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June 19, 2015

ELECTRONIC TRANSMISSION AND FEDERAL EXPRESS OVERNIGHT
Ms. Barbara Delaney
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Philadelphia Center Director
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Lori Wagner, Esq.
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Chief
Attn: DJ #175-15-46
Housing and Civil Enforcement Section
Civil Rights Division
United States Department of Justice
1800 G Street NW
Washington, DC 20006

Re: Fifth Semi-Annual Compliance Report Under the Sussex County Voluntary Compliance Agreement (HUD) and Consent Decree (USDOJ)

Dear Ms. Delaney and Ms. Wagner:

This correspondence serves as Sussex County's fifth semi-annual compliance report ("Fifth Semi-Annual Compliance Report") as required under Section V(A)(1) of the Voluntary Compliance Agreement ("VCA") executed between Sussex County and the U.S. Department of Housing and Urban Development ("HUD") on November 28, 2012, and Section VI(18) the Consent Decree ("CD") executed between Sussex County and the U.S. Department of Justice ("USDOJ") on November 28, 2012, entered by the Court on December 19, 2012 (Civil Action No. 12-1591-MPT). By email April 16, 2015, from Ms. Taylor-Blancher to Stephanie Hansen, an extension until June 19th, 2015, was granted by HUD to submit this Fifth Semi-Annual Compliance Report. No extension was required by USDOJ under the CD because

submission of the Fifth Semi-Annual Compliance Report on or before June 19, 2015, is timely. Exhibits are attached as noted.

This correspondence expressly incorporates by reference all of the previous reporting information submitted to HUD and USDOJ in the County's correspondences dated December 28, 2012; March 28, 2013; May 28, 2013; July 2, 2013; July 23, 2013; August 5, 2013[1]; September 30, 2013; October 30, 2013; November 7, 2013, November 27, 2013; January 6, 2014; March 19, 2014; May 9, 2014[2]; June 19, 2014; and December 19, 2014.

I. Requirements Under the Consent Decree

The compliance status of each requirement is addressed below in the numerical order in which the requirement is found in the CD.

A. **Section I(8)(a) through (d)** – General Injunction. The County believes it is in compliance with the continuing obligations of the general injunction as set forth in this section.

B. **Section II** – Development of New Horizons by Diamond State Community Land Trust ("Diamond State CLT"). With the exception of Subsection II(11)(a), the requirements of this section become active only upon submission of an application by Diamond State CLT. Since no application has been received, the requirements have not been activated. With regard to Subsection II(11)(a), the County affirmatively states that it is in compliance with the requirements of this subsection which prohibit public disparagement of Diamond State CLT, the New Horizons development project, or the viability of the community land trust model for affordable housing development.

Subsection II(11)(b) states that the County shall, upon request by Diamond State CLT, provide letters from the County to actual or potential funders or any other governmental entity indicating the County's support for Diamond State CLT's New Horizons project. Since the County's Fourth Semi-Annual Compliance Report, there has been no such request by Diamond State CLT. As a result, the County believes it is in compliance with this requirement.

C. **Section III(12)** – Additional Provisions Related to Affordable and Fair Housing. This section requires certain notice to an applicant should the County decline, reject, or deny any type of request or application for zoning or land use approval related to an Affordable Housing proposal or a proposal processed under the Moderately Priced Housing Unit ("MPHU") program

[1] The August 5, 2013 correspondence was sent solely to HUD in response to HUD's July 30, 2013 email request from Ms. Sharese Paylor for additional information on the County's interaction with DSHA and the Delaware Office of State Planning Coordination in drafting the AI Evaluation and Proposed Priority Fair Housing Plan.

[2] The May 9, 2014 correspondence was sent solely to HUD in partial response to the HUD Review Letter (hereinafter defined).

or the Sussex County Rental Program ("SCRP"). The County believes it has not declined, rejected, or denied any such request and, therefore, believes it is in compliance with this section.

D. **Section III(13)(a) through (d)** - Additional Provisions Related to Affordable and Fair Housing. This section requires the County to submit to USDOJ a draft Affordable and Fair Housing Marketing Plan ("Marketing Plan") inclusive of specific items within one hundred (100) days of the adoption of the CD. The one-hundred-day deadline was April 1, 2013. The County submitted its draft Marketing Plan in its correspondence to USDOJ and HUD dated March 28, 2013. USDOJ provided comments to the draft Marketing Plan by letter dated April 29, 2013, and the County submitted a revised Marketing Plan to USDOJ by letter dated May 13, 2013. The County submitted a second revised Marketing Plan in its correspondence to USDOJ on July 2, 2013 to incorporate "gender identity" as a new protected class in accordance with a new law recently enacted in Delaware. Subsequently, the County requested a date change for one of the items in the Marketing Plan (the date by which to hold the Homebuyer Fair) in its correspondence to USDOJ dated July 23, 2013, and with that correspondence, submitted another revised Marketing Plan showing the date change.

Under the provisions of this section of the Consent Decree, the County must proceed to implement the Marketing Plan within five (5) days upon its approval by USDOJ. The County nows considers its Marketing Plan approved by USDOJ. As mentioned within the County's Fourth Semi-Annual Compliance Report, the County asked one final time for approval from USDOJ on the Marketing Plan and stated that unless it was informed otherwise by USDOJ by January 1, 2015, it would consider the Marketing Plan approved. No such communication was received from USDOJ. Regardless, since the Marketing Plan was first submitted to USDOJ approximately two (2) years ago, the County has proceeded in good faith to implement the provisions of the Marketing Plan as those items have come due. Compliance with the Marketing Plan has been addressed in other correspondences to USDOJ dated July 2, 2013; September 30, 2013; January 6, 2014; and the County's Fourth Semi-Annual Compliance Report.

E. **Section IV(14)** – Fair Housing Compliance Officer. This section required the County to designate a Fair Housing Compliance Officer ("FHCO"). As set forth in its correspondence to USDOJ and HUD dated December 28, 2012, the County believes it is in compliance with this requirement.

F. **Sections IV(15) and (16)** - Fair Housing Compliance Officer. These sections require the FHCO to receive and review all complaints of housing discrimination made against the County, to keep a written record of verbal complaints, and to provide HUD and USDOJ with a copy of the complaints received and the County's response. Since the County's Fourth Semi-Annual Compliance Report dated December 19, 2014, the County has not received any complaints of housing discrimination. The County would like to note that its complaint form is available in Spanish on the County's website and in the County's offices.

G. **Section IV(17)** - Fair Housing Compliance Officer. This section requires the FHCO to maintain copies of the CD, the Fair Housing Policy, the HUD Complaint form and HUD pamphlet entitled "Are you a victim of housing discrimination?" (HUD official forms 903 and 903.1, respectively) and make these materials freely available to anyone, upon request, without charge, including all persons making fair housing complaints to the FHCO. The required materials continue to be freely available, upon request, without charge, to anyone at the County's office of Community Development and Housing and on the County's website. As a result, the County believes it is in compliance with this section.

H. **Section IV(18)** - Fair Housing Compliance Officer. This section requires the FHCO to report to the County every six months on activities taken in compliance with this CD. The FHCO reported to the County at the County Council meeting held on June 9, 2015, in compliance with this section. Attached as **Exhibit 1** is the agenda from the County Council meeting showing the FHCO's presentation on the agenda and memorandum of the FHCO outlining the material presented.

I. **Section V(19)** – Fair Housing Policy. Among other things, this section requires the County to adopt a Fair Housing Policy with the text as set forth in the CD at Attachment A. The policy was so adopted and notice of the fulfillment of this requirement was sent to USDOJ and HUD in the County's correspondence dated December 28, 2012. The Fair Housing Policy has subsequently been revised to reflect new protected class status for gender identity in Delaware and to include the County's Anti-NIMBY language. Notice of each revision was sent to your office via correspondences dated July 2, 2013, and July 23, 2013.

This section also requires the County to include the Fair Housing Policy in all literature and information or application materials provided to residential developers, including developers of affordable housing. As mentioned in the Fourth Semi-Annual Compliance Report, the County is inserting the Fair Housing Policy in its Application for Major Subdivision attached previously thereto. This section also requires the County to include the Fair Housing Policy as a readily accessible link on the County's website. This link is currently active and can be found on the County's website and under the Community Development & Housing webpage at: http://www.sussexcountyde.gov/fair-housing-policy. Lastly, the Fair Housing Policy is available in Spanish on the County's website and in the County's offices. As a result, the County believes it is in compliance with this section.

J. **Section V(20)** – Fair Housing Policy. This section requires the County to place the "Equal Housing Opportunity" or fair housing logo on the County's website and on all future published notices and advertisements related to housing or residential development. The County states affirmatively that this requirement continues to be fulfilled and includes the agendas from recent meetings of the Board of Adjustment, the Planning and Zoning Commission, and County Council as examples illustrating such compliance as **Exhibit 2**.

K. **Section VI(21) – (23)** – Training. On February 6, 2015, the County was notified by USDOJ that the Fair Housing trainer previously approved by USDOJ was no longer approved to conduct the future training.[3] Since that time, at USDOJ's insistence, County has been in communication with HUD and HUD's preferred training organization (the National Community Reinvestment Coalition ("NCRC")) to identify a particular trainer and approve the training material. That process has not been swift, due in large part to HUD's lack of communication with the County. As a result, the County's annual training requirement deadline was extended by USDOJ to May 29th, then to June 30th, and now to July 31, 2015.[4]

As of today (more than four (4) months after initiating contact with HUD regarding the training) the training has still not been scheduled and the training material supplied by NCRC has not been confirmed by USDOJ as meeting the full requirements of the Consent Decree. USDOJ has led the County to believe that Mr. Jeffrey May of NCRC will be approved as the trainer and Mr. May has submitted material to USDOJ for approval; however, whether Mr. May's material is all that is necessary to meet the requirements for training under the Consent Decree remains an open question. The County is currently awaiting a response from USDOJ on this question.

New Employees: There are four (4) new County employees since the submission of the Fourth Semi-Annual Compliance report whose employment positions the County believes are covered under the terms of the CD. All were required to receive the fair housing training within thirty (30) days of employment. One of the new employees is County Councilman Robert Arlett. Councilman Arlett was elected to office on November 4, 2014, but actually attended the County's in-person training on February 28, 2014 prior to being elected. His training certificate is included with the training certificates of the other three (3) employees as **Exhibit 3.** Rather than review the videotape of the training that he actually attended in-person, the County believes that his prior in-person attendance of the training presentation fulfills the spirit and intent of the training requirement. Janelle Cornwell was hired on February 16, 2015; however, her training did not occur until June 11, 2015. This was an oversight on the part of the County, but corrected once the oversight was discovered. The name of each employee, the date of hire, and the date of training are listed below:

1. Robert Arlett (elected 11/4/14, trained 2/28/14)

2. Ryan Stuart (hired 3/16/15, trained 3/17/15)

3. Guillermo Montalvo (hired 4/21/15; trained 4/22/15)

[3] Email from Lori Wagner, USDOJ, to Stephanie Hansen, YCST, dated February 6, 2015.

[4] Emails from Lori Wagner, USDOJ, to Stephanie Hansen, YCST, dated February 6, 2015; May 4, 2015; and June 15, 2015; respectively.

4. Janelle Cornwell (hired 2/16/15; trained 6/11/15)

L. **Section VII(24)(a) through (c)** – Reporting and Recordkeeping. The requirements of this section do not become active until Sussex County acts upon Diamond State CLT's preliminary subdivision plat application for New Horizons. Since no such application has been submitted as of this time, the requirements of this section have not been activated. Additionally, as mentioned in the Third Semi-Annual Compliance Report, Sussex County understands that Diamond State CLT will not be pursuing the development of the New Horizons project on the land that was the subject of the original application.

M. **Section VII(25)** – Reporting and Recordkeeping. This section requires the submission to USDOJ of contact information for the FHCO, the adopted Fair Housing Policy, a printout of the County's website showing the "Equal Opportunity Logo," the name of the fair housing trainer, and other information required by section 21(a). As set forth in the County's previous correspondences, the County has fulfilled the requirements of this section.

N. **Section VII(26)** – Reporting and Recordkeeping. This section required the County to submit the executed Certificates of Training and Receipt of Consent Decree for the initial in-person training, and the proposed Marketing Plan, to USDOJ by April 1, 2013. These documents were submitted to USDOJ and HUD in the County's correspondence dated March 28, 2013. As a result, the County believes it has fulfilled the requirements of this section (also please see the County's response to Section VI(21) – (23) above).

O. **Section VII(27)(a) through (f)** – Reporting and Recordkeeping.

Webpage: This section requires the County to develop an Affordable Housing webpage and update the webpage twice annually with certain information. The County was required to post its first compliance report and notify USDOJ of such posting within six (6) months after entry of the CD (by June 19, 2013). The County launched the webpage on June 19, 2013, and the content of the webpage conforms to the requirements of this section and to the draft Marketing Plan. However, the County has gone above and beyond the requirement to update the webpage twice annually and, instead, updates the webpage on a continuous basis as new material related to affordable housing becomes available. For your reference, the web address to the County's Affordable Housing webpage is:

http://www.sussexcountyde.gov/affordable-and-fair-housing-resource-center

Compliance Report Postings: This section also sets forth the information that should be posted on the webpage as part of the compliance report postings. In particular, the compliance report postings on the webpage should include: (a) copies of any letters of support by the County for New Horizons; (b) a summary of each zoning or land-use request or application related to Affordable Housing or housing being processed under the MPHU or SCRP programs and certain information related to those requests or applications; (c) representative copies of any published notices or advertisements containing the phrase "Equal Housing Opportunity" or the fair housing logo; (d) copies of any Certifications of Training and Receipt of Consent Decree

signed since the preceding compliance report; (e) copies of any materials previously submitted to USDOJ if such materials have been substantially altered or amended since they were last submitted; and (f) copies of any changes to the County's zoning or land use laws, regulations, policies or procedures addressing the construction of or approval process for Affordable Housing or housing being processed under the MPHU or SCRP programs enacted since the previous compliance report was submitted.

The County states affirmatively that the above required information has been posted on the Affordable Housing webpage. Since the County's submission of the Fourth Semi-Annual Compliance Report, the County states the following with respect to the items required above, each in the order as presented above:

(a) The County has not issued any letters of support for New Horizons and there is no active application for New Horizons in front of the County.

(b) With one possible exception, there have been no zoning or land-use requests or applications related to Affordable Housing or housing being processed under the MPHU or SCRP programs on which the County has made a determination since the County's Fourth Semi-Annual Compliance Report. As reiterated in the County's Fourth Semi-Annual Compliance Report, USDOJ and the County have agreed that the phrase 'A summary of each zoning or land-use request or application related to Affordable Housing' refers to zoning or land use requests or applications for housing development projects intended or designed for households earning less than 80% of the Area Median Income ("AMI") as calculated by the U.S. Department of Housing and Urban Development. Such projects do not include requests or applications from individual homeowners seeking variances or special use exceptions from the County's Board of Adjustment. Instead, this provision is interpreted as applying to requests and applications from developers of residential housing projects. A residential housing project is interpreted as a project to construct housing in which more than one family is intended to be served and in which some portion of the project is specifically proposed by the developer as intended to serve households earning less than 80% AMI.

The one possible exception relates to a Board of Adjustment special use exception application that the County received from Donald and Karen A. Radcliff seeking approval for a recovery home for men recovering from drug and/or alcohol addiction. The hearing on this matter occurred on December 1, 2014, before the Board of Adjustment and the Board approved the application on January 5, 2015.

(c) Attached are representative copies of published notices containing the phrase "Equal Housing Opportunity" (**see Exhibit 2**). These notices are the agendas of County Council, the Planning and Zoning Commission, and the Board of Adjustment.

(d) As mentioned earlier in this correspondence, the County has hired four new employees since the Fourth Semi-Annual Compliance report whose employment positions the County believes are covered under Sections VI(21) to (23) of the CD. Copies of their certificates of training will be posted on the County's website concurrent with the posting of this Fifth Semi-Annual Compliance Report.

(e) There have been no materials altered or amended since such materials were last submitted to USDOJ.

(f) There have been no changes to the County's zoning or land use laws, regulations, policies or procedures addressing the construction of or approval process for Affordable Housing, or housing being processed under the MPHU or SCRP programs enacted since the previous compliance report was submitted.

P. **Section VII(28)** – Reporting and Recordkeeping. This section requires the County to send to USDOJ any proposed change to the County's zoning or land-use laws, regulations, policies or procedures addressing the construction of or approval process for Affordable Housing or housing being processed under the MPHU or SCRP programs prior to the County's consideration. There have been no such proposed changes since the County's submission of the Fourth Semi-Annual Compliance Report. As reiterated in the Fourth Semi-Annual Compliance Report, USDOJ and the County understand that this section is meant to address proposed changes to laws, regulations, policies, or procedures that are intended to specifically address the construction of or approval process for Affordable Housing programs, or housing being processed under the MPHU or SCRP programs, not changes which implicate residential development in general.

Q. **Section VII(29)** – Reporting and Recordkeeping. This section requires the County to retain all records relating to any provision of the CD and gives USDOJ the opportunity to inspect and copy any such records. The County affirmatively states that it is in compliance with this section.

R. **Section VIII(30) – (31)** – Compensation of Aggrieved Persons. These sections require compensation to Diamond State CLT and set forth a procedure whereby, once the compensation is received, a release from Diamond State CLT ("Release") is obtained and sent to the County. The compensation has been received by Diamond State CLT and the Release has been received by the County via correspondence from USDOJ dated January 3, 2013. As a result, the County believes the requirements of these sections have been fulfilled.

S. **Section IX(32) – (33)** – Jurisdiction and Scope of Decree. These sections set forth the jurisdiction of the court in this matter and state that the CD is in effect for four (4) years. Nothing in these sections requires compliance on the part of the County.

T. **Section IX(34)** – Jurisdiction and Scope of Decree. This section states that modifications to the CD, other than a time limit for performance, will be effective upon the filing of a written agreement between the County and USDOJ with the Court. In order to modify the

CD to include the agreement between USDOJ and the County regarding certain training provisions, calculations of deadlines, and posting of Certificates of Training and Receipt of Consent Decree, the County submitted to USDOJ a draft Stipulation and Order for review within the First Semi-Annual Compliance Report and reports thereafter. As per communication from USDOJ, it is the County's understanding that all of the terms in that Stipulation and Order are acceptable to USDOJ. Additionally, even though the Stipulation and Order have not been filed with the Court, the County and USDOJ are proceeding as though the Stipulation and Order have been properly filed. As with previous compliance reports, the County renews its request that USDOJ execute the Stipulation and Order as submitted within the Fourth Semi-Annual Compliance Report.

U. **Sections X (Enforcement of This Decree), XI (Costs and Fees) and XII (Termination of Litigation Hold)**– Nothing in these sections require compliance on the part of the County.

II. Requirements Under the Voluntary Compliance Agreement

The County received a letter dated April 21, 2014, from HUD which set forth HUD's evaluation of the County's corrective actions under the VCA and provided recommendations to the County which would, in HUD's opinion, ensure compliance with the VCA (the "April HUD Review Letter"). The Third Semi-Annual Compliance Report served as the County's response to the HUD Review Letter. Within the Third Semi-Annual Compliance Report, the County raised an objection to all eight (8) of HUD's recommendations for inclusion within the draft Priority Plan "Priority Plan") as being outside of the requirements of the VCA. The County received a subsequent letter from HUD (the "November HUD Review Letter"), dated November 7, 2014, evaluating the County's actions under the VCA, disputing the County's position in the Third Semi-Annual Compliance Report, and providing additional recommendations "to ensure compliance".[5] Within the County's Fourth Semi-Annual Compliance Report, the County again objected to HUD's eight (8) recommendations as being outside of the scope of the VCA and the County requested a meeting with HUD to discuss the continued elements of disagreement.

Since the submission of the Fourth Semi-Annual Compliance Report last December, the County has vigorously pursued HUD to agree to meet to discuss, and hopefully resolve, the parties' disputes. HUD has been either non-responsive, or agrees to a meeting only to cancel the meeting at a later date. Six months have now passed. To this day, there has been no meeting between the County and HUD to address the issues the County raised, and then renewed, in the Third and Fourth Semi-Annual Compliance Reports despite repeated requests by the County. The County had even agreed to travel to HUD's Philadelphia Office to meet. After HUD

[5] Letter from Melody Taylor-Blancher, Region III Director, Fair Housing and Equal Opportunity, HUD, to Stephanie L. Hansen, Counsel to Sussex County, dated November 7, 2014.

canceled the last scheduled meeting between HUD and the County on May 28th (the meeting had been scheduled for June 3rd), there had been no communication from HUD on rescheduling the meeting until after the close of business yesterday – the day before this compliance report is due. This last minute gesture on the part of HUD agreeing to meet, once again, is met with skepticism by the County given its timing and HUD's past practice of agreeing to meet and then canceling.

HUD's pattern of delay and refusal to cooperate is not confined to just the County's request to meet. From the time the County submitted its draft Priority Plan to HUD on March 28, 2013, it took HUD thirteen (13) months to provide its comments on the Priority Plan. Those comments were not received until April 21, 2014 as part of the April HUD Review Letter. Coupled with the delay of six months (and counting) since the County has requested a meeting with HUD, this reveals over a year and a half of delay on HUD's part. We are now into the third year of the VCA which, by its terms, will expire in approximately eighteen (18) months. The County has serious concerns whether the delay on HUD's part to attempt to resolve the differences between the parties is purposeful and intended to bring about renewed litigation in this case. We sincerely hope that it is not and, despite our skepticism, continue to remain open to discussions with HUD to resolve our differences. The County's position is that it remains in compliance with the VCA and will continue to operate in compliance with the VCA through its expiration on November 28, 2016, regardless of HUD's inability or unwillingness to assist the County.

Having not had any discussions with HUD since the County's Fourth Semi-Annual Compliance Report on the issues raised in the County's Third and Fourth Semi-Annual Compliance Reports, the County has no choice but to reiterate those same concerns and objections in this Fifth Semi-Annual Compliance report. As a result, the remainder of this compliance report will only set forth any updates to the information previously submitted to HUD in the Fourth Semi-Annual Compliance Report and the County affirmatively reiterates its previous position.

A. **Section II** – General Provisions. The only provision in this section requiring compliance on the part of the County is Section II(7). This section requires that the County make a copy of the VCA available for review to any person, in accordance with the law. The County affirmatively states that it continues to be in compliance with this section.

B. **Section III(1)** – Corrective Actions. This section references the training requirements as set forth in Section VI(21)(a) through (c) of the CD. As mentioned earlier in this report, the County's annual training requirement deadline was extended to July 31, 2015 as per an email from Lori Wagner (USDOJ) to Stephanie Hansen, dated June 15, 2015. The County is continuing to coordinate with HUD and USDOJ regarding a trainer, training date and training material and will report back to USDOJ and HUD with the training certificates once the training has occurred.

C. **Section III(2)** – Corrective Actions. Under this provision in the VCA, the County is required to address the decision to deny the New Horizons Cluster Subdivision proposal and reimburse Diamond State CLT as agreed upon in Sections II(10) and VIII of the CD. The

County believes it is in compliance with this requirement and reiterates its position as set forth in its Fourth Semi-Annual Compliance Report.

D. **Section III(3)** – Corrective Actions. This section requires the County to limit the evaluation of future land use proposals to compliance with the County Code and State law. The County affirmatively states that it is in compliance with this section.

E. **Section III(4)** – Corrective Actions. This section requires the County to comply with guidance and instructions provided by the State of Delaware to affirmatively further fair housing, to the greatest extent feasible or practicable, contingent upon funding and the County's authority. The County believes it is in compliance with this section. The County reiterates its position as set forth in its Fourth Semi-Annual Compliance Report.

F. **Section III(5)** – Corrective Actions. This section requires the County to hire or appoint the FHCO and to notify HUD of the appointment within 30 days. As set forth in the County's correspondence to HUD and USDOJ dated December 28, 2012, the County is in compliance with this requirement and both the April and November HUD Review Letters state that this provision of the VCA has been met.

G. **Section III(6)** – Corrective Actions. This section only becomes active if the FHCO resigns or is otherwise terminated prior to the expiration of the VCA. Because that situation has not arisen, there is nothing in this section that requires compliance by the County at this time.

H. **Section III(7)** – Corrective Actions.

1. **Section III(7)(a)** requires that the County review and evaluate the 1998, 2003, and 2011 Analysis of Impediments ("AI's"), develop a proposed priority fair housing plan to address the identified impediments that continue to exist, and submit the plan to DSHA and HUD for review and approval within 120 days of the effective date of the VCA (by March 28, 2013). In response, the County performed the required review and evaluation, drafted the Priority Plan, and submitted the Priority Plan to HUD and DSHA for review and approval.

In both the April and November HUD Review Letters, HUD does not dispute that the County reviewed and evaluated the required AI's, determined the identified impediments, developed a proposed Priority Plan, and submitted the Priority Plan to DSHA and HUD for review and approval. However, upon its review of the Priority Plan, within the April HUD Review Letter, HUD listed eight separate recommendations that it believes the County needs to address in order to be in compliance with the VCA under Section III(7)(a). In response, the County raised a general objection to all eight of the recommendations as being outside of the requirements under the VCA. Within the County's Fourth Semi-Annual Compliance Report, the County again objected to HUD's eight (8) recommendations as being outside of the scope of the VCA and the County requested a meeting with HUD to discuss the continued elements of disagreement.

Having had no discussion with HUD regarding the County's responses to HUD's recommendations in its Fourth Semi-Annual Compliance Report, the County reiterates its position as set forth in its Fourth Semi-Annual Compliance Report to each of HUD's recommendations. However, the County has instituted a number of initiatives and completed a number of actions that we would like to bring to your attention:

a. The County met with representatives of Milford Housing Development Corporation, Diamond State Community Land Trust, and Habitat for Humanity on February 12, 2015, to discuss options for increasing the supply of accessible, affordable housing. One issue that was identified as problematic is the payment of sewer impact fees. The County depends upon sewer impact fees to extend and operate the sewer system; however, the County desires to encourage the construction of affordable housing for low- and moderate-income households. The County believes that the up-front payment of sewer impact fees for affordable residential housing development may create a barrier to such development and desires to ease the barrier by exploring the idea of deferring the time for payment of the fees. This is an initiative that must be approved by County Council and we will update you on this initiative in the next compliance report.

b. The County is a member of the Sussex Housing Group ("SHG"), which includes as its members the Delaware State Housing Authority, Milford Housing Development Corporation, Sussex County Habitat for Humanity, Delaware Community Reinvestment Action Council, Sussex Unity, Delaware Housing Coalition, First State Community Action, Discover Bank, NCALL Research, and Delaware Manufactured Homeowners Association. The Sussex Housing Group met on September 30, 2014 to discuss impacted communities in Sussex County and decided that a focused approach on a single community would be an excellent project for the group to work on over the next couple of years. Subsequently, Group met on March 18th to review and rate proposals submitted by impacted communities interested in participating. The community of Pinetown was chosen by the SHG, though Sussex County abstained from voting. Sussex County is anticipating its work in Pinetown to consist of 4 to 6 owner-occupied rehabilitation projects and is awaiting confirmation from DSHA regarding the Fiscal Year 2015 grant award on its use of CDBG funds to do so. The Sussex Housing Group expects the focus project for Pinetown to run from June 2015 through May 2016. It should be noted that the County previously installed the sewer system in Pinetown.

c. The County's Fair Housing Compliance Officer, Brandy Nauman, and Director of the County's Community Development and Housing Department, Brad Whaley, are on the advisory committee for the DelawareHousingSearch.org website. Outreach materials (available in both English and Spanish) for the website are available at NCALL Research and First State Community Action, both of which are very involved in the Hispanic community. These non-profits have been educated about the existence of the website and the associated resources and are positioned to direct members of the Hispanic community to the website as housing needs arise.

d. As you know from the County's Fourth Semi-Annual Compliance Report, the County instituted its Affordable Housing Support Policy and Template Support

Letter and supplied support letters to a lender and DSHA for a joint affordable housing project being pursued by Diamond State Community Land Trust and Habitat for Humanity. Ultimately, Habitat for Humanity received the funding and we understand that they are now moving forward with the development of 8 lots for affordable housing in Ingram Village, a development located in Ellendale.

e. As of February 2015, Sussex County has a contract with CTS Language Link to provide Interactive Voice Response interpretation service. At its immediate disposal, CTS has access to interpreters for more than 240 languages. County staff have quick reference guides at every phone to allow for a quick call to an interpreter in the event an LEP individual walks-in or calls for service. CTS provides "Point to Your Language" posters to aid staff in determining the language for which to interpret. This service is available 24 hours a day, 7 days a week, 365 days a year, and available to staff in the field.

f. The County reviewed the April 2012 report "Community and Choice: Housing Needs for People with Disabilities in Delaware," and developed a number of recommendations. Regarding accessibility, in order to increase the availability of and access to rental and homeownership opportunities with accessibility features, the County will be expanding and coordinating it resources for accessibility modifications for homeowners and homebuyers. Specifically, the County receives emergency repair funding that targets owner-occupied households at or below 80% AMI. The funds are frequently used for minor home modifications for person with disabilities (ramps, walk-in showers, grab bars, and lifts). The County is often called by nursing homes requesting discharge assistance and family members or home-based care nurses for help with accessibility features and modifications. To date, the County has not specifically tracked funding used for this purpose. Starting July 1, 2015, the County will expand its accounting system to accurately identify the number of households assisted with new accessibility features and modifications. This upgrade in reporting will aid the State-wide effort to keep individuals in home-based care situations versus long-term care facilities.

Regarding affordability, in order to increase the availability of and access to affordable housing for people with disabilities, the County will assist in the effort to improve asset-building opportunities for people with disabilities. Specifically, the County is working with The Money School (Delaware Financial Literacy Institute) to introduce financial literacy and credit repair courses to Sussex County's low-income rural communities. Our goal is to expand that relationship to include courses specifically targeted to people with disabilities. According to the Community and Choice report, individuals with disabilities would greatly benefit from financial literacy, credit repairs, asset-building, homeownership counseling, and tax preparation.

Regarding community, in order to build a community-based system of care with a range of housing options, the County will assist in this effort by prioritizing community-based care by redirecting resources from institutional care to community-based services and providing for housing needs. Specifically, the County will financially support the Money Follows the Program Demonstration for individuals exiting long-term facility care to Sussex County

residences and/or the Delaware Aging and Disability Resource Center (ADRC). Both are developed and maintained by DHSS. Money Follows the Person assists individuals transition from long-term care facilities to home-based care. Individuals qualify if they have lived in long-term care facility for more than 90 days and are Medicaid eligible. Qualifying home-based care residences are homes/apartments owned/leased by a family member, and small group homes with four or fewer unrelated individuals. The County anticipates targeting funding for households exiting only to Sussex County. ADRC is a one-stop access point for aging and disability information and resources in Delaware. Similar to DelawareHousingSearch.org, this provides a web-based system (or hotline) for aging or disabled individuals to find resources to suit a variety of needs from options counseling for best services to help with service enrollment. It also provides support to hospital discharge planners to improve and increase hospital-to-home transitions.

g. The County met with a number of the civic leaders from some of the unincorporated communities at the end of April to hear their concerns about issues that plague their neighborhoods. A number of the communities are listed as Impacted Communities in the VCA. As a result of the meeting, the County is spearheading a joint County/State initiative to address their grievances. An early step has been the creation of a guide by the County, which has now been distributed to over 100 property owners, residents, and tenants in the Coolspring community, instructing them on various Code enforcement matters (see **Exhibit 4**).

2. **Section III(7)(a)(i)** requires the Priority Plan to "incorporate a strategy to increase housing opportunities throughout the County, taking into account the housing needs of African-Americans and Hispanic residents and it will develop mechanisms in which Sussex County will use CDBG and other funding to affirmatively further fair housing."[6] The County believes it is in compliance with this requirement and reiterates its position as set forth in its Fourth Semi-Annual Compliance Report. Additionally, the County continues to pursue an in-person meeting with the appropriate representatives from HUD in an attempt to cooperatively discuss and resolve our disagreements.

3. **Section III(7)(a)(ii)** requires, "in future planning efforts, Sussex County shall collaborate with DSHA and the Office of State Planning and Coordination to identify the County's priority actions to develop a strategy to integrate affordable housing that is fully available without regard to race or ethnicity into all communities throughout the County. To the extent that the County approves development outside designated growth areas, the provision of affordable housing shall be a consideration."[7] The County believes that it is in compliance with this section and the November HUD Review Letter concurs.

[6] VCA, Section III(7)(a)(i).

[7] VCA Section III(7)(a)(ii).

4. **Section III(7)(a)(iii)**. In an effort to Affirmatively Further Fair Housing, the County agreed that within 120 days of the effective date of the VCA, the Fair Housing Compliance Officer ("FHCO") would identify successful models of affordable housing strategies used in other states, counties or localities similar in jurisdiction and authority to Sussex County to recommend to County Council, to assist the County in formulating an affordable housing policy as prescribed in the Consent Decree. In order to meet this requirement, the FHCO presented six strategies to County Council on March 26, 2013, and Council adopted Strategy #1 (the Anti-NIMBY policy). As a result, the County believes it is in compliance with the requirements of this section and the November HUD Review Letter concurs.

5. **Section III(7)(b)** requires the County to amend the MPHU ordinance to include provisions that create access to persons that are between 50% and 120% of the County's median household income and to post the revised provisions on the County's website. The County amended the MPHU ordinance on April 23, 2013, and subsequently posted the revised provisions of the MPHU ordinance on its website and on the County's Community Development and Housing webpage. As a result, the County believes it is in compliance with the requirements of this section and the November HUD Review Letter concurs.

6. **Section III(7)(c)** requires the County to perform an internal evaluation of the Impacted Communities through the Strong Communities Initiative in order to determine investment strategies, priority designation of infrastructure and/or community development for those elements of infrastructure over which the County has primary governing authority. This section also requires the County to evaluate its past participation in providing secondary elements of infrastructure in the Impacted Communities with the goal of prioritizing the funding for such infrastructure improvements and formalizing an approval process for continued County participation in such infrastructure projects.

HUD Recommendation: *"The Department requests that the County provide details regarding how it intends to fulfill this requirement; the survey instrument and how it will be administered; analysis of data; including the timeline for completion of the bidding, work, and completion of requirements of this section. The Department recommends that the Recipient include the Department's prior recommendation and in its re-bid require that the contractor/consultants have experience in fair housing and or the consolidated planning process. Again, this should be a requirement as the residents should be informed of the basis for responding to the survey."*[8]

County's Response: The County incorporates its response in its Fourth Semi-Annual Compliance Report and provides the following as an update. The County has surveyed the residents in a majority of the Impacted Communities using the survey instrument as previously supplied to HUD and it anticipates completion of the remaining Impacted Communities by the end of August 2015. In order to perform the analysis of the data collected,

[8] November HUD Review Letter, page 12.

the County is soliciting proposals from the same organizations that previously responded to the County Request for Proposals to perform work related to the Strong Communities Initiative ("RFP") as well as an additional two organizations previously awarded contracts from the State of Delaware for similar work. The source of the funding ($50,000) is the same CDBG grant as the prior RFP. Attached hereto is the bid package that was sent to solicit proposals (see **Exhibit 5**). You may note on page 10 that one of the minimum proposal requirements is the description by the proposer of its organization's experience in fair housing/AFFH and familiarity with HUD's Consolidated Plan Process. Bids are due back by June 5th and the County expects to be under contract by June 30th. In fact, under the current terms of the CDBG grant, the County must be under contract by June 30th.

I. **Section III(8)** – Corrective Actions. Following the internal evaluation and drafting of an approval process for future primary and secondary infrastructure projects, this section requires the County to provide such improvements and services so long as such assistance is consistent with the County's available resources, and is consistent with relevant statutes, rules, regulations and policies. The evaluation of the Impacted Communities, the approval process, and the approvals granted will be made publicly available on Sussex County's website on an on-going basis. Since the internal evaluation has not been completed and no approval process is yet in place, the requirements of this section have not yet been activated. As mentioned by HUD in the November HUD Review Letter, this provision of the VCA is open and ongoing.

J. **Section III(9)** – Corrective Actions. Under this provision in the VCA, the County is required to revise its methodology, as currently proposed by DSHA, to target minorities with disproportionate housing needs to ensure that minorities are benefiting from all affordable housing programs supported by the County. Within the April HUD Review Letter, HUD required the County to provide additional information and documentation to show its process and procedures used to identify incorporated and rural residents for funding submissions to DSHA. In response, the County supplied its Sussex County Community Development Block Grant (CDBG) Application Methodology ("Methodology") as an exhibit within the Third Semi-Annual Compliance Report. HUD's response in the November HUD Review letter was that it "did not review any items in the Recipient's submission that respond to this recommendation."[9] The County responded in its Fourth Semi-Annual Compliance Report requesting further explanation from HUD on any area of deficiency within the Methodology. No such explanation has been forthcoming.

With this Fifth Semi-Annual Compliance Report, the County repeats its request for further information from HUD on any area of deficiency within the Methodology. In addition, it supplies hereto as **Exhibit 6** documentation from the past Delaware State Housing Authority Community Development Block Grant Quarterly Status Report (DSHA-13) generated by Sussex County and submitted to DSHA to show that its methodology does, in fact, target minorities with disproportionate housing needs. Specifically, from 2009 to 2013, the percentage of minorities

[9] November HUD Review Letter, page 13.

receiving CDBG grant funding, as compared to all other applicants for the same funding, was 65% (in 2009), 66% (in 2010), 61% (in 2011), 65% (in 2012), and 67% (in 2013).

K. **Section IV** – Public Notice. Under this section, the County must publish a Notice in a newspaper of general circulation and on its website regarding the VCA within 30 days of the effective date of the VCA or the CD, whichever is later As mentioned in the County's correspondence to USDOJ and HUD dated December 28, 2012, the requirements of this section have been satisfied. The November HUD Review Letter concurs that this provision of the VCA has been satisfied.

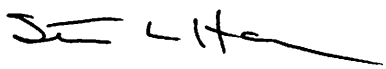
L. **Section V** – Reporting and Compliance Requirements. Under Section A(1), the County must submit semi-annual reports to HUD for the duration of the CD. Under Section A(2) the reports must contain information on each corrective action (progress made, work remaining, reasons for any delay, dates of completion or proposed completion), and must be signed and certified as accurate by the FHCO. This correspondence from the County is meant to satisfy the requirements of these sections for the Fifth Semi-Annual Compliance Report.

M. **Section VI** – Recordkeeping Requirements. This section requires the County to maintain adequate files along with all materials relating to the County's implementation of the VCA. The County asserts that it is in compliance with this section.

N. **Sussex County Fair Housing Marketing Plan** – HUD included questions relating to the Sussex County Fair Housing Marketing Plan in the April and November HUD Review Letters. In particular, HUD posed questions related to the Citizen Participation Plan. The County provided responses to HUD's questions in its Fourth Semi-Annual Compliance Report and has not received any further response from HUD. As a result, the County believes that its responses adequately addressed the questions from HUD.

This concludes the County's Fifth Semi-Annual Compliance Report. Please feel free to contact me with any questions or comments.

Sincerely yours,



Stephanie L. Hansen

Alice Hung (via email at Alice.Hung@usdoj.gov)
Ms. Melody Taylor-Blancher (via email at Melody.C.TaylorBlancher@hud.gov)
Ms. Mary Jean Carabello (via email at MaryJean.Carabello@hud.gov)
Ms. Danielle.L.Sievers (via email at Danielle.L.Sievers@hud.gov)
Mr. Todd Lawson (via email at tlawson@sussexcountyde.gov)
Mr. Brad Whaley (via email at bwhaley@sussexcountyde.gov)

I attest that the material presented in this Fifth Semi-Annual Compliance Report is accurate to the best of my knowledge as the Sussex County Fair Housing Compliance Officer.

Brandy B. Nauman
Sussex County Fair Housing Compliance Officer

Exhibit List

Exhibit 1 - County Council Agenda for June 9, 2015, and the FHCO Memorandum.

Exhibit 2 – Representative agendas of County Council, the Planning and Zoning Commission, and the Board of Adjustment.

Exhibit 3 - Certificates of Training

Exhibit 4 - Citizens Guide to the County Code

Exhibit 5 - Sussex County Community Development & Housing Department RFP for Impacted Communities Study (May 2015)

Exhibit 6 - Delaware State Housing Authority Community Development Block Grant Quarterly Status Report (DSHA-13) for 2009, 2010, 2011, 2012, and 2013.

Exhibit 1

MICHAEL H. VINCENT, PRESIDENT
SAMUEL R. WILSON JR., VICE PRESIDENT
ROBERT B. ARLETT
GEORGE B. COLE
JOAN R. DEAVER

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Sussex County Council

AGENDA

JUNE 9, 2015

10:00 A.M.

Call to Order

Approval of Agenda

Approval of Minutes

Reading of Correspondence

Public Comments

Delaware Technical & Community College – Starry Starry Night Presentation

Todd Lawson, County Administrator

1. **Tribute – Sussex County Habitat for Humanity**
2. **Update on the EPA's rule relating to the "Waters of the U.S."**
3. **Administrator's Report**

Gina Jennings, Finance Director

1. **Quarterly Pension Review**
2. **Audit RFP Award**
3. **Discussion and Possible Introduction of a Proposed Ordinance entitled "AN ORDINANCE AUTHORIZING THE ISSUANCE OF UP TO $850,000 OF GENERAL OBLIGATION BONDS OF SUSSEX COUNTY IN CONNECTION WITH THE CONSTRUCTION AND EQUIPPING OF THE CONCORD ROAD WASTEWATER EXPANSION AND AUTHORIZING ALL NECESSARY ACTIONS IN CONNECTION THEREWITH"**

EQUAL HOUSING OPPORTUNITY

Andrea Wall, Manager of Accounting

1. **Federal Payment in Lieu of Taxes**

Brandy Nauman, Housing Coordinator & Fair Housing Compliance Officer

1. **Fair Housing Update**

Julie Cooper, Project Engineer

1. **Henlopen Pumping Stations Electrical Cable Replacement, Project 14-12**

   A. **Bid Rejection**

Grant Requests

1. **Town of Greenwood for the Police Department's National Night Out Event**
2. **Georgetown Playground & Park for metal benches**
3. **Georgetown Little League Baseball for field improvements**
4. **Georgetown Historical Society for project costs**
5. **Town of Blades for the Police Department's National Night Out Event**
6. **Lewes Historical Society for operating expenses**
7. **Coastal Concerts for program costs**

Introduction of Proposed Zoning Ordinances

Council Members' Comments

12:00 Noon – Workshop with the Sussex Conservation District to discuss Drainage Guidelines – Sussex County West Complex

Adjourn

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Sussex County Council meetings can be monitored on the internet at www.sussexcountyde.gov.

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In accordance with 29 Del. C. §10004(e)(2), this Agenda was posted on June 2, 2015 at 8:55 p.m., and at least seven (7) days in advance of the meeting.

This Agenda was prepared by the County Administrator and is subject to change to include the addition or deletion of items, including Executive Sessions, which arise at the time of the Meeting.

Agenda items listed may be considered out of sequence.

####

BRANDY BENNETT NAUMAN
HOUSING COORDINATOR &
FAIR HOUSING COMPLIANCE OFFICER
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(302) 854-5397 F
bnauman@sussexcountyde.gov

Sussex County
DELAWARE
sussexcountyde.gov

MEMORANDUM

TO: Sussex County Council
The Honorable Michael H. Vincent, President
The Honorable Samuel R. Wilson, Vice President
The Honorable George B. Cole
The Honorable Joan R. Deaver
The Honorable Robert B. Arlett
Todd Lawson, County Administrator

FROM: Brandy Nauman, Fair Housing Compliance Officer

RE: Fair Housing Update

DATE: June 4, 2015

During Tuesday's Council meeting, I will provide you with a brief update on actions taken in compliance with the U.S. Department of Justice and U.S. Department of Housing & Urban Development fair housing settlement agreements over the last six months in order to comply with Section IV(18) of the Consent Decree. Below you will find an outline of the items I will be discussing. Please note that no action is required of Council; this is simply an update.

U.S. Department of Justice Consent Decree

- Section III(13)(a-d) – Affordable and Fair Housing Marketing Plan
  - PLUS responses
  - 2nd Annual Sussex County Homebuyer Fair – Scheduled September 26, 2015
- Sections IV(15) and (16) – Housing Discrimination Complaints
- Section VI(18) – Submission of Fifth Semi-Annual Compliance Report
- Section VI(21 – 23) and VII(26) – Fair Housing Training
  - 3 new employees trained
  - Annual Training delayed
- Section VII(27)(a) through (f) – Affordable Housing Webpage

U.S. Department of Housing & Urban Development Voluntary Compliance Agreement

- Section III(7)(a)(i-iii) – Sussex County Analysis of Impediments Evaluation and Proposed Priority Fair Housing Plan
    - CTS Language Link
    - Disabilities Report Recommendations
- Section III(7)(c) – Strong Communities Initiative
    - RFP/Bid Status
- Section V – Submission of Fifth Semi-Annual Compliance Report

If you have any questions, please do not hesitate to ask. Thank you.

CC: Brad Whaley, Director of CD&H
Stephanie Hansen, Esquire
Robin Griffith, Clerk of Council

Exhibit 2

MICHAEL H. VINCENT, PRESIDENT
SAMUEL R. WILSON JR., VICE PRESIDENT
ROBERT B. ARLETT
GEORGE B. COLE
JOAN R. DEAVER

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Sussex County Council

AGENDA

JUNE 2, 2015

10:00 A.M.

Call to Order

Approval of Agenda

Approval of Minutes

Reading of Correspondence

Public Comments

Todd Lawson, County Administrator

1. **Proclamation – Home Ownership Month**
2. **Wastewater Agreement – Forest Landing, Phase 3B**
3. **Sheriff's Department - Constables Renewal**
4. **Administrator's Report**

Vince Robertson, Assistant County Attorney

1. **Woods at Walls Creek – Bond Payment and Release**

Brad Whaley, Director of Community Development & Housing

1. **"Mayor's Challenge to End Veterans Homelessness" Program**

10:30 a.m. Public Hearing

Route 54 Expansion of the Fenwick Island Sanitary Sewer District

EQUAL HOUSING OPPORTUNITY

Michael Izzo, County Engineer

1. **Inland Bays Regional Wastewater Facility**

   A. **Design Contract – Class "A" Sludge Dryer**

John Ashman, Director of Utility Planning

1. **Deerbrook Off-Site Infrastructure Agreement**
   Long Neck Sanitary Sewer District

Old Business

Conditional Use No. 2013
TBHM, LLC

Grant Requests

1. **Indian River High School for Business Professionals of America team/students**
2. **Georgetown-Ellendale VFW Post 2931 for Veteran's House Build Project**
3. **The Auxiliary of Milford Memorial Hospital for proposed new health campus**
4. **Milford New Century Club for civic projects**
5. **Greenwood Volunteer Fire Company for truck housing ceremony**
6. **Delaware Hospice for annual 5K fundraising event**
7. **Friends of the Georgetown Public Library for annual 5K fundraising event**
8. **Lewes Historical Society for operating expenses**
9. **Coastal Concerts for program costs**
10. **The Home of the Brave Foundation homeless women veterans assistance**
11. **Milford Museum for fundraising campaign**

Introduction of Proposed Zoning Ordinances

Council Members' Comments

Executive Session – Pending/Potential Litigation pursuant to 29 Del. C. §10004(b)

Possible Action on Executive Session Items

1:30 p.m. Public Hearing

Change of Zone No. 1770 filed on behalf of TD Rehoboth, LLC
"AN ORDINANCE TO AMEND THE COMPREHENSIVE ZONING MAP OF SUSSEX COUNTY FROM AN AR-1 AGRICULTURAL RESIDENTIAL DISTRICT TO A CR-1 COMMERCIAL RESIDENTIAL DISTRICT FOR A CERTAIN PARCEL OF LAND LYING AND BEING IN BROADKILL HUNDRED, SUSSEX COUNTY, CONTAINING 114.4821 ACRES, MORE OR LESS" (land lying on the northeast side of Route One (Coastal Highway) across from Route 88 (Cave Neck Road) (Tax Map I.D. No. 235-23.00-1.00) (911 Address: None Available)

Adjourn

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Sussex County Council meetings can be monitored on the internet at www.sussexcountyde.gov.

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In accordance with 29 Del. C. §10004(e)(2), this Agenda was posted on May 26, 2015 at 4:20 p.m., and at least seven (7) days in advance of the meeting.

This Agenda was prepared by the County Administrator and is subject to change to include the addition or deletion of items, including Executive Sessions, which arise at the time of the Meeting.

Agenda items listed may be considered out of sequence.

####

ROBERT C. WHEATLEY, CHAIRMAN
IRWIN G. BURTON III
MICHAEL B. JOHNSON
MARTIN L. ROSS
RODNEY SMITH

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Sussex County
Planning & Zoning Commission

AGENDA

MAY 21, 2015

6:00 P.M.

Call to Order

Approval of Agenda

Approval of Minutes – May 7, 2015

Old Business

C/Z #1771 B. Ray Investments, LLC RW

an Ordinance to amend the Comprehensive Zoning Map of Sussex County from AR-1 (Agricultural Residential District) to a CR-1 (Commercial Residential District) for a certain parcel of land lying and being in Northwest Fork Hundred, Sussex County containing 2.062 acres, more or less. The property is located east of U.S. Route 13 (Sussex Highway) 0.2 miles north of Road 583 (Adams Road) (911 Address: None Available) Tax Map I.D. 530-14.00-15.00

Public Hearings

C/Z #1772 Sussex Ventures, LLC RW

an Ordinance to amend the Comprehensive Zoning Map of Sussex County from AR-1 (Agricultural Residential District) to a CR-1 (Commercial Residential District) for a certain parcel of land lying and being in Broad Creek Hundred, Sussex County containing 2.33 acres, more or less. The property is located east of U.S. Route 13 (Sussex Highway) 995 feet south of Road 482 (Boyce Road) (911 Address: None Available) Tax Map I.D. 132-12.00-112.00 and 112.05.

EQUAL HOUSING OPPORTUNITY

C/Z #1773 Ernest and Donna DeAngelis **IGB**

an Ordinance to amend the Comprehensive Zoning Map of Sussex County from AR-1 (Agricultural Residential District) to a CR-1 (Commercial Residential District) for a certain parcel of land lying and being in Broadkill Hundred, Sussex County containing 9.541 acres, more or less. The property is located south of Route 9 (Seashore Highway) 800 feet west of Road 262 (Fisher Road) (911 Address: None Available) Tax Map I.D. 235-30.00-53.00.

C/Z #1774 John R. and Susan K. Eisenbrey **IGB**

an Ordinance to amend the Comprehensive Zoning Map of Sussex County from AR-1 (Agricultural Residential District) to a CR-1 (Commercial Residential District) for a certain parcel of land lying and being in Broadkill Hundred, Sussex County containing 31,200 square feet, more or less. The property is located south of Lewes Georgetown Highway (Route 9) 0.7 mile east of Route 5 at Harbeson (911 Address: 26822 Lewes Georgetown Highway, Harbeson) Tax Map I.D. 235-30.00-58.02 (Part of).

C/Z #1776 Larry Yoder **MJ**

an Ordinance to amend the Comprehensive Zoning Map of Sussex County from AR-1 (Agricultural Residential District) to a LI-2 (Light Industrial District) for a certain parcel of land lying and being in Nanticoke Hundred, Sussex County containing 1.079 acres, more or less. The property is located northwest of Shawnee Road (Road #36) 3,439 feet northeast of Road 628 (Coon Den Road) (911 Address: 10862 Shawnee Road, Harrington) Tax Map I.D. 430-3.00-11.01.

Other Business

Americana Bayside – Route 54 **RS**
Amended Phase 4 Site Plan (Sunridge Pool)

Atlantic Business Properties, LLC – U.S. Route 13 **RW**
Interpretation of Similarity in Use

Smithfield Acres - Route 17 **RS**
Consideration to Reinstate a Portion of a Subdivision

Subdivision #2014-6 – James Swann III **RS**
Final Subdivision – 5 Lot Expansion

Leslie Johnson – Neals School Road **RW**
Lot & 50' Easement

Rehoboth Shores – Area 2 – Long Neck Road **MJ**
Campground/Manufactured Home Park Revision

Overlook 2 – MR-RPC – Bayville Road **RS**
Phase 2 Preliminary Plan – 5 Units

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Planning and Zoning Commission meetings can be monitored on the internet at www.sussexcountyde.gov.

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In accordance with 29 Del. C. §10004(e)(2), this Agenda was posted on May 11, 2015, at 10:18 a.m., and at least seven (7) days in advance of the meeting.

This Agenda is subject to change to include the addition or deletion of items, including Executive Sessions, which arise at the time of the Meeting.

Agenda items listed may be considered out of sequence.

####

DALE A. CALLAWAY, CHAIRMAN
JEFFREY M. HUDSON
JOHN M. MILLS
NORMAN C. RICKARD
E. BRENT WORKMAN

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Sussex County Board of Adjustment

REVISED AGENDA

JUNE 8, 2015

7:00 P.M.

Call to Order

Pledge of Allegiance

Approval of Agenda

Approval of Minutes of April 20, 2015

Approval of Finding of Facts of April 20, 2015

Approval of Minutes of May 4, 2015

Approval of Finding of Facts of May 4, 2015

Public Hearings

Case No. 11580 – Francis & Theresa Mellon seeks a variance a reduction in the rear yard setback (Section 115-34B of the Sussex County Zoning Ordinance). The property is located north side of Vincent Village Drive, west of Beulah Boulevard and being Lot 3 within The Vincent Overlook Subdivision. 911 Address: 29735 Vincent Village Drive, Milton. Zoning District: MR. Tax Map: 2-35-27.00-160.00.

Case No. 11581 – Bernice O'Hara seeks a variance a reduction in the rear yard setback (Section 115-25C of the Sussex County Zoning Ordinance). The property is located southeast side of Ashwood Drive and being Lot 13 and ½ Lot 14 within Angola by the Bay Subdivision. 911 Address 32734 Ashwood Drive, Lewes. Zoning District AR-1. Tax Map: 2-34-11.20-149.00.

EQUAL HOUSING OPPORTUNITY

Case No. 11582 – Roy Weismiller & Dino Dachino seeks variances a reduction in the side yard setback, a variance from the separation requirement between units, the maximum lot coverage requirement in a Mobile Home Park and a variance from the minimum lot width and a reduction in the minimum lot area (Section 115-172 G(4)(7) of the Sussex County Zoning Ordinance). The property is located on Waterview Court in the Angola Beach Mobile Home Park located on the east side of Angola Beach Road. 911 Address: None Available. Zoning District: AR-1. Tax Map 2-34-18.00-1.00-Unit 12961.

Case No. 11583 – Robert O. & Christina M. Thompson seeks a variance a reduction in the minimum lot width requirement for a parcel (Section 115-42A *Note of the Sussex County Ordinance). The property is located west side of Bi-State Boulevard approximately 81 feet north of W. Snake Rd. 911 Address: 36192 Bi-State Boulevard, Delmar. Zoning District GR. Tax Map 5-32-13.00-32.00.

Case No. 11584 – Michael Kelly seeks variance a reduction in the front yard, side yard, and rear yard setbacks (Section 115-25C of the Sussex County Ordinance). The property is located west side of Tyler Avenue approximately 370 feet south of Lincoln Drive 911 Address: 38772 Tyler Avenue, Selbyville. Zoning District AR-1. Tax Map 5-33-20.14-39.00.

Case No. 11585 – Sussex Lumber Land Co., LLC seeks a variance a reduction in the front yard setback (Section 115-82B of the Sussex County Ordinance). The property is located at the northeast intersection of Mitchell Street and Dagsboro Road 911 Address: 655 Mitchell Street, Millsboro. Zoning District C-1. Tax Map: 2-33-5.00-80.00.

Case No. 11586 – Michael C. Brittingham seeks a variance a reduction in the rear yard setback (Section 115-185F of the Sussex County Ordinance). The property is located north side of Mary Road approximately 241 feet west of Breasure Road 911 Address: 25140 Mary Road, Georgetown. Zoning District AR-1. Tax Map 1-33-6.00-201.00.

Case No. 11587 – James McIntire seeks a variance a reduction in the front yard setback (Section115-25C of the Sussex County Ordinance). The property is located north side of Harbor Road Extended and northwest of Cedar Road. 911 Address: 19 Harbor Road, Rehoboth Beach. Zoning District AR-1. Tax Map 3-34-14.05-22.00

Case No. 11588 – Clear Channel Outdoors, Inc. seeks a special use exception to place an off-premise sign, and seeks a variance a reduction from the maximum square footage and maximum height requirement for an off-premise sign (Section 115-80C, 115-210(3)(6), 115-159.5 B(3), and 115-159.5(C) of the Sussex County Ordinance). The property is located west side of Route One (Coastal Highway) approximately 846 feet north of Willow Creek Road. 911 Address: 16218 Coastal Highway, Lewes. Zoning District C-1. Tax Map 2-35-23.00-52.01.

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Board of Adjustment meetings can be monitored on the internet at www.sussexcountyde.gov.

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In accordance with 29 Del. C. §10004(e)(2), this Agenda was posted on May 15, 2015, at 2:16 p.m., and at least seven (7) days in advance of the meeting.

This Agenda is subject to change to include the addition or deletion of items, including Executive Sessions, which arise at the time of the Meeting.

Agenda items listed may be considered out of sequence.
Revised: May 26, 2015 (to include approval of Minutes and Finding of Facts for April 20, 2015).
Revised: June 1, 2015 (to include approval of Minutes and Finding of Facts for May 4, 2015).

####

Exhibit 3

ATTACHMENT B

CERTIFICATION OF TRAINING AND RECEIPT OF CONSENT DECREE

On 03/17/2015, I attended training on the federal Fair Housing Act. I have had all of my questions concerning these topics answered to my satisfaction.

I also have been given and I have read a copy of the Consent Decree entered in United States v. Sussex County, Delaware, et al., Case No. 12-1591-MPT (D. Del.). I understand my legal responsibilities and will comply with those responsibilities. I further understand that the Court may impose sanctions on Sussex County or the Planning and Zoning Commission of Sussex County if I violate any provision of this Decree.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Signature

Ryan W. Stuart
Print Name

March 17, 2015
Date

Constable
Position with Sussex County

[redacted]
Home Street Address

[redacted]
City, State, Zip

[redacted]
Home Telephone Number

"I was unable to attend the live-training session due to:

_____ I was a member of the 25% of my department's staff that was required to report to work on the day of training.

_____ Traveling either out of State, or out of the Country

_____ Illness

X I was hired by the County, or transferred departments, after the date of the training."

ATTACHMENT B

CERTIFICATION OF TRAINING AND RECEIPT OF CONSENT DECREE

On 4/22/2015, I attended training on the federal Fair Housing Act. I have had all of my questions concerning these topics answered to my satisfaction.

I also have been given and I have read a copy of the Consent Decree entered in United States v. Sussex County, Delaware, et al., Case No. 12-1591-MPT (D. Del.). I understand my legal responsibilities and will comply with those responsibilities. I further understand that the Court may impose sanctions on Sussex County or the Planning and Zoning Commission of Sussex County if I violate any provision of this Decree.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Guillermo Montalvo
Signature

Guillermo Montalvo
Print Name

4/22/2015
Date

Rehabilitation Specialist
Position with Sussex County

[redacted]
Home Street Address

[redacted]
City, State, Zip

[redacted]
Home Telephone Number

"I was unable to attend the live-training session due to:

_____ I was a member of the 25% of my department's staff that was required to report to work on the day of training.

_____ Traveling either out of State, or out of the Country

_____ Illness

__X__ I was hired by the County, or transferred departments, after the date of the training."

01:12731981.2

ATTACHMENT B

CERTIFICATION OF TRAINING AND RECEIPT OF CONSENT DECREE

Robert B. Arlett

On 2/28/14, I attended training on the federal Fair Housing Act. I have had all of my questions concerning these topics answered to my satisfaction.

I also have been given and I have read a copy of the Consent Decree entered in United States v. Sussex County, Delaware, et al., Case No. 12-1591-MPT (D. Del.). I understand my legal responsibilities and will comply with those responsibilities. I further understand that the Court may impose sanctions on Sussex County or the Planning and Zoning Commission of Sussex County if I violate any provision of this Decree.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Robert B. Arlett

Signature

Robert B. Arlett

Print Name

6/15/15

Date

County Councilman

Position with Sussex County

[redacted]

Home Street Address

[redacted]

City, State, Zip

[redacted]

Home Telephone Number

ATTACHMENT B

CERTIFICATION OF TRAINING AND RECEIPT OF CONSENT DECREE

On Janelle M Cornwell, I attended training on the federal Fair Housing Act. I have had all of my questions concerning these topics answered to my satisfaction.

I also have been given and I have read a copy of the Consent Decree entered in United States v. Sussex County, Delaware, et al., Case No. 12-1591-MPT (D. Del.). I understand my legal responsibilities and will comply with those responsibilities. I further understand that the Court may impose sanctions on Sussex County or the Planning and Zoning Commission of Sussex County if I violate any provision of this Decree.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Janelle M Cornwell
Signature

Janelle Cornwell
Print Name

June 11, 2015
Date

Planning & Zoning Manager
Position with Sussex County

[redacted]
Home Street Address

[redacted]
City, State, Zip

[redacted]
Home Telephone Number

"I was unable to attend the live-training session due to:

_____ I was a member of the 25% of my department's staff that was required to report to work on the day of training.

_____ Traveling either out of State, or out of the Country

_____ Illness

__✓__ I was hired by the County, or transferred departments, after the date of the training."

01:12731981.2

Exhibit 4

SUSSEX COUNTY

DELAWARE

CITIZEN'S GUIDE

TO THE COUNTY CODE

A reference for citizens seeking information regarding common questions on Code Enforcement. For specific information, please contact the appropriate County office.

1. Property Maintenance ($250-$500 fine)

All grass and weeds must not exceed 12 inches in height.

Does not apply to trees, bushes, or ornamental vegetation.

(Call: 855-7819)

2. Trash | Waste | Debris ($250-$500 fine)

Accumulation of trash, waste and debris is prohibited.

(Call: 855-7819)

3. Junk Vehicles | Boats | Sheds

($250-$500 fine)

More than two unregistered, inoperable or junk cars, trucks, campers, trailers, boats, etc. is prohibited.

The use of a camper/RV or shed as living space is explicitly prohibited.

(Call: 855-7878)

4. Animal Control

Incidents involving a dog bite or attack, a dangerous dog, an at-large dog, or a barking dog are covered by State Code.

(Call: 302-698-3006)

5. Dog Licenses ($50-$100 fine)

Dogs older than 6 months require a County dog license.

(Call: 855-7720)

6. Building Permits ($100 fine)

All buildings, which includes sheds, fences, pools, additions and other structures of a semi-permanent placement require a building permit issued prior to the construction, installation, alteration, enlargement or placement of the building or structure. Permits may require that plans be submitted and that inspections be performed.

(Call: 855-7720)

7. Manufactured Homes ($100 fine)

Manufactured homes, including single and double-wides, require a placement permit issued prior to the movement of the structure to a site to allow for hook-ups to sewer/septic, water, and electricity from a Power Company. Living in an illegally placed home is a violation of County Code.

Permits may require that plans be submitted and that inspections be performed.

(Call: 855-7720)

For More Information Contact:

County Administration	855-7700
Planning and Zoning	855-7878
Building Code	855-7860
Constable's Office	855-7819
Community Development	855-7777
Animal Control	(302) 698-3006

Exhibit 5

BRAD D. WHALEY
DIRECTOR OF COMMUNITY
DEVELOPMENT & HOUSING
(302) 855-7777 T
(302) 854-5397 F
bwhaley@sussexcountyde.gov

Sussex County
DELAWARE
sussexcountyde.gov

Sussex County

Community Development & Housing Department

Request for Proposals (RFP)

For Impacted Communities Study

May 2015

To be completed:

From July 2015 – April 2016

Contact Person:

Brad D. Whaley, Director

Phone 302-855-7777

E-mail: Bwhaley@sussexcountyde.gov

EQUAL HOUSING OPPORTUNITY

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I. Project Overview

A. Introduction

The Sussex County Community Development and Housing Department ("the Department"), a department of the Sussex County Council, is soliciting proposals from qualified organizations to analyze data for the County's Strong Communities Study. Information from this study will be used by the County to better understand the needs of impacted communities in order to prioritize future planning and funding of infrastructure for these areas.

Sussex County has collected data from impacted communities that:

- Defines location and total number of households;
- Provides household demographic data;
- Identifies the condition of homes and number of substandard units;
- Establishes community priorities regarding infrastructure and services;
- Determines the percentages of low- and moderate-income persons.

The data from the study will ultimately be evaluated by the County to determine investment strategies, priority designation of infrastructure and/or community development for those elements of infrastructure over which the County has primary governing authority. Data will be made available to housing and advocacy groups throughout the state for additional planning purposes.

The Department has completed a majority of the data collection for the study through household surveys and community meetings. The proposer may be required to seek additional information from respondents. Though the study calls only for data analysis, the completed report should be a clear and professional presentation supported by narrative, GIS maps, graphs, and tables. The remainder of the necessary data will be collected by Sussex County during June and July 2015.

The specifications contained in this RFP shall be considered as clear and complete unless written attention is called to any apparent discrepancy or omission thereof before opening of proposals.

The proposer agrees that any estimates as stated in the RFP are only to provide a uniform basis for comparison of proposals and are not represented to be accurate. Such estimates shall not be considered a binding feature of any contract nor in any other way to determine a liability against the Sussex County Council.

B. Sussex County Community Development & Housing Department Overview

Sussex County Community Development & Housing Department was established in 1990 and is a department of Sussex County Government. The Department administers the Community Development Block Grant (CDBG) program for Sussex County, as well as for municipalities and rural communities throughout Sussex County. CDBG funding is made available to the County through the Delaware State Housing Authority (DSHA), from the U.S. Department of Housing & Urban Development (HUD). The Department administers the CDBG program in accordance with State and Federal guidelines.

In addition to CDBG funding, the Department also administers several other federally-funded programs such as, the HOME Investment Partnerships Program (HOME), the Neighborhood Stabilization Programs (NSP1 & 2), and the U.S. Department of Agriculture Housing Preservation Grant (HPG). Further, the Department also administers the County's two inclusionary zoning programs: the Moderately Priced Housing Unit (MPHU) Program and the Sussex County Rental Program (SCRP).

To date, the Department has assisted over 3,000 households with housing repairs through CDBG, HOME, HPG, and County Council Emergency Repair funding, and helped 42 households attain homeownership through NSP.

The Department's employees also assist local community service and housing providers by serving on boards and advisory groups.

C. Background

The Impacted Communities Study is a combination of several factors. The Department has applied for and administered CDBG funding in the majority of the impacted communities since its origination in 1990. Until now, the Department has applied on behalf of every rural community for owner-occupied housing rehabilitation. DSHA's CDBG Review Board makes the ultimate decision in which communities receive funding each year. This Study will provide strong evidentiary support necessary to seek future funding for various eligible activities based on the needs voiced by residents of each community. Further, this Study will provide the percentages of low- and moderate-income (LMI) persons in each of the impacted communities. In order for the County to seek funding for eligible targeted areas in the future, it must be able to define an area as LMI.

Also, in November 2012, Sussex County Government reached a settlement with HUD and the U.S. Department of Justice (DOJ) regarding a fair housing complaint originated by

Diamond State Community Land Trust. One of the settlement provisions outlined by HUD in the Voluntary Compliance Agreement (Section III, 7, (c)) requires Sussex County to "perform an internal evaluation of the recommended communities below (the 'Impacted Communities') to determine at minimum, investment strategies, priority designation of infrastructure and or community development over which the County has primary governing authority. The County will also evaluate its past participation in providing secondary elements of infrastructure in the Impacted Communities (such as funding for trash disposal, roadway crusher run installation, well and septic installation and repair, public water and sewer system hookup, after-school and community programs, street lighting, and construction for accessibility purposes) with the goal of prioritizing the funding for such infrastructure improvements and formalizing an approval process for continued County participation in such infrastructure projects. Priority designations shall be given to communities that have the greatest need.

1. Lucas Development
2. Pine Town
3. New Hope
4. West Rehoboth
5. Polly Branch
6. Dog Patch
7. Mount Joy
8. Concord
9. Possum Point
10. Coverdale Crossroads"

The Department expects that this Study will provide the necessary information to plan and coordinate investment strategies for these communities for at least the next 5 years.

D. Request for Proposals

The contract will be awarded to the proposer that offers the most beneficial proposal encompassing all possible criteria established within this Request for Proposals, as well as cost for the proposed services and timeframe needed to complete the data collection. Proposals will be opened privately. The Director of the Community Development & Housing Department will make the final announcement of the awarded proposal.

II. Scope of Work

A. Project Details

The following is a list of objectives with respect to data analysis and presentation for the Strong

Communities Study. The Scope of Services to be provided by the proposer shall include, but not be limited to, the following:

1. *Community Defined*

Geographic assessment of each impacted community, total number of households, and demographics of each household.

- Brief historic description of each community
- Map identifying community boundaries, census tract, parcels identifying ownership status, property owner, and vacant lots/land, as well as the location of community buildings
    - The County will provide base ArcGis maps with parcel lines and community boundaries.
- Total number of units
- Proximity to existing infrastructure service areas and planned infrastructure expansion (roads, public water, and sewer)
    - The County will provide data and maps related to County water and sewer infrastructure.
- Proximity of each impacted community to existing and planned growth areas, as well as current infrastructure service areas and proposed infrastructure expansions and improvements
- Review of the County's past involvement in providing primary and secondary elements of infrastructure in each community (extension of public water, extension of public sewer, water well installation/repair, septic system installation/repair, housing rehabilitation, periodic trash/debris collection, streetlights, crusher run, accessibility features, community events, etc.).
    - The County will provide a comprehensive working list of known primary and secondary elements of infrastructure provided by the County to the rural communities identified in this RFP to serve as a basis for analysis.
    - The proposer will be expected to review the last 10 years of County involvement in each community and provide the current status of previously provided elements of primary and secondary infrastructure.
- Current community services available in each community (i.e. after-school programs, financial literacy courses)
- Any other current community investments from outside agencies or organizations

2. *Individual Residents*

Individual assessment of the residents of each impacted community, including need and demographics. The proposer is expected to be able to provide specific details and breakdown regarding the data collected, such as identifying common survey responses based on occupancy (owner-occupied vs. tenant-occupied). The County also expects to see this data in the aggregate for each community. Note: A majority of the data will be provided

based on survey results obtained by the Department. The proposer may be required to seek additional information from respondents.

- Property ownership status (own land & home, rent land & own home, or rent land & home)
- Property ownership details (names and Tax Identification Number)
- Tenant details (if applicable)
- Household demographics (number of people in household, ages of each family member, female head of household, gross household income, disability, race/ethnicity, gender)
- Approximate age of home
- Needs (i.e. home repair, home accessibility/handicap modifications, water quality testing, well/septic installation or repair, trash collection/disposal, other)
- Residents' acceptability of additional primary/secondary elements of infrastructure within their community
- Property condition (scaled interpretation)

3. Collective Community Needs

Overall assessment of community needs and desires as related to infrastructure and services based on individual resident surveys, small focus groups, and interviews with community representatives.

- Community Services (i.e. after-school programs, financial literacy education, animal control services, light code enforcement, other)
- Community Infrastructure (i.e. public water/sewer system, demolition of vacant/condemned/dangerous structures, drainage problems, community center repairs or accessibility, street lights, sidewalks, road improvements, public transportation, other)
    - The County will provide outlines/notes from community meetings conducted by the Department.

4. LMI Determinations

Presentation of the percentage of low- and moderate-income persons in each community.

- Proposers must be able to document the County's attempt to achieve 100% individual household survey completions for each community.
    - Requirements for CDBG Methodology Surveys are outlined in HUD Notice CPD-05-06, also attached as Attachment D to this RFP.

B. Geographic Regions for Identifying Needs

The study should incorporate data analysis from each of the following impacted communities within Sussex County:

1. Lucas Development (Milton)
2. Pine Town (Lewes)
3. New Hope/S. Old State Road (Ellendale)
4. West Rehoboth (Rehoboth)
5. Polly Branch (Selbyville)
6. Dog Patch (Frankford)
7. Mount Joy (Millsboro)
8. Concord (Seaford)
9. Possum Point/Rural Millsboro (Millsboro)
10. Coverdale Crossroads (Bridgeville)
11. Diamond Acres (Millsboro)
12. Cool Spring (Milton)
13. Cedar Creek Development (Lincoln)
14. Greentop (Lincoln)

The County has provided maps that demonstrate an approximate boundary of each of the above communities for reference only, included as Attachment E to this RFP.

C. Study Format

The findings must be submitted as 3-4 work products timed with the payment schedule. A suggested general outline is below, but proposals may include different outlines in their work schedule. Consultants must include a work calendar, description of proposed work products and organization of the report in their proposals. Final report should include a summary PowerPoint presentation, as well as fact sheets for each community studied. All reports, surveys, studies, and data will become the property of Sussex County.

a) Work product 1
    i. Draft of Community Defined
b) Work product 2
    i. Draft Survey Results Summary for Collective Community Needs
c) Work product 3
    i. Draft Survey Results Summary/Aggregation for Individual Residents
d) Work product 4
    i. Complete draft of all three project components (Community Defined, Collective Community Needs, and Individual Residents)
    ii. Final LMI Determinations
e) Work product 5
    i. Final report

ii. Summary PowerPoint presentation and fact sheets
iii. Presentation to Sussex County Council

D. Data Sources and Format

See Attachments for a list of suggested data sources. All data tables collected must be in Excel or DBASE/ArcGIS format. All the descriptive and narrative files must be submitted to Sussex County in MS Word and PDF formats. Data tables and files become the property of Sussex County. To represent the findings, maps must be incorporated throughout the report where appropriate. All maps must be in ArcGIS-compatible format, with appropriate metadata and where possible, a map PKG should be supplied.

E. Stakeholder Input

The involvement of community members, residents, and stakeholders is absolutely essential to collecting information regarding the needs of the impacted communities. The Department has held least one public focus group with residents and stakeholders from each of the impacted communities. Proposers may be required to seek additional information from residents or stakeholders. Sussex County will supply lists of suggested contacts for interviews and follow-up, as well as notes/outlines from the community meetings held.

It should be noted that some communities may have residents that speak English as a second language. Proposers are expected to be able to accommodate any translations necessary.

III. Proposal Format, Content, and Submission Requirements

A. Submission of Proposals and Deadline

Provide one electronic copy and one paper copy in one sealed, company-marked envelope and clearly labeled "Sussex County Strong Communities Study" to Sussex County Community Development & Housing Department by **4:00 p.m. EST June 5, 2015**. The Proposal should be addressed to:

Brad Whaley, Director
Sussex County Community Development & Housing Department
P.O. Box 589 (or 22215 DuPont Boulevard if hand-delivered or non-USPS)
Georgetown, DE 19947

Proposals will not be accepted after 4:00 on June 5, 2015.

There is no expressed or implied obligation for Sussex County to reimburse responding firms for any expenses incurred in preparing proposals in response to this request. Sussex County reserves the right to retain all proposals submitted and to use any ideas in a proposal regardless of whether that proposal is selected.

Submission of a proposal indicates acceptance by the firm of the conditions contained in this Request for Proposals, unless clearly and specifically noted in the proposal submitted and confirmed in the contract between Sussex County and the firm selected.

B. Equal Opportunity

All qualified persons, firms and proposers will receive consideration without regard to age, color, disability, gender, national origin, race, religion, or sexual orientation. Minority Business Enterprises (MBE), Women-Owned Business Enterprises (WBE), and Veteran-Owned Business Enterprises are encouraged to apply.

C. Questions about the Request for Proposals

Questions related to the scope of work, requests for additional information, and/or concerns about the submission of the proposal, may be directed to Brandy Nauman at (302) 855-7779 or bnauman@sussexcountyde.gov.

D. Minimum Proposal Requirements

1. *Contents*
    a. An executive summary of not more than one page
    b. Description of approach/methodology to the scope of services
    c. Description of deliverable products
    d. Implementation schedule of how the study should progress, and at what points various tasks will be completed, including at 25%, 50%, 75%, and 100% of completion.
    e. A general background of your organization, including:
        i. Description of similar studies undertaken
        ii. Location of planning organization
        iii. Resumes of staff members to be assigned to this study
        iv. Samples of similar work completed in the last three years
        v. Names and contact information for three references familiar with similar work
        vi. Experience in fair housing/AFFH
        vii. Familiarity with HUD's Consolidated Plan process
    f. Costs by work product
    g. Signed proposer warranty

E. Debarred, Suspended, and Ineligible Contractors

The consultant certifies by submission of a proposal that it is not a debarred, suspended, or ineligible contractor by any Agency of Federal or State government. No proposal received from a debarred, suspended, or ineligible contractor will qualify for award.

F. Acceptance of Consultant Proposals

Sussex County reserves the right to reject any and all proposals, to accept or reject any part of any proposal, or to waive informalities and minor irregularities in the proposals. Proposals which contain erasures, alterations, conditional proposals, omissions, or irregularities, may be rejected.

G. Consultant Selection and Contract Execution

Each proposal will be rated and ranked in accordance with the following criteria:

a. Approach for conducting the Strong Communities Study (15 points)
b. Specific methodologies for completing various aspects of the study (20 points)
c. Demonstrated ability and capacity (15 points)
d. Technical qualifications of individuals to be assigned to project (10 points)
e. Ability to meet proposed timeline (15 points)
f. Total price of study (15 points)
g. Continuity and stability of proposer (10 points)

Based on a review of submitted proposals, a list of no more than three organizations will be selected for interviews. Sussex County reserves the right to award a contract based solely on the proposals or to negotiate further with one or more consultants. The consultant selected will be chosen on the basis of the greatest benefit to Sussex County, not necessarily on the basis of the lowest price. The consultant agrees, if successful, to execute a contract within 15 days after the Notice of Award. No contract may be assigned, either in whole or in part, without the prior approval of Sussex County.

Sussex County may request additional information or clarification from applicants during the evaluation process.

H. Contract Price and Payment

The Proposal must state the total planned hours and hourly rate by staff classification of those anticipated to work on the project. An all-inclusive maximum fee for each work product, broken out by planned hours and hourly rates by staff classification must be provided, as well as an all-inclusive maximum fee for the entire study.

The price quoted in the proposal must be firm and not subject to change by vendor for 90 days from date of proposal opening. The price shall represent the total cost to Sussex County including direct, indirect, and out-of-pocket costs. Quoted costs should include meetings with Sussex county staff and presentation of final report at a Sussex County Council meeting open to the public.

Payment shall be made upon approval by Sussex County of products at 25%, 50%, and 75% completion. The final 25% will be paid upon completion and approval of all products.

Note: The budget for this project is based on an awarded $50,000 Community Development Block Grant through the Delaware State Housing Authority.

IV. Timeline

A. RFP Timeline

6/5/15 - RFP Responses due to Sussex County
Week of 6/22/15 – Interviews
Week of 6/29/15 – Contract signed and work begins

B. Study Timeline

Interim due dates are estimated and will be confirmed upon execution of a contract. Proposers are required to develop their own more detailed proposed timelines for completion of the project. All work products must be complete by March 30, 2016.

July 2015	Initial Meeting with Sussex County
August 15, 2015	Work product 1 (25% Completion/Draw #1)
November 1, 2015	Work product 2 (50% Completion/Draw #2)
December 31, 2015	Work product 3 (75% completion/Draw #3)
March 1, 2016	Work product 4
April 15, 2016	Final Deliverables (100% Completion/Final Draw)

V. Attachments

Attachment A – Suggested Data Sources

Sussex County can direct the consultant to the following sources of appropriate information:

- 2010 Census and 2006-2012 American Community Survey
- Multi-Listing Service (MLS): Sussex County MLS
- USPS Vacancy Data
- CenStats Database
- PolicyMap

Sussex County can provide data or assist in securing data on:

- Household surveys from each of the 14 impacted communities (2014-2015)
- Outlines and notes from community meetings held in each of the 14 impacted communities (2014-2015)
- Historical background information on each of the 14 impacted communities
- Foreclosure filings and Sheriff sales
- Property transfers and ownership

- Sussex County Existing Land Use and Future Land Use Plan
- Human Service Grant Awards
- Sussex County Sewer and Water maps

Attachment B - Certifications and Proposer Warranties

SUSSEX COUNTY GOVERNMENT

The proposer certifies that it has current coverage under a Professional Liability insurance policy with an amount of no less than US $500,000 per loss.

The proposer certifies that it will provide all services set forth in this Request for Proposal, and that it will not delegate, subcontract, or assign its responsibilities without the prior written permission of Sussex County Government.

The proposer certifies that it is aware of the contracting and payment policies set forth in this Request for Proposal and hereby agrees to adhere to said requirements in all contract agreements.

The proposer warrants that it is licensed to do business in the State of Delaware.

The proposer warrants that all information provided by it in connection with this proposal is true and accurate.

Signature of Official: _____

Name (typed): _____

Title: _____

Firm: _____

Address: _____

_____

Date: _____

Attachment C – Non-Collusion Certification

Proposer's Name (typed): _____

Address: _____

_____

Project: _____

This is to certify that neither the above named proposer nor any of its officers, partners, owners, agents, representatives, employees or parties in interest, has in anyway colluded, conspired, connived or agreed, directly or indirectly, with any other proposer, firm or person to submit a collusive or sham proposal in connection with the Contract for which the attached proposal has been submitted or to refrain from proposing in connection with such Contract, or has in any matter, directly or indirectly, sought by agreement or collusion or communication or conference with any proposer, firm or person to fix the price or prices in the attached proposal or of any other proposer, or to fix any overhead, profit or cost element of the proposal price of any other proposer, or to secure through any collusion, conspiracy, connivance of unlawful agreement any advantage against the Owner or any person interested in the proposed Contract; and the price or prices quoted in the attached proposal are fair and proper and are not tainted by any collusion, conspiracy, connivance or unlawful agreement on the part of the proposer or any of its agents, representatives, owners, employees, or parties in interest.

(Signed) _____

_____
Title

_____
Date

Seal – If Proposer is a Corporation

ATTEST: _____

Secretary

Attachment D – HUD Suggested Survey Methodology

U.S. Department of Housing and Urban Development
Office Community Planning and Development

Special Attention of:

CPD Division Directors
Entitlement CDBG Grantees
State CDBG Grantees

Notice CPD-05-06

Issued: July 26, 2005

Expires: July 26, 2006

Cross References

SUBJECT: US Department of Housing and Urban Development (HUD) Suggested Survey Methodology to Determine the Percentage of Low- and Moderate-Income (LMI) Persons in the Service Area of a Community Development Block Grant-Funded Activity.

This Notice describes suggested procedures for conducting a survey to ascertain whether or not a Community Development Block Grant (CDBG)-funded activity designed to benefit an area generally qualifies as primarily benefiting LMI persons. HUD urges field staff to review this Notice to improve their understanding of regulatory requirements and basic techniques that may be used in conducting incomes surveys. HUD's regulatory requirements for conducting a survey to determine the percentage of LMI persons in the service area of a CDBG-funded activity are located at 24 CFR 570.208(a)(1)(vi) for the Entitlement program and at 24 CFR 570.483(b)(1)(i) for the State program. CDBG grantees are urged to use these suggested procedures or other comparable methods when they conduct surveys to ascertain that at least 51 percent of the residents of the service area of a CDBG-funded activity are LMI persons.

Distribution: W-3-1

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I. Introduction

This guide is prepared to assist CDBG grantees to develop surveys for the purpose of determining whether the service area of a proposed activity meets the LMI Area Benefit national objectives criteria. It provides Entitlement, State and local CDBG staff who have no substantial survey research background with the basic survey research techniques to make a determination of the income status of residents of the service area of a CDBG-funded activity. The methods discussed in this guide are basic techniques for conducting a survey that will yield acceptable levels of accuracy.

The procedures described in this guide are comprehensive approaches to conducting the least costly surveys possible and attempts are made to render them as simple as possible. The procedures are purposely designed to be used for the determination of income levels in the service area of a CDBG-funded activity; therefore, computations of parameters such as standard deviation, variance, standard error, standardized scores, etc. that are routinely undertaken in marketing research and other opinion surveys, are not applicable herein. If an Entitlement grantee chooses another survey method, it is required to demonstrate that the survey method meets standards of statistical reliability that are comparable to decennial census data (24 CFR 570.208(a)(1)(vi)). Prior to conducting a survey, Entitlement grantees are required to have their survey instruments and methodology reviewed and approved by their local HUD Community Planning and Development (CPD) Office. The State CDBG regulations at 24 CFR 570.483(b)(1)(i) requires that the survey be methodologically sound.

Confidentiality

If you choose to conduct a survey, you must emphasize to respondents that their answers will be kept confidential. People are more likely to provide honest answers if their answers are to remain anonymous. You should do your very best to maintain this confidentiality. It is recommended that the respondent's name, address, and telephone number appear only on the cover sheet of the questionnaire. After the survey is completed, the cover sheet may be numbered and separated from the actual interview sheet. If the cover sheets and the questionnaires are both numbered, they can be matched if necessary. It is suggested that the grantee make reasonable efforts to protect the privacy of those surveyed and follow applicable State and local laws regarding privacy and obligations of confidentiality.

Lifespan of a Survey

There is no firm answer as to how long an income survey for the purpose of determining the percentage of LMI persons in the service area is good for. Perhaps there might be instances in which an income survey could continue to be used until the next decennial census, but the grantee would have to be sure that there have been no significant demographic, economic and non-economic changes in the area during that time. Such changes may include factory openings

or closings, layoffs by a major employer in the service area, or the occurrence of major disasters (such as tornados hurricanes, earthquakes, etc.). Grantees may also want to conduct income surveys for defined service areas when they develop new Consolidated Plans. Note that even if a survey is current, it cannot be used for a different activity in a different service area; however, it might be usable for another activity in the same service area.

II. Definition of Terminologies

Some of the terms defined in this section are governed by CDBG regulatory requirements. CDBG regulatory definitions of *income*, *family* and *household* are located at 24 CFR 570.3 for the Entitlement program. States may choose to adopt the definitions applicable to the Entitlement program or provide their own definitions under 24 CFR 570.481(a) provided that they are explicit, reasonable, and not plainly inconsistent with the Housing and Community Development (HCD) Act of 1974. The definitions below are located at 24 CFR 570.3 and are applicable only to the Entitlement program.

CDBG Terminology

1. Family means all persons living in the same household who are related by birth, marriage or adoption.

2. Household means all persons who occupy a housing unit. The occupants may be a single family, one person living alone, two or more families living together, or any other group of related or unrelated persons who share living arrangements.

3. Income - Entitlement grantees may select any one of the following three definitions of income:
   - (i) Annual income as defined at 24 CFR 5.609 (except that if the CDBG assistance being provided is homeowner rehabilitation under 24 CFR 570.202, the value of the homeowner's primary residence may be excluded from any calculation of net family assets);
   - (ii) Annual income as reported under the Census long-form for the most recent available decennial Census; or
   - (iii) Adjusted gross income as defined for the purpose of reporting under Internal Revenue Service (IRS) Form 1040 for individual Federal annual income tax purposes.

4. Low-Income person means a member of a family that has an income equal to or less than the Section 8 very low-income limit established by HUD. Unrelated individuals shall be considered as one-person families for this purpose. (The Section 8 very low-income limit is income that does not exceed 50 percent of the median income for the area, as adjusted by HUD.)

5. Moderate-Income person means a member of a family that has an income equal to or less than the Section 8 low-income limit and greater than the Section 8 very low-income limit, established by HUD. Unrelated individuals shall be considered as one-person families for this purpose.

Terms Used in Survey Research

1. Unit of analysis refers to what is being measured and for the purpose of this guidance, the unit of analysis is family income. Whether one is counting households or families, what actually matters is the total family income, not the income of any one individual.

2. Respondent refers to the person who is responding to the questionnaire or interview.

3. Rate of response is expressed as a percent; it refers to the number of households participating in a survey divided by the number of households in the sample.

4. Population refers to the group whose characteristics you seek to estimate.

5. Parameter is the summary description of a given variable in a population.

6. Sample refers to a portion of the population under study. Samples are used to draw inferences about the population.

7. Sampling is the process of selecting a sample from the population.

8. Simple random sampling is a type of probability selection process in which the units composing a population are assigned numbers and a set of random numbers is then generated, and the units having those numbers are selected to make up the sample.

9. Representativeness refers to the quality of a sample having the same distribution of characteristics as the population from which it is selected.

III. Service Area

This is the area to be served by the CDBG-funded activity. One of the crucial aspects of qualifying an activity as principally benefiting LMI persons on an area basis is the proper identification of the service area. The service area must be defined first before deciding which data to use to determine the percentage of LMI persons and not vice versa. The principal responsibility for determining the area served by the activity rests with each CDBG grantee.

Entitlement Program

Once it has been determined that the benefits of the activity will be available to all residents of a particular service area, the activity may meet the LMI Area Benefit national objective if the boundaries of the area served by the activity are clearly defined and at least 51 percent of the residents are LMI persons. In some communities, the planning department or the agency administering a particular facility or service, for their own purposes, establishes service areas for such things as libraries, parks, playgrounds, etc. Entitlement grantees may use such service areas if the CDBG-funded activity is located in the same service area. If not, it will be necessary for the service area to be defined before CDBG assistance may be provided if the activity is to qualify under the LMI area benefit criteria. Factors to be considered in defining the service area include:

1. Nature of the activity: In determining the boundaries of the area served by a facility, you must consider whether the facility is adequately equipped to meet the needs of the residents. For example, a park that is expected to serve an entire neighborhood cannot be too small or have so little equipment (number of swings, slides, etc.) that it would only be able to serve a handful of persons at a time. Conversely, a park that contains three ball fields or a ball field with grandstands that can accommodate hundreds of spectators cannot reasonably be said to be designed to serve a single neighborhood. The same comparison would apply to the case of assisting a small two-lane street in a residential neighborhood versus that of assisting an arterial four-lane street that may pass through the neighborhood but is clearly used primarily by persons commuting.

2. Location of the activity: Where an activity is located may affect its capacity to serve particular areas, especially when the location of a comparable activity is considered. For example, a library cannot reasonably benefit an area that does not include the area in which it is located. When a facility is located near the boundary of a particular neighborhood, its service area would be expected to include portions of the adjacent neighborhoods as well as the one in which it is located. The grantee may even carry out activities that are outside its jurisdiction if this is done in accordance with 24 CFR 570.309.

3. Accessibility issues: If a geographic barrier such as a river or an interstate highway separates persons residing in an area in a way that precludes them from taking advantage of a facility that is otherwise nearby, that area should not be included in the service area. Language barriers might also constitute an accessibility issue in some circumstances.

The use of more current income data collected by conducting a survey instead of HUD's Low- and Moderate-Income Summary Data (LMISD) derived from the most recent US decennial census may be accepted for any service area, including whole block groups or census tracts for which the percentage of residents that are LMI is 51 percent or greater. However, where such data indicates a percentage lower than 51 percent, the area could only qualify under the *exception rule* provision or *upper quartile criterion.* Section 105(c)(2)(B) of the HCD Act provides an

exception to the general rule at section 105(c)(2)(A) for determining whether CDBG-assisted area benefit activities principally benefit LMI persons. The general rule requires that area benefit activities serve areas where the concentration of LMI persons is at least 51 percent. The *exception rule* provision located at 24 CFR 570.208(a)(1)(ii), allows certain grantees to undertake the same types of activities in areas where the proportion of LMI persons in the area is within the highest quartile of all areas in the grantee's jurisdiction in terms of the degree of concentration of LMI persons. The *exception rule* provision allows these grantees to undertake the same types of activities in areas where the proportion of LMI persons in the area is within the highest quartile of all areas in the grantee's jurisdiction in terms of the degree of concentration of LMI persons. Based on 24 CFR 570.208(a)(1)(ii), HUD uses census block groups as the common denominator for determining the minimum percentage of LMI persons required for area benefit activities in communities qualified to use the *exception rule*.

Block group data cannot be relied on to exclusively determine the percent of LMI persons currently residing in the service area of an area benefit activity when the service area boundaries do not reasonably coincide with census areas. Where fragments of one or more block groups form part of the service area of an activity, the following approach may be used to determine the income characteristics of each fragment:

1. Assume that the percentage of LMI persons in the respective block group(s) also applies to the fragments therein, unless there is good reason to believe that the residents of the fragments have higher incomes than the balance of the block group; or

2. Either: (a) determine the likely income levels in the fragments through analysis of HUD's Low and Moderate-Income Summary Data (LMISD) at the block face level; or (b) conduct an income survey throughout the fragment(s) to determine the current income levels; or

3. Combine the data arrived at for the fragment(s) with the values already determined through the use of the LMISD for any block group(s) that are completely subsumed within the service area of the activity.

As discussed above, the statute and the regulations recognize that some entitlement communities have few, if any, areas within their jurisdiction that have 51% or more LMI residents. Exception grantees qualify for this exception when less than one-quarter of the populated block groups in its jurisdiction contain at least 51 percent LMI persons. Grantees who decide to conduct an income survey must do so in all block groups in its jurisdiction so that a new assessment can be made of the upper quartile percentage resulting from the more current data obtained from the survey. The standards for accepting an area benefiting less than 51 percent LMI persons should be unambiguous—that is, there should be clear evidence that the percentage of LMI persons in a block group shown by the more current data is less than 51 percent and falls within the upper quartile of all block groups based on that same data source. The *upper quartile criterion* does not apply to the State CDBG program.

State Program

HUD will generally accept the determination of the service area by the state and its grant recipients unless the nature of the activity or its location raises serious doubt about the area claimed by the state and its grant recipients. The area to be served by a CDBG funded activity need not be coterminous with census tracts or other officially recognized boundaries; it is critical that the service area be the entire area served by the activity (see 24CFR 570.483(b)(1)(i)). The service area boundaries of State CDBG-funded activities may or may not coincide with census or other geographic boundaries, especially in smaller communities and rural areas where block groups or census tracts with low population densities cover large areas. One census tract may cover an entire city or there may be only two or three census tracts in an entire county. Scenarios which states and state grant recipients commonly face include the following:

1. The service area comprises only a small portion of the unit of general local government, or of a census tract. In such situations, information on the unit of government or the census tract is not useful because the residents of the service area make up only a small fraction of the total, and their characteristics may not mirror those of the larger area. A survey of the residents of the service area may be the most appropriate way to determine whether the service area qualifies under the LMI criterion. Examples of activities in which this may be encountered include: extending water lines to serve rural settlements in a county; construction of a neighborhood tot lot serving one subdivision in a city where the entire city is one census tract.

2. The service area includes all or part of several units of general local government and may contain both incorporated and unincorporated areas. Data from HUD may be usable for a portion of the service area; therefore, the State and its grant recipients may need supplementary survey data for the other portions of the service area. It may be necessary to survey a large area to determine the percentage of service area residents who are LMI. Examples of activities include: (1) construction of a rural water system which serves more than one incorporated city plus portions of the surrounding unincorporated area of two counties in which the cities are located; (2) construction of a new fire station in a city where the municipal fire department provides, through contract, fire protection service for two adjoining townships (one of which is in a different county).

For the State CDBG program, the service area may be a sparsely populated rural area. For such an area, a census of the entire population may be undertaken; however, the following conditions are applicable:

- The grantee must show how the percentage of LMI persons was calculated. The percentage of LMI persons must be calculated from the entire population of the service area, and not from the proportion of participants who responded to the survey. If for example, a town in rural America with a population of 640 conducts a census of the entire population to determine the percentage of LMI persons, and gets an 80 percent response rate. Fifty-one percent of 640 is 326, and 80 percent of 640 is 512.

Of the 512 respondents, 326 of them should be LMI persons. It is inaccurate to use 51 percent of 512 which is 261.

- It is possible that some families in the service area may vehemently refuse to participate in the census, or cannot be reached (after several attempts) for several reasons (for example, families on lengthy vacations). In such cases, it is suggested that the total number of persons in the families that participated in the census be used in calculating the percentage of LMI persons. However, the number of refusals or absentees must be relatively small (for example, two or three families out of, say, 50) so as to have a negligible effect on the validity of the results of the census. Regardless of the type of method used, compare the percentage of LMI persons obtained from the survey or census with the percentage of LMI persons provided in the most recent LMISD and give an explanation if the two percentages differ widely.

Performing LMI Qualification

Once the boundaries of the service area of the CDBG-funded activity have been defined, the next step is to determine the required percentage of residents that are LMI persons. To determine the percentage of LMI persons in the service area, grant recipients may utilize HUD's LMISD. HUD's LMISD is based on the most recent US decennial census data, which may not reflect current income levels in the service area and/or the census tract/block boundaries may not coincide sufficiently with the service area. This leads to the option of conducting a survey to determine the percentage of LMI persons in the service area.

For the Entitlement program, the CDBG Regulations at 24 CFR 570.208(a)(1)(vi) require that the results of the survey meet standards of statistical reliability comparable to that of the decennial census for areas of similar size to determine the percentage of LMI persons in the service area of a CDBG-funded activity. A statistically reliable survey entails the following:

1. The grantee must clearly state the survey method used: mail questionnaire, face-to-face or telephone interviews, etc. (Each method has advantages and disadvantages.)

2. Participants for the survey must be selected through a random sampling process, and replacements for nonrespondents must also be selected through the same random sampling process.

For the State program, CDBG regulations at 24 CFR 570.483(b)(1)(i) require that grantees conduct surveys that are methodologically sound to determine the percentage of LMI persons in the service area of a CDBG-funded activity.

Temporary residents (for example, residents of seasonal cabins) may not participate in an income survey if their benefit of a service or an activity is incidental. For example, the use of a library or senior center by temporary residents would be considered an incidental benefit. Temporary

residents may participate in income surveys for CDBG-funded activities such as installation of sewer lines and sewage treatment plants, etc.

IV. A Summary of Steps in Conducting LMI Surveys

When HUD's LMISD data are not used in documenting LMI benefit on an area basis, CDBG grantees must comply with the standards for conducting surveys located at 24CFR 570.208(a)(1)(vi) for the Entitlement program and 24 CFR 570.483(b)(1)(i) for the State CDBG program. Experienced researchers employ survey methods that are easy to complete, generate consistent and accurate data, and produce results that answer specific questions. Anybody who has not conducted a survey can still do so by following a systematic approach. This guide describes procedures that may be used to determine whether the requisite percentage of the residents of a service area (51% or the exception percentage, as applicable) of a CDBG-funded activity are LMI persons. This guide does not restrict the CDBG grantee to any one type of survey methodology. The steps in conducting surveys are as follows:

Step 1: Select the Type of Survey

Decide which survey method to use (telephone, door-to-door, or mail questionnaire) and base your decision on available staff, size of the sample you need, and the means you have available for identifying samples for the survey. The bibliography at the end of this Notice contains a list of books on how to conduct other types of surveys.

Step 2: Develop the Questionnaire

If you choose to conduct a mail questionnaire, use standard 12-point print and do not congest too many questions on one sheet of paper. Generally, follow these guidelines:

- The questions in the questionnaire should be short, simple and efficient. Keep the language as simple as possible. Avoid bias. Do not encourage particular answers. Include other questions, if you like, but make sure that the survey does not take too long.
- Use the correct income limits (correct amount, correct year, and correct service area) for the survey instrument. (Contact your local HUD CPD Office when in doubt.).
- Avoid loaded questions—i.e., questions with no correct answers. Loaded questions increase respondent burden.

Step 3: Select the Sample

Define your service area: What are the boundaries of the service area? What is the size of the population for which you are calculating the percentage of persons who are LMI?

Identify the Sample: Select a procedure for identifying the sample in the service area and identify a procedure for randomly selecting the sample. Obtain a *complete* list of residents, addresses, and telephone numbers in the service area.

Determine the sample size: Determine the sample size needed in order to achieve an acceptable level of accuracy.

Randomly select the sample: Make sure you add families to replace refusals and that the entire service area is covered—that is, be certain that you have not excluded certain areas or groups of people. Commercial (retail and industrial) sites, vacant lots and abandoned and vacant homes should be excluded from the sample because they do not have any effect on the outcome of the survey. Use an acceptable random selection method and decide the number of attempts and replacement procedures to be used. Ascertain that the selection of subjects to be included in the sample and replacement procedures are structured to avoid bias; for example, daytime or weekday attempts may skew response rates in favor of unemployed, retired, or single income families.

Step 4: Conduct the Survey

If you choose to conduct an interview survey, select and train your interviewers. One of the most important aspects of any interview survey is the training of the interviewers. The quality of the results of the survey depends on how well the survey is conducted. Even in small studies involving a single researcher-interviewer, it is important to organize in detail the interviewing process before beginning the formal process. Make sure the interviewers are very comfortable with the questions. The training process includes the following major topics:

- Describing the entire survey
- Identifying the sponsor of the survey
- Providing the interviewer with a working knowledge of survey research
- Explaining the survey sampling logic and process
- Explaining interview bias
- 'Walking through' the interview process
- Explaining respondent selection process
- Explaining scheduling and supervision
- Explaining follow-up for non-response

Make contact with the residents of the service area and consider writing or telephoning to let people know in advance that you are coming. Or just knock on doors, if this is the procedure you select. Try again (and again) to establish contact and reschedule another interview if initial contact has not resulted in an interview. Replace families you have written off as "unreachable."

Step 5: Analyze the Results

Complete the LMI Worksheet correctly. Record your calculated percentage of LMI persons.

Step 6: Document and Save Your Results

- Save the completed questionnaires—preferably in a form that does not reveal the identity of the respondents. Use code numbers to conceal the identity of respondents
- Save the list of respondents—preferably in a form that does not identify their responses
- Save the description of the service area, the list of your sampling procedures (original sample, interview sheets or completed questionnaires, tabulations and a list or memo describing how other survey elements were handled, including replacements and replacement methods). Save your data.

V. Suggested Procedures for Conducting a Survey to Determine The Percentage of LMI Persons in the Service Area of a CDBG-Funded Activity

Step 1: Selecting the Survey Type

The most commonly used surveys for this application are: (a) mail survey (or self-administered questionnaire), (b) face-to-face (or door-to-door) interviews, and (c) telephone interviews (see Table A). For telephone and door-to-door surveys, it might be useful for the survey team to notify people by mail in advance, to let them know that they will be contacted for a survey. This can overcome resistance due to 'telemarketing fatigue.'

(a) Mail (or Self-Administered) Questionnaires

This is a basic method for collecting data through the mail: a questionnaire is a set of questions sent by mail accompanied by a letter of explanation and self-addressed stamped envelope for returning the questionnaire. The respondent is expected to complete the questionnaire, put it in the envelope and return it. A common reason for not returning a questionnaire is that some people may feel it's too burdensome. To overcome this problem, researchers often send a self-mailing questionnaire that can be folded in a certain way so that the return address appears on the outside. In this manner, the respondent does not risk losing the envelope.

Advantages of Mail Questionnaires

- Covers large geographic area
- Provides an opportunity for honest answers to very personal questions

- No travel required
- Enables researcher to target a particular segment of the population
- Allows respondents to complete the questionnaire at their convenience

Disadvantages of Mail Questionnaires

- May have possible coverage errors; for example, address lists might be inaccurate or out of date (duplicate address, incomplete or wrong addresses)
- Not appropriate for requesting detailed written responses
- May have a low return rate if too lengthy, poorly worded, or seems too personal
- May not have anyone available to assist the respondent with questions, especially if the questions are in English but the respondent's primary language is not English. Provisions must be made to provide non-English-speaking residents with a questionnaire in their own language, as appropriate
- Easiest for people to disregard, postpone, misplace or forget about it
- Needs to allow longer time to collect responses
- Costly—must pay for return postage to get a decent response rate; also you have paid for postage even for those that aren't returned
- It's all or nothing—people will either do it all or not at all; with phone or in-person surveys, one might at least get some answers
- Lack of control over who fills out the questionnaire (for example, a child)

HUD does not recommend mail surveys unless at least one follow-up letter or telephone call is made to obtain an adequate response rate. Combining a mail survey with a follow-up letter or telephone call may improve the rate of response. For example, if in a door-to-door survey you find that someone is not at home, you can leave a note for the head of the family (or responsible adult) to telephone the interviewer. You can also use the phone to schedule a time when to conduct an interview or mail a letter to residents of the service area and let them know in advance when an interviewer will call or visit.

(b) Face-to-Face (Door-to-Door) Interviews

This is a data collection technique in which one person (an interviewer) asks questions of another (the respondent) in a face-to-face encounter. It involves more work since the interviewer must go and knock on doors in order to obtain interviews. However, in small areas this type of survey may be the easiest because one can define the service area by its geographic boundaries and develop procedures for sampling within those boundaries so that a list of families living in the area is not required. Interviewers have to be well trained to ensure that procedures are consistently followed and that responses are not influenced by facial expressions.

Advantages of Face-to-Face Interviews

- Is a very reliable method of data-collection
- Researcher has full range and depth of information
- Interview may be scheduled to suit respondent's daily agenda
- Respondent has the option to ask for clarifications
- Target population may be easily located and defined
- People may be willing to talk longer, face-to-face, particularly with in-home interviews that have been arranged in advance

Disadvantages of Face-to-Face Interviews

- Responses may be less candid and less thoughtful
- Interviewer's presence and characteristics may bias responses
- Interviewer is required to go to the respondent's location
- Respondents who prefer anonymity may be influenced negatively
- May reach a smaller sample
- Lengthy responses must be sorted and coded
- Can take too much time
- Costs more per interview than other survey methods; particularly true of in-home interviews in rural areas where travel time is a major factor
- May not be able to gain access to the house (e.g., locked gates, guard dogs, "no trespassing signs," etc.)
- Translators may be needed when dealing with non-English speakers

(c) Telephone Interviews

A telephone interview is a data collection technique in which one person (an interviewer) asks questions of another (the respondent) via telephone. Telephone numbers of potential participants must be selected randomly. The interviewer must ensure that the respondent is someone competent and knowledgeable enough to answer questions about the family income status. In a telephone survey, you must devise a method for contacting those families without telephones or those with unlisted numbers. Hence it may be preferable to conduct door-to-door interviews in small service areas, especially in rural areas.

Advantages of Telephone Interviews

- Relatively easy to conduct
- Saves money and time
- Appearance and demeanor of interviewer do not influence the respondent
- Respondents may be more honest in giving socially disapproved or sensitive answers due to greater anonymity for respondent

- Interviewer may use an alias rather than his/her real name for privacy or to conceal ethnicity if relevant to the study
- Allows interviewer to ask follow up questions
- No fear for personal safety

Disadvantages of Telephone Interviews

- Respondents may be hostile to interviews because of experience with previous telemarketing sales calls disguised as surveys
- Respondents may terminate the interview abruptly
- The interviewer may have problems reaching potential respondents by telephone because of the prevalence of answering machines that screen telephone calls
- May not be able to reach households with unlisted numbers, no telephone at all, or families that use only cell phones
- Some people often do not like the intrusion of a telephone call to their homes
- Difficulty of reaching people due to reasons such as conflicting schedules
- It may be easier to be less candid to someone on the phone than in person
- Difficult to get accurate answers from non-English speakers

Table A – Summary Comparison of the Three Survey Methods

Dimension of Comparison	**Mailed Questionnaire**	**Face-to-Face Interviews**	**Telephone Interviews**
Cost	Moderate	High	Low
Data Quality: Response rate Respondent motivation Interview bias	 Low Low None	 High High Moderate	 Moderate to High High Low
Sample quality	Low	High	Moderate
Interview length	Short	Very Long (but depends on size of service area)	Long
Ability to probe and clarify	None	High	High
Speed	Low	Low	High
Interviewer supervision	None	Low	High
Anonymity	High	Low	Low
Ability to use computer assistance during process	May be possible but too expensive	Possible	High
Dependence on respondent's reading and writing abilities	High	None	None
Control of context and question order	High	High	High

Step 2: Developing a Questionnaire

Constructing a questionnaire is a skill, which requires decisions concerning the content, wording, format, and placement of questions—all of which have important consequences on the results of what you intend to measure. There are basically four areas involved in constructing a questionnaire:

- Determine the question content, scope, and purpose
- Choose the response format to be used in collecting information from the respondent
- Word the questions so as to get at the issue of interest
- Determine how best (i.e., the order) to place the question(s) of interest among other questions in the questionnaire

It is important that all respondents be asked the same questions, in the same order, and their responses recorded exactly, without additions or deletions. To ensure this, the questions must be written properly and the exact response of each respondent recorded as it is presented.

It is recommended that interviewers carry two cards for each family. One card will contain figures for each low- and moderate-income level and its corresponding family size (see Table B). If racial data are to be collected, the other card will contain the following racial categories: White, Black/African American, Asian, American Indian/Alaskan Native, and Native Hawaiian/Other Pacific Islander, American Indian/Alaskan Native & White, Asian & White, Black/African American & White, American Indian/ Alaskan Native & Black/African American, Other Multi-racial; and the following ethnic categories: Hispanic, Latino, or not Hispanic or Latino.

TABLE B - Illustration of Income Cards

Card Number	Number of Persons in Family	Low/Mod Income Level
1	1	$19,800
2	2	$22, 650
3	3	$25,450
4	4	$28,300
5	5	$30,050
6	6	$31,850
7	7	$33,600
8	8	$35,400
9+	9+	$37,200+

Information about the racial and ethnic composition of the service area may be obtained directly from Census data. However, HUD does not object to collecting information about racial and

ethnic composition of the service area from the survey. CDBG regulations at 24 CFR 570.506(g)(2) for the Entitlement program and 24 CFR 570.491 for the State program require submission of data on the racial, ethnic and gender characteristics of persons who are applicants for, participants in or beneficiaries of their CDBG programs. This information must be reported for each activity and should indicate the number persons benefiting by race, ethnicity, and gender.

Sample Questions

Question 1
How many families currently reside at this address? _____ (If more than one family, each family must complete a separate questionnaire).

Question 2
How many persons are there in your family including yourself? _____ (If you are single with no dependents, write 1).

If more than one family resides at the address, complete the following:
Family #1: family size (i.e., number of persons in family) _____
Family #2: family size (i.e., number of persons in family) _____
Family #3: family size (i.e., number of persons in family) _____

Question 3
Is the current, combined income of all family members residing at this address (including any related, dependent persons over 65 or working dependent children over 18) above or below the figure quoted on this card? ___ Yes, ___ No (Present the card showing family sizes and income levels from Table A).

Question 4
Please, check the ethnic group to which you belong:
Hispanic or Latino_____, Not Hispanic or Latino_____

Please, check the racial group to which you belong:
White _____, Black/African American _____, Asian _____, American Indian/Alaskan Native _____, and Native Hawaiian/Other Pacific Islander _____, American Indian/Alaskan Native & White _____, Asian & White _____, Black/African American & White _____, American Indian/ Alaskan Native & Black/African American _____, Other Multi-racial_____.
(Present the card showing various categories).

Making Contact

Initially, the interviewer should make contact with the head of the family or someone who is qualified to speak for the family and has knowledge about the family income. After making contact, the interviewer should introduce him/herself, state the purpose of the survey and solicit the participation of the respondent. If the interview is being conducted face-to-face, the interviewer should find the card for the family size of the respondent, hand it to the respondent, and then ask the questions and record the answers. If the interview is being conducted by telephone, a card cannot be used; therefore, the interviewer should make reference to the income level that is the threshold for a family of the size of that of the respondent. For example, if there are three persons in the respondent's family you might ask, "is the current combined income for your family during the past twelve months, less than or more than $25,450?"

While the necessary questions are brief and simple, there are some additional factors to take into account when designing the questionnaire. First, the questions used in the survey cannot be "loaded" or biased. For example, the interviewer may not imply that the neighborhood will benefit or receive Federal funding if respondents say that they have low incomes. The questions must be designed to determine truthfully and accurately whether respondents are LMI persons. It is permissible to state that the reason for the survey is to gather information essential to support an application for funding under the CDBG program or to undertake a CDBG-funded activity in the area.

Second, bear in mind that questions about income are rather personal. Some people may be suspicious or reluctant to answer questions about their incomes—especially if they do not see the reason for the question. A good way to handle this problem is usually to put questions about income at the end of a somewhat longer questionnaire on other community development matters. In this instance, a local agency can use this questionnaire to gather some information on what the neighborhood sees as important needs or to gather feedback on a proposed policy or project. At the end of such a questionnaire, it is usually possible to ask questions on income more discretely. If this option is chosen, however, the interviewer should be cautioned that a lengthy questionnaire might cause respondents to lose interest before completing the survey. The ideal length here would probably be less than ten minutes, although certainly you could develop an even longer or shorter questionnaire as necessary.

Step 3: Selecting the sample

The selection of a sample of families to interview involves a series of steps. You must begin by defining the population whose characteristics you are trying to estimate. Then you must determine how many families in that group must be sampled in order to estimate the overall characteristics accurately. Next you must make some allowances for families who, for whatever reason, you will not be able to interview. And finally you must actually select the families from which you will try to obtain interviews. This section discusses each of these steps.

Defining the Population

If you are trying to determine the proportion of families in a neighborhood with low- and moderate-incomes, that neighborhood is the population. However, instead of a neighborhood, the population may be a town, it may be as large as a county, or it may be defined by some other boundary. But before you can obtain a sample, you must clearly define what area you want the sample to represent. Let us assume here that the population is a neighborhood that contains about 400 families. You will sample from the 400 families and make estimates about the income levels of all of the persons in the sample.

Once you have defined your population, you next need a method of identifying the families in that area so that you can interview them. Ideally, for a given neighborhood, you would have a list of every family living in the neighborhood and perhaps his or her telephone number. Then you would devise a procedure to randomly select the families you want to interview. In reality, you probably will not have a list of all of the families in the neighborhood, so you will have to improvise. One way would be to go to the neighborhood and randomly select which homes to go to for an interview—the advantage of this method is that the houses are there, so you can go right to them instead of using a list. After collecting information on the various families, you can then make some estimates about the number of people in the neighborhood and their incomes.

City indexes (if available and up-to-date) usually provide the best source of household information suitable for sampling. Telephone books may be adequate, but keep in mind that you will miss people without telephones or with unlisted numbers. Also, telephone directories usually will have far more people listed than those who are in the service area, so you will need to eliminate those outside of your service area. Tax rolls are a source of identifying addresses in an area; however, they identify only property owners whereas you are interested in residents. Also, tax rolls generally identify building addresses, whereas in the case of apartment buildings you are interested in the individual apartments. You can use tax rolls to identify addresses to go to, in order to get an interview, but you cannot use them as the basis of a mail or telephone survey (unless you have access to a telephone directory that identifies telephone numbers by property address).

How Big a Sample?

After you have defined your population and selected a method for identifying individual families in the service area, you must next determine how many families to survey—that is, the sample size. A sample is representative of the population from which it is selected if its aggregate characteristics closely approximate those same aggregate characteristics in the population. The larger the sample, the more likely it is that its aggregate characteristics truly reflect those of the population. However, sample size is not dependent on the size of the population, for large populations. This means that a random sample of 500 people is equally useful in examining the characteristics of a state of 6,000,000 as it would a city of 100,000 or 50,000. For this reason, the

size of the population is irrelevant when it is large or unknown; however, it becomes relevant when dealing with sparsely populated areas.

Sample Size Calculator (SSC) is a website (*http://surveysystem.com/sscalc.htm*) developed by Creative Research Systems to enable survey researchers to calculate sample sizes from various population sizes. To use the SSC you need both the confidence interval and the confidence level. The confidence interval is the range of values within which a population parameter is estimated to lie. Confidence interval is sometimes referred to as margin of error (+ or –).

Table C – Sample Sizes at 95% Confidence Level

Total Number of Families in the Service Area	**Sample Size: Number of Families**	
	95% Confidence Level	
	Confidence Interval = 4	**Confidence Interval = 5**
50	46 – 50 (may conduct a census)	43 – 50 (may conduct a census)
60	51 – 59	47 – 57
80	67 – 75	61 – 71
110	89 – 97	81 – 91
150	116 – 124	103 – 113
210	152 – 160	131 – 141
290	192 – 200	160 – 170
400	236 – 244	191 – 201
700	319 – 327	243 – 253
1200	396 – 404	286 – 296
1800	446 – 454	312 – 322
2500	480 – 488	328 - 338

For example, if a survey shows that 55 percent of a randomly selected sample has the parameter under investigation and the confidence interval is 5, what that means is that the actual percentage

of the population which has that parameter may lie within the interval 50 to 60. Confidence intervals are applicable only in surveys where the sample is randomly selected from the relevant population.

The confidence level is the estimated probability that a population parameter lies within a given confidence interval. The confidence level tells you how sure you can be. It is expressed as a percentage and represents how often the true percentage of the population with the parameter being examined lies within the confidence interval. The 95% confidence level means you can be 95% certain; the 99% confidence level means you can be 99% certain. Most researchers use the 95% confidence level because the 99% level leaves very little margin for error.

The numbers in the column titled "Total Number of Families in the Service Area" in Table C, are hypothetical numbers. If the total number of families in your service area does not match any of the numbers in Table C, select a confidence level and a confidence interval, and use the SSC to calculate the number of families in your sample.

As seen in Table C, at the same confidence level, sample size decreases as confidence interval increases. For example, when the total number of families in the service area is 80, the range for the number of families is 67 – 75, at a confidence interval of 4 compared to a range of 61 – 71, for a confidence interval of 5. This has serious implications on the representativeness of the sample. A small sample size may decrease the extent to which the sample is representative of the population. For any given population, the sample size will be larger at a confidence interval of 4 than at a confidence interval of 5.

Unreachables and Other Nonresponses

The standard requirements for conducting surveys include not only the notion that systematic, representative sampling methods be used, but also that high response rates be obtained and statistical weighting procedures be imposed to maximize representativeness. No matter what you do, some families will not be home during the time you are interviewing, some probably will refuse to be interviewed, some will terminate the interview before you finish, and some will complete the interview but fail to provide an answer to the key question on income level. If you choose to get responses from replacements, they must be selected through a random sampling process. The decision to get responses from replacements may become inevitable if the proportion of non-responses is high enough to affect the validity of the results of the survey. Non-response rates greater than 20 percent may affect the validity of the survey; for example, a non-response rate can become a serious problem when a census is conducted instead of a survey (as may the case in sparsely populated areas). If the non-response rate is too high, there is the risk of not having enough LMI respondents to make the required percent of the total population of the service area.

Drawing Samples

In sampling, you are looking at a portion of everyone in a group and making inference about the whole group from the portion you are observing. For those inferences to be most accurate, everyone who is in the group should have an equal chance of being included in the sample. For example, if you are sampling from a list, using a random numbers table will provide you with a random sample—see instruction at Appendix A and numbers at the Table in Appendix B. In using a random-numbers table, you take a list of your population and draw from it according to the table. If, for example, the first three random numbers were 087, 384, and 102, then you would go through your population list and target the 87^{th}, 384^{th}, and 102^{nd} families for an interview.

If your sample size is less than 384, you should skip '384' and go to the next number in the Table. Continue until you have achieved the desired sample size. If you encounter unreachables, you should replace them with the next family in the list, in the order they were selected. For example, if you draw a list of 300 families in an effort to obtain 250 interviews, the first family you write off as *unreachable* should be replaced with the 251^{st} family.
If you do not have a list of all the families in a service area you are trying to measure, but you know the geographic boundaries of the area, you might randomly select a point at which to start and proceed systematically from there. In the hypothetical 400-family neighborhood, in trying for 250 interviews, you would need to interview every 1.6^{th} family (400 divided by 250) in order to cover the entire neighborhood. In whole numbers, this works out to about 2 of every 3 families. Therefore, you could start at one end of the neighborhood and proceed systematically through the entire neighborhood trying two doors and then skipping one. A family that is skipped may be used as replacement for any family selected but for which an interview is not possible. If the sample size allows for systematic selection of one out of every six families for interview, begin by randomly selecting any number from one to six; use that family as the starting point for the interview and from there select the every sixth family for interviewing. If the sixth family is unreachable, you could use the third family within the count as replacement.

You will achieve more accuracy if you are not too quick to write off a family as unreachable. You are more likely to achieve randomness if you obtain interviews from the families you selected first. Thus, if you are doing a door-to-door survey, you probably should make two or more passes through the area (preferably at different times) to try to catch a family at home. Frequently they will be busy, but may say that they can do the interview later—you should make an appointment and return. Only after at least two tries or an outright refusal should a sampled family be replaced. With a telephone survey, at least three or four calls should be made before replacing a family.

Step 4: Conducting the survey

To carry out the survey, you have to reproduce a sufficient number of questionnaires, recruit and train interviewers, schedule the interviewing, and develop procedures for editing, tabulating, and analyzing the results.

Publicity

To promote citizen participation it may be worthwhile to arrange advance notice. A notice in a local newspaper or announcements at churches or civic organizations can let people know that you will be conducting a survey to determine the income levels of the area. Moreover, if you let people know in advance how, why, and when you will be contacting them, usually they may be more likely to cooperate.

As with all aspects of the survey and questionnaire, any publicity must be worded so that it does not bias the results. For example, it is better to say that the community is applying for a CDBG grant and that, as part of the application, the community has to provide current estimates of the incomes of the residents of the service area. It is not appropriate to say that, in order for the community to receive the desired funding, a survey must be conducted to show that most of the residents of the service area have low and moderate incomes.

Interviewers

It may not be necessary to hire professional interviewers. Volunteers from local community groups and civic organizations serve well. Also, schools or colleges doing courses on civics, public policy, or survey research may be persuaded to assist in the effort as a means of providing students with practical experience.

It is best if interviewers are chosen that make the respondents feel comfortable. For this reason, survey research companies often employ mature women as their interviewers. When interviewers are of the same race and social class as the respondent, the survey usually generates a better response rate and more accurate results. It is important that the interviewer commands the attention of the respondent, reads the questions as they are written, and writes down the responses as given.

It is important that interviewers have all of the materials they need to complete the interview. Usually, you will want to assemble an interviewer kit that can be easily carried and includes all of the important materials such as:

- A 'professional-looking' 3-ring notebook (this may even have the logo of the organization conducting the survey)
- Map of the service area
- Sufficient copies of the survey instrument
- Official identification (preferably a picture ID)

- A cover letter from the sponsor of the survey
- A phone number the respondent can call to verify the interviewer's authenticity.

Contact and follow-up

Interviewers should plan to contact respondents at a time when they are most likely to get a high rate of response. Telephone interviews are usually conducted early in the evening when most people are home. Door-to-door interviews also may be conducted early in the evening (especially before dark) or on weekends. You should try again, at a different time to reach anyone in the initial sample who is missed by the initial effort.

In general, you should know the best times residents of your community can be reached—avoid selecting interview times, which risk yielding biased results. For example, interviewing only during the day, from Monday to Friday, will probably miss families where both the husband and wife work. Since these families may have higher incomes than families with only one employed member, your timing may lead to the biased result of finding a high proportion of low-and moderate-income households.

Of course, in making contact with a member of the family, the interviewer first has to determine that the person being interviewed is of sufficient knowledge and competence to answer the questions being asked. The interviewer thus should ask to speak to the head of the family. If it is absolutely necessary to obtain an interview at the sample residence, the interviewer may conduct an interview with other resident adults or children of at least high school age only after determining that they are mature and competent enough to provide accurate information.

As part of your questionnaire, you should develop an introduction to the actual interview. This should be a standard introduction in which the interviewers introduce themselves, identify the purpose of the survey, and request the participation of the respondents. Usually, it is also a good idea to note the expected duration of the interview—in this case, to let respondents know that the burden to them will be minimal.

Interviewers also should follow the set procedures for replacing "unreachables" (discussed in step 3). If they must write off an interview, they should not say, "well, I was refused an interview here, so I'll go over there where I think I can get an interview." This replacement procedure is not random and thus will affect the validity of your survey results.

The Interview

Every interview includes some common components. There is the introduction where the interviewer is invited into the home and establishes a rapport that facilitates the process of asking questions. The first thing the interviewer must do is gain entry and several factors can enhance this. Probably the most important factor is your initial appearance. The interviewer needs to dress professionally and in a manner that will be comfortable to the respondent. The way the

interviewer appears initially to the respondent sends simple messages—that you are trustworthy, honest, and non-threatening.

You are standing at the doorstep and someone has opened the door, even if only halfway. You need to smile and be brief. State why you are there and suggest what you would like the respondent to do. Don't ask—suggest what you want. For example, instead of saying "May I come in to do an interview?" you might try a more imperative approach like "I'd like to take a few minutes of your time to interview you for a very important study."

Without waiting for the respondent to ask questions, introduce yourself. You should have this part of the process memorized so you can deliver the essential information in 20-30 seconds at most. State your name and the name of the organization you represent. Show your identification badge and the letter that introduces you. If you have a three-ring binder or clipboard with the logo of your organization or sponsor, you should have it out and visible. You should assume that the respondent will be interested in participating in your study—assume that you will be doing an interview here.

If the respondent indicates that the interview should go ahead immediately, you need an opening sentence that describes the study. Keep it short and simple, no big words, and no details. Use the questionnaire carefully but informally. Interviewers should read the questions exactly as they are written. If the respondent does not understand the question or gives an unresponsive answer, it usually is best for the interviewer to just repeat the question. Do not attempt to guide the respondent to give particular responses. Questions should be read in the order in which they are written. The respondents' answers should be recorded neatly, accurately, and immediately as they are provided. At the end of the interview, and before proceeding to the next interview, the interviewer should always do a quick edit of the questionnaire to be sure that they have completed every answer correctly. This simple check helps to avoid the frustrating mistake of having taken the time and expense of conducting the interview, but without getting the information sought.

If you elect to include other questions and if you place the questions on income at the end, it is possible that a willing respondent will end the interview before you get to the critical question. If it appears to the interviewer that the respondent is about to terminate the interview, it is recommended that you immediately try to get an answer to the critical income question(s).

Editing

Interviewers should turn their completed surveys over to the person who will tabulate and analyze the data. That person should review each survey to ensure that it is complete and that each question is answered only once and in a way that is clear and unambiguous. Questions or errors that are found should be referred to the interviewer for clarification. It also may be desirable to call the respondent, if necessary, to clarify incomplete or ambiguous responses. If a question or an error cannot be resolved, a replacement should be added and the new respondent

contacted. Note that editing is an ongoing process because even after you have started to tabulate or analyze the data, you may come across errors that need correction.

Step 5: Determining the Results

After you have your data collected and edited, you need to add up the numbers to see what you have learned. Actually, it is useful to think of this in two parts: (1) tabulating the responses from the questionnaires and calculating an estimated proportion of low-and moderate-income persons; and (2) determining how accurate that estimate is. The first part can be taken care of by completing the sample LMI Worksheet.

Tabulation

Computer programs such as Excel, Access, Minitab, SAS, and SPSS are easy to use for tabulating data. The computer also makes it relatively easy to check for accuracy and consistency in the data. However, you can perform the calculations by hand or with a calculator. Also, you can process the data by putting it on a code sheet, by entering it on a manual spreadsheet, or just by flipping through the completed surveys. Regardless of how you process and tabulate the data, when you are finished you should be able to complete the Low-and Moderate-Income Worksheet.

Table D - Low- and Moderate-Income Worksheet

1. Enter the Estimated total number of families in the service area	1. _____
2. Enter the total number of families interviewed	2. _____
3. Enter the total number of persons in the families interviewed	3. _____
4. Enter the total number of persons in the families interviewed who are low- and moderate-income persons	4. _____
5. Divide Line 4 by Line 3	5. _____
6. Multiply Line 5 by 100. This is the percentage of LMI persons in the service area	6. _____

Analysis

If you have done everything correct, including random selection of the required number of families, and your estimate shows that less than 51 percent of the residents of the service area have low- and moderate-incomes, you cannot undertake LMI area benefit activities in that area. However, this may not be the case if it is an "upper quartile exception community." Therefore, this section and the remainder of these instructions are not applicable to exception grantees. If the entry at Line 6 is at least 51 percent, you can perform additional analyses to determine the extent to which your estimate of the low- and moderate-income residents is correct. First, compare the average size of low- and moderate-income families with non-LMI families. The closer these figures are to each other, the more confident you can be in your estimate. Thus, if you estimate that 53 percent of the residents have low- and moderate-incomes and you find in your sample that both low- and moderate-income families and above low- and moderate-income-families have an average of 3.4 people, you can be pretty sure that your results are reliable.

Table E – Comparing the Distribution of Family Size by Family Income

Number of Persons in Family	Families With Low-Mod Incomes		Families Above Low-Mod Incomes	
	Number	Percent	Number	Percent
One				
Two				
Three				
Four				
Five				
Six				
Seven				
Eight				
Nine or more				
Total		100%		100%

A second simple calculation is to arrange your data into a table such as that shown in Table E. This table enables you to compare the distribution of family sizes of families of low- and moderate-incomes with those that are above low- and moderate-incomes. In completing Table E, you would count the number of low- and moderate-income families in your survey that have

just one person and enter the figure under "number" across from "one." You would proceed to enter the number of low- and moderate-income families with two persons, with three persons, and so forth through the "nine or more" category. Adding up all the entries in this column, you enter the sum across from "total" which will be the total number of low- and moderate-income families from which you obtained interviews. Then considering families that are above low- and moderate-income levels, you follow the same procedures to complete the "number" column for them. For each income group, divide the number of one person families by the total number of families in that income group and multiply it by 100, to yield the percent of that group that are in one-person families. Fill in the "percent" columns, using this procedure. Each of the percent columns should total to 100 or so allowing for rounding errors.

Upon completion of Table E, compare the percentages of LMI respondents with the percentages of the above LMI respondents for each family size. The more similar the two distributions are, the greater the degree of confidence you can have in your estimate of the proportion of persons with low- and moderate-incomes. For example, if among your low and moderate-income group, 10 percent have one person, 40 percent have two persons, and 50 percent have three persons, and among your above low- and moderate-income group 12 percent have one person, 41 percent have two persons, and 47 percent have three persons, you would have a great deal of confidence in your estimate.

Compare your survey results to the most recent LMISD (available on HUD's website) for the census geography that most closely matches the service area. If there is a big difference (e.g., LMISD = 29%, survey = 55%), then there may be other known factors to explain the difference. For example, there may have been a major economic downturn in the service area since the last census or the service area may be only a small part of a large census tract. Also, compare the block-group level data to ascertain that there were no anomalies in one part of town versus another; review the map of respondents versus block groups to make sure the responses were not skewed toward one side of town. Carefully analyze each scenario and make efforts to document the basis for any discrepancy.

Consider the scenario where you estimate that 51 percent of the residents have low- and moderate-incomes. You examine the distribution of the family sizes according to Table D and find that in your sample 100 percent of your low- and moderate-income group has just one person per family and 100 percent of your 'above low- and moderate-income' group has nine or more persons (this would be an exceptional neighborhood).

Third, after completing data collection, non-respondents should be analyzed to determine that they were reasonably random. For example, you may want to tabulate the rate of response by street or block in the service area to see whether there are notable gaps in the coverage of your survey. You may want to examine the racial or ethnic background of your respondents (if your survey collected such information) and compare them with what you supposed the distribution to be. If you do not detect any major gaps in the coverage of your sample or any anomalies in the characteristics of your non-respondents, you can be more certain of the accuracy of your estimates.

Step 6: Documenting Your Results

It is important that the results of the survey be documented, since those who audit or evaluate your program may want to review the procedures and data used to determine that the service area qualifies under the CDBG program regulations. You should therefore maintain careful documentation of the survey. The contents of that documentation are as follows:

1. Keep the completed surveys. This will show that you actually did the survey and that you asked the proper questions. It is best if each survey has a cover sheet containing information that identifies the respondent, such as name, address, and telephone number. Then, when the survey is complete, the cover sheets can be separated from the questionnaires. You can save the questionnaires as documentation of your work, but you maintain the privacy of your respondents.

2. Saving the cover sheets separately provides a record of who was contacted. If anyone wanted subsequently to verify that you have not made up that data, they could contact some of the respondents noted on the cover sheet and ask them whether, in fact, they have been contacted on such-and-such a date by such-and-such a person to discuss matters related to community development. The privacy of their original responses still is protected by this procedure.

3. Keep a list of the actual families sampled. This might be one list with the sampled families checked once if they were sampled, and checked twice if they were interviewed. Replacement families should be noted too. There should be written documentation about the method you used to select families from the list for interviewing. Note that this is different from keeping just the cover sheets, since it documents not just who was interviewed, but also who was not interviewed and how interviewees were selected. If you did a door-to-door sample without starting from a universe, you should have written down the procedures used to select the sample, including instructions to interviewers for replacing sampled families who were not interviewed.

4. Survey data should be retained in accordance with record-keeping requirements of the State program at 24 CFR 570.490 and the Entitlement program at 24 CFR 570.506. Keep a backup disk of your data. If you do your tabulations on spreadsheets, retain the spreadsheets. If you just read through the questionnaires and count up responses and enter them into a table as you go, keep the tables with the raw data counts.

Appendix A – Using Random Numbers Table

This appendix shows four examples of how numbers can be randomly drawn from a table. Numbers can be drawn vertically, horizontally or diagonally using any column or combination of columns. Examples 1 – 4 show how random numbers can be drawn from the table in Appendix

B. The numbers on the first column of the Table in Appendix B denote row numbers, 1 to 19, they are labels only. (*The numbers used in Examples 1 to 4 are for illustration only*).

Example 1 – Drawing a Sample of 5 of 10

Assume that you have a listing of 10 families and you want to draw a random sample of 5 families. Find the number "53" in the upper left-hand corner—column 2, row 1. Start with the first digit of the first five numbers in column 2 and you will have the following numbers: "5," "6," "9," "1," and "3." So from the list of 10 families, the sample of five would include the fifth, sixth, ninth, first, and third family.

Example 2 – Drawing a Sample of 5 of 100

Start at "31" in the lower left-hand corner of the table (column 2, row 19) and work across the bottom row; the numbers are "31," "6," "46," "39," and "27." From the list of 100 families, our sample would include the 31st, 6th, 46th, 39th, and 27th families on the list.

Example 3 – Drawing a Sample of 5 of 30

Start at the upper left-hand corner and begin with the "53" (column 2, row 1) and work across. The numbers in order are "53," "95," "67," "80," "79," "93," "28," "69," and "25." The problem here is that you are sampling from a population of 30 so any number above 30 must be skipped. Except for 28 and 25, the rest of the numbers are greater than 30. Keep skipping until you find a number in your range. Here you would sample the 28th and 25th family on your list and continue until you find three more (which would be the 13th, 24th, and the 21st).

Example 4 – Drawing a Sample of 5 of 300

Start again with "53" (column 2, row 1) in the upper left-hand corner. Disregard the first digit (i.e.,'5') and take the second digit ('3'); combine this with the number in column 3, row 1 ('95'); this will make it "3 95." Since we need a three-digit number to cover the size of our service area, we can use these three (or any three columns—each number is random). Reading from the "3 95," we see "3 95," "2 12," "0 16," and "0 59." From the list of 300 families, then, you would take the 212th, 16th, and the 59th families (as well as how many more you need—the next two would be the 217th and the 60th).

Appendix B -- Random Numbers

1	53	95	67	80	79	93	28	69	25	78	13	24	100	62	62	21	11	4	54
2	62	12	27	41	5	4	19	34	84	78	71	45	73	79	33	57	29	58	75
3	90	16	47	72	20	60	70	71	2	67	21	65	7	39	58	81	61	11	70
4	10	59	4	76	80	6	82	20	60	92	33	61	76	83	73	12	84	43	90
5	32	17	36	64	3	30	80	95	61	33	65	5	39	88	36	44	42	43	5
6	54	71	27	89	41	53	60	10	2	91	76	95	98	91	64	65	23	57	16
7	10	60	18	77	34	59	28	99	15	11	70	34	27	78	67	19	97	30	33
8	42	20	24	36	78	58	82	81	49	91	35	53	30	92	57	19	97	40	58
9	73	55	87	48	49	97	60	92	27	78	2	55	29	76	99	21	45	72	56
10	21	56	41	23	58	57	49	49	70	33	6	79	95	3	70	38	26	26	5
11	9	60	37	99	6	41	69	97	18	44	100	18	46	3	90	57	22	82	15
12	63	26	41	8	21	38	15	63	38	100	68	69	24	39	19	29	93	97	40
13	98	72	9	45	69	50	7	86	5	80	0	8	25	96	45	0	0	13	95
14	87	89	65	22	98	55	86	9	66	43	64	55	80	30	15	99	26	25	71
15	5	91	68	44	67	2	71	96	15	73	78	3	12	87	53	9	11	12	21
16	75	93	62	49	95	82	30	81	24	4	11	30	71	96	49	47	65	48	28
17	76	15	55	38	29	0	8	20	71	42	81	51	44	76	93	42	87	89	38
18	26	76	93	84	8	40	96	69	84	52	89	5	16	43	34	37	64	39	14
19	31	6	46	39	27	8	67	81	13	33	14	86	38	23	33	22	56	47	60

Note: Other methods of creating random numbers include using a random number generator computer program or the phone book method.

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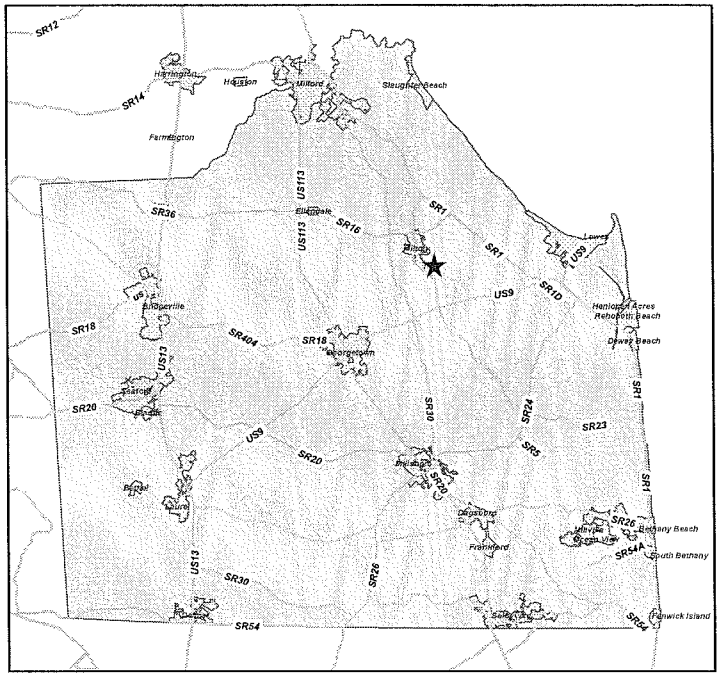
Attachment E – Impacted Community Maps

Sam Lucas Development
Sussex County Delaware



EQUAL HOUSING OPPORTUNITY

The boundaries of the rural community shown on this map have been developed solely for the purpose of the bid package [Sussex County Community Development & Housing Department Request for Proposals (RFP) for Impacted Community Study, February 2014] and may or may not represent the actual boundaries of the community as it exists today. Consultants will be asked to use their judgment in the field as to their interpretation of the boundaries of the rural community.

Pinetown Area
Sussex County Delaware

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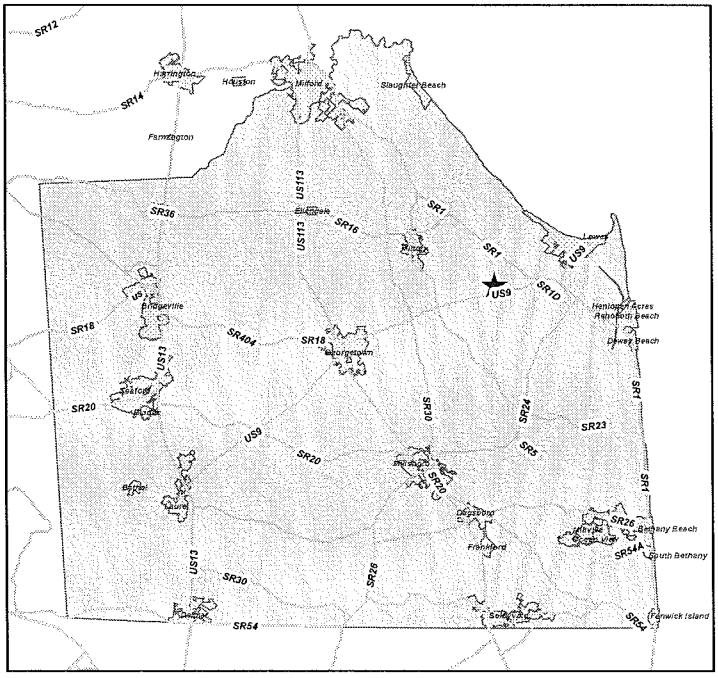

EQUAL HOUSING OPPORTUNITY

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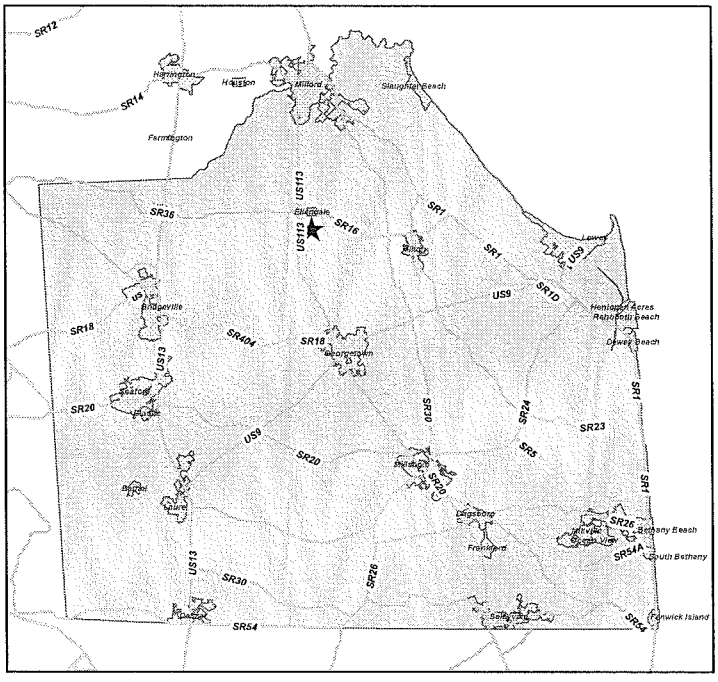
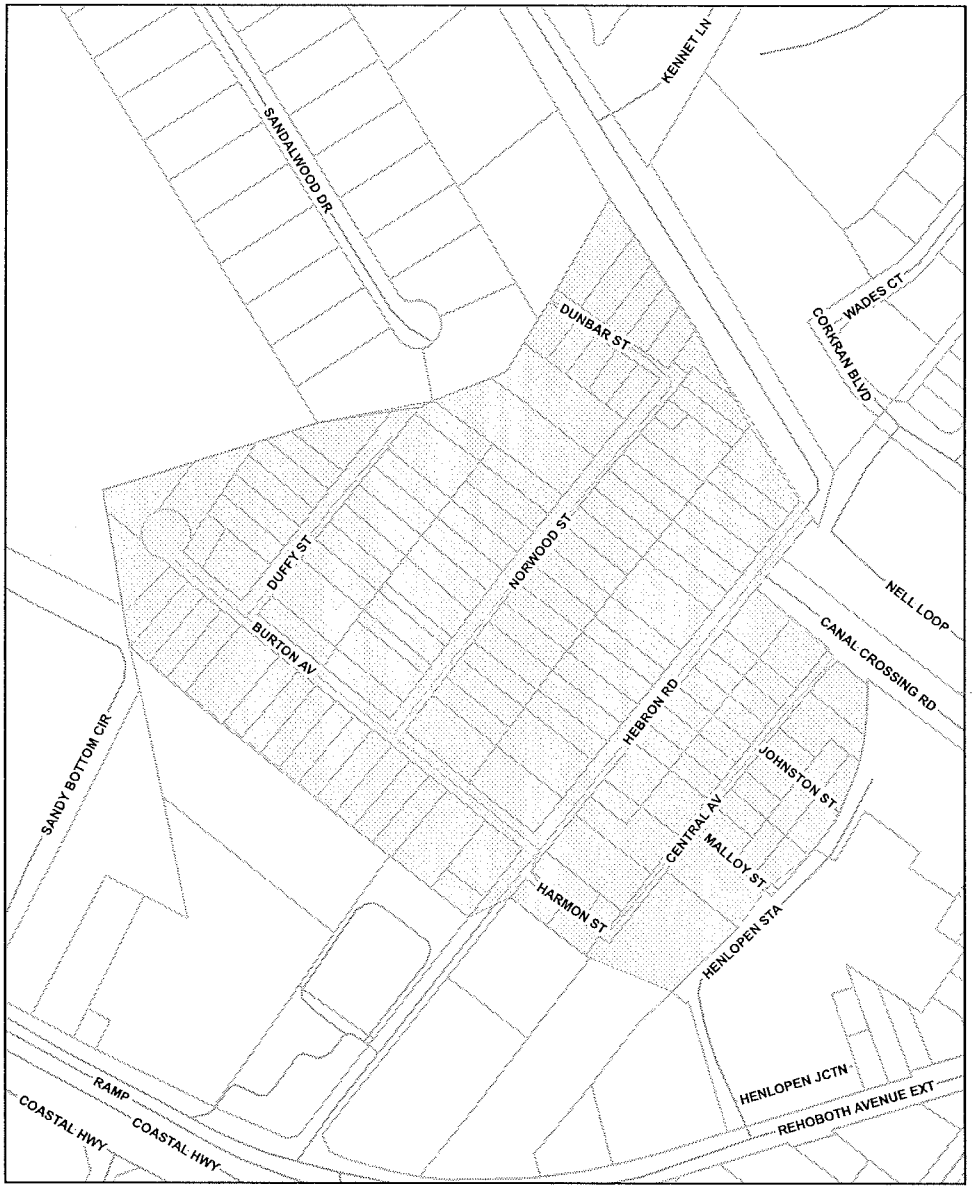
Rural Ellendale
Sussex County Delaware

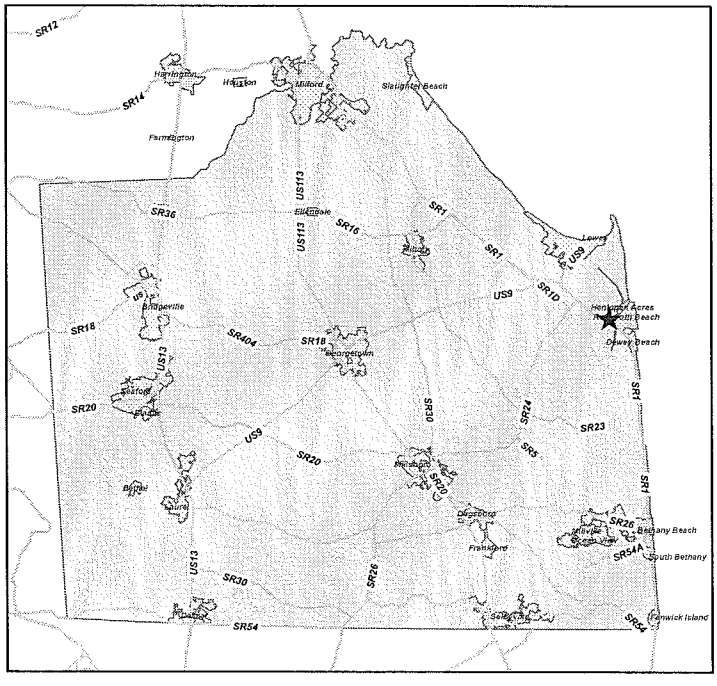


EQUAL HOUSING OPPORTUNITY

The boundaries of the rural community shown on this map have been developed solely for the purpose of the bid package [Sussex County Community Development & Housing Department Request for Proposals (RFP) for Impacted Community Study, February 2014] and may or may not represent the actual boundaries of the community as it exists today. Consultants will be asked to use their judgment in the field as to their interpretation of the boundaries of the rural community.

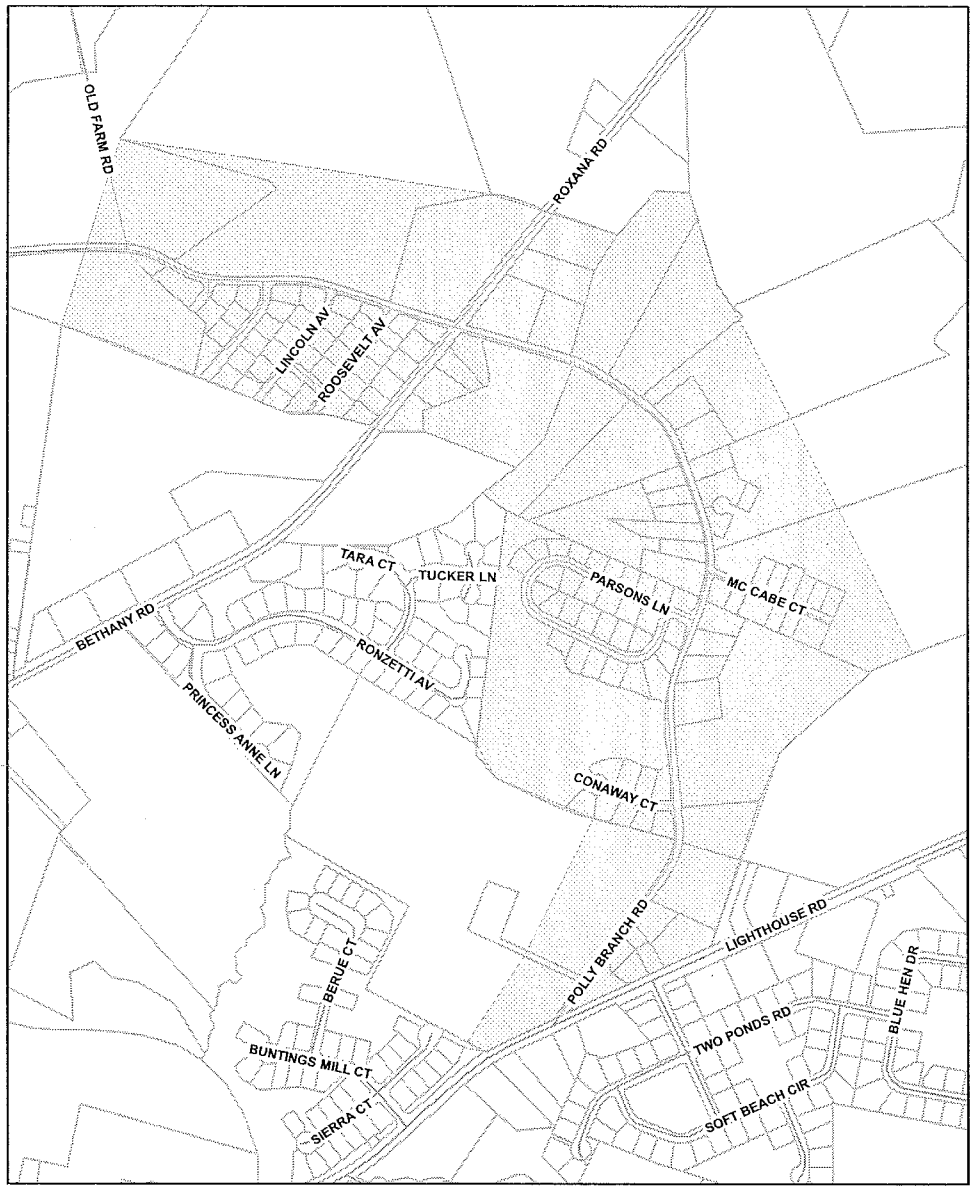
West Rehoboth
Sussex County Delaware

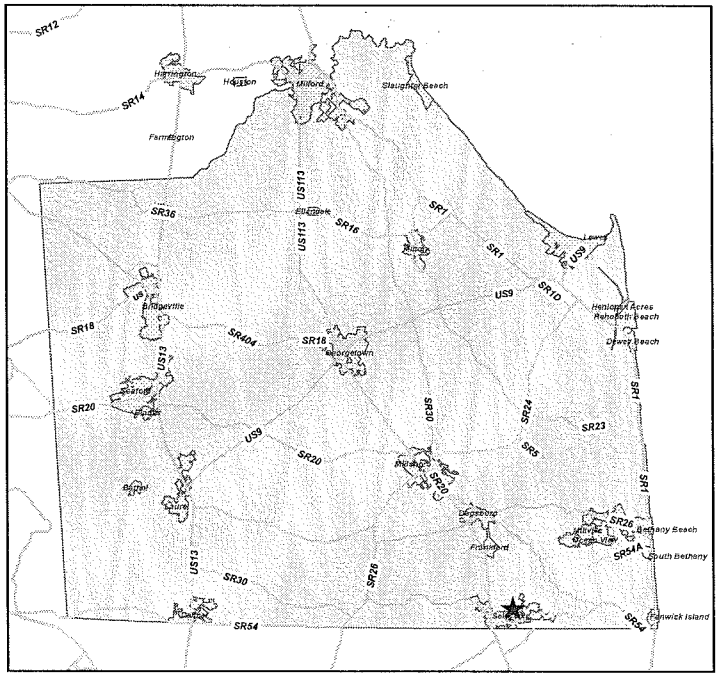




The boundaries of the rural community shown on this map have been developed solely for the purpose of the bid package [Sussex County Community Development & Housing Department Request for Proposals (RFP) for Impacted Community Study, February 2014] and may or may not represent the actual boundaries of the community as it exists today. Consultants will be asked to use their judgment in the field as to their interpretation of the boundaries of the rural community.

Polly Branch Area
Sussex County Delaware





EQUAL HOUSING OPPORTUNITY

The boundaries of the rural community shown on this map have been developed solely for the purpose of the bid package [Sussex County Community Development & Housing Department Request for Proposals (RFP) for Impacted Community Study, February 2014] and may or may not represent the actual boundaries of the community as it exists today. Consultants will be asked to use their judgment in the field as to their interpretation of the boundaries of the rural community.

Dog Patch Area
Sussex County Delaware

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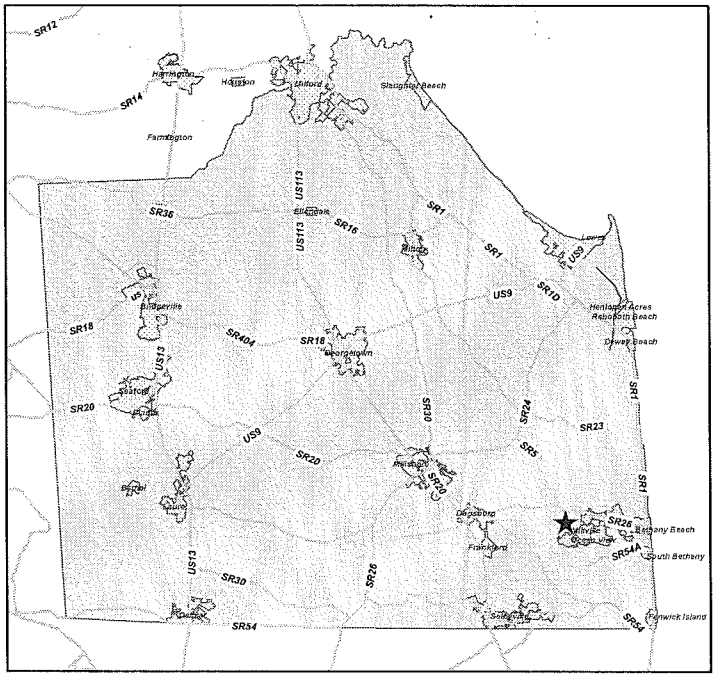
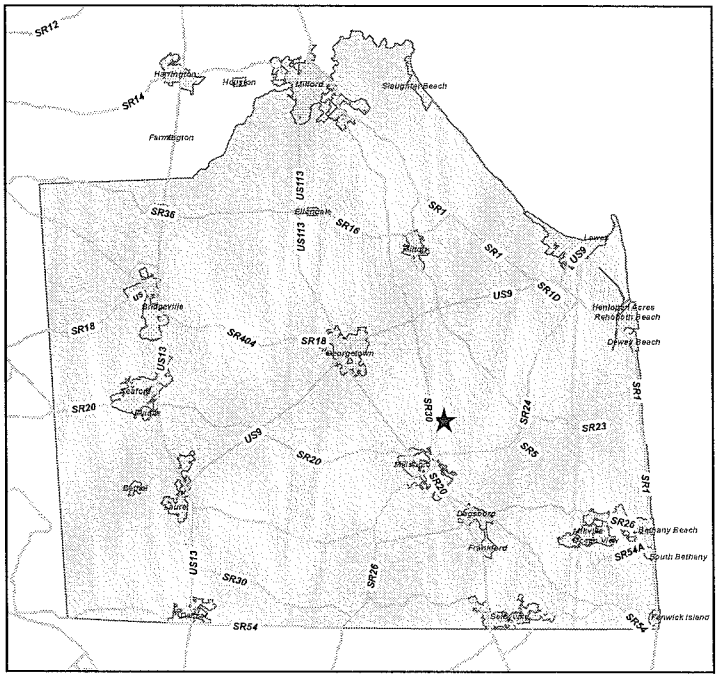


EQUAL HOUSING OPPORTUNITY

The boundaries of the rural community shown on this map have been developed solely for the purpose of the bid package [Sussex County Community Development & Housing Department Request for Proposals (RFP) for Impacted Community Study, February 2014] and may or may not represent the actual boundaries of the community as it exists today. Consultants will be asked to use their judgment in the field as to their interpretation of the boundaries of the rural community.

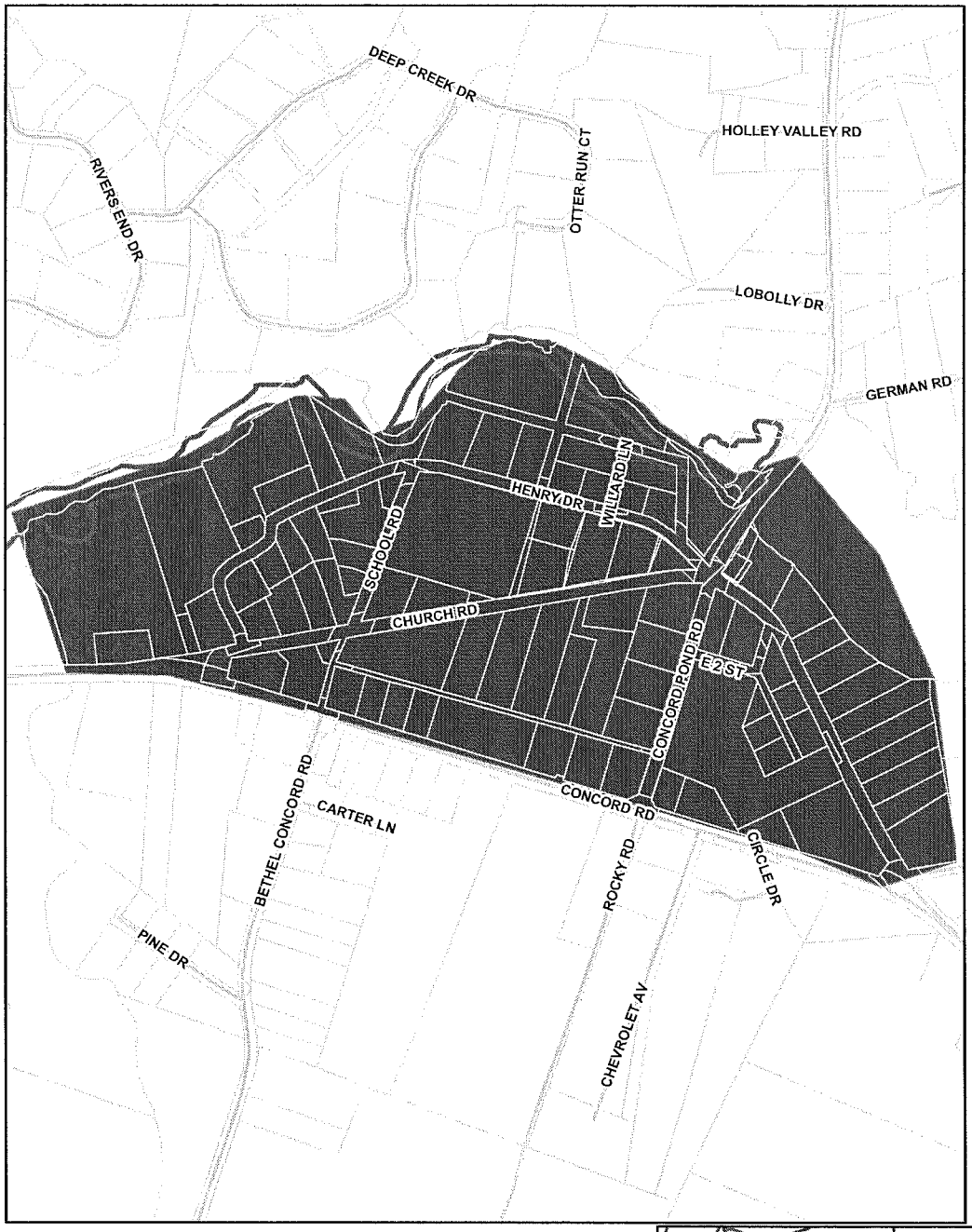
Mount Joy Area
Sussex County Delaware



EQUAL HOUSING OPPORTUNITY

The boundaries of the rural community shown on this map have been developed solely for the purpose of the bid package [Sussex County Community Development & Housing Department Request for Proposals (RFP) for Impacted Community Study, February 2014] and may or may not represent the actual boundaries of the community as it exists today. Consultants will be asked to use their judgment in the field as to their interpretation of the boundaries of the rural community.

Concord Area
Sussex County Delaware



EQUAL HOUSING OPPORTUNITY

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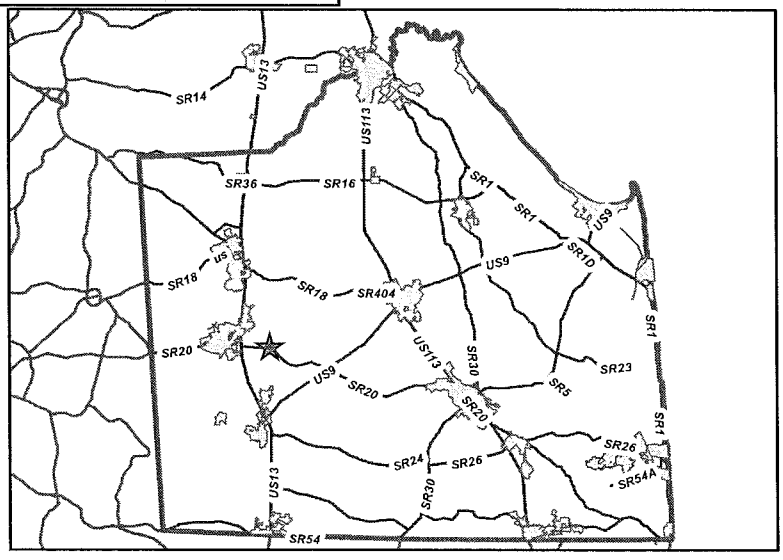

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Possum Point Area
Sussex County Delaware

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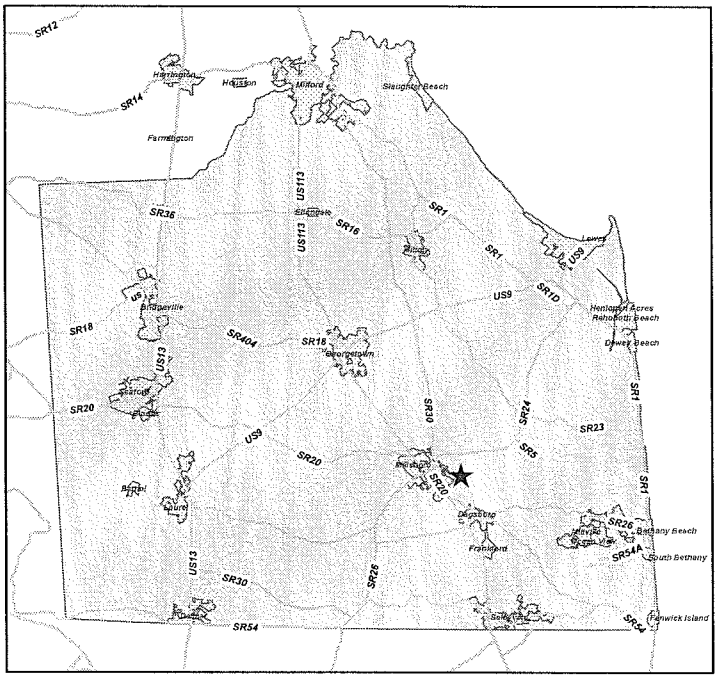
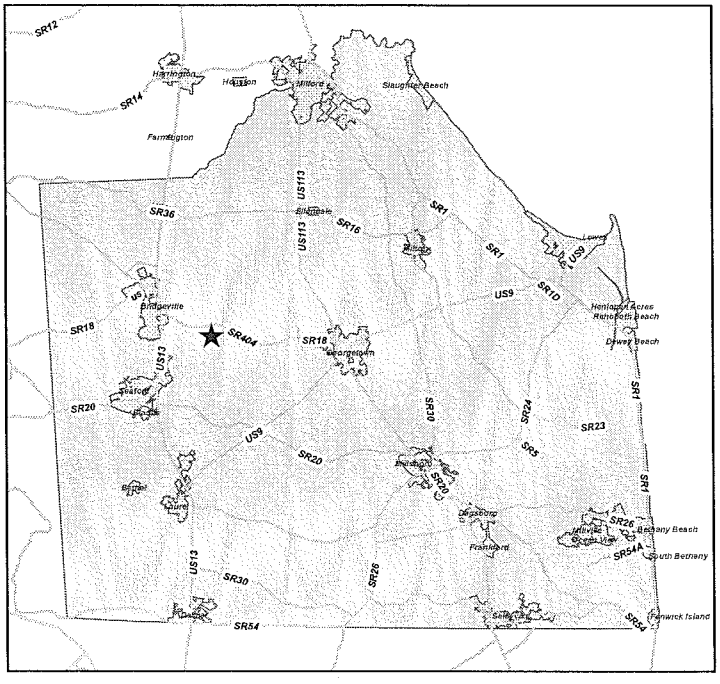
EQUAL HOUSING OPPORTUNITY



The boundaries of the rural community shown on this map have been developed solely for the purpose of the bid package [Sussex County Community Development & Housing Department Request for Proposals (RFP) for Impacted Community Study, February 2014] and may or may not represent the actual boundaries of the community as it exists today. Consultants will be asked to use their judgment in the field as to their interpretation of the boundaries of the rural community.

Coverdale Crossroads Area
Sussex County Delaware



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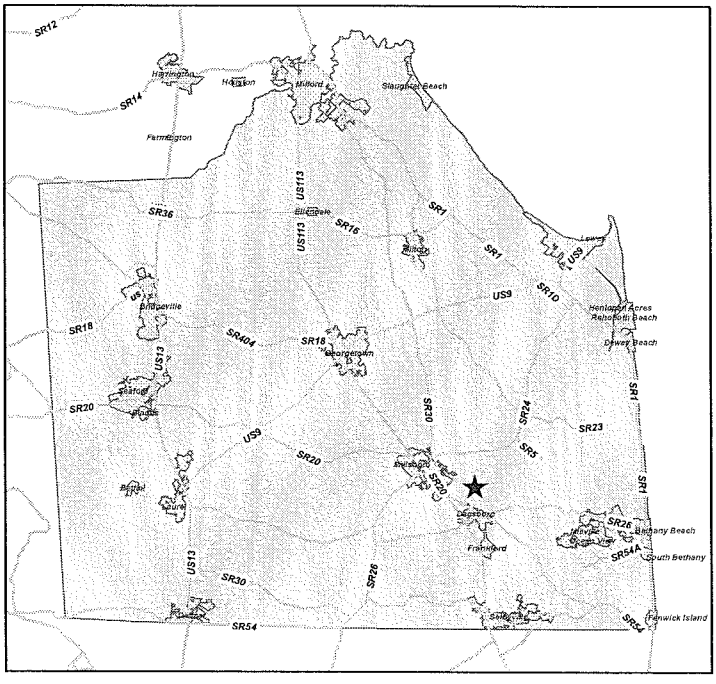
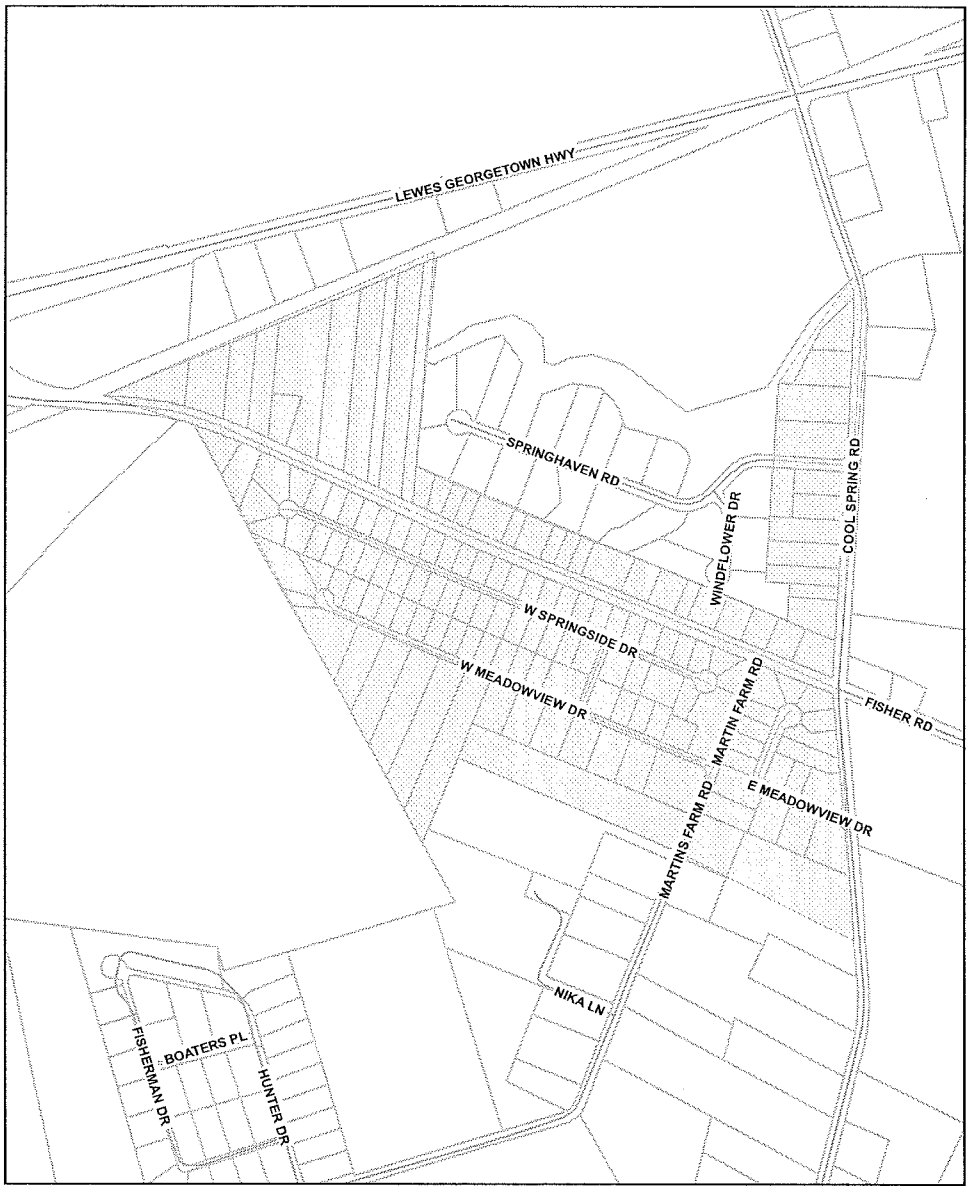
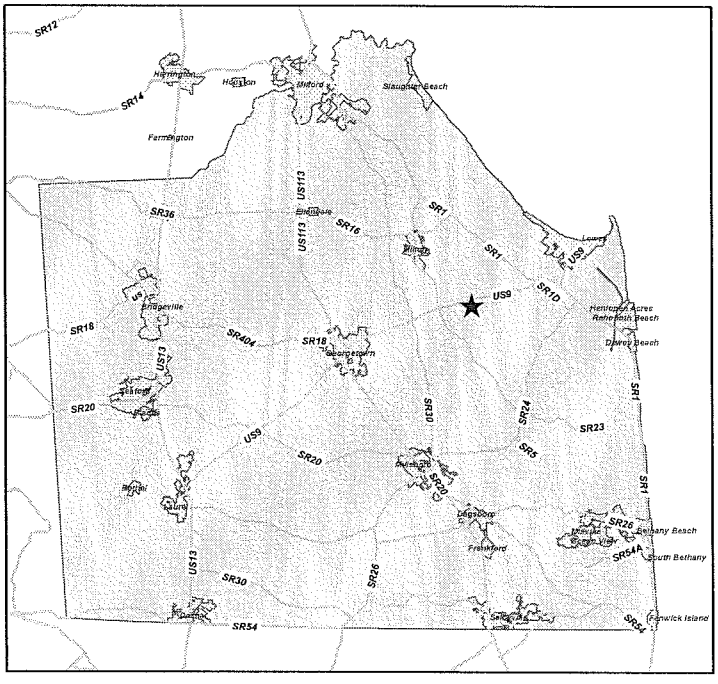
Diamond Acres Area
Sussex County Delaware



The boundaries of the rural community shown on this map have been developed solely for the purpose of the bid package [Sussex County Community Development & Housing Department Request for Proposals (RFP) for Impacted Community Study, February 2014] and may or may not represent the actual boundaries of the community as it exists today. Consultants will be asked to use their judgment in the field as to their interpretation of the boundaries of the rural community.

Cool Spring Area
Sussex County Delaware





EQUAL HOUSING OPPORTUNITY

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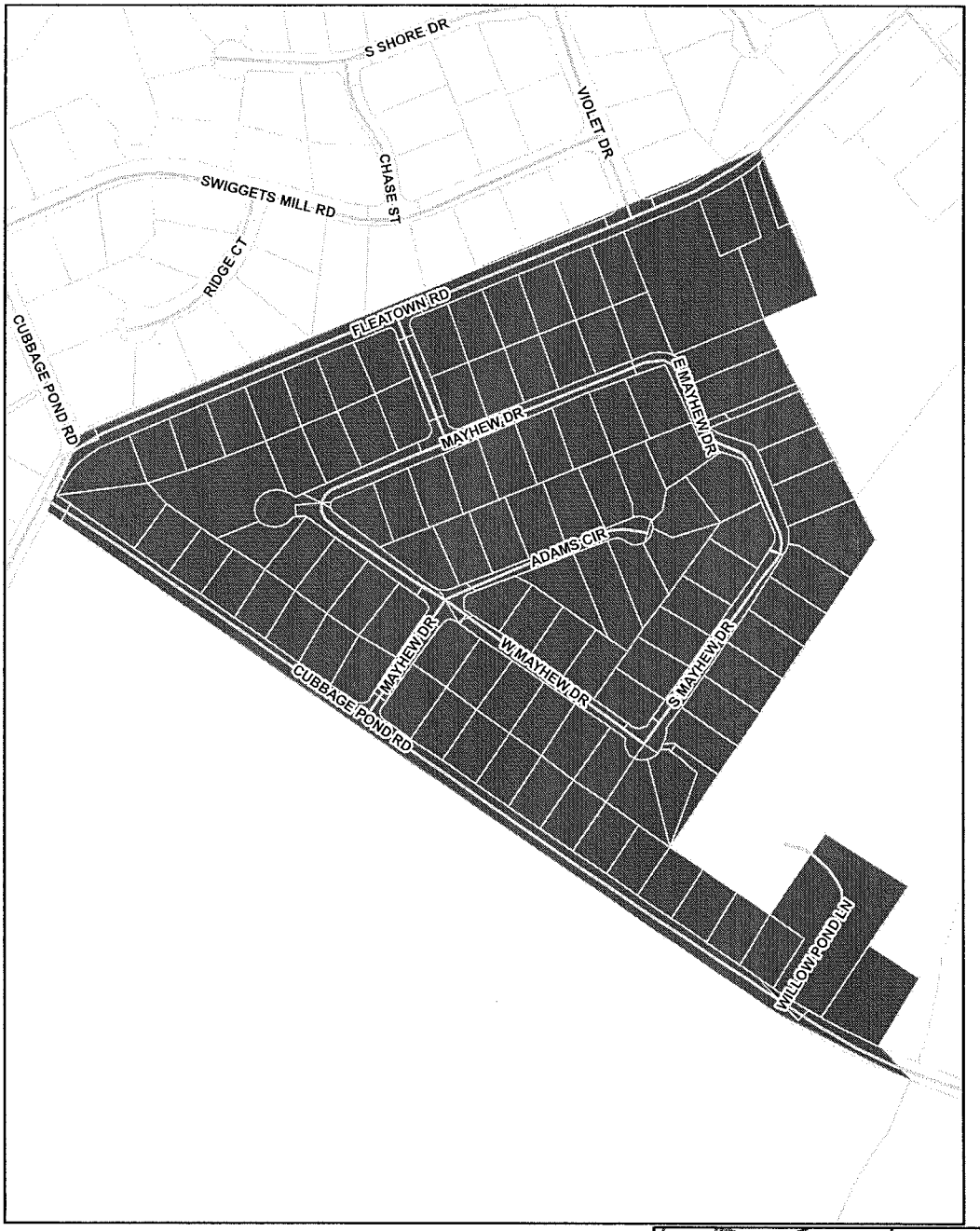
Cedar Creek Area
Sussex County Delaware



EQUAL HOUSING OPPORTUNITY

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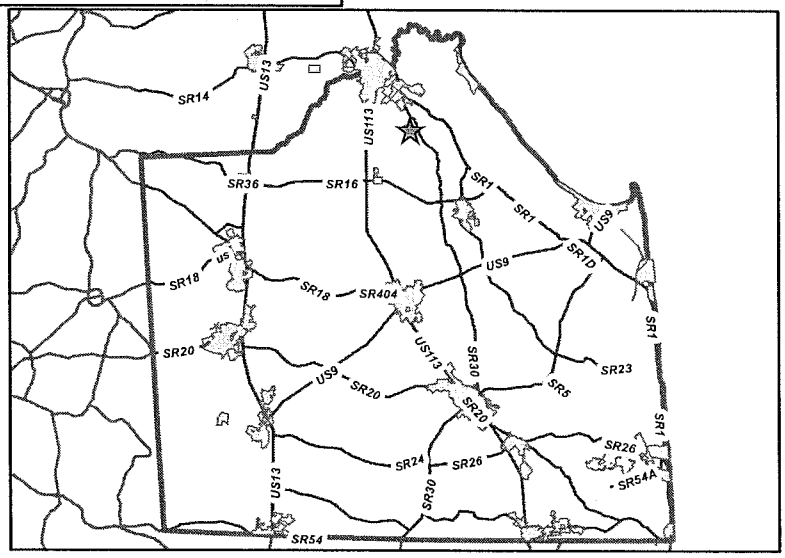
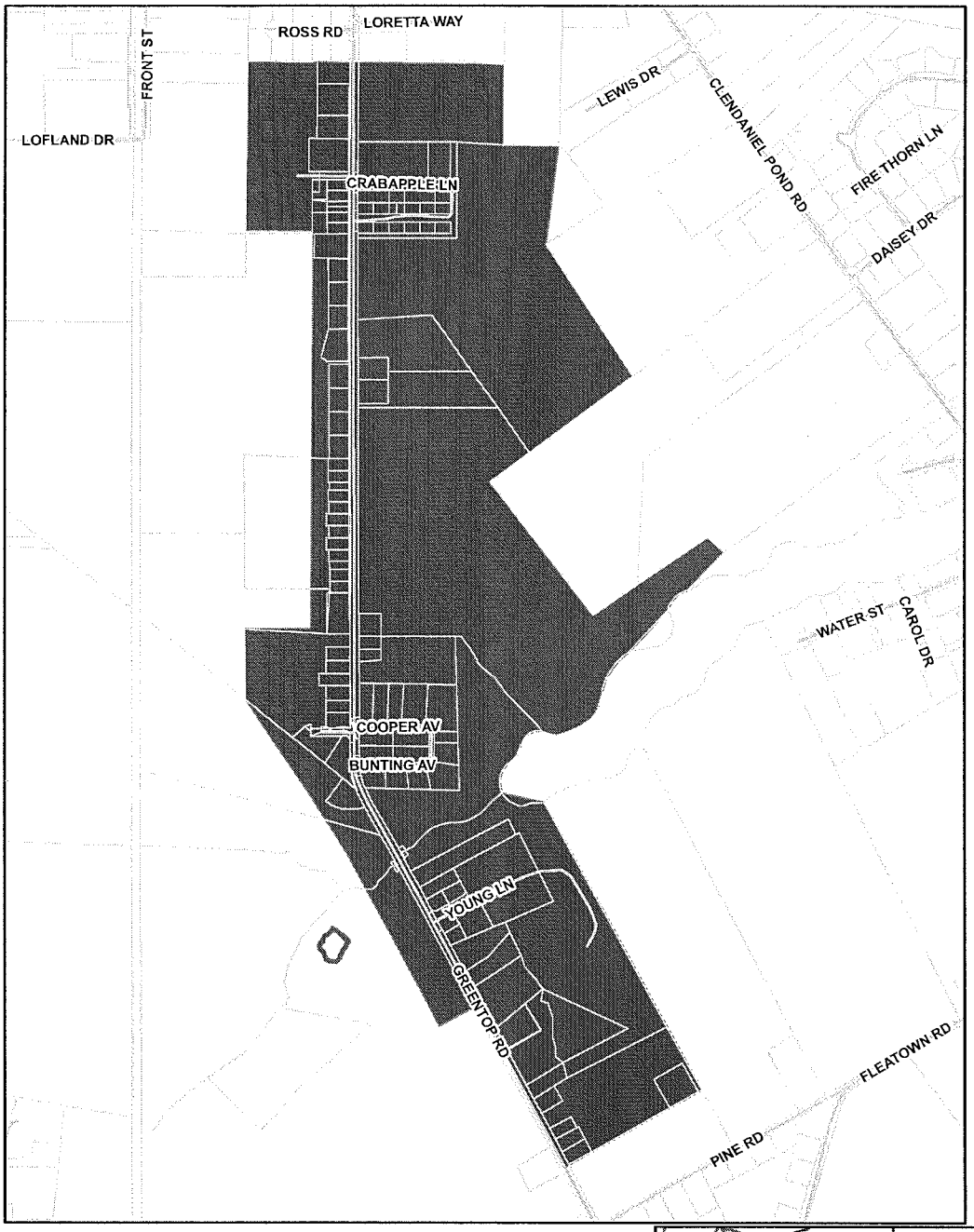


The boundaries of the rural community shown on this map have been developed solely for the purpose of the bid package [Sussex County Community Development Request for Proposals (RFP) for Impacted Community Study, February 2014] and may or may not represent the actual boundaries of the community as it exist today. Consultants will be asked to use their judgement in the field as to their interpretation of the boundaries of the rural community

Green Top Area
Sussex County Delaware



EQUAL HOUSING OPPORTUNITY

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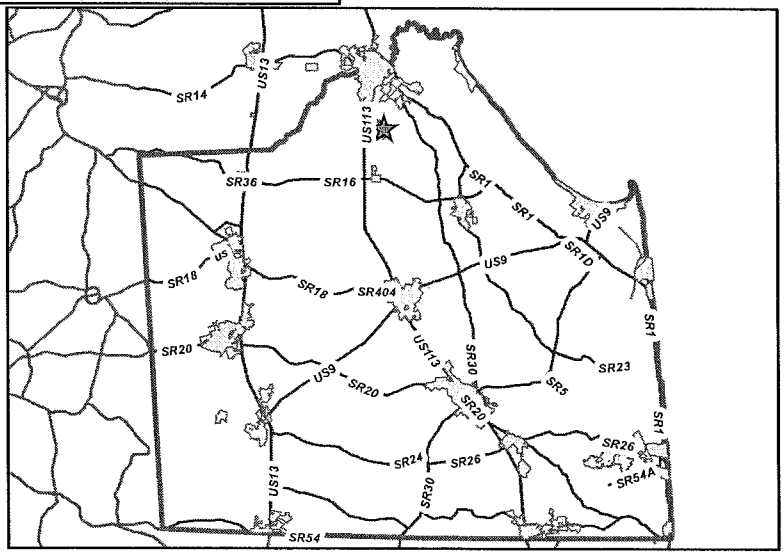

The boundaries of the rural community shown on this map have been developed solely for the purpose of the bid package [Sussex County Community Development Request for Proposals (RFP) for Impacted Community Study, February 2014] and may or may not represent the actual boundaries of the community as it exist today. Consultants will be asked to use their judgement in the field as to their interpretation of the boundaries of the rural community

Exhibit 6

APPLICANT

2009 B4J

IV. QUARTERLY FAIR HOUSING/EQUAL OPPORTUNITY (FHEO) APPLICANT/BENEFICIARY STATUS REPORT

APPLICANT HOUSEHOLD DATA														
				NUMBER OF PERSONS BY RACIAL CODE (1-10) / ETHNIC CODES (1)										
Activities	Total Persons	Total Households	No. Disabled	#1? / #1?	#2? / #1?	#3? / #1?	#4? / #1?	#5? / #1?	#6? / #1?	#7? / #1?	#8? / #1?	#9? / #1?	#10? / #1?	No. Female Head Households
Blades	6	3		5	1									2
Coverdale	23	8	1		23									4
Ellendale	16	6		4	12									2
Laurel	20	8			20									5
Milford	11	5		6	5									2
Pinetown	11	7		0	11									3
Rural				6	14									2
Selbyville	20	9												
Scatter Hookup	48	27	0	31	17									
Scatter Rehab	48	28	2	22	26									13
West Demo	7	4	0	0	7									2
Total	210	105	3	24	136									33
Percent	100%	100%	.01	35	65									.16

Comments:

Racial Codes

1=White
2=Black or African American
3=Asian
4=American Indian or Alaska Native
5=Native Hawaiian or Other Pacific Islander
6=American Indian or Alaska Native & White
7=Asian & White

Racial Codes Continued

8=Black or African American & White
9=American Indian or Alaska Native & Black or African American
10=Other Multi-Racial

Ethnic Codes

1=Hispanic or Latino

*CDBG Funding Total - $1,055,000.00

APPLICANT

2010 RAW

IV. QUARTERLY FAIR HOUSING/EQUAL OPPORTUNITY (FHEO) APPLICANT/BENEFICIARY STATUS REPORT

Activities	Total Persons	Total Households	No. Disabled	APPLICANT HOUSEHOLD DATA — NUMBER OF PERSONS BY RACIAL CODE (1-10) / ETHNIC CODES (1)										No. Female Head Households
				#1? / #1?	#2? / #1?	#3? / #1?	#4? / #1?	#5? / #1?	#6? / #1?	#7? / #1?	#8? / #1?	#9? / #1?	#10? / #1?	
Bridgeville Demo	3	3	0		3									2
Coverdale.	12	7	1		12									6
Greenwood	7	5		4	11								2	4
Laurel	12	6		5	7									5
Mt. Joy	13	8	2	1	12									6
Oak Orchard	17	11	1	8	6		0		2					6
Seaford	8	5		2	6									4
Selbyville	11	6	1	4	7									4
Total														
Percent	100%	100%												

Comments:

Racial Codes

1=White
2=Black or African American
3=Asian
4=American Indian or Alaska Native
5=Native Hawaiian or Other Pacific Islander
6=American Indian or Alaska Native & White
7=Asian & White

Racial Codes Continued

8=Black or African American & White
9=American Indian or Alaska Native & Black or African American
10=Other Multi-Racial

Ethnic Codes

1=Hispanic or Latino

CDBG Funding
Total $1,141,000.00

APPLICANT

IV. QUARTERLY FAIR HOUSING/EQUAL OPPORTUNITY (FHEO) APPLICANT/BENEFICIARY STATUS REPORT

APPLICANT HOUSEHOLD DATA

Activities	Total Persons	Total Households	No. Disabled	NUMBER OF PERSONS BY RACIAL CODE (1-10) / ETHNIC CODES (1)										No. Female Head Households
				#1? / #1?	#2? / #1?	#3? / #1?	#4? / #1?	#5? / #1?	#6? / #1?	#7? / #1?	#8? / #1?	#9? / #1?	#10? / #1?	
West Rehoboth	9	6			9									
Scatter Hookup	45	24	1	20	25									11
Scatter Rehab	51	33	3	15	36									24
Total	188	114	9	60	124				4				4	70
Percent	100%	100%	.05	32	66				.02				.02	.37

Comments:

Racial Codes

1=White
2=Black or African American
3=Asian
4=American Indian or Alaska Native
5=Native Hawaiian or Other Pacific Islander
6=American Indian or Alaska Native & White
7=Asian & White

Racial Codes Continued

8=Black or African American & White
9=American Indian or Alaska Native & Black or African American
10=Other Multi-Racial

Ethnic Codes

1=Hispanic or Latino

2011 RAW

APPLICANT

IV. QUARTERLY FAIR HOUSING/EQUAL OPPORTUNITY
(FHEO) APPLICANT/BENEFICIARY STATUS REPORT

Activities	Total Persons	Total Households	No. Disabled	APPLICANT HOUSEHOLD DATA — NUMBER OF PERSONS BY RACIAL CODE (1-10) / ETHNIC CODES (1)										No. Female Head Households
				#1? / #1?	#2? / #1?	#3? / #1?	#4? / #1?	#5? / #1?	#6? / #1?	#7? / #1?	#8? / #1?	#9? / #1?	#10? / #1?	
Delmar	6	5	3	4	2									4
Ellendale	10	5	1	4	6									3
Laurel	8	6	3	3	5									4
Milford	11	6	1	11										3
Rural Ellendale	21	7	5	0	21									4
Rural Lincoln/ Greentop	14	6	3	2	12									3
Rural Millsboro/ Dagsboro	15	7	2	2	13									3
Seaford	11	8	5	5 1	4									6
Total														
Percent	100%	100%												

Comments:

Racial Codes

1=White
2=Black or African American
3=Asian
4=American Indian or Alaska Native
5=Native Hawaiian or Other Pacific Islander
6=American Indian or Alaska Native & White
7=Asian & White

Racial Codes Continued

8=Black or African American & White
9=American Indian or Alaska Native & Black or African American
10=Other Multi-Racial

Ethnic Codes

1=Hispanic or Latino

CDBG Funding
Total $ 993,000.00

APPLICANT

IV. QUARTERLY FAIR HOUSING/EQUAL OPPORTUNITY (FHEO) APPLICANT/BENEFICIARY STATUS REPORT

APPLICANT HOUSEHOLD DATA

Activities	Total Persons	Total Households	No. Disabled	NUMBER OF PERSONS BY RACIAL CODE (1-10) / ETHNIC CODES (1)										No. Female Head Households
				#1? / #1?	#2? / #1?	#3? / #1?	#4? / #1?	#5? / #1?	#6? / #1?	#7? / #1?	#8? / #1?	#9? / #1?	#10? / #1?	
Scattered Site Em. Rehab	12	8	4	2	10									7
Scattered Site Hookups	46	26	5	27 2	19									15
Scattered Site Rehab	54	29	20	25 3	29									15
Total														
Percent	100%	100%												

208 113 52 87 121

Comments:

48% 56%

Racial Codes

1=White
2=Black or African American
3=Asian
4=American Indian or Alaska Native
5=Native Hawaiian or Other Pacific Islander
6=American Indian or Alaska Native & White
7=Asian & White

Racial Codes Continued

8=Black or African American & White
9=American Indian or Alaska Native & Black or African American
10=Other Multi-Racial

Ethnic Codes

1=Hispanic or Latino

* Minorities Assisted

61%

APPLICANT

2012 BAJ

IV. QUARTERLY FAIR HOUSING/EQUAL OPPORTUNITY (FHEO) APPLICANT/BENEFICIARY STATUS REPORT

APPLICANT HOUSEHOLD DATA

Activities	Total Persons	Total Households	No. Disabled	NUMBER OF PERSONS BY RACIAL CODE (1-10) / ETHNIC CODES (1)										No. Female Head Households
				#1? / #1?	#2? / #1?	#3? / #1?	#4? / #1?	#5? / #1?	#6? / #1?	#7? / #1?	#8? / #1?	#9? / #1?	#10? / #1?	
Bridgeville	6	5	3	1	5									3
Cool Spring	8	5	2		8									5
Coverdale	17	9	5	1 1	16									6
Georgetown Infra.	165	91	30	123 63	41		1							45
Milton	14	5	3	2	12									3
Mount Joy	15	6	3	0	15									4
Selbyville	10	6	2	1	9									6
Total														
Percent	100%	100%												

Comments:

Racial Codes

1=White
2=Black or African American
3=Asian
4=American Indian or Alaska Native
5=Native Hawaiian or Other Pacific Islander
6=American Indian or Alaska Native & White
7=Asian & White

Racial Codes Continued

8=Black or African American & White
9=American Indian or Alaska Native & Black or African American
10=Other Multi-Racial

Ethnic Codes

1=Hispanic or Latino

CDBG Funding
Total # 959,790

APPLICANT

IV. QUARTERLY FAIR HOUSING/EQUAL OPPORTUNITY (FHEO) APPLICANT/BENEFICIARY STATUS REPORT

APPLICANT HOUSEHOLD DATA														
				NUMBER OF PERSONS BY RACIAL CODE (1-10) / ETHNIC CODES (1)										
Activities	Total Persons	Total Households	No. Disabled	#1? / #1?	#2? / #1?	#3? / #1?	#4? / #1?	#5? / #1?	#6? / #1?	#7? / #1?	#8? / #1?	#9? / #1?	#10? / #1?	No. Female Head Households
Scattered Site Em. Rehab	21	11	6	6	15									8
Scattered Hook-Ups	38	26	3	29	9									23
Scattered Site Rehab	35	21	5	15	20									11
* Total Minorities Assisted	214 65%													
Total	329	187	62	170	150		1							114
Percent	100%	100%	33%	54%	46%		03%							61%

Comments:

Racial Codes

1=White
2=Black or African American
3=Asian
4=American Indian or Alaska Native
5=Native Hawaiian or Other Pacific Islander
6=American Indian or Alaska Native & White
7=Asian & White

Racial Codes Continued

8=Black or African American & White
9=American Indian or Alaska Native & Black or African American
10=Other Multi-Racial

Ethnic Codes

1=Hispanic or Latino

2013 AAJ

APPLICANT

IV. QUARTERLY FAIR HOUSING/EQUAL OPPORTUNITY (FHEO) APPLICANT/BENEFICIARY STATUS REPORT

APPLICANT HOUSEHOLD DATA

Activities	Total Persons	Total Households	No. Disabled	NUMBER OF PERSONS BY RACIAL CODE (1-10) / ETHNIC CODES (1)										No. Female Head Households
				#1? / #1?	#2? / #1?	#3? / #1?	#4? / #1?	#5? / #1?	#6? / #1?	#7? / #1?	#8? / #1?	#9? / #1?	#10? / #1?	
Cool Spring	13	6	3		13									3
Coverdale	28	10	6		28									6
Frankford	14	7	5		14									6
Georgetown Infra.	165	91	30	123 63	41		1							45
Georgetown Rehab	17	6	2	14 11	3									2
Laurel	13	5	3	7 2	6									3
Mount Joy	10	7	4		10									5
Rural Selbyville	20	10	6	4	16									8
Total														
Percent	100%	100%												

Comments:

Racial Codes

1=White
2=Black or African American
3=Asian
4=American Indian or Alaska Native
5=Native Hawaiian or Other Pacific Islander
6=American Indian or Alaska Native & White
7=Asian & White

Racial Codes Continued

8=Black or African American & White
9=American Indian or Alaska Native & Black or African American
10=Other Multi-Racial

Ethnic Codes

1=Hispanic or Latino

CDBG Funding
Total $ 1,031,460.00

APPLICANT

IV. QUARTERLY FAIR HOUSING/EQUAL OPPORTUNITY (FHEO) APPLICANT/BENEFICIARY STATUS REPORT

APPLICANT HOUSEHOLD DATA														
				NUMBER OF PERSONS BY RACIAL CODE (1-10) / ETHNIC CODES (1)										
Activities	Total Persons	Total Households	No. Disabled	#1? / #1?	#2? / #1?	#3? / #1?	#4? / #1?	#5? / #1?	#6? / #1?	#7? / #1?	#8? / #1?	#9? / #1?	#10? / #1?	No. Female Head Households
Scattered Site Em. Rehab	17	13	10	8	9									9
Scattered Site Demolition	0	8	0	0										0
Scattered Hook-Ups	30	17	7	16	14									10
Scattered Site Rehab	9	9	8	4	5									8
Seaford	14	7	4		14									6
Impacted Comm. Planning Study														
* Total Minorities Assisted	67%													
Total	**350**	**196**	87	176	173		1							111
Percent	**100%**	**100%**	.46	.50	.49		.04							.58

Comments:

Racial Codes

1=White
2=Black or African American
3=Asian
4=American Indian or Alaska Native
5=Native Hawaiian or Other Pacific Islander
6=American Indian or Alaska Native & White
7=Asian & White

Racial Codes Continued

8=Black or African American & White
9=American Indian or Alaska Native & Black or African American
10=Other Multi-Racial

Ethnic Codes

1=Hispanic or Latino