

HOUSING AND COMMUNITY DEVELOPMENT

Final Draft Task Force Report
September 10, 2007



**City of Portland Housing and Neighborhood Services Division and the
Housing and Community Development Task Force**
July 27, 2007

TABLE OF CONTENTS

PARTICIPANTS	2
PREAMBLE	4
INTRODUCTION	5
CITY OF PORTLAND’S HCD TEN POINT PLAN	6
TO IMPROVE THE HCD PROGRAM AND PROCESS	
RATIONALE AND RECOMMENDATIONS	7

APPENDIX

Memo to the City Manager from HNS Staff 06/15/06	Appendix A
Council Order 03/01/07	Appendix B
Approving the Housing and Community Development Task Force	
HCD Task Force Work Plan 03/01/07	Appendix C
HCD Task Force Calendar of Meetings	Appendix D
HCD Task Force Meetings Agenda and Meeting Minutes:	
Please refer to the website: http://www.portlandmaine.gov/hcdtaskforce.htm	
HCD Task Force Public Forums Agenda and Meeting Minutes	
Please refer to the Website: http://www.portlandmaine.gov/hcdtaskforce.htm	

FORMAT OF THE REPORT

Each section of the **Rationale and Recommendations** section includes three parts.

- 1) The *Shapiro and Boxer-Macomber Memo and Program Review*, referenced below, was part of a memorandum sent to the City Manager on June 15, 2006, provided to City Council for background information in the creation of the HCD Task Force on March 5, 2007, and given to HCD Task Force members at the first meeting as a guide and problem statement on March 16, 2007. It clearly summarizes the current status of the HCD Program and Process and identifies the areas to be focused upon.
- 2) *Topics of Discussion* are subjects the HCD Task Force discussed, analyzed and debated, but were not included in the Ten Point Plan because they did not reach consensus by the entire group. However, these points were essential in understanding the issues and how the Ten Point Plan emerged.
- 3) *Recommendations* are rewritten under each section illustrating a response to the issues identified in the *Shapiro and Boxer-Macomber Program Review*, numbered in the same order as they are in the Ten Point Plan. The HCD Task Force considered these critical components of a re-structured process that increases meaningful neighborhood participation, and an open, transparent process in compliance with HUD’s Consolidated Plan and CDBG regulations. Although the recommendations address adjustments in the HCD Process from beginning to end, ultimately final budgetary allocations are the responsibility of the Portland City Council.

PARTICIPANTS: March 2007 to July 2007

Task Force Members:

Chair: Councilor Ed Suslovic	At-large City Councilor
Tae Chong	CMPAC Chair
Wendy Harmon	CMPAC Representative
Kirk Goodhue	District 1 Representative
Markos Miller	District 1 Representative
Wendy Cherubini	District 2 Representative
Aaron Shapiro	District 2 Representative, Cumberland County Comm. Dev. Director
Fred Dillon	District 3 Representative, CMPAC Representative
Grant Lee	Public Service Representative
Dick Ranaghan	Public Service Representative
Mark Adelson	Portland Housing Authority
John Shoos	United Way Representative
T. J. Martzial	Housing and Neighborhood Services (HNS) Division Director
Lee Urban	Planning and Development Department Director

City:

Councilor Kevin Donoghue	District 1 City Councilor
Mike Bobinsky	Director of Public Works
Denise Clavette	Director of Parks and Recreation
Doug Gardner	Director of Health and Human Services
Alex Jaegerman	Planning Division Director
Jeanie Bourke	Code Enforcement Division Director
Nelle Hanig	Business Development Representative for the Econ. Dev. Department
Don Heath	Commercial Loan Officer for the Economic Development Department
Deb Andrews	Historic Preservation Manager
Mary Davis	Loan Officer for Housing and Neighborhood Services
Deb Marquis	Principle Financial Officer for the Planning Department
Janet Harris	Administrative Assistant and Fair Housing Office for HNS
Amy Grommes Pulaski	Housing and Community Development Program Manager

Community Members who participated in Task Force Meetings*:

Gloria Mallet	CMPAC Member
Catherine Whittemore	CMPAC Member
Rob Ellis	Executive Director Youth and Family Outreach
Leona Good-Simpson	President West End Neighborhood Association
Victoria Szatkowski	Bayside Neighborhood Community Organizer
Steven Hirshon	Bayside Neighborhood Association Representative
Collette Bouchard`	Bayside Neighborhood Association Representative
Ron Spinella	Bayside Neighborhood Association Representative
Alex Landry	Bayside Neighborhood Association Representative
Victoria Hershey	Portland West Employee

PARTICIPANTS: March 2007 to July 2007

Public Forum I Participants*:

Jim Devine	Preble Street Voices for Homeless advocate
Matt Velguth	Executive Director, The Bike Shop
Jo Coyne	West End Neighborhood Association Member
Peter Stuckey	PROP employee and resident of Portland
Mark Swann	Executive Director Preble Street
Dory Waxman	Community Organizer for BNA
Leona Good-Simpson	President of West End Neighborhood Association
Ron Spinella	Chair Bayside Neighborhood Association
Ethan Boxer-Macomber	Former HCD Program Manager and resident of Portland

Public Forum II Participants*:

Gloria Mallet	CMPAC Member
Steve Hirshon	CMPAC Member
Charlene Thompson	CMPAC Member
Catherine Whitemore	CMPAC Member
Annette Rogers	CMPAC Member
Victoria Hershey	Portland West Employee
Collette Bouchard	Bayside Neighborhood Association Representative
Leona Good-Simpson	President of West End Neighborhood Association
Mark Swann	Executive Director Preble Street
Ron Spinella	Chair Bayside Neighborhood Association
Carl Winslow	Former CMPAC member and resident of Portland
Dory Waxman	Community Organizer for BNA
Peter Stuckey	PROP employee and resident of Portland
Steve Hirshon	BNA steering committee member
Rob Ellis	Executive Director, Youth and Family Outreach

* Other members of the public attended public forums and task force meetings, but did not participate.

PREAMBLE

The time is both right and ripe to initiate reform in Portland's Community Development programs. The program operates in a framework molded by long established tradition, lacking flexibility to respond to changing community conditions, HUD requirements or national community development innovations.

The challenge the City Council faced in adopting the HCD budget this spring [2006] is but one symptom of broader programmatic shortcomings. With careful consideration the program can be brought up-to-date, continuing to provide the programs and services vital to our low/moderate income residents and neighborhoods.

