 26. The CAPER was also available for review on the City's website during the comment period. No comments were received during that period.

## **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.**

There were no changes in Cranston's program objectives. Cranston has historically tried to address the many areas of priorities as equitably as possible given the limited availability of funds and the cap on Public Services funding.

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

No

**[BEDI grantees] Describe accomplishments and program outcomes during the last year.**