



CDBG and HOME 2021-22 ANNUAL ACTION PLAN FOR INDEPENDENCE, MO



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Executive Summary

AP-05 Executive Summary - 24 CFR 91.200(c), 91.220(b)

1. Introduction

The City of Independence, Missouri is an entitlement grantee that receives Community Development Block Grant (CDBG) and Home Investment Partnerships (HOME) funding from the United States Department of Housing and Urban Development (HUD). As a condition of funding, the City performs a broad range of housing and community development activities to promote the revitalization of neighborhoods and address the needs of low and moderate-income households. The City's acceptance of entitlement funds requires the City of Independence prepare and submit to HUD a Five (5)-Year Consolidated Plan that suitably determines a needs analysis of the City's demographics and similarly considers the stated and unmet needs of citizens and stakeholders. The City's Five-Year Consolidated Plan was approved by the City Council and submitted to HUD on July 14, 2017. It serves as an application for funding and a planning guide for the use of federally funded program activities. The Plan documents the City's efforts to ensure an engaging Citizen Participation process occurred in the planning of these activities.

Each year of the five-year strategy, the City of Independence is required to prepare a one-year Action Plan to notify citizens and HUD of planned (funded) activities for the upcoming program year. Each annual Action Plan also takes into account citizen and stakeholder input collected during an annual citizen participation process, and all actions proposed for funding must relate directly to the adopted Consolidated Plan. Each Action Plan is due to HUD within 45 days from the beginning of the application fiscal year. Pending HUD's approval of the Action Plan, the City will receive Community Development Block Grant (CDBG) and HOME Investment Partnerships (HOME) funds in an amount by federal formula. The funding notification for 2021-22 CDBG funds of \$821,542 and HOME funds of \$465,330. The City is also reprogramming approximately \$32,511 in prior year CDBG; using carryovers of CDBG administration funds.

Regulations governing the CDBG program require that each activity undertaken with CDBG funds meet one of the following three broad national objectives:

- Benefit people with low and moderate incomes
- Aid in the prevention or elimination of slums and blight
- Meet an urgent need (such as earthquake, flood, or tornado relief)

In order to aggregate accomplishments on a national level, HUD has prescribed standardized objectives and outcomes for reporting achievements. The primary objective of the CDBG program is to develop viable urban communities. Based upon this intent one of the following three objectives best describe the purpose of an activity:

- Provide decent housing (DH);
- Provide a suitable living environment (SL); and/or
- Expand economic opportunities, principally for lower income persons (EO).

Each activity must also meet specific performance outcomes to at least one of the following:

- Availability/Accessibility (1);
- Affordability (2); or
- Sustainability - Promoting Livable or Viable Communities (3).

2. Summarize the objectives and outcomes identified in the Plan

This could be a restatement of items or a table listed elsewhere in the plan or a reference to another location. It may also contain any essential items from the housing and homeless needs assessment, the housing market analysis or the strategic plan.

Outcome: Decent Housing for low/mod income households including special needs populations, homeless, and at-risk homeless

Objectives:

- Return of deteriorated buildings as affordable housing when feasible; demolition of dangerous structures deemed beyond rehabilitation and a public safety concern;
- Improve housing stock through correction of deficiencies/installation of energy efficiency measures to reduce utility burden;
- Reinvest in existing, multi-family rental properties to restore quality, affordable housing
- Provide subsistence level rent/utility assistance, and other relevant supportive services, to prevent homelessness;

Outcome: Suitable Living Environment for low/mod income households including special needs populations, homeless, and at-risk homeless

Objective:

- Install public facility improvements/infrastructure in unimproved/underserved areas, and areas of low-income concentration;
- Invest in programs and projects that enhance quality of life and increase family success;
- Restore neighborhoods and preserve property values through the removal of blighting conditions and the increase of safety;
- Support programs that provide for the basic needs of vulnerable populations;

Outcome: *Expanded Economic Opportunities for low/mod income households including special needs populations, homeless, and at-risk homeless*

Objectives:

- Provide job training and job creation/retention activities that offer low/mod income persons the opportunity to earn a living wage;
- Provide direct assistance to small business and economic development activities that promote the long-term economic and social viability of the community;
- Support empowerment and self-sufficiency programs for low-income persons to reduce generational poverty;
- Assist low/mod income, at-risk homeless and special needs households to become homeowners;

3. Evaluation of past performance

During the 2020-21 plan year, CDBG and HOME Program funding was used to cover minimal administration cost; while the city maximized project expenditures and investment in home repairs, code enforcement, blight removal, development of affordable housing, and substantial infrastructure such as street replacement, curb and sidewalk improvement in areas of most need through public facility improvement projects. The City invested CDBG funding in public services activities that provided:

- nutritious meals for seniors in congregate and home delivered forms,
- rent subsidy to prevent eviction and utility disconnection prevention assistance,
- domestic violence victim shelter operation and outreach,
- child abuse prevention case management and
- operations support for homeless shelters, transitional housing, and nonprofit neighborhood organizations meeting the needs of very low, low and moderate income households.

The established objectives are carefully weighed and compared with the 2019-20 Consolidated Annual Performance Evaluation Report (CAPER) to ensure ongoing progress toward Consolidated Plan performance benchmarks.

4. Summary of Citizen Participation Process and consultation process

Summary from citizen participation section of plan.

During this collaborative process City staff has held and participated in a wide-range of engagement opportunities, including:

- Neighborhood & community meetings
- ESF-6 meetings
- Public hearings
- Inter-departmental coordination
- One-on-one nonprofit partner and public service agencies consultations
- One-on-one citizen engagement through partnering agencies and via City staff's email correspondence with residents responding to a newsletter invite
- Participation in regional planning efforts including the Kansas City Continuum of Care for the Homeless, the KC Regional Consortium on Fair Housing, Independence Community Connect (formerly Hungry and Homeless Coalition), MARC's Community for All Ages Initiative and AFFH Partnership with five other metro jurisdictions.

5. Summary of public comments

Public comments received were primarily focused on:

- Senior Services at Palmer Senior Center
- Support of Public Service agencies with CDBG funds
- Substantial rehab for low income homeowners with HOME funds
- Sidewalk replacement assistance for income eligible homeowners
- Minor home repair grant programs
- Section 108 Loan for infrastructure, home repairs and public facility improvements
- Nutrition programs for Seniors
- Alternative low cost home purchases and repair loans
- Work with seniors who are on a fixed income
- Dangerous tree removal assistance
- Support for public transit

6. Summary of comments or views not accepted and the reasons for not accepting them

All public comments received have been included in the Annual Action Plan.

7. Summary

The Five Year Consolidated Plan for years 2017-2021 identifies goals, objectives and strategies to address Independence's housing and community development needs. These needs were identified through an extensive citizen participation process that involved residents, service providers and other community partners. The Consolidated Plan guides the City's use of CDBG and HOME Program resources towards the goals of ensuring decent and safe housing, a suitable living environment and expanded economic opportunities are made available to low and moderate income residents. Over the remaining two years, the City of Independence will continue to strive towards these goals by funding and supporting economic development, affordable housing programs, services for non-homeless special needs populations, neighborhood stabilization and public improvements, as well as, partnerships with an array of public and homeless service providers. Accomplishments to date, attest to the increasing need and the City's efforts to meet such demand.

DRAFT

PR-05 Lead & Responsible Agencies – 91.200(b)

1. Agency/entity responsible for preparing/administering the Consolidated Plan

Describe the agency/entity responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

Agency Role	Name	Department/Agency
CDBG Administrator	Tom Scannell	Community Development Department
HOME Administrator	Tom Scannell	Community Development Department

Responsible Agencies Table

Narrative (optional)

Community Development Department staff provide the administration of the CDBG and HOME grants. The HOME Construction Project Specialist conducts contract management and building inspections for all HUD funded housing projects undertaken by the City.

Consolidated Plan Public Contact Information

Community Development Department
Neighborhood & Housing Services Division
City of Independence
111 E. Maple Ave.
Independence, Mo 64050
816-325-7398
Office Hours: M-F 8:00 a.m.-5:00 p.m.

AP-10 Consultation – 91.100, 91.200(b), 91.215(I)

1. Introduction

The 2021-22 Annual Action Plan was developed by the Community Development Department Staff in consultation with a wide range of non-profit community stakeholders and Independence residents. Staff developed the plan's priorities with significant consideration given to feedback provided through an extensive community engagement process that adheres to the 2016 Citizen Participation Plan. The engagement process was further expanded by opportunities that were presented in the formulation of the Strategic Plan-Independence for All and the Comprehensive Plan-Imagine Independence 2040, in which residents and stakeholders were a part of intense focus and discussion panels that provided additional guidance to meet the needs of Independence's residents. City Council adopted the 2017-2021 Strategic Plan on February 16, 2017 and Imagine Independence 2040 in April 2018.

The City's various departments engage community-based, local agencies and regional planning organizations year-round concerning matters related to the Comprehensive Plan and Annual Action Plan. One of these organizations, the Mid-America Regional Council (MARC), sponsors regular discussion on a number of issues related to the Consolidated Plan. As the premiere planning organization for the Kansas City region, MARC formulates regional approaches to issues such as transportation, homelessness, and public health. Independence's participation in MARC initiatives such as the First Suburbs Coalition, Community for All Ages, Transportation 2040/Smart Moves 3.0 Regional Transit and Mobility contributes valuable insight towards development of the 2020-21 Action Plan.

In addition, the City consults with the Greater Kansas City Continuum of Care, Independence Housing Authority, and Independence Community Connect (formerly Hungry and Homeless Coalition). The Kansas City Regional Affirmatively Furthering Fair Housing Consortium (Cities of Independence, MO, Leavenworth, KS, Kansas City, KS and Kansas City, Mo and Blue Springs, MO) were instrumental in development of the Consolidated Plan and Annual Action Plan document. In the preparation of the Action Plan, the City gathered fact finding and statistical data to assess housing needs and conditions from the many agencies including American Community Survey, U.S. Census, Comprehensive Housing Affordability Strategy (CHAS), Housing Authority of Independence, the Independence Council for Economic Development, the Independence School District, Kansas City Region Continuum of Care, and Local Investment Commission (LINC). This information supplemented the City's plan document concerning housing and special population needs.

Provide a concise summary of the jurisdiction's activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies (91.215(I))

The City of Independence benefits from a mature network of regional public and assisted housing providers and private and governmental health, mental health and service agencies that are connected

in the delivery of services and programs through the use of Case-worthy (formerly MAACLink) a Homeless Management Information System (HMIS) and social service software suite developed and maintained by the Mid-America Regional Council, serving as the lead agency. The system contains vital information regarding services provided to individuals throughout the community. Access to this information helps service agencies manage limited resources more efficiently by: Minimizing duplication of services; Capturing information about unmet community needs; and Identifying households that could benefit from more comprehensive case management or support services.

The Regions' service coordination is further enhanced through local agency participation in the Kansas City region's Continuum of Care and the Independence Community Connect Coalition, both of which focus on serving the unmet housing and social service needs of our regions' homeless and at-risk homeless populations.

Finally, the Kansas City Metropolitan Area Emergency Support Function (ESF-6) is designed to:

- Facilitate the exchange of information among jurisdictions during incidents of a regional nature involving mass care, emergency assistance, temporary housing and human services activities.
- Assist the jurisdictions in the metropolitan area in considering multi-jurisdictional issues when accomplishing local mass care, emergency assistance, temporary housing and human services activities.
- Promote a coordinated regional approach to providing mass care, emergency assistance, temporary housing and human services assistance when the needs of the event impact, tax or overwhelm existing local capabilities.

The Temporary Housing component of ESF-6 provides short-term temporary housing to those affected by the incident. Temporary housing options including rental, repair and loan assistance; replacement; factory-built housing; semi-permanent construction; referrals; identification and provision of safe, secure, functional and physically accessible housing; and access to other sources of temporary housing assistance. The Human Services component provides other victim related recovery efforts such as crisis counseling, ongoing support for special populations, and coordinating the provision of local, state and federal disaster assistance.

Describe coordination with the Continuum of Care and efforts to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans, and unaccompanied youth) and persons at risk of homelessness.

The City of Independence is a participating member in the Kansas City/Jackson County Continuum of Care (CoC) which encompasses Kansas City, Independence, Lee's Summit and all unincorporated portions of Jackson County, MO. Coordination of efforts to identify and address the needs of the homeless and at risk homeless is an ongoing effort involving a broad network of local and regional nonprofit and government agencies who are charged with serving the region's homeless. Activities of

the CoC include regular membership meetings, planning sessions, plan development, training, service events, funding applications, and completion of the annual Point in Time count that collects information about the regional homeless population that will help to more accurately define the nature and extent of homelessness in the community. Agencies awarded funding through the CoC are called to implement projects and programs that will assist the region in carrying out its coordinated strategy for ending homelessness. At the local level, the City of Independence's Independence Community Connect Coalition is a body made up of community leaders, Independence service providers and City staff that coordinates local efforts to increase community awareness and outreach programs for the homeless. Coalition members meet monthly in order to maintain open communication and coordinate all services provided. Agency members who also participate in the CoC work to tie the efforts of the Coalition into the regional strategy for reducing homelessness.

Describe consultation with the Continuum(s) of Care that serves the jurisdiction's area in determining how to allocate ESG funds, develop performance standards for and evaluate outcomes of projects and activities assisted by ESG funds, and develop funding, policies and procedures for the operation and administration of HMIS

The City of Independence does not receive or administer ESG funding. The City has determined waiving it's option to apply to the State of Missouri Family Services Division for Emergency Solutions Grant funding is the most cost effective and efficient way for local service providers and shelters to benefit from Emergency Solutions Grant funds.

2. Describe Agencies, groups, organizations and others who participated in the process and describe the jurisdiction's consultations with housing, social service agencies and other entities

Community Services League, Salvation Army and Hope House receive ESG funding from the State of Missouri for shelter operations, transitional housing and rapid rehousing of those in shelter. All identified agencies within the jurisdiction including those administering ESG funds - are given opportunity to provide input on housing and community development needs during the preparation of the plan. The City maintains a database of service providers within Independence for resident referral and solicitation of comment.

Table of Agencies, groups, organizations who participated

1	Agency/Group/Organization	Housing Authority of Independence
	Agency/Group/Organization Type	PHA
	What section of the Plan was addressed by Consultation?	Public Housing Needs Homeless Needs - Families with children
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Input received from the IHA Executive Director, Mr. Michael Bishop, states the largest unmet need seen by the PHA is actual affordable housing. He stresses that does not mean properties developed with LIHTC which sets a below market rent, but is not based upon the actual amount a low income person can afford. The current waiting list at the time of this consultation for Section 8 was approximately 1,300; the waiting list for Public Housing was well over 3,000. He recommends an annual set-aside of CDBG funds for the Housing Authority. He also poses the question of State LIHTC to reform laws to have a set-aside for PHAs, for new construction or use of the LIHTC to renovate existing stock to be able to provide a more sustainable product that the City will be proud of and the people living in them. Unfortunately, the need for funds greatly exceeds the allocations and this is not planned in the near future.
2	Agency/Group/Organization	Hillcrest Transitional Housing of Mid-America
	Agency/Group/Organization Type	Housing Services - Housing
	What section of the Plan was addressed by Consultation?	Homeless Needs - Families with children

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Input received directly from Cotton Sivils, VP of Development at Hillcrest Transitional Housing of Mid-America, he suggests the need for affordable housing and workforce housing is the greatest need. These would be followed by transportation. He feels the transportation system is not as comprehensive as it needs to be in terms of hours of operation and destinations. With transportation dollars stretched to meet current services, and a substantially larger bus system than surrounding suburbs the City is unable to increase services in the near future.
3	Agency/Group/Organization	SALVATION ARMY CROSSROADS SHELTER
	Agency/Group/Organization Type	Services-homeless
	What section of the Plan was addressed by Consultation?	Homeless Needs - Chronically homeless Homeless Needs - Families with children
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	In an interview with Ms. Cathy Asher, Shelter Director at Crossroads, the need for additional emergency shelter for individuals and families is great, with approximately 200 families turned away due to overcrowding from the family shelter and the inability to shelter individuals at their location.
4	Agency/Group/Organization	Independence Meals on Wheels
	Agency/Group/Organization Type	Services-Elderly Persons Services-Persons with Disabilities
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	In an interview with Mr. Howard Penrod, the increase of requests for home delivered meal subsidies has increased 130% in the last year. A larger number of clients are no longer able to afford the daily co-pay/cost of the home delivered meals and are turning to the CDBG funding provided by the City to supplement the co-pay.

5	Agency/Group/Organization	COMMUNITY SERVICES LEAGUE
	Agency/Group/Organization Type	Services-homeless Services-Employment Job Training
	What section of the Plan was addressed by Consultation?	Homeless Needs - Chronically homeless Homeless Needs - Families with children Non-Homeless Special Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	In an interview with the Executive Director and Vice President, a larger number of people seek assistance each year. Job training would be an important focus to increase the family income and financial literacy classes to teach budgeting and saving to those welcoming a new career and higher income from job training programs.

Identify any Agency Types not consulted and provide rationale for not consulting

All recommended agency types were consulted.

Other local/regional/state/federal planning efforts considered when preparing the Plan

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	Homeless Services Coalition of Greater Kansas City	Plan goals established to serve the unmet needs of the homeless and at-risk homeless in Independence strive to support the regional strategy of the Continuum of Care.
City of Independence Capital Improvement Plan	City of Independence	Where feasible, Plan goals are established to supplement and complement the goals of the City's Capital Improvement Plan.

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Independence 353 Redevelopment Plans	Multiple city approved 353 Redevelopment Corporations	Both the Strategic Plan goals and the goals of adopted 353 Redevelopment Plans focus on revitalization of blighted, low-income neighborhoods through reinvestment in housing stock, infrastructure, and community economic development.
Affirmatively Further Fair Housing	KC Regional Consortium	The Analysis of Impediments to Fair Housing identifies and analyzes the most significant barriers affecting fair housing choice at both the regional and local level, and outlines specific steps to address and overcome the effects of any impediments. The AI is a necessary component of the Five-Year ConPlan.
PHA Annual Plan	Independence Housing Authority	Like the ConPlan, the IHA's Annual Plan is used to express the Public Housing Authority's quantifiable goals and objectives for the 5-year period. Overlapping the purposes of the CDBG & HOME Programs, the primary mission of the Housing Authority is to provide affordable decent, safe and sanitary housing opportunities to low and moderate income families including elderly and disabled persons, while supporting programs to foster economic self-sufficiency.
Independence for All Strategic Plan	City of Independence	City adopted document outlining needs and goals of the City. Primary adopted goals are: 1. Customer-focused: Improve customer service and communication. 2. Financially Sustainable: Ensure City finances are stable and sustainable. 3. Growth: Increase economic prosperity of the community. 4. Quality: Achieve livability, choice, access, and health and safety through a quality built environment.
Community For All Ages	City of Independence	
Independence On a Roll Working Group	City of Independence	The Independence on a Roll Working Group (IRWG) was created for the purpose of advancing initiatives to improve the quality of life for all of Independence, maximize the historical and cultural attractiveness of Independence, create attraction to "Heritage" Independence, promote economic development and job creation, spur private investment and work in collaboration with existing community efforts. Their area of focus is in the western portion of the City of Independence.

Table of Other local / regional / federal planning efforts

Narrative (optional)

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AP-12 Participation – 91.105, 91.200(c)

1. Summary of citizen participation process/Efforts made to broaden citizen participation Summarize citizen participation process and how it impacted goal-setting

The Annual Action Plan identifies federal, state, local and private resources expected to be made available to the City of Independence to address priority needs and specific objectives identified in the Strategic Plan. These resources are summarized in SP35. The City anticipates a total allocation of \$821,542 in CDBG funding for the 2021-22 program year, and \$465,330 in HOME funding. Prior year CDBG funding in the amount of \$32,511 will be reallocated from projects completed under budget.

CDBG funds will be used for housing and community development activities including home rehabilitation, public facility and/ infrastructure improvements, public services, and administration of the City's CDBG program. HOME funds will be used for the development of affordable housing for homeownership.