The program has funded many excellent programs and community improvements over the years. Recognize that in all that follows, there is not the slightest intention of degrading the program or the great work that has been accomplished. The focus is solely on improvements, refinements and positive reforms. The intent is to right the ship, not scuttle it.

- Shapiro and Boxer- Macomber. *Housing and Community Development 2006 Program Review*, June 15, 2006.

INTRODUCTION

The Housing and Community Development (HCD) Task Force was established by the Portland City Council on March 5, 2007 and was charged with reviewing and evaluating current practices in relation to the implementation of Portland's HCD Program. The HCD Program is comprised of three grants from the Federal Housing and Urban Development (HUD) Department, including the Community Development Block Grant (CDBG), HOME Investments Partnership Program, and the Emergency Shelter Grant (ESG). The Task Force will be focusing primarily on CDBG, specifically its process, priorities, and public participation.

Federal guidelines split CDBG funding into three funding categories: Planning and Administration, Public Services, and Other Improvement Projects. HUD regulations specify that no more than 20% of the CDBG grant can go to Planning and Administration. Similarly, the Public Service section of the grant is also capped. While most cities and counties receiving CDBG funding around the country are regulated to 15% for Public Services, the City of Portland received an exemption in 1982 to allow 33% of our funding to go to this category. All other funding can go to Housing, Public Improvements, Economic Development and Code Enforcement among other eligible activities. The Other Improvement Project category typically utilizes 47% of the allotted CDBG funding.

The HCD Task Force began meeting in March 2007. Over the past five months the Task Force has held sixteen task force meetings, two public forums and presented their recommendations to one Council Committee.

The HCD Task Force was driven by a collective desire to improve the process and its accountability. The expectation is to have enhanced objectivity and transparency in both the priority setting process and annual allocation of resources. They diligently reviewed the three HUD specified funding categories specified by HUD, in addition to reviewing all eligible activity types, specifically: planning, administration, housing, code enforcement, public improvements, public works, parks, economic development, and public services. The Task Force thoroughly reviewed, debated, and finally agreed upon recommendations that would significantly change and improve the public participation process of the HCD program.

All Task Force meetings were open to the public and advertised on the City of Portland's calendar and website. Additional notification was provided for Public Forums, including newspaper notices and emails to all funded HCD agencies, organizations, and City Departments.

CITY OF PORTLAND'S HCD TEN POINT PLAN

1. All proposals will meet or exceed HUD and City requirements, be outcome driven, and reflect the priorities identified in the City of Portland's HUD Consolidated Plan. These priorities will be developed every three years through a Priority Setting Process.
2. Priority will be given to proposals providing direct benefit to low and moderate income persons and proposals contributing to a comprehensive revitalization of targeted neighborhoods identified in the HUD Consolidated Plan.
3. Staff will enhance communication and planning with neighborhoods and community members throughout the year. HCD public participation should be a year long process of open communication between City departments, neighborhood associations, public service agencies, and residents discussing needs and coordination of projects. Modes for engaging public input can include but are not limited to meetings, studies, focus group discussions, and surveys. This ongoing communication replaces the traditional, annual, once-a-year HCD Meetings.
4. Restructure CMPAC to create two Council appointed committees:
 - a. Priority Setting Task Force to establish priorities for the HCD Program Funds. Priorities will be set in all three funding categories: planning/ administration, public services, and other public improvement projects. Recommended priorities will be reviewed by a Council Committee prior to City Council review and adoption. This group should consist of 9-16 Portland residents representing diverse and relevant populations and expertise.
 - b. Annual Scoring Committee to rate, rank, score and make recommendations for the allocation of HCD resources. This group should consist of 7-10 Portland residents, who will serve staggered three year terms. Conflict of interest should be minimized; no staff, board members, contractors or anyone receiving financial gain from an applicant's proposal can participate on this committee. HNS staff will conduct a threshold review of applications and forward all that comply with HUD guidelines to the Scoring Committee.
5. Recommendations from the Annual Scoring Committee will be sent to the City Manager for review. The City Manager will create a letter addressed to the City Council describing his endorsement or concerns for the recommendations, plus a description of budgetary impacts on the General Fund. Council can either accept the HCD budget as recommended by the scoring committee, or reject the entire HCD budget with specific written objections. The scoring committee would then review the objections and either adopt and re- score the proposals, or stand by their recommendations. The HCD budget will then go back to Council for a final decision.
6. All proposals from agencies, organizations, and City Departments requesting funding are required to submit an annual budget and proposed work plan that communicates the outcomes, objectives and deliverables for the year.
7. All physical improvement, public infrastructure, housing, and economic development project proposals should be adequately funded to complete the proposed scope of work. Proposed projects are to be completed within two years or funds will be reallocated.
8. All applicants must demonstrate administrative and financial history and capacity to complete the proposed scope of work.
9. The Priority Setting Task Force will set a minimum grant amount to ensure a measurable outcome can be tracked. The current \$5,000 minimum grant allotment would remain for FY08-09.
10. Revamp the HCD Program's Request for Proposal (RFP) process to be in compliance with the Purchasing Ordinance. In a competitive process scoring criteria should be based on the priorities developed by the Task Force (and approved by Council) and included in the RFP. Create a pre-application process for public improvement projects, both in-house and outside, to screen for Environmental Review Requirements, specifically Historic Preservation.

RATIONALE AND RECOMMENDATIONS

TOPIC: OVERALL

HCD Task Force Recommendations:

1. All proposals should meet or exceed HUD and City requirements, be outcome driven, and reflect the priorities identified in the City of Portland's HUD Consolidated Plan. These priorities will be developed every three years through a Priority Setting Process.
2. Priority will be given to proposals providing direct benefit to low and moderate income persons and proposals contributing to a comprehensive revitalization of targeted neighborhoods identified in the HUD Consolidated Plan.

TOPIC: CITIZEN PARTICIPATION

The Citizen Participation component has three primary elements: Neighborhood meetings; CMPAC [City Manager's Policy Advisory Committee]; and City Council Public Hearings.

Neighborhood Meetings – These are great “town forum” type meetings where a host of important neighborhood issues are aired. They simply don't generally cover the CDBG program, current CDBG funded projects in the neighborhood or future CDBG projects that might be funded. Few people attending or leaving the meeting would have great understanding of the program - what it does or could do for their neighborhood. This situation can easily be changed by modifying the current meeting, particularly in the target area neighborhoods or by augmenting the current meetings with additional gatherings targeted on the CDBG program.

CMPAC – CMPAC labors long and hard. This year's group [2006/2007], like their predecessors, cared deeply about the task and approached it with diligence and devotion. They simply lack the tools to guide their selections. The group operates without defined priorities, review criteria or clear boundaries to frame their deliberations. ...

City Council Public Hearings – The Council will always be the ultimate decision makers and will hold Public Hearings prior to adoption of the program budget. But...if Council were to establish clear priorities, programmatic procedures and an objective review of projects and applications, little would be left to personal preference, political affiliation, or simply past funding practices.

*- Shapiro and Boxer- Macomber. Housing and Community Development
2006 Program Review, June 15, 2006.*

Topics of Discussion

- HNS will add one staff position to coordinate the priority setting process including gathering appropriate data every three years, ongoing neighborhood outreach activities, attending neighborhood organization meetings, working with neighborhoods and community groups to develop annual CDBG proposed activities, and general community outreach including providing technical assistance as needed. This person would help coordinate the public participation process as well.

- Designate a senior planner to work on long-range planning that will be fully funded through HCD.

HCD Task Force Recommendations:

3. Staff will enhance communication and planning with neighborhoods and community members throughout the year. HCD public participation should be a year long process of open communication between City departments, neighborhood associations, public service agencies, and residents discussing needs and coordination of projects. Modes for engaging public input can include but are not limited to meetings, studies, focus group discussions, and surveys. This ongoing communication replaces the traditional, annual, once-a-year HCD Meetings.
4. Restructure CMPAC to create two Council appointed committees:
 - a. Priority Setting Task Force to establish priorities for the HCD Program Funds. Priorities will be set in all three funding categories: planning/ administration, public services, and other public improvement projects. Recommended priorities will be reviewed by a Council Committee prior to City Council review and adoption. This group should consist of 9-16 Portland residents representing diverse and relevant populations and expertise could include but is not limited to: a) residents of eligible neighborhoods; b) low and moderate income Portland residents; c) renters and d) landlords; individuals who are knowledgeable about e) planning and f) economic development; g) public service representatives from various areas of expertise; h) Portland housing authority (resident or worker); i) senior citizens; j) young persons (under 30); k) immigrant and refugees; and an individual with a l) disability.
 - b. Annual Scoring Committee to rate, rank, score and make recommendations for the allocation of HCD resources. This group should consist of 7-10 Portland residents, who will serve staggered three year terms. Conflict of interest should be minimized; no staff, board members, contractors or anyone receiving financial gain from an applicant's proposal can participate on this committee. HNS staff will conduct a threshold review of applications and forward all that comply with HUD guidelines to the Scoring Committee.
5. Recommendations from the Annual Scoring Committee will be sent to the City Manager for review. The City Manager will create a letter addressed to the City Council describing his endorsement or concerns for the recommendations, plus a description of budgetary impacts on the General Fund. Council can either accept the HCD budget as recommended by the scoring committee, or reject the entire HCD budget with specific written objections. The scoring committee would then review the objections and either adopt and re- score the proposals, or stand by their recommendations. The HCD budget will then go back to Council for a final decision.

TOPIC: ALLOCATION OF CDBG RESOURCES

The allocation of CDBG resources is bound by longstanding tradition and practice. By virtue of a special exemption received from HUD in 1982 the City expends 33% of program funds for Public Service activities. This is well in excess of the 15% national limit, giving Portland's program the look and feel of a social service grant distribution program, not an overall community development initiative.

The City has historically utilized the full 20% allotted for Planning & Administrative expenditures. Much of this amount pays the salaries [Housing and Neighborhood Services Staff,] Planning Department staff and the Director of the Department of Planning & Development.

The remaining 47% of annual program funds are divided, again more by tradition than plan, between Public Works activities (60%) and Parks & Recreation (40%). The vast majority of funds expended for Public Works activities have been the re-construction of brick sidewalks. It is further noted that the funds for Public Works and Parks projects are typically equally divided between Council Districts #1 & #2. Portions of Council District #3 have recently become eligible so the split now appears more along the lines of 40%, 40%, 20%.

This funding structure has been static for many years. [It might be] time for reconsideration. A few examples to highlight the issue:

1) [The re-development of the Reiche School campus grounds, the reconstruction of Hampshire Street and the re-development of Adams Street playground are projects that stretched over several years, some lasting seven years to finish(paraphrased).] *While these projects were deemed worthy of funding, we were required to segment activity into three phases and “save up” over five years of HUD allocations to amass enough funds to accomplish the project. It would seem if the project was worth starting, it should be worthy of completing in a timely fashion.*

- Shapiro and Boxer- Macomber. *Housing and Community Development 2006 Program Review*, June 15, 2006.

Topics of Discussion

- If needed, eligible studies or capacity building activities could be funded out of the Planning/ Administration cap as needs are identified.
- All inspection activities will comply with HUD guidelines and *comprehensively* address the needs of a defined area.
- CDBG funding may be allocated to eligible housing activities as the needs are identified. Activities can include but are not limited to: energy efficiency upgrades, green building renovation, rehabilitation, smoke free, acquisition of land, etc. consistent with City policy.
- Utilize the priorities to determine project funding and move away from balancing dollars between eligible districts.
- HCD funds will not be used to replace CIP investment in eligible areas.
- Projects identified through the Priority Setting Process which do not get funded through HCD will be submitted in the CIP budget.

HCD Task Force Recommendations:

6. All proposals agencies, organizations, and City Departments requesting funding are required to submit an annual budget and proposed work plan that communicates the outcomes, objectives and deliverables for the year.
7. All physical improvement, public infrastructure, housing, and economic development project proposals should be adequately funded to complete the proposed scope of work. Proposed projects are to be completed within two years or funds will be reallocated.
8. All applicants must demonstrate administrative and financial history and capacity to complete the proposed scope of work.

TOPIC: PUBLIC SERVICE PROGRAMS

Given the large percentage of funds distributed to social service programs and agencies, this topic deserves special attention. Thirty-five outside public service agencies currently receive CDBG fund allocations ranging from \$1,000 to \$78,000. Many of these are long-term grantees, receiving allocations for the past 25 years or more.

There are many issues associated with the current Public Service grant program that should be evaluated. The following highlights five large concerns.

1) There is no clear sense of community priorities in the use of the funds. The program funds all sorts of activities – day care centers, community newspapers, senior care management, youth activities and on and on – in a grab bag approach. Further, there is no rationale for how dollars are allocated. Why does one program receive \$10,000 and another \$25,000? The answer often lies in how much they received the prior year or how much funds were available the year they initially were funded.

2) The application process is opaque. Applicants have no idea how their applications are reviewed. There is no system to rate and rank the applications and projects. Are funds awarded to the best written applications? Well conceived and successful programs? Those with close connections to City Councilors? Those awarded funds in the past? Those meeting significant and emerging community needs? No one knows. ... The Committee has no guidelines on which to base its decisions, just as applicants have no idea how they are judged.

- Shapiro and Boxer- Macomber. *Housing and Community Development 2006 Program Review*, June 15, 2006.

Topics of Discussion

- The Public Service funding may not always reach the 33% cap, dependent on each year's needs.
- Re-categorize proposals into the four categories presented by United Way: Meeting Basic Needs and Building Self- Sufficiency, Strengthening Children, Youth, Family and the Elderly, Building Safe and Strong Communities, and Promoting Health and Wellness.

HCD Task Force Recommendations:

9. The priority setting task force will set a minimum grant amount to ensure a measurable outcome can be tracked. The current \$5,000 minimum grant allotment would remain for FY08-09.
10. Revamp the HCD Program's Request for Proposal (RFP) process to be in compliance with the Purchasing Ordinance. In a competitive process scoring criteria should be based on the priorities developed by the Task Force (and approved by Council) and included in the RFP. Create a pre-application process for public improvement projects, both in-house and outside, to screen for Environmental Review Requirements, specifically Historic Preservation.



Memorandum

Planning and Development Department
Housing and Community Development Program

To: Joe Gray, City Manager

Cc: Lee Urban, Planning and Development Director

From: Aaron Shapiro, Housing and Neighborhood Services Director
Ethan Boxer-Macomber, HCD Program Manager

Date: June 15, 2006

Re: HCD Program Review and Recommendations

As a follow-up to our recent discussion on the current policies and practices of the City's Housing and Community Development Program, the enclosed *Draft Program Review* presents some detailed observations and recommendations for consideration.

While this review is staff generated, the observations and ideas it presents are drawn from feedback received through the FY 06/07 budget review process from various participants including: Program sub-recipients and beneficiaries, CMPAC members, HCD Program staff, staff from other affected divisions of the City, and members of the City Council. Additionally, certain observations and recommendations are based on information collected at recent HUD training and NCEA conference events and through other recent communications received from those agencies.

Again, the review is, at this point, only in draft form. Once you have had an opportunity to read and consider this review, we request that you meet with us again on topic to discuss matters internally and consider possible next steps.

Housing and Community Development Program 2006 Program Review

INTRODUCTION - Rethinking Community Development in Portland

The time is both right and ripe to initiate reform in Portland's Community Development programs. The program operates in a framework molded by long established tradition, lacking flexibility to respond to changing community conditions, HUD requirements or national community development innovations.

The challenge the City Council faced in adopting the HCD budget this spring is but one symptom of broader programmatic shortcomings. With careful consideration the program can be brought up-to-date, continuing to provide the programs and services vital to our low/moderate income residents and neighborhoods.

The program has funded many excellent programs and community improvements over the years. Recognize that in all that follows, there is not the slightest intension of degrading the program or the great work that has been accomplished. The focus is solely on improvements, refinements and positive reforms. The intent is to right the ship, not scuttle it.

Timing

There will never be an easy time to initiate reform of the City's CDBG program, but four factors make this as good a time as ever.

1) HUD's Outcome Measurement System.

HUD is instituting new systems to track performance of grantees. There is increased emphasis on program outcomes (as opposed to outputs) and measuring and achieving targeted goals.

2) O.M.B Scrutiny., Congressional Oversight and Funding Pressures.

O.M.B. has been vocal in their criticism of the program, pointing to HUD's inability to demonstrate results. Congress is pressed to provide level, but in real dollars, reduced funding. HUD's proposal to change the funding formula, while it may not see the light of day, would cut Portland's allocation by 43%.

3) '06 breakdown at City Council.

The challenge the Council faced in enacting the '07 HCD budget goes well beyond the problem caused by modest HUD funding reductions. The program lacks a clear, defined process to make fair funding distribution choices.

4) New Program Staff.

The new Community Development Program Manager (Ethan Boxer-Macomber) and Director (Aaron Shapiro) have identified numerous issues in need of reform. We recognize the considerable time and energy that will need to be devoted to a change process, but believe it is absolutely necessary.

Goals and Priorities

The priority needs list established for the program is incomplete and provides limited guidance in determining the allocation of program resources. The program operates without clear guidelines, priorities or objectives. These are critical to providing a rational allocation of resources and knowing whether we're achieving stated goals. Developing such priorities and creating program goals, and following them, will benefit all involved – program applicants, program staff, CMPAC and City Councilors

Citizen Participation

The Citizen Participation component has three primary elements: Neighborhood meetings; CMPAC and City Council Public Hearings.

Neighborhood Meetings – These are great “town forum” type meetings where a host of important neighborhood issues are aired. They simply don’t generally cover the CDBG program, current CDBG funded projects in the neighborhood or future CDBG projects that might be funded. Few people attending or leaving the meeting would have great understanding of the program - what it does or could do for their neighborhood. This situation can easily be changed by modifying the current meeting, particularly in the target area neighborhoods or by augmenting the current meetings with additional gatherings targeted on the CDBG program.

CMPAC – CMPAC labors long and hard. This year’s group (2006/2007), like their predecessors, cared deeply about the task and approached it with diligence and devotion. They simply lack the tools to guide their selections. The group operates without defined priorities, review criteria or clear boundaries to frame their deliberations. While they read the applications with care and listen to presentations attentively, choices are largely based upon personal preference, conjecture, speculations or so as to not offend others in the group representing interested applicants.

City Council Public Hearings – The Council will always be the ultimate decision makers and will hold Public Hearings prior to adoption of the program budget. But...if Council were to establish clear priorities, programmatic procedures and an objective review of projects and applications, little would be left to personal preference, political affiliation, or simply past funding practices.

Allocation of CDBG Resources

The allocation of CDBG resources is bound by longstanding tradition and practice. By virtue of a special exemption received from HUD in 1982 the City expends 33% of program funds for Public Service activities. This is well in excess of the 15% national limit, giving Portland’s program the look and feel of a social service grant distribution program, not an overall community development initiative.

The City has historically utilized the full 20% allotted for Planning & Administrative expenditures. Much of this amount pays the salaries Planning Department staff and the Director of the Department of Planning & Development.

The remaining 45% of annual program funds are divided, again more by tradition than plan, between Public Works activities (60%) and Parks & Recreation (40%). The vast majority of funds expended for Public Works activities have been the re-construction of brick sidewalks. It is further noted that the funds for Public Works and Parks projects are typically equally divided between Council Districts #1 & #2. Portions of Council District #3 have recently become eligible so the split now appears more along the lines of 40%, 40%, 20%.

This funding structure has been static for many years. We believe it’s time for reconsideration. A few examples to highlight the issue:

- 1) The re-development of the Reiche School campus grounds will take at least 7 years from planning through final construction. While the project was deemed worthy of funding, we were required to segment activity into three phases and “save up” over five years of HUD allocations to amass enough funds to

accomplish the project. It would seem if the project was worth starting, it should be worthy of completing in a timely fashion. It hardly fosters confidence in our community's performance when a child entering first grade at Reiche, when planning for the project began, will be entering middle school when the project is completed.

2) The reconstruction of Hampshire Street and the re-development of the Adams Street playground are two additional examples. These projects required the "banking" of program funds over four years of CDBG allocations. With an alternative system to allocate resources projects like these can be completed in much tighter timeframes.

3) Public Service funds are "sprinkled" onto 37 programs, 18 of which receive less than \$10,000, with 6 of these receiving less than \$5,000. If significant community issues emerge requiring large resource commitment (e.g. substance abuse/addiction or refugee integration) the program should be flexible and capable of responding.

4) Many communities nation-wide provide funds for a variety of programs not typically seen in Portland, for example: small business assistance, economic development, façade improvements, weatherization, infrastructure to support affordable housing, large-scale infrastructure projects, or infrastructure to support affordable housing or homeownership initiatives. Allocating resources to such programs in Portland is impossible given the traditional funding structure.

Public Service Programs

Given the large percentage of funds distributed to social service programs and agencies, this topic deserves special attention. Thirty-five outside public service agencies currently receive CDBG fund allocations ranging from \$1,000 to \$78,000. Many of these are long-term grantees, receiving allocations for the past 25 years or more.

There are many issues associated with the current Public Service grant program that should be evaluated. The following highlights five large concerns.

1) There is no clear sense of community priorities in the use of the funds. The program funds all sorts of activities – day care centers, community newspapers, senior care management, youth activities and on and on – in a grab bag approach. Further, there is no rationale for how dollars are allocated. Why does one program receive \$10,000 and another \$25,000? The answer often lies in how much they received the prior year or how much funds were available the year they initially were funded.

2) The application process is opaque. Applicants have no idea how their applications are reviewed. There is no system to rate and rank the applications and projects. Are funds awarded to the best written applications? Well conceived and successful programs? Those with close connections to City Councilors? Those awarded funds in the past? Those meeting significant and emerging community needs? No one knows. Further, much of CMPAC's deliberations are based on conjecture and speculation. The Committee has no guidelines on which to base its decisions, just as applicants have no idea how they are judged.

3) Existing grantees have become "entitlements". The chances of receiving funds in the future are almost entirely based upon receiving funds in the past. Once you're in you're in. If you're not currently receiving funds, regardless of how worthy or important the program might be, chances of being awarded a grant are slim. Essentially, new applicants must displace long-time entrenched grantees to be awarded funds.

4) The program tends to fund "agencies" as opposed to investing in programs designed to achieve identified

results. Aside from counting program participants, the notion of achieving goals, outcomes or results is negligible.

5) The CDBG program as a whole has become associated in the minds of many community members, particularly those in the social service provider community, as a funder of social service agencies and programs. Many of these programs are closely linked to the social service “safety net” providing assistance to residents in desperate straights. The “community development” aspects of the program, consistent with the original intent of Congress and HUD and operation of the program in communities nation-wide has almost entirely been obscured.

From Here to There

First off, recognize that we understand that perfection is never possible. There will never be a perfect identification of priorities, everyone will not all agree on one set of programmatic goals. Councilors may object to any proposal that might negatively impact a program they support. Long-time recipients of funds will also object. We know this, but it should not deter us from moving the program closer to where it should lie.

The key to any reform initiative begins with educating the community – from City Councilors, City Staff, grant recipients, neighborhood organizations and the public at large about the block grant program. This includes an understanding of the new emphasis on outcomes and performance measurement.

A short list of initial actions:

Dialogues with significant interested parties:

- City Council Committees beginning with Health and Recreation
- Mayor Cohen
- Councilors in the eligible target neighborhoods
- Neighborhood Organizations
- Representatives of United Way

- Review HUD’s Table “2B” – The priority needs table
- Revise Public Service application
- Develop a “rating & ranking” procedure for all programs and applicants
- Identify time-frames for infrastructure projects to be funded
- Ensure neighborhood meetings address CDBG issues

Transition not Transformation

In closing, we emphasize the value and importance of the longstanding relationships we have with multiple community partners. We do not envision and are not recommending a radical transformation of the program in a short timeframe. Instead, we envision a period of transition akin to the changes that the United Way of Greater Portland has undergone.

TECHNICAL ANALYSIS AND RECOMMENDATIONS

1. Goals and Objectives

The central planning document of the City's HCD Program is the Consolidated Plan. The required content and structure of the Consolidated Plan is dictated by HUD regulations. At the heart of the Consolidated Plan framework is HUD Table 2B which identifies community development goals and priorities. For each identified priority, the community's unmet need must be measured and quantified. Planned program outcomes for the course of the plan along with available dollars to meet those goals must also be quantified.

Attached is a sample HUD Table 2B taken from HUD's current template (Attachment A).

Current Practices

In contrast to the sample Table 2B presented in Attachment A, Portland's Table 2B (Attachment B) is incomplete and goals are not adequately identified, prioritized, or quantified:

- The "Social Service Needs List" identifies a wide range of Public Service activities, all classified as "priority"
- Community Policing, the largest Public Service allocation, is not identified as a priority
- Parks and Public Works activities are absent from Table 2B and must be included
- All needs are identified as "priority"- HUDs low, medium, high format is not used
- Needs are not quantified, target goals are not identified

Observations

Without clear measurable goals to target, the program encounters challenges:

- Project selection process undefined / politicized
- CMPAC and City Manager given no policy framework to base recommendations
- Focus is on funding agencies, not outcomes
- Program funds the same agencies and activities year to year for decades
- Difficult to ascertain if CDBG dollars are used in the most appropriate and effective manner

Methods for annual reporting to HUD are expected to change as new computer-based systems are instituted. In the future, activities identified in the Annual Action Plan will be required to link directly to the identified needs in Table 2B of the Consolidated Plan.

Recommendations

With oversight and direction by the City Council:

- 1A. Initiate a public planning process to identify attainable and quantifiable community goals and priorities leading to the development of a complete Table 2B. Amend the Consolidated Plan accordingly. Do not be afraid to break from tradition as necessary and appropriate to reach these goals.
 - 1B. Ensure that this process is repeated semi-annually in increments of 3-5 years. Minor revisions may also be appropriate on a year-to-year basis.
-

2. Public Participation

All recipients of CDBG funds are required to enact a public participation plan as a key element of the Consolidated Plan. The intent of this requirement is to (1) better inform the public about community needs and the resources available to address those needs, (2) learn about hidden community needs and issues, (3) allow citizens and organizations to bring forward ideas on how to address community needs, and (4) generate involvement in and commitment to proposed solutions.

Current Practices

The City of Portland's Consolidated Plan includes a detailed and comprehensive public participation plan (Attachment C) outlining policies concerning (1) the role of the CMPAC Committee, (2) the annual publication and distribution of the HCD Brochure, (3) the convening neighborhood meetings, (4) special solicitation of information from housing and social service agencies, and (5) communication of plans to adjacent jurisdictions.

The stated goal of the participation plan is to ensure an "effective participation process" that "encourages input from all Portland residents" especially low and moderate income persons living in eligible areas.

Observations

The City's participation plan is quite complete and comprehensive but, in practice, does not function as intended:

- A review of five years of transcripts reveals that the HCD meetings seldom, if ever, touch on topics related to eligible program activities. While these are extremely valuable and worth while community meetings, they do not currently inform the HCD process in any quantifiable, direct, or meaningful way.
- CMPAC and the City Manager are unfairly asked to provide budget recommendations to Council absent clear program priorities or meaningful public input.
- Staff's experience is that many citizens and subrecipients, particularly those with longer involvement with the program, openly dismiss the public participation process and focus their attention on lobbying their City Councilors.

Recommendations:

With oversight and direction by the City Council:

- 2A. Restructure the annual HCD meetings so as to satisfy the spirit and intent of the City's public participation plan and HUD's citizen participation requirements.
 - Open meetings with a formal staff presentation on the program.
 - Facilitate the meeting so as to concentrate at least 50% of the dialogue on priorities for the HCD program.
 - Compile and present relevant public input to the full Council and the CMPAC Committee.
 - 2B. Provide the CMPAC Committee with:
 - (1) A complete table 2B, priority needs list; and
 - (2) A clear rating and ranking process to inform their recommendations.
-

3. Project Selection

HUD's model for CDBG program budget planning and annual project selection is based on a cyclical process assessing community needs periodically and refining goals and priorities accordingly. Under this model, identified priority needs guide current program and project selection. By repeating this process every few years, programs become responsive and affective at addressing changing community needs.

Current Practices

The City of Portland has used CDBG funds to support roughly the same activities at the same allocation ratios for decades without substantive refinement of goals and priorities. Without defined community needs and objectives or meaningful, informed public input, project selection has come to take its cues more from tradition than process.

Observations

A scattershot approach to funding public services means that:

- Meaningful, measurable outcomes are difficult to quantify
- Selection process funds favored agencies, not desired outcomes
- Administrative and managerial resources are spread thin servicing numerous contracts decreasing opportunity for meaningful City-Agency relationships

Recommendations

With oversight and direction by the City Council:

- 3A. Create a comprehensive priority needs list to target desired program outcomes which are attainable with resources available. Limited resources will mean limited priorities and limited numbers of projects.
 - 3B. Design and implement a clear, transparent RFP process including a rating and ranking system leading to the selection of the best programs and projects. Namely, those programs and projects that demonstrate an ability to address priority needs in the most direct, effective, and quantifiable way.
-

ATTACHMENT A: Sample Table 2B – Required Priority Needs Reporting Format

Sample HUD Table 2B

PRIORITY COMMUNITY DEVELOPMENT NEEDS	Priority Need Level High, Medium, Low, No Such Need	Unmet Priority Need	Dollars to Address Unmet Priority Need	Goals
PUBLIC FACILITY NEEDS (projects)				
Senior Centers				
Handicapped Centers				
Homeless Facilities				
Youth Centers				
Child Care Centers				
Health Facilities				
Neighborhood Facilities				
Parks and/or Recreation Facilities				
Parking Facilities				
Non-Residential Historic Preservation				
Other Public Facility Needs				
INFRASTRUCTURE (projects)				
Water/Sewer Improvements				
Street Improvements				
Sidewalks				
Solid Waste Disposal Improvements				
Flood Drain Improvements				
Other Infrastructure Needs				
PUBLIC SERVICE NEEDS (people)				
Senior Services				

APPENDIX A

Handicapped Services				
Youth Services				
Child Care Services				
Transportation Services				
Substance Abuse Services				
Employment Training				
Health Services				
Lead Hazard Screening				
Crime Awareness				
Other Public Service Needs				
ECONOMIC DEVELOPMENT				
ED Assistance to For- Profits(businesses)				
ED Technical Assistance(businesses)				
Micro-Enterprise Assistance(businesses)				
Rehab; Publicly- or Privately-Owned Commercial/Industrial (projects)				
C/I* Infrastructure Development (projects)				
Other C/I* Improvements(projects)				
PLANNING				
Planning				
TOTAL ESTIMATED DOLLARS NEEDED:				

ATTACHMENT A: Sample Table 2B – Required Priority Needs Reporting Format

ATTACHMENT B: Current Table 2B from the City of Portland's Consolidated Plan**Consolidated Housing and Community Development Plan**
Social Services Priority Needs List

The services listed within each grouping below are **NOT** listed in order of priority.

HIGHEST PRIORITY

- HOUSING:** Location and referral services, residential support services, operational support for housing for homeless, special needs populations and immigrants/refugees and shelter beds for individuals and families.
- FOOD:** Prepared meals programs, soup kitchens and food banks
- FAMILY SUPPORT SERVICES:** Affordable child care for low income families, particularly for infants under two including infant and toddler preschool, after school and early-intervention programs seven days a week, and 24 hours a day. Outreach, referral, treatment, counseling and case management for domestic violence, parenting support, crisis intervention and substance abuse programs including services targeted to refugees/immigrants and ethnic minorities.
- HEALTH CARE:** Access and outreach for homeless, disabled and special needs populations, un- and under-insured adults and children, immigrants/refugees and ethnic minorities with a special emphasis on affordable medications and preventive health care and programs addressing behavioral causes of disease e.g. smoking, nutrition, exercise, substance abuse, sexual transmission of disease, domestic violence, child and elder abuse, sexual assault, animal cruelty. Community programs addressing prevention and early intervention for cardiovascular disease, cancer, emphysema and diabetes.
- MENTAL HEALTH CARE:** Outreach, referral, treatment, counseling and case management for mental health and substance abuse programs serving low income, homeless, refugees/immigrants, ethnic minorities and special needs populations. Drug and alcohol rehabilitation programs. Access to mental health services for low income families and violence prevention programs.
- CRISIS COUNSELING & CASE MANAGEMENT:** Services for victims of rape and abuse and victims of domestic violence including legal services and services targeted to refugees and immigrants.

HIGH PRIORITY

ADOLESCENT SUPPORT

SERVICES: Outreach, referral, treatment, counseling and case management, education and training, residential support, substance abuse and recreation programs, substance abuse prevention programs and school-based health and mental health services.

SENIOR SERVICES: Outreach, referral and delivery of elder care management services, including health care, recreation and home care programs, transportation services, minor home repairs and elder abuse prevention.

EMPLOYMENT/EDUCATION/

TRAINING: Pre-employment, training, and employment services for low income, homeless, special needs populations, refugees/immigrants and ethnic minorities.

PRIORITY

HIV-AIDS: Outreach, referral, counseling, case management and residential support services for persons with HIV and AIDS. Prevention programs in schools and for high risk populations.

HOMEMAKER

SERVICES: Outreach, referral, and delivery of non-health home care services for special needs populations, refugees and immigrants.

RECREATION: General recreation programs for low income, refugees/immigrants and special needs populations.

LEGAL SERVICES: Legal services for low income, homeless, special needs populations, immigrants/refugees and victims of domestic violence

NEIGHBORHOOD

ORGANIZATIONS: Public information services as well as advocacy and assistance

ATTACHMENT C: Current Approved Public Participation Plan from the City of Portland's Consolidated Plan**Section III - Citizen Participation Plan****Introduction**

The City of Portland has had an adopted Citizen Participation Plan since the inception of the Community Development Block Grant Program in 1975. The original plan is in compliance with Section 104(a)(3) of the Housing and Community Development Act of 1974 and was the basis for a revision made in 1995 as part of the 1995-99 Consolidated Housing and Community Development Plan. The revised plan was required and in compliance with federal regulations for the Consolidation of Community Planning and Development Programs of the U. S. Department of Housing and Urban Development, 24 CFR Part 91. It is the basis of the 2005-2010 Citizen Participation Plan that incorporates certain minor revisions, but remains in compliance with federal regulations.

The purpose of the Citizen Participation Plan is to ensure that the City undertakes an effective public process that encourages input and participation from all citizens, non-profit organizations and other interested parties. The Citizen Participation Plan also ensures that the aforementioned have access to meetings, information and public hearings on the Consolidated Housing and Community Development Plan. Technical assistance must also be provided, upon request, to organizations that would like to develop proposals for funding under the City's Housing and Community Development Program.

The Citizen Participation Plan must encourage the participation and input of all Portland residents, especially lower income persons living in neighborhoods that are eligible for and targeted for activities funded by the Community Development Block Grant and other HUD programs. Residents of Portland Housing Authority developments and Section 8 recipients are also encouraged to become involved in the process of developing the City's Consolidated Plan as are minorities, non-English speaking persons and persons with disabilities.

Citizens are also encouraged to participate in any proposed amendments to the Consolidated Plan and annual performance reports submitted to HUD.

Participation

In order to encourage participation, involvement and input from a broad range of Portland citizens, particularly low-income persons, public housing residents, racial and ethnic minorities and persons with disabilities, the City will implement the following elements of its Citizen Participation Plan.

- * City Manager's Policy Advisory Committee (CMPAC)

The City Manager's Policy Advisory Committee is responsible for providing advice to the City Manager on the Housing and Community Development needs and priorities of the city. Specifically the social, economic, housing and neighborhood revitalization needs and their relative priorities within the community. CMPAC also advises strategies for addressing those

ATTACHMENT C: Current Approved Public Participation Plan from the City of Portland's Consolidated Plan

needs and recommends annual activities that implement the strategies and will be funded under the Housing and Community Development Program. CMPAC also advises the City Manager as to the program's performance.

CMPAC is an ongoing Committee with broad representation from several neighborhood organizations, the United Way of Greater Portland, NAACP, Portland Housing Authority, Portland Housing Authority tenants, landlords, Downtown Portland Corporation, persons with disabilities and senior citizens. By-laws and membership of CMPAC as of January 2005 are available in the Housing and Neighborhood Services Office.

* Housing and Community Development Brochure

Each year the City will produce and mail to every household in the city an informational brochure regarding the Housing and Community Development Program. At a minimum the informational brochure will announce the schedule for and location of the annual neighborhood meetings, summarize key housing, community and economic development activities accomplished during the proceeding year, identify key City and School Board officials and encourage participation and input into the development of the Consolidated Housing and Community Development Plan and Annual Updates. Translation of the brochure and any additional information requested will be offered in the brochure in 10 languages. On occasion the brochure may include a citizen survey to solicit input from the public directly.

* Neighborhood Meetings

Each year the City will hold a series of six neighborhood meetings to inform the public of the Housing and Community Development Program and anticipated funding. Input from the public will be solicited at the meetings with regard to specific activities, need for and location of future activities. The City will also use these meetings to inform the public of the Consolidated Plan development process.

* Special Solicitation

The City will request information from housing and social service organizations that provide services in Portland for inclusion in the Consolidated Housing and Community Development Plan. Specifically information regarding current needs, future trends and strategies for addressing these needs and the performance of the City's recent activities will be solicited.

* Adjacent Jurisdictions

In order to inform towns and cities adjacent to Portland of the purpose and process of developing the Consolidated Plan, the City will publish information in the regular newsletter of the Greater Portland Council of Governments or contact GPCOG member jurisdictions directly. These jurisdictions also have access to advertisements placed in the Portland Press Herald. The City of Portland will seek comments from adjacent

jurisdictions on how planned or proposed activities may impact their communities.

ATTACHMENT C: Current Approved Public Participation Plan from the City of Portland's Consolidated Plan

Access to Information

Prior to the adoption of the Consolidated Plan, the City will make available to citizens, public agencies and other interested parties information regarding the purpose and process for developing the Plan, the anticipated funding to be received and the range of activities that are eligible and planned to be undertaken.

The City will use many of the same mechanisms described in the previous section to provide access to this information including the network created by CMPAC, the informational brochure, special solicitations to groups such as the Emergency Shelter Assessment Committee, and the six annual neighborhood meetings.

Beyond the mechanisms previously described, the City will also take the following steps to provide access to information on the Plan.

1. Publish a summary of the proposed Consolidated Plan in the Portland Press Herald, prior to the 30-day public comment period.
2. Make the proposed Consolidated Plan available for review on the City of Portland's website and at City Hall in the Housing and Neighborhood Services Office, Room 312.
3. Conduct a 30-day public comment period to receive comments from citizens, public organizations, other interested parties and stakeholders. The 30-day comment period will be advertised in a legal notice placed in the Portland Press Herald prior to its commencement. Translation services for non-English speaking persons will be made available as requested.
4. Citizens, public agencies and other interested parties will also have access to records (on a timely basis) relating to the City's Consolidated Plan, proposed activities and the use of funding over the previous five years. Translation services for non-English speaking persons will be made available as requested. Records are available at the Housing and Neighborhood Services, Room 312 City Hall, 389 Congress Street.

Public Hearings

In addition to the six public neighborhood meetings which are held prior to publishing the proposed Consolidated Plan for comment, the City will hold a minimum of two public hearings each year to obtain citizen input on housing and community development needs, development of proposed activities and program performance.

The public hearings will be held prior to the City Council's adoption of the Consolidated Plan and vote on its annual budget plan. The City will notify the general public of the time and dates of the hearing by placing a legal advertisement in the Portland Press Herald at least 15 days prior to the date of the hearing. The City will also notify public agencies, organizations and other stakeholders through a special mailing 7-10 days prior to the

hearing.

The public hearings will be held at Portland City Hall in City Council Chambers in the early evening between 5:00 and 9:00 p.m.

ATTACHMENT C: Current Approved Public Participation Plan form the City of Portland's Consolidated Plan

Technical Assistance

The City's Housing and Neighborhood Services Office offers technical assistance, upon request, to any organization or agency serving or interested in serving low income neighborhoods and persons for the purpose of developing proposals to request funding under Housing and Community Development programs and activities. Technical assistance may take the form of information regarding the time frame for applications, eligibility of specific activities and completion of the application forms including appropriate budget pages. This technical assistance is available upon request from Housing and Neighborhood Services staff in Room 312 City Hall, 389 Congress Street or by calling 874-8731.

Comments and Complaints

The City will consider all comments, whether received in writing or orally, during the development of the Consolidated Housing and Community Development Plan and related performance report. A summary of the comments received in the preparation of the plan, and in the case of those comments or suggestions not incorporated into the Plan the reason why, will be attached to the final Consolidated Plan, amendment of the plan, or performance report.

The City will respond to all complaints regarding the Consolidated Plan, or activities implemented under the Plan, in writing within 15 working days of receiving said complaints where feasible. Responses will be substantive, where appropriate. If a complainant remains unsatisfied the Housing and Neighborhood Services staff will bring the complaint to the City Manager for review and resolution. If warranted, the City Manager may refer the complaint to the City Council for review and resolution.

Amendments to the Consolidated Housing and Community Development Plan

Due to changes in local needs during the program year amendments and revisions to the Consolidated Plan may be necessary. Some of them may be substantial amendments that significantly alter the priorities of the 5-year strategy and the activities within the annual plan. Most will be minor in nature, requiring only insignificant shifting of funds from one account to another in order to complete an approved activity.

This may include the reprogramming of contingency or surplus funds. The following criteria will govern how the City implements substantial amendments and funding revisions.

1. Substantial Amendments

Substantial amendments are defined as follows:

- * The City proposes to use more than 25% of its fiscal year allocation, from any one HUD Program, to undertake one or more new activities.

ATTACHMENT C: Current Approved Public Participation Plan from the City of Portland's Consolidated Plan

- * The City proposes to alter the location or beneficiaries of previously approved activities whose cost exceeds 25% of the fiscal year allocation for any one HUD Program.
- * The City proposed to alter the 5 year strategy within the Consolidated Plan by adding a new priority, previously not considered, in order to undertake new activities that fiscal year.

Substantial amendments require a written submission to HUD for approval prior to implementation. Prior to submission to HUD the following steps will be completed.

- a. The City Manager's Policy Advisory Committee will review and comment on the proposed change to the City Manager.
- b. A legal notice will be placed in the Portland Press Herald describing the proposed change a minimum of 15 working days prior to City Council consideration.
- c. The City Council will hold a public hearing on the proposed change(s) prior to its review and approval.

2. Funding Revisions

Funding revisions are defined as minor programmatic or budgeting changes necessary to fund new activities or secure adequate funding to complete approved activities. Funding revisions will be addressed in the following ways.

- a. Any new activities proposed to be funded with either reprogrammed contingency or with monies from another account will require City Council approval, preceded by a public hearing. The City Manager's Policy Advisory Committee may review and recommend action to the City Manager prior to City Council action.
- b. Any fund transfer from one activity to another that increases the under funded activity in excess of 25% of the original allocation will require City Council approval preceded by a public hearing.
- c. Any fund transfers from one approved activity to another (including contingency funds), in an overrun/under-run situation, will be approved on an administrative basis.

Adoption of the Citizen Participation Plan

The Citizen Participation Plan will be adopted as part of the City's Consolidated Housing and Community Development Plan, thereby going through the same process of local review and public comment, ending with a

30 day public comment period and City Council approval.

Amendments and changes to the Citizen Participation Plan will be addressed in the annual update of the Consolidated Housing and Community Development Plan.