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/ attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
4	Newspaper Ad	Non-targeted/ broad community	A Public Notice was run in The Examiner, a newspaper of general circulation on May 20, 2020 to accept 30 days of public		All comments received where considered in the Annual Action Plan.	

			comment on the proposed 2021-22 Annual Action Plan, and to inform the public of a Public Meeting at City Hall on June 21, 2020.			
6	Newspaper Ad	Non-English Speaking - Specify other language: Spanish	All newspaper and online posting of Public Notices published by the Community Development Department includes a Spanish accommodation for Limited English Proficiency persons (LEP)	No inquiries were received regarding language interpretation needs.	All comments received were considered in the Annual Action Plan.	
7	Public Meeting	Residents of Public and Assisted Housing	A notification of all Public Meetings, Public Hearing and Public Comment Periods are		All comments received were considered in the Annual Action Plan.	

			provided directly to Independence Housing Authority staff for distribution.			
8	Internet Outreach	Non-targeted/ broad community	All Public Meeting and Hearing information is posted on the City Community Development website and displayed on the main page calendar.		All comments received where considered in the Annual Action Plan.	www.ci.independence.mo.us/comdev/CDBG.aspx

Citizen Participation Outreach

Table of Citizen Participation Outreach

Expected Resources

AP-15 Expected Resources – 91.220(c)(1,2)

Introduction

The Five Year Consolidated Plan identifies the federal, state, local and private resources expected to be available to the City of Independence to address priority needs and specific objectives identified in the Strategic Plan. These resources are summarized in **SP35**.

The City was awarded \$821,542 in CDBG funding for the 2021-22 program year. No program income is expected, and \$32,511 in prior year un-spent CDBG funds will be used. CDBG funds will be used for housing and community development activities including public improvements, public services, low- to moderate-income home repair program and administration of the City's CDBG program. The City was awarded \$465,330 in HOME program funds for the 2021-22 program year. HOME funds will be used for the development of affordable housing.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	821,542	0	32,511	854,053	750,000	Based on current and prior trends, the City has consistently received approximately \$810,000 for the annual allocations. The City will re-allocate \$32,511 of 2019 CDBG funds originally targeted for administration to 2021 CDBG home repair program.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	465,330	0	0	465,330	450,000	Based on current allocation and prior trends, the City has received between \$300,000 and \$500,000 for the annual allocations.

Expected Resources – Priority Table

Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied

Federal funds received from HUD through the CDBG and HOME Programs will leverage a variety of other funding resources from private, state and local funds. Program activities not administered directly by the City will be allocated utilizing a competitive application process designed to give favor to projects leveraging the most funds from other resources. When appropriate, funds administered directly by the City for public improvement projects will be utilized in combination with other sources available to the City and, when eligible, will be provided as match in order to leverage grant assistance from regional, state and federal programs. HOME Program dollars are also allocated through a competitive application process and are treated by the City strictly as a gap financing source. This means that project developers must exhaust all other reasonably available funding sources before requesting HOME program assistance. Leveraged funds for HOME assisted projects include tax credits, tax abatements, private bank loans, donations, in-kind donations, and sweat equity. Match requirements, when applicable for HOME funded projects, will be satisfied through the donation of property, materials, construction labor, and sweat equity.

If appropriate, describe publically owned land or property located within the jurisdiction that may be used to address the needs identified in the plan

The city will make infrastructure improvements to ensure accessibility and safety in eligible low to moderate income census tracts. With the latest 2011-15 ACS data, Independence has been determined at 55.4% low-moderate income and will expand the use of CDBG funds to area benefit projects city-wide due to the new flexibility this creates.

Discussion

The City's anticipated funding allocation from CDBG will be utilized to address the City's goals for increasing the availability of quality accessible affordable housing, reducing and preventing homelessness, carrying out neighborhood revitalization in low and moderate income areas, enhancing quality of life for low and moderate income families through increased economic opportunity, and providing direct assistance to special needs populations. The City is fortunate to have a network of public or social service providers and other City departments to help address these goals through financial leveraging, coordination and collaboration. The City's anticipated funding allocation from HOME will be utilized to improve and increase affordable housing opportunities within the community.

Annual Goals and Objectives

AP-20 Annual Goals and Objectives

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Quality housing choice for all	2017	2021	Affordable Housing Fair Housing	City-wide	Home Repair and Energy Efficiency Improvements Vacant Residential Properties Reuse	HOME: \$418,797	Homeowner Housing Added: 2 Household Housing Unit Homeowner Housing Rehabilitated: 40 Household Housing Unit
2	Strong, healthy, well-balanced neighborhoods	2017	2021	Affordable Housing Non-Housing Community Development	CDBG Eligible Area Census Tracts	Code Enforcement and Blight Removal	CDBG: \$195,000	Housing Code Enforcement/Foreclosed Property Care: 2200 Household Housing Unit

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
3	Commitment to preventing and ending homelessness	2017	2021	Homeless	City-wide	Homeless Case Management & Counseling Homeless Shelters & Transitional Housing Subsistence Level Housing (rent/utility) Assistance Supportive Service for Homeless & At-risk Homeless	CDBG: \$48,000	Homelessness Prevention: 12000 Persons Assisted
4	Self-sufficiency and family success	2017	2021	Non-Housing Community Development	City-wide	Public Services for Special Needs Populations Subsistence Level Housing (rent/utility) Assistance Supportive Service for Homeless & At-risk Homeless	CDBG: \$24,200	Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit: 100 Households Assisted
5	Dependable care for those with special needs	2017	2021	Non-Homeless Special Needs	City-wide	Domestic Violence Prevention & Services Public Services for Special Needs Populations	CDBG: \$48,000	Public service activities other than Low/Moderate Income Housing Benefit: 3000 Persons Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
6	Ongoing Capacity Building	2017	2021	Program Administration & Capacity Building	City-wide	Support for the Institutional Delivery System	CDBG: \$166,353 HOME: \$71,508	Other: 2 Other
7	Local AFH Goal 1: Reasonable Accommodations Policy	2017	2021	AFFH Goal and Strategies #1	City-wide	Fair Housing	CDBG: \$0 HOME: \$0	Other: 1 Other
8	Local AFH Goal 2: Rental Ready Program	2017	2021	AFFH goals and Strategies #2	City-wide	Fair Housing	CDBG: \$0 HOME: \$0	Other: 1200 Other
9	Local AFH Goal 3: Fairmount Business District Plan	2017	2021	AFFH goals and strategies #3	CDBG Eligible Area Census Tracts	Fair Housing	CDBG: \$0 HOME: \$0	Businesses assisted: 1 Businesses Assisted
11	Reg AFH Goal 1: Expand Use of CDFI/NMTC	2017	2021	Affordable Housing Public Housing Homeless Non-Homeless Special Needs Non-Housing Community Development AFFH Regional Goal 1	City-wide	Fair Housing	CDBG: \$0 HOME: \$0	Other: 1 Other

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
12	Reg AFH Goal 2: Establish Fair Housing Website	2017	2021	Access to Fair Housing Information	City-wide	Fair Housing	CDBG: \$0 HOME: \$0	Other: 1 Other
13	Reg AFH Goal 3: Fair Hsg Education - Stakeholders	2017	2021	AFFH	City-wide	Fair Housing	CDBG: \$0 HOME: \$0	Other: 1 Other
14	Reg AFH Goal 4: Advocate for Universal Designs	2017	2021	AFFH	City-wide	Fair Housing	CDBG: \$0 HOME: \$0	Other: 1 Other
15	Reg AFH Goal 5: Regional Housing Mobility	2017	2021	Affordable Housing Public Housing AFFH	City-wide	Fair Housing	CDBG: \$0 HOME: \$0	Other: 10 Other
16	Reg AFH Goal 6: Develop Compact Use Zoning	2019	2021	AFFH	City-wide	Fair Housing	CDBG: \$0 HOME: \$0	Other: 1 Other
17	Reg AFH Goal 7: Develop Regional Hsg Locator	2017	2021	Affordable Housing AFFH	City-wide	Fair Housing	CDBG: \$0 HOME: \$0	Other: 1 Other
18	Reg AFH Goal 8: Encourage Affordable TOD by Zoning	2018	2021	Affordable Housing AFFH	City-wide	Fair Housing	CDBG: \$0 HOME: \$0	Other: 1 Other
19	Reg AFH Goal 9: Universal Design Incentive Policy	2019	2021	AFFH	City-wide	Fair Housing	CDBG: \$0 HOME: \$0	Other: 1 Other

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
20	Reg AFH Goal 10: Promote KC Degrees/KC Scholars	2017	2021	Affordable Housing Non-Homeless Special Needs AFFH	City-wide	Fair Housing	CDBG: \$0 HOME: \$0	Other: 1 Other
21	Reg AFH Goal 11: KC Rising Education and Job Train	2017	2021	AFFH	City-wide	Fair Housing	CDBG: \$0 HOME: \$0	Other: 1 Other
22	Reg AFH Goal 12: Transportation Option Partnership	2017	2021	AFFH	City-wide	Fair Housing	CDBG: \$0 HOME: \$0	Other: 1 Other
23	Reg AFH Goal 13: Align Regional Transit to Jobs	2017	2018	AFFH	City-wide	Fair Housing	CDBG: \$0 HOME: \$0	Other: 1 Other
24	Reg AFH Goal 14: Affordable Hsg Education Material	2017	2019	Affordable Housing AFFH	City-wide	Fair Housing	CDBG: \$0 HOME: \$0	Other: 1 Other
25	Reg AFH Goal 15: Fair Hsg Goals Metrics	2017	2021	Affordable Housing AFFH	City-wide	Fair Housing	CDBG: \$0 HOME: \$0	Other: 1 Other

Table of Goals Summary

Goal Descriptions:

1	Goal Name	Quality housing choice for all
	Goal Description	<p>CDBG and HOME program funds will be utilized to improve existing housing stock through correction of structural and mechanical deficiencies, installation of weatherization and energy efficiency measures to reduce utility burden, and installation of accessibility improvements. Activities may include acquisition of vacant and abandoned residential structures for rehabilitation and resell for homeownership.</p> <p>In the fourth year of the Consolidated Plan the City will continue to work with the adoption of a formal reasonable accommodation policy for housing that informs and provides clear direction to persons with disabilities on the process for making a reasonable accommodation request. Following adoption, the City will work with community organizations to make the disabled community aware of the policy and how to use it.</p>
2	Goal Name	Strong, healthy, well-balanced neighborhoods
	Goal Description	Funds will be used to support residential property maintenance code compliance enforcement in low and moderate income neighborhoods, and demolition of dangerous buildings on a spot blight basis.
3	Goal Name	Commitment to preventing and ending homelessness
	Goal Description	Funds will be used to assist homeless and at-risk homeless through the provision of emergency shelter, rent and utility assistance, subsistence level services, case management services, and transitional housing.
4	Goal Name	Self-sufficiency and family success
	Goal Description	Funds will be used to assist a variety of public service programs aimed at increasing self-sufficiency and family success including transitional housing for families in crisis, and transitional housing for pregnant teens.
5	Goal Name	Dependable care for those with special needs
	Goal Description	Funds will provide support for direct services to special needs populations including meal programs for seniors, the disabled, and supportive services for victims of domestic violence and child abuse.

6	Goal Name	Ongoing Capacity Building
	Goal Description	Support the effective administration of CDBG and HOME eligible programs and projects, and capacity building of local housing and community development organizations on an as needed basis.
7	Goal Name	Local AFH Goal 1: Reasonable Accommodations Policy
	Goal Description	
8	Goal Name	Local AFH Goal 2: Rental Ready Program
	Goal Description	The Rental Ready Program was adopted by the City Council in September 2016 with an effective date of June 1, 2017. Rental Ready is a program with goals to protect the health, safety and welfare of residents, maintain attractive and desirable neighborhoods, and ensure minimum standards for the interior of residential buildings. This Program applies to all residential rental units in the city and would require all properties to be licensed and pass a basic health and safety inspection every two years.
9	Goal Name	Local AFH Goal 3: Fairmount Business District Plan
	Goal Description	The Fairmount Business District Plan was approved by the City in October 2017. Over the 8-month planning process, the design team has worked extensively with the public, client, and consultants during the research, analysis, and conceptual design process. An ongoing public input process solicited feedback about existing conditions and proposed direction for the district plan. Client feedback from the City of Independence, MARC, and MoDOT has helped steer the master plan. Specifically this plan was desired to accomplish the following goals: • Equitably engage the Fairmount community and neighbors • Create a plan for all forms of transportation, considering MoDOT requirements • Create pedestrian connections throughout the area eliminating public safety hazards • Create streetscape enhancements to improve the overall pedestrian experience • Protect and restore the natural resources • Facilitate revitalization efforts in The Fairmount District and surrounding neighborhoods.
11	Goal Name	Reg AFH Goal 1: Expand Use of CDFI/NMTC
	Goal Description	

12	Goal Name	Reg AFH Goal 2: Establish Fair Housing Website
	Goal Description	
13	Goal Name	Reg AFH Goal 3: Fair Hsg Education -Stakeholders
	Goal Description	
14	Goal Name	Reg AFH Goal 4: Advocate for Universal Designs
	Goal Description	The City of Independence has required Universal Design be achieved in all funded HOME single family developments. Required Universal Design best practices were established in conjunction with the RL Mace Universal Design Institute.
15	Goal Name	Reg AFH Goal 5: Regional Housing Mobility
	Goal Description	
16	Goal Name	Reg AFH Goal 6: Develop Compact Use Zoning
	Goal Description	
17	Goal Name	Reg AFH Goal 7: Develop Regional Hsg Locator
	Goal Description	
18	Goal Name	Reg AFH Goal 8: Encourage Affordable TOD by Zoning
	Goal Description	

19	Goal Name	Reg AFH Goal 9: Universal Design Incentive Policy
	Goal Description	The City of Independence has required Universal Design be achieved in all funded HOME single family developments. Required Universal Design best practises were established in conjunction with the RL Mace Universal Design Institute.
20	Goal Name	Reg AFH Goal 10: Promote KC Degrees/KC Scholars
	Goal Description	
21	Goal Name	Reg AFH Goal 11: KC Rising Education and Job Train
	Goal Description	
22	Goal Name	Reg AFH Goal 12: Transportation Option Partnership
	Goal Description	
23	Goal Name	Reg AFH Goal 13: Align Regional Transit to Jobs
	Goal Description	
24	Goal Name	Reg AFH Goal 14: Affordable Hsg Education Material
	Goal Description	
25	Goal Name	Reg AFH Goal 15: Fair Hsg Goals Metrics
	Goal Description	

Projects

AP-35 Projects – 91.220(d)

Introduction

CDBG funding will be used for administration and general oversight; sidewalk improvements in low to moderate income neighborhoods; code enforcement in eligible areas; and public service programs that provide meals, transitional and emergency shelter, child abuse prevention, rent and utility assistance, operational support for nonprofit neighborhood organizations serving the low and moderate income community. HOME funding will be used for administration and general oversight; CHDO capacity building; and single-family and multi-family projects by qualified CHDO's.

Projects

#	Project Name
1	2021-22 CDBG Administration
2	2021-22 CDBG Housing Investment Program
3	2021-22 CDBG Public Facility and Infrastructure Investments
4	2021-22 CDBG Public Service Programs
5	2021-22 HOME Administration
6	2021-22 HOME Community Housing Development Corporations (CHDO Projects)
7	2021-22 HOME Community Housing Development Organization Operating Funds
8	2021-22 HOME Single Family and Multi Family Affordable Housing Development Program
9	2021-22 HOME Single and Multi-Family Housing Projects

Table of Project Information

Describe the reasons for allocation priorities and any obstacles to addressing underserved needs

The allocation priorities are focused on achieving the first six goals of the Consolidated Plan which are to strive for:

- Quality housing choice for all
- Strong, healthy, well-balanced neighborhoods
- Commitment to preventing and ending homelessness
- Self-sufficiency and family success
- Dependable care for those with special needs
- Ongoing Capacity Building

The primary obstacle to meet underserved needs is the availability of funding resources and the organizational capacity to effectively and efficiently deliver needs-based programs in balance with other community priorities and needs. Recent economic conditions, a lack of living wage jobs and private investment in the community, tightened lending practices, and a lack of organizational and private contractor capacity all hamper the community's ability to fully address unmet needs. At the same time, acquisition by out of state landlords have driven the rent prices within the City the increase nearly 75% in the last five years. This, and leaving acquired homes vacant for speculative purposes leaves neighborhoods suffering the effects of blighted and virtually abandoned properties.

The applications for CDBG funding from outside agencies continue to exceed available dollars by over 200%. The effectiveness of using the limited federal dollars that are available to meet underserved needs has been further reduced by cuts and changes in social service, housing funding and programs at the state and federal level; and the subsequent increase in the level of individual need as a result of these cuts. Furthermore, the City of Independence is realizing an increase in the level of unmet needs, housing and public service alike, as low income families continue to move into the City from outlying areas to access the supply and variety of assistance available in Independence.

AP-38 Project Summary
Project Summary Information

DRAFT

1	Project Name	2020-21 CDBG Administration
	Target Area	City-wide
	Goals Supported	Ongoing Capacity Building
	Needs Addressed	Support for the Institutional Delivery System
	Funding	CDBG: \$162,831
	Description	General administration of the CDBG Program including paid staff positions, supplies and operational expenses such as public notices, training, printing and professional studies. Staff positions paid with CDBG funds will conduct Environmental Reviews, RFPs, contracting, monitoring and process invoicing of sub-recipients. Professional services funding will be used for advanced environmental studies such as Phase I or II reports, language translation services, and studies determined necessary for the successful administration of the grant program and to insure compliance with federal regulations.
	Target Date	6/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	Administration expenses support all beneficiaries reported throughout the Annual Action Plan
	Location Description	City-wide
	Planned Activities	ALL
2	Project Name	2021-22 CDBG Housing Investment Program
	Target Area	CDBG Eligible Area Census Tracts
	Goals Supported	Quality housing choice for all Strong, healthy, well-balanced neighborhoods
	Needs Addressed	Code Enforcement and Blight Removal
	Funding	CDBG: \$195,000
	Description	Residential code complaint investigation, inspection and enforcement in declining or deteriorating neighborhoods; addressing unsafe and dangerous buildings.
	Target Date	6/30/2022

	Estimate the number and type of families that will benefit from the proposed activities	Approximately 2200 housing units will be inspected, violations addressed and re-inspected for compliance with housing codes.
	Location Description	Focus will be in Districts 1, 2 and 4 where the highest concentration of low-mod income census tracts exist. This is the central, North West, North East and South Western areas of Independence.
	Planned Activities	Property Maintenance regulation compliance
3	Project Name	2020-21 CDBG Housing Investment Program
	Target Area	CDBG Eligible Area Census Tracts City-wide
	Goals Supported	Quality housing choice for all Strong, healthy, well-balanced neighborhoods
	Needs Addressed	Home Repair and Sidewalk Repair/Replacement; dead and dangerous tree removal
	Funding	CDBG: \$371,514
	Description	Low-moderate income home repair and sidewalk repair/replacement as well as dead and/or dangerous tree removal.
	Target Date	6/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	Although it is difficult to determine actual locations of sidewalk replacement, the project will be available to residents city-wide that are income eligible and low-mod census tracts where the benefit will be given to designated area-wide improvement.
	Location Description	Neighborhoods in 64050, 64052 and 64053
	Planned Activities	Home repair, sidewalk repair/replacement and dead and/or dangerous tree removal for low-moderate income eligible individuals. This project will include \$32,511 of prior year CDBG funds from administration funds not drawn from previous years.
4	Project Name	2020-21 CDBG Public Service Programs
	Target Area	City-wide

	Goals Supported	Strong, healthy, well-balanced neighborhoods Commitment to preventing and ending homelessness Self-sufficiency and family success Dependable care for those with special needs Ongoing Capacity Building
	Needs Addressed	Homeless Shelters & Transitional Housing Supportive Service for Homeless & At-risk Homeless Homeless Case Management & Counseling Subsistence Level Housing (rent/utility) Assistance Education/Self-sufficiency Programs/Legal Services Public Services for Special Needs Populations Domestic Violence Prevention & Services
	Funding	CDBG: \$123,231
	Description	Funding assistance for public service activities that provide direct support to low-moderate income and special needs populations.
	Target Date	6/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 17,000 families are below the poverty line and eligible to be assisted each year by the network of public service organizations in Independence.
	Location Description	Independence is fortunately served by a variety of agencies with a long established network of programs available for low income residents. Offices for Community Services League, one of the largest non-profit agencies has locations in each of the Independence, Mo zip codes to better serve the population.
	Planned Activities	Public Service programs will provide congregate and home delivered senior meals; rent/utility assistance; homeless prevention and case management; emergency and transitional housing operational support; child abuse prevention and domestic violence programs.
5	Project Name	2021-22 HOME Administration
	Target Area	City-wide
	Goals Supported	Ongoing Capacity Building
	Needs Addressed	Support for the Institutional Delivery System
	Funding	HOME: \$46,533

	Description	General administration costs for the HOME Affordable Housing Partnership, including staff salary and benefits.
	Target Date	6/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	Three to six families will be provided homeownership opportunities.
	Location Description	City-wide
	Planned Activities	Homebuyer education, financial literacy programs
6	Project Name	2021-22 HOME Community Housing Development Corporations (CHDO Projects)
	Target Area	An area generally west of Noland Rd.
	Goals Supported	Quality housing choice for all Strong, healthy, well-balanced neighborhoods Commitment to preventing and ending homelessness Self-sufficiency and family success
	Needs Addressed	Vacant Residential Properties Reuse Home Repair and Energy Efficiency Improvements Rental Housing Rehabilitation Homebuyer Assistance and Non-traditional Financing
	Funding	HOME: \$69,800
	Description	Affordable housing development by eligible Community Development Housing Organizations (CHDO) with a focus on Englewood and council district 4.
	Target Date	2022
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	An area generally north of 23 rd St, west of Northern Blvd, east of Arlington.
	Planned Activities	Vacant property redevelopment, homeowner occupied rehab/repair

7	Project Name	2021-22 HOME Community Housing Development Organization Operating Funds
	Target Area	City-wide
	Goals Supported	Quality housing choice for all Strong, healthy, well-balanced neighborhoods
	Needs Addressed	Support for the Institutional Delivery System
	Funding	HOME: \$23,267
	Description	Support will be provided for new or expanding Community Housing Development Organizations (CHDOs) to establish or maintain required staffing and capacity.
	Target Date	6/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	With small investments in acquisition/rehab of existing, vacant single family homes the City anticipates 3-6 projects with area CHDOs. Rehabilitation projects will be targeted in the first and fourth City Council districts, which is the West portion of Independence. These units will be sold to families in the >80% income group. Down payment assistance will be provided on a needs based basis. Universal Design will be incorporated as allowed with existing buildings and proposals will be scored with additional value if they include Universal Design. Both new construction and rehabilitation of single family homes will be funded with Habitat for Humanity city-wide. CHDO Operating funds will be provided to new or expanding CHDOs.
	Location Description	Priority will be given to projects in the first and fourth City Council districts to align with other City initiatives including a newly established Tax Abatement area which is made up census tracts 119 and 121 and the Englewood Planning area.
8	Planned Activities	Tax abatement, SF home redevelopment, new SF home construction
	Project Name	2021-22 HOME Single Family and Multi Family Affordable Housing Development Program
	Target Area	City-wide
	Goals Supported	Quality housing choice for all Strong, healthy, well-balanced neighborhoods Commitment to preventing and ending homelessness Self-sufficiency and family success

Needs Addressed	Vacant Residential Properties Reuse Rental Housing Rehabilitation Homebuyer Assistance and Non-traditional Financing
Funding	HOME: \$325,730
Description	Development and or redevelopment of affordable housing units. Focused in Council Districts 1 and 4 to coordinate housing investment with the newly establish SW Independence Tax Abatement 353 and Englewood Planning Area.
Target Date	2022
Estimate the number and type of families that will benefit from the proposed activities	During the next two program years two very low income and three moderate income families will be provided homeownership opportunities through designated CHDO's.
Location Description	Vacant properties identified city-wide
Planned Activities	Development of affordable housing units for low and moderate income households through scattered site acquisition of vacant properties, rehabilitation or redevelopment, and resell for homeownership. Projects selected for HOME Program funding through a competitive RFP process.

AP-50 Geographic Distribution – 91.220(f)

Description of the geographic areas of the entitlement (including areas of low-income and minority concentration) where assistance will be directed

Plan assistance will be focused in areas of low income concentration. In accordance with HUD's criteria for CDBG eligible area benefit activities, the City has defined areas of low income concentration as census tracts and block groups where at least 51% of the residents earn less than 80% of the Kansas City Metropolitan Statistical Area (MSA) median income, based on current Census data. As determined in 2019, updated data from HUD (ACS 2011-2015) indicates Independence is now at 55% low income, thus area benefit projects may be conducted city-wide.

Areas eligible for CDBG investment have been generally concentrated in the urban center, north and western portions of the City. During the 2017-21 Consolidated Plan period, City driven CDBG and HOME activities will continue to focus on supplementing the community's larger redevelopment efforts in western Independence including the Fairmount Carlisle and St. Clair Park 353 Redevelopment Plans, and revitalization of the Independence Square and U.S. 24 Highway Corridor Study Area. These project areas will encompass much of the City's low and low-moderate income and minority populations. A new single-family tax abatement plan has been approved for Census Tracts 119 and 120, located in South Western Independence to incentivize property owners to make improvements in order to receive a seven (7) year abatement of real estate tax assessed on the dwelling.

Geographic Distribution

Target Area	Percentage of Funds
CDBG Eligible Area Census Tracts	75
City-wide	25

Table of Geographic Distribution

Rationale for the priorities for allocating investments geographically

The basis for allocating investments within the jurisdiction for funding projects during the Plan period, has been to focus on deteriorated neighborhoods and areas of private disinvestment. This is determined by census data, identified property value decline and vacancy rates.

Discussion

The rationale for assigning funding priorities annually, is determined primarily by the results (identification of needs and priorities) of the annual citizen participation process, and through committee evaluation of competitive grant applications submitted by eligible sub-recipients and third-party developers. Approximately 20% of available CDBG project funds and 90% of HOME funds are awarded through formal RFP process. The basis for determining these awards includes basic project eligibility, applicant capacity, and proposed benefit for the low and moderate income community, and

leveraging of other funding resources. City initiated activities including redevelopment planning, program administration, code compliance, housing and infrastructure improvements and economic development activities typically account for the remaining 50% of projects. City initiated activities are also targeted at community needs identified during the annual citizen participation process and Council support of priorities identified in the City's Comprehensive and Capital Improvement Plan processes. Public service projects selected for funding will provide a direct benefit for low to moderate income clientele City-wide. These benefits are targeted to all persons whose household income falls below 80% of the median income and whose residence lies within the city limits, and the regions' homeless. Targeted housing, economic development and public facilities assistance will be directed first to the low to moderate income census tracts and block groups eligible for CDBG assistance. Projects proposed outside of a CDBG eligible area will be considered when a direct benefit for low and moderate income beneficiaries will be achieved. HOME funded affordable housing development projects and CDBG assisted housing rehabilitation will be considered city-wide in an effort to affirmatively further fair housing and be fairly responsive to the needs of all qualifying households.

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

The City of Independence, Mo's affordable housing investment will focus on decent Housing for low and moderate income households including special needs populations, homeless, and at-risk homeless prevention services. Additional objectives also include the provision of subsistence level rent and utility assistance, and other relevant supportive services, required to prevent homelessness and create a suitable living environment. The City, as the responsible entity of the jurisdiction will provide administrative support to the Independence Housing Authority in the form of environmental reviews and assessments, certification of consistency with the Consolidated Plan and consultation in each other's annual planning processes.

The City's federal funding for affordable housing consists of HOME funds. Additional housing funds are provided by HUD directly to Community Services League for subsistence level assistance to families with children within the Independence Public School System and rapid rehousing with ESG funds. Salvation Army's Crossroads Emergency Shelter, Hope House Domestic Violence Shelter and Comprehensive Mental Health Services also receive housing funds directly from HUD and/or the State of Missouri.

One Year Goals for the Number of Households to be Supported	
Homeless	500
Non-Homeless	5,000
Special-Needs	500
Total	6,000

One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through	
Rental Assistance	50
The Production of New Units	4
Rehab of Existing Units	2
Acquisition of Existing Units	0
Total	56

One Year Goals for Affordable Housing by Support Type

Discussion

Low-mod households will be given direct assistance of rent/utility/food, etc. through sub-recipients, and administration of the Independence Rate Adjustment Program (IRAP) which discounts 50% of the IPL rate for eligible disabled residents, home delivered and congregate meals for seniors and operational support of local nonprofits.

Homeless household assistance will be through operating support of emergency and transitional housing facilities.

Rental housing will be sustained through enforcing rental licensing and conduct approximately 2400 inspections by the Rental Ready Program.

At least three affordable single family units will be redeveloped in partnership with OIKOS Development Corporation, a certified Community Housing Development Organization (CHDO). Vacant or abandoned properties will be acquired and returned to the market providing the dual benefit of addressing blight, and returning these properties to the tax rolls and increasing value of both the redeveloped property and it's surrounding properties. Universal Design best practises will be required with funding to encourage aging in place and address needs of those with disabilities.

Approximately 20 low or moderate income homeowners will receive home repairs from CDBG funding awarded in 2017.

AP-60 Public Housing – 91.220(h)

Introduction

The public housing program for the City is owned and managed by the Independence Housing Authority (IHA). The Independence Housing Authority is a semi-independent agency governed by a Board of Commissioners. The members are appointed by the Mayor and confirmed by the City Council. The authority to budget funds and expend them is contained within the statutes permitting the establishment of the IHA and also in the regulations published by the Federal Government through HUD. Operating and Capital funds, from HUD, are provided by formula and expenditure decisions are made by the IHA Board. The IHA also receives HUD funding for approximately 1500 Housing Choice Vouchers (HCV Section 8).

Actions planned during the next year to address the needs to public housing

The IHA has identified the following goals and objectives for serving the needs of low-income and very low-income, and extremely low-income families for the next five years

- Preserve and increase the availability of decent, safe, and affordable housing needed in our community
- Improve community quality of life and economic vitality
- Promote self-sufficiency and asset development of families and individuals
- Ensure Equal Opportunity in Housing for all Americans pursuant to Section 504 of the Rehabilitation Act of 1973
- To provide improved living conditions for very low and low income families while maintaining their rent payments at an affordable level
- To operate a socially and financially sound public housing agency that provides decent, safe, and sanitary housing within a drug free, suitable living environment for tenants and their families
- To lawfully deny the admission of applicants, or the continued occupancy of residents, whose habits and practices reasonably may be expected to adversely affect the health, safety, comfort, or welfare of other residents or the physical environment of the neighborhood, or create a danger to housing authority staff members
- To ensure compliance with Title VI of the Civil Rights Act of 1964 and all other applicable Federal laws and regulations

During the next year the Independence Housing Authority will make its best effort to address public housing needs as follows:

- Applying for HUD's Rental Assistance Demonstration conversion program for Hocker Heights, depending on the availability of renovation loan funding and the feasibility of successful future operations under RAD rules in place at the time of evaluationContributing 10 vouchers to the Regional Voucher Mobility Model Program in conjunction with an application for funding with

MARC and the Kansas City, Mo PHA and in an effort to meet AFFH goals and objectives for the Kansas City region.

- Submitting a new 5-Year capital Improvement Plan for 2021-25 to HUD which will be carried out through the IHA's annual action plans as funding is made available
- Maximizing occupancy of the existing Public Housing dwelling units by responsible families
- Enforcing screening and eviction policies to ensure that only responsible families receive assistance
- Maintaining the Public Housing inventory in decent, safe condition, and determine the long-term viability of current stock
- Maximizing utilization of Section 8 housing assistance funding and assist as many families as possible with that funding by holding down per family assistance costs
- Working with industry organizations and Congress toward increasing housing assistance funding in order to help more families
- Working with the City of Independence and other affordable housing groups to increase the availability of such housing locally
- Seeking out new funding avenues in order to directly preserve existing housing and increase affordable housing inventory

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

The PHA encourages resident involvement with agency management in a number of ways, including having a resident serve on the PHA Board of Commissioners, monthly solicitation of resident input from all three sites resident councils, providing each resident council an office, office equipment, internet and phone service, and special meetings with residents and resident councils during development of the Annual Agency Plan and 5-Year Capital Plans.

The IHA will continue the Section 8 voucher homeownership program and Jobs Plus job training programs that do not affect the housing eligibility of participants due to initial income increases. The program provides incentives for completing a career training program, enrolling and graduation from college or one year of employment.

If the PHA is designated as troubled, describe the manner in which financial assistance will be provided or other assistance

The City of Independence has not been notified by the Public Housing Authority or other governing agencies regarding a negative PHA's designation or alert related to its administrative and/or financial capacity.

Discussion

The City and IHA will continue to work together as opportunities arise through the consolidated

planning and citizen participation process to identify unmet needs and priority objectives; and to leverage resources to the benefit of Independence very low income community.

DRAFT

AP-65 Homeless and Other Special Needs Activities – 91.220(i)

Introduction

This section of the Annual Action Plan describes the City's one year goals and the specific actions steps it will undertake in the program year to carry out the homeless strategy identified in the Strategic Plan. Additionally, this section addresses any activities related to the supportive housing needs of non-homeless populations.

Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including:

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

Independence Community Connect Coalition is purposed to provide awareness opportunities for residents and outreach programs for homeless and at-risk homeless in need. The following activities are ongoing efforts of the Coalition to reach the homeless population and to assess their unmet needs, and will be undertaken during the plan year or as often as resources become available:

1. Participation in the National Point in Time Homeless Count in January and July. Volunteers visit libraries, encampments, the Bus Transit and other locations in order to locate homeless individuals and families. They are interviewed, data is collected, and referrals are made.
2. Civic Club Challenge Food Drive where participating clubs compete for the most pounds of food donations to stock the shelves of our local food pantries and community kitchens.
3. Homeless Connect Event to provide direct needed services and education to those in need such as blood pressure checks, vaccinations, and haircuts. Done in partnership with the Independence School District and previously with Salvation Army and Hawthorne Place Apartments.
4. 5th Sunday Initiative where volunteer churches, who are not necessarily members of the Coalition, collect specific identified needed items during the months with a 5th Sunday. Items are donated to the service agencies for distribution.
5. Power-Up for Warmth Blanket Drive is done in partnership with the Independence School District, Independence Power and Light and McDernott Moving Company for blankets and utility assistance for our unaccompanied youth and low-income families.
7. Blessing Bags with items such as soap, toothbrushes, combs, washcloths, socks and scarves are assembled by volunteer groups for Coalition members to distribute at Christmas time.
8. Participation in the National Hunger and Homelessness Awareness Week providing a variety of events

during a week in November to help convey existing needs.

Addressing the emergency shelter and transitional housing needs of homeless persons

During the 2021-22 Program Year the City will provide CDBG funding assistance for the following activities and objectives to address the emergency shelter and transitional housing needs of homeless persons:

- The City shall provide operational funds with CDBG Public Service funding to eligible providers to support emergency and transitional housing programs within the City of Independence. Proposals will be evaluated and scored by the CDBG Grant Advisory Committee and awarded a total of 15% of CDBG funding.
- The City shall continue to participate in the Jackson County Continuum of Care, providing staff liaison in monthly meetings. This participation provides notice of available funding for which the City may be eligible, input opportunity for regional policy and program development.

Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again

- Hope House, Meals on Wheels, Child Abuse Prevention Association, Hillcrest Transitional Housing, Mother's Refuge, and the Salvation Army Crossroads Family Shelter are each assisting a unique target group of homeless persons.
- Community Services League, Metro Lutheran Ministries and Salvation Army are each providing homeless prevention services with case management, rent or utility assistance, food supplies and job training or referrals.

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

During the 2021-22 Program Year the City will provide CDBG funding assistance for the following

activities to help homeless and at-risk homeless persons make the transition to and then sustain permanent affordable housing:

- The City shall provide operational funds with CDBG Public Service funding to eligible public service providers through a competitive grant application. Proposals will be evaluated and scored by the CDBG Grant Advisory Committee.
- The City shall provide gap funding for affordable housing development with the HOME allocation to eligible Community Development Housing Organizations through a competitive application process to develop decent, affordable single family housing units for homeownership opportunities targeted to families below 80% of low-moderate income limits for the Kansas City metro. HOME funds will also be used with Truman Heritage Habitat For Humanity for rehab or construction of single family homes to provide homeownership opportunities for families up to 50% of income limits.

Discussion

The City of Independence will continue to partner with the Jackson County Continuum of Care (CoC), and Greater Kansas City Homeless Services Coalition, to participate and support the Continuum of Care Process. The Continuum is supported by a variety of non-profit and public homeless service agencies in Independence that are working directly with the homeless and at-risk homeless on a daily basis.

The City of Independence will continue to provide monetary assistance when available and technical assistance to social service agencies in the development of transitional housing in Independence and for supportive services to the homeless and at-risk homeless. Monetary assistance will be provided through the Community Development Block Grant and HOME Programs. Social service agencies and non-profit housing providers within the City's jurisdiction will continue providing assistance to the homeless and those at-risk of homelessness in an effort to address unmet housing needs within the City. These services will be provided to a range of recipients which includes, but is not limited to, the elderly, the disabled (physically or mentally), single heads of households, adult children that have aged out of foster care, and others who are economically disadvantaged.

The City will continue to encourage agencies to embark on affordable housing programs by offering technical support and, when appropriate, certificates of consistency with the City's Consolidated Plan.

The City will continue to collaborate with the area non-profit agencies to provide shelter and services to the homeless and those at risk of homelessness during FY 2021-22:

- Homelessness prevention
- Family emergency shelter

- Shelter for battered women and their children
- Transitional Housing
- Homeless Prevention
- Homeless Assistance
- Truman Heritage Habitat for Humanity
- Transitional Housing for pregnant teenagers
- Independence School District—Family Services Program

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AP-75 Barriers to affordable housing – 91.220(j)

Introduction:

HUD established America's Affordable Communities Initiative as a way to identify and overcome regulatory barriers to affordable housing. Independence is a participant in the Initiative's National Call to Action for Affordable Housing through Regulatory Reform. As part of this Initiative, the City committed itself to identifying and preventing possible regulatory barriers to affordable housing and developing solutions that: address unique housing challenges and increase the supply of affordable housing opportunities. The City continues to participate in the Kansas City Regional Affirmatively Furthering Fair Housing.

Actions it planned to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment

While the City does not currently face significant affordable housing barriers, it remains committed to this Task Force's efforts. In the coming year the City will undertake the following steps to support the availability of affordable housing:

- City completed transition to City Works, a GIS based data and work management system that will allow the City to streamline development and building approval and permitting processes for the benefit of residential and commercial development, including affordable housing.
- Continuation of implementation of the Independence Comprehensive Plan - Independence For All
- Supporting affordable housing initiatives through our CDBG and HOME Programs, including the production of affordable housing units
- Support the issuance of Certificates of Consistency for applications for Low Income Housing Tax Credits and other incentives, when compatible with the goals and objectives of the City's Consolidated Plan that will result in the production and preservation of affordable housing units.
- Implementation of residential rehabilitation and property tax abatement redevelopment programs for SW Independence neighborhoods as an investment in quality housing choice for all
- Funding and operation of the Independence city-wide public transportation system which operates independently of, and connects with, the larger Kansas City metro system, and supports the availability of a wide variety of affordable housing options and access to jobs.

Discussion:

While Independence has a large number of "affordable" housing, the population living in poverty is estimated at 15-17% of residents, or 17,000-20,000 residents are economically challenged. The traditional 33% of income standard of affordable rent, typical of place-based rental subsidy still leaves the average social security or disability recipient with minimal funds for food, healthcare and necessities. Comprehensive Housing Affordability Strategy (CHAS) data for 2012-2016 indicate 14,400 households have a cost burden of over 30% of monthly income; 6,420 households have a cost burden of over 50% of monthly income. This data set also indicates:

- 2,985 owner-occupied and 5,985 rental households income are less than or = 30% HAMFI
- 3,815 owner-occupied and 3,365 rental households income are >30% to less than 50% HAMFI

AP-85 Other Actions – 91.220(k)

Introduction:

This section identifies additional required actions the City must take as a part of its annual action plan.

Actions planned to address obstacles to meeting underserved needs

The primary obstacles in meeting the underserved needs of the low and moderate income community are the availability of sufficient funding resources and the lack of organizational capacity to effectively and efficiently deliver needs-based programs in balance with other community priorities and needs. In order to address these obstacles, the following actions will continue to be undertaken on an ongoing basis when opportunities arise:

- City application, and support of partner agencies applications, for grant and other types of funding assistance for housing and community development initiatives from private, state and federal resources.
- Development of local investment incentives to encourage private investment in housing and community development initiatives that promote neighborhood stabilization.
- Implementation of program changes when necessary that add value and efficiency, and that encourage the leveraging of other resources, in order to improve the effectiveness of CDBG and HOME Program investments.
- Encourage collaborative partnerships between City Departments, local service providers and non-profit housing development agencies to avoid duplication of efforts and to maximize the impact of CDBG and HOME Program investments.

Actions planned to foster and maintain affordable housing

As opportunities become available, the following actions will be undertaken to foster and maintain affordable housing, specifically ensure Certificates of Consistency for proposed affordable housing development projects found to be consistent with the Goals and Priorities of the City's Consolidated Plan, Annual Action Plan, and Strategic Plan and Comprehensive Plan goals.

- Provision of funding assistance through the City's CDBG and HOME Programs to qualified sub-recipients and developers of affordable housing projects to assist with project costs including, but not necessarily limited to, predevelopment loans (restricted to Community Housing Development Organizations), property acquisition, rehabilitation, energy efficiency upgrades, lead abatement, new construction, and disposition.
- Provision of homebuyer assistance in partnership with HOME funded affordable housing development projects.

- Partnership with state and regional funded affordable housing investment programs including the Missouri Neighborhood Stabilization Program, Missouri Weatherization Assistance Programs, and the Lead Safe KC Program.
- Administration of residential redevelopment tax abatement incentive programs in areas of greatest need to encourage reinvestment in existing housing stock, including both multi-family and single-family, and both owner occupied and rental units.

Actions planned to reduce lead-based paint hazards

All housing programs (rental and owner occupied) funded by the City, including emergency home repair programs and the HOME Program projects, require that the funded housing stock be evaluated for the presence of lead paint hazards and that appropriate action is taken as required by the federal Lead-based Paint Regulation. The City has developed a proactive plan with lead based paint hazards. This includes a pre-inspection letter to seller and/or seller's agent advising them of the LBP regulations and that the HQS inspection to follow will be looking specifically for deteriorated paint surfaces. They are also be advised that if deteriorated paint surfaces are discovered the owner will be required to correct the deficiencies using lead safe work practices and/or be required to provide testing indicating that the surface is free of LBP. In any case the City will provide occupants and prospective occupants/purchasers of income qualified housing units of potential lead paint hazards and appropriate methods for lead hazard reduction.

Actions planned to reduce the number of poverty-level families

Community partners receiving funding awards through the CDBG and HOME Programs are selected based on their promise to help achieve plan goals and to accomplish objectives that will result in the provision of decent housing, suitable living environments, and expanded economic opportunities for those in poverty or on the brink of poverty. In addition to the specific anti-poverty objectives to be funded directly through the City's allocation of CDBG and HOME programs, the City will seek opportunities to do the following during the 2019-20 Plan Year:

The City will continue to advocate for homebuyer training programs and homebuyer assistance to low and moderate income households.

Actions planned to develop institutional structure

To the extent resources are available, the following actions will be taken in an effort to encourage development of an institutional structure that is increasingly responsive to housing and community development needs in Independence:

- Provide supportive services and technical assistance to neighborhood and community organizations in low and moderate income service areas that are involved in grassroots efforts

to address community needs and building capacity and service delivery.

- Provide technical assistance to new and existing service providers and nonprofit housing agencies assisting the City in implementation of CDBG and HOME program objectives.
- Pursue professional training for CDBG and HOME Program and other community development staff to ensure effective administration of program resources.

Actions planned to enhance coordination between public and private housing and social service agencies

The City of Independence, and other local Kansas City jurisdictions already benefit from a mature network of regional public and assisted housing providers and private and governmental health, mental health and service agencies that are connected in the delivery of services and programs through the use of Case-worthy HMIS, a social service software suite developed and maintained by the Mid America Regional Council and the Continuum of Care. Additionally, agencies in Independence benefit from coordinated participation in the Independence Hungry and Homeless Coalition. Local agencies continues to host quarterly small scale Social Services Summits which invites community and regional agencies to participate in a one-day training and networking event designed to identify and enhance opportunities for community collaboration. As a member of the Kansas City Area Regional Affirmative Fair Housing Consortium, the City collaborates with other jurisdictions to overcome regional barriers to fair housing choice through an ongoing performance measurement report. Participating AFH members meet regularly throughout the years.

Program Specific Requirements

AP-90 Program Specific Requirements – 91.220(I)(1,2,4)

Introduction:

Community Development Block Grant Program (CDBG)

Reference 24 CFR 91.220(I)(1)

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out.

1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed	0
2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan.	0
3. The amount of surplus funds from urban renewal settlements	0
4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan	0
5. The amount of income from float-funded activities	0
Total Program Income:	0

Other CDBG Requirements

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	70.00%

HOME Investment Partnership Program (HOME)
Reference 24 CFR 91.220(l)(2)

1. A description of other forms of investment being used beyond those identified in Section 92.205 is as follows:

HOME funds will not be used for items not described in § 92.205(b).

2. A description of the guidelines that will be used for resale or recapture of HOME funds when used for homebuyer activities as required in 92.254, is as follows:

Direct subsidy includes HOME investment that enabled the homebuyer to purchase the property. This includes down payment assistance, closing costs or other HOME assistance provided directly to the homebuyer and/or the difference between the fair market value of the property and a reduced sales price attributed to HOME development assistance. Development subsidies (i.e., the difference between the cost of producing the unit and the fair market value of the unit) cannot be subject to recapture since the homebuyer did not realize a direct benefit from these funds.

The following serves as the guidelines that will be used for recapture of HOME funds when used for homebuyer activities as required in 92.254. All HOME assisted buyers will certify that they will be the owner occupant of the assisted unit and will occupy the property as his/her primary residence. During the Affordability Term, the buyer may not lease, transfer, sell, encumber, lien, abandon, or otherwise alienate the project, and must inhabit it as his/her primary residence. If the buyer violates any of these use restrictions during the Affordability period, the HOME assistance will be subject to Repayment provisions, as follows:

The City uses recapture provisions to ensure affordability in the HOME assisted homeownership program. When HOME funds are used to assist homeownership, the housing will be subject to the following affordability period: Five years when the HOME investment is less than \$15,000, Ten years when the HOME investment is greater than \$15,000 but less than \$40,000, and Fifteen years when the HOME investment exceeds \$40,000.

If the buyer no longer uses the HOME assisted unit as his/her principal residence, upon determination of the buyer's noncompliance with the use restrictions, the entire principal amount of the HOME assistance provided for the project shall, at the option of the City, become immediately due and payable to the City. The City may institute proceedings to recover any rents, profits or proceeds generated from noncompliant use of HOME assisted unit, and costs of collection,

including attorneys' fees and costs of litigation resulting from violation.

Direct assistance to homebuyers shall not exceed \$10,000.00, equating to a five year period of affordability. During the period of affordability, no amount of direct assistance to the buyer shall be pro-rated until the third year. Thereafter, the lien will be forgiven at a rate of 20% per year, back to the date of execution.

Repayment will be limited to the net proceeds of the sale. The net proceeds of the sale are considered the sales price minus loan repayment (other than HOME funds) and closing costs. Funds recaptured are limited to the amount of net proceeds available from the sale.

3. A description of the guidelines for resale or recapture that ensures the affordability of units acquired with HOME funds? See 24 CFR 92.254(a)(4) are as follows:

The following will serve as the guidelines that will be used for resale or recapture of HOME funds when used to acquire units for affordable housing as required by 24 CFR 92.254(a)(4).

Same as above. The long term affordability of units acquired with HOME funds under a redevelopment agreement with the City, whether for rental or development of homebuyer opportunities, will be immediately secured through a deed restriction, covenant running with the land, or other HUD-approved mechanism filed with Jackson County Recorder of Deeds in order to insure a minimum Affordability Period required by the HOME Program. The minimum Affordability Period for acquired properties is determined by the level of HOME assistance provided per unit as follows:

- Five years when the per unit HOME investment is under \$15,000
- Ten years when the per unit HOME investment is \$15,000-40,000
- 15 years when the per unit HOME investment exceeds \$40,000
- 20 years for new construction of rental housing

Recapture requirements shall be enforced by the recorded instrument, and the requirements within shall be triggered upon sale or transfer of the HOME-assisted property, or determination that the HOME-assisted property is out of compliance with requirements for long term affordability.

4. Plans for using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds along with a description of the refinancing guidelines required that

will be used under 24 CFR 92.206(b), are as follows:

HOME funds will not be used to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds.

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Appendix A – Citizen Participation Plan

Revised April 2016

CITY OF INDEPENDENCE, MISSOURI

CITIZEN PARTICIPATION PLAN

PURPOSE

This Citizen Participation Plan of the City of Independence seeks to provide for and encourage the participation of Independence residents in the development of the City's Assessment of Fair Housing (AFH), Consolidated Plan, any substantial amendments to the Consolidated Plan, and the associated annual performance report. The Consolidated Plan document serves as the City's comprehensive housing affordability strategy, community development plan, and submissions for funding under any of the U.S. Department of Housing and Urban Development (HUD) Community Planning and Development formula grant programs, including the Community Development Block Grant (CDBG) and the HOME Investment Partnership Act (HOME) Programs.

The overall goal of HUD Community Planning and Development programs is to develop viable urban communities by providing decent housing and a suitable living environment and expanding economic opportunities principally for low- and moderate-income persons. While the primary means towards this end is to extend and strengthen partnerships among all levels of government and the private sector, the City of Independence especially aims to encourage participation by low and moderate income persons, residents of low and moderate income areas as determined by the City of Independence, the homeless, persons with disabilities, persons living with AIDs, and representative organizations of these groups.

This Citizen Participation Plan has been designed to meet the regulatory requirements of the Housing and Community Development Act of 1974, as amended, and the Consolidated Submission for Community Planning and Development Programs Final Rule of the U.S. Department of Housing and Urban Development (HUD) as published on January 5, 1995. Nothing in this Plan shall restrict the responsibility and authority of the City of Independence (City) from developing and executing its Consolidated Plan in accordance with federal requirements. This document may be amended by the City Council.

Copies of this Citizen Participation Plan can be obtained through the City of Independence Neighborhood Services Division, Community Development Department, City Hall, 111 E. Maple, Independence, MO 64050, or on the Web at <http://www.ci.independence.mo.us/comdev/CDBG.aspx>

I. Effective Date: This Citizen Participation Plan will become effective July 1, 2016.

II. Assessment of Fair Housing (AFH): During the development of the Assessment of Fair Housing, the City shall:

A.) Make any proposed analysis and the relevant documents, including HUD-provided data and any other data to be included in the AFH, available to the public;

B.) Consult with agencies and organizations identified in consultation requirements at 24 CFR part 91;

C.) Publish the proposed AFH in a manner that affords residents and others the opportunity to examine its content and submit comments;

D.) Provide for at least one public hearing during the development of the AFH and provide notice of this public hearing in the same manner as Consolidated Plan; and

E.) Provide a period of not less than 30 calendar days to receive comments from residents of the community.

III. Consolidated Plan Development: During the development of the Consolidated Plan, the City shall:

A.) Make available to citizens, public agencies, and other interested parties information that includes the amount of assistance that the City expects to receive from the Community Development Block Grant (CDBG) and HOME Investment Partnership (HOME) programs and the range of activities that may be undertaken using these funds, including the estimated amount that will benefit persons of low and moderate income; and the plans to minimize displacement of persons and to assist any persons displaced. This information will be made available before the adoption of the Consolidated Plan. With regard to displacement, the general policy of the City is to keep displacement of persons participating in the CDBG or HOME programs to an absolute minimum. In those rare occasions when displacement is necessary, the City will abide by the regulations of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended (URA), and Section 104(d) of the Housing and Community Development Act of 1974.

B.) Encourage the participation of residents of public and assisted housing developments, along with other low-income residents of targeted revitalization areas, in the process of developing and implementing the Consolidated Plan. The City shall provide direct notice to the Independence Housing Authority (IHA) about Consolidated Plan activities related to IHA developments and surrounding communities so that the public housing agency can make this information available at the annual public hearing required for the PHA Plan.

C.) Publish the proposed Consolidated Plan in a manner that affords citizens, public agencies, and other interested parties a reasonable opportunity to examine its contents and to submit comments. This information will be summarized and may be published in one or more newspapers of general circulation in Independence, Missouri; published on the City of Independence, Missouri website; and posted at local public buildings including City Hall, public libraries, as well as direct notice to the Independence Housing Authority and local social service agencies. The summary will include a description of the contents and purposes of the proposed Consolidated Plan and a list of the locations where copies of the entire proposed Consolidated Plan may be examined.

D.) Make available free of charge to interested citizens and groups copies of the proposed and final Consolidated Plan through the City of Independence Neighborhood and Housing Services Division, Community Development Department, City Hall, 111 E. Maple, Independence, MO 64050, and on the Web at <http://www.ci.independence.mo.us/comdev/CDBG.aspx>.

E.) Provide for at least two (2) public hearings per year to obtain citizens' views and to respond to proposals and questions, to be conducted at a minimum of two (2) different stages of the program year. Together, the hearings must address housing and community development needs, development of proposed activities, and review of program performance. To obtain the views of citizens on housing and community development needs, including priority non-housing community development needs, at least one of these hearings will be held before the proposed Consolidated Plan is published for comment.

- 1.) The City shall give adequate advance notice of public hearings to citizens by: publishing notices in a newspaper of general circulation in Independence, Missouri which includes information on the purpose, time and location of the hearing; posting notice on the City of Independence Web site, posting notice with the City Clerk's Office, and providing other notice as determined appropriate by the City.
- 2.) The City shall hold the hearing at a time and location convenient to potential and actual beneficiaries and with accommodation for persons with disabilities.
- 3.) In the case where a significant number of non-English speaking residents can be reasonably expected to participate, the City will provide a qualified interpreter at the public hearing to accommodate the needs of these residents.

F.) The City will receive comments on the proposed Consolidated Plan from citizens for a period of not less than thirty (30) days.

G.) Consider any comments or views of citizens received in writing or orally at the public hearing when preparing the final Consolidated Plan. A summary of these comments or views and a summary of any comments or views not accepted and reasons therefore shall be attached to the final Consolidated Plan.

IV. Substantial Amendments to the Consolidated Plan, which includes the Citizen Participation Plan: When considering substantial amendments to the Consolidated Plan, the City shall:

A.) Amend the Consolidated Plan if any one of the following actions is proposed:

- 1.) A change in the City's allocation priorities or a change in the method of distribution of funds covered by the Consolidated Plan;
- 2.) Implementation of an activity using funds from any program covered by the Consolidated Plan (including program income) not previously described in the action plan; or,

3.) A change in the purpose, scope, location, or beneficiaries of a program funded by the Community Development Block Grant (CDBG) or the HOME Investment Partnership (HOME) programs as listed in the Action Plan section of the adopted Consolidated Plan.

- a. A Substantial Amendment in the purpose of an activity will occur when the activity will serve a purpose other than that which was originally intended. In order to clarify purposes, the following eligibility categories are established:
 - i. Housing
 - ii. Public Facilities
 - iii. Public Services
 - iv. Economic Development
 - v. Planning
 - vi. Program Administration
 - b. A Substantial Amendment in the scope of an activity will occur when the federal funding allocation for the activity will be increased by 50% or more.
 - c. A Substantial Amendment in the location of an activity will occur when a change of location will cause the targeted group of beneficiaries to lose the benefit.
 - d. A Substantial Amendment in the beneficiaries of an activity will occur when the targeted groups of beneficiaries will no longer benefit, or when the percentage of low-income beneficiaries will be less than the minimum required by federal law or regulation.
4. A modification to the Citizen Participation Plan required by HUD regulatory changes.

Any one of the actions listed in Section IV (A) (1-4) shall constitute a “substantial amendment” to the Consolidated Plan.

B.) Provide citizens with reasonable notice and an opportunity to comment on substantial amendments to the Consolidated Plan. Reasonable notice must include a summary of the proposed change and its potential effect on households of low and moderate income. The summary must be published in a newspaper of general circulation in Independence, Missouri and include an opportunity for written comment by interested citizens and groups for a period of not less than thirty (30) days before the amendment is implemented. The published summary must indicate that written comments must be submitted by a specified date to the City.

C.) Consider any comments or views of citizens received in writing or orally at public hearings, if held, in preparing the substantial amendment of the Consolidated Plan. The City shall attach to the substantial amendment to the Consolidated Plan a summary of comments or views accepted and a summary of comments or views not accepted and the reasons therefore.

V. Performance Reports Associated with the Consolidated Plan: When preparing performance reports associated with the Consolidated Plan, the City shall:

A.) Provide citizens with reasonable notice and an opportunity to comment on performance reports associated with the Consolidated Plan. Reasonable notice must include a summary of the accomplishments and their effect on households of low and moderate income. The summary must be published in a newspaper of general circulation in Independence, Missouri and include an opportunity for comment by interested citizens and groups for a period of not less than fifteen (15) days before the performance report is submitted to HUD. The published summary must indicate that written comments must be submitted by a specified date to the City.

B.) Consider any comments or views of citizens received in writing or orally at public hearings, if held, in preparing the performance report. The City shall attach a summary of these comments or views to the performance report.

VI. Availability of the Consolidated Plan and Related Documents to the Public: The City shall make available to the public free of charge and upon request the final Consolidated Plan as adopted, any substantial amendments, and any associated performance reports. Upon request the City will also make available the final Consolidated Plan as adopted, any substantial amendments, and any associated performance reports in a form accessible to persons with disabilities.

VII. Access to Records Associated with the Consolidated Plan: The City will provide reasonable and timely access to information relating to the Consolidated Plan and the City's use of assistance under the Community Development Block Grant (CDBG) or HOME Investment Partnerships (HOME) programs during the preceding five years.

VIII. Complaints Associated with the Consolidated Plan and Related Documents: The City will provide a timely, substantive written response within fifteen (15) working days to every written citizen complaint related to the Consolidated Plan, substantive amendments and associated performance reports.

IX. Technical Assistance: The City shall provide technical assistance to all persons or groups interested in submitting proposals for the consolidated planning process. The assistance provided shall include, at minimum:

1. Access to all forms, guidelines and time schedules pertaining to the annual consolidated planning process.
2. Upon request, technical assistance in understanding proposal requirements.
3. Source information for obtaining required supporting data.
4. Persons/places to be contacted for further information.
5. Notice of available training opportunities.
6. Information regarding the location of all applicable federal rules and regulations.

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Appendix B

Affidavit of Publication and Citizen Comments Received

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Appendix C

Authorizing Ordinance

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Appendix D

Lead Hazard Reduction Plan

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LEAD-BASED PAINT HAZARD REDUCTION PLAN

The following actions will be taken on an ongoing basis to evaluate and reduce lead-based paint hazards and plans for integrating lead hazard reduction strategies into the jurisdiction's low-mod housing policies and program, consist of the following:

1. All housing programs (rental and owner occupied) funded by the City, including emergency home repair programs and the City "First Time Homebuyers" Program, require that the funded housing stock be evaluated for the presence of lead paint hazards and that appropriate action is taken as required by the federal Lead-based Paint Regulation. In response to a monitoring concern identified in May 2007, the City has developed a proactive plan with regards to the Independence First Time Homebuyers Program and lead based paint hazards. This includes a pre-inspection letter to the seller and/or seller's agent advising them of the LBP regulations and that the HQS inspection to follow will be looking specifically for deteriorated paint surfaces. They are also be advised that if deteriorated paint surfaces are discovered the owner will be required to correct the deficiencies using lead safe work practices and/or be required to provide testing indicating that the surface is free of LBP. In any case the City will provide occupants and prospective occupants/purchasers of income qualified housing units of potential lead paint hazards and appropriate methods for lead hazard reduction.

2. All housing projects/programs and contracts administered by the City and contracts/projects with subrecipients funded through CDBG or HOME will be in compliance with sections 1012 and 1013 of the Residential Lead-Based Paint Hazard Reduction Act of 1992, which is Title X (ten) of the Housing and Community Development Act of 1992, and with regulations as they appear within Title 24 part 35. The City will continue to monitor and evaluate the lead based paint requirements for housing rehabilitation and the activities necessary to reduce lead based paint hazards and, as new requirements are identified, the city will continue to integrate these into our housing policies and programs

[To summarize the City's approach in satisfying the requirements of 24 CFR 35 the City is guided by Tables "Summary of Lead-based Paint Requirements by Activity" and "Four Approaches to Implementing Lead Hazard Evaluation and Reduction", which can be found as an attachment to this document.]

3. The Independence Health Department will continue to provide general information to landlords, residents and businesses regarding the hazards of lead-based paint. Efforts to this end include; mandatory distribution of the Independence Landlord-Tenant Guide, by all landlords to their tenants, which includes a copy of EPA's "Protect Your Family From Lead in Your Home" brochure; ongoing City promotion of lead hazard reduction through participation in community health fairs, dissemination of educational materials through the Health Department's Maternal Child Health Program and cooperation with the Jackson County Health Department to promote availability of free lead screening for children.

Four Approaches to Implementing Lead Hazard Evaluation and Reduction

The regulation provides four approaches to implementing lead hazard evaluation and reduction:

Do No Harm

- ✓ **Lead Hazard Evaluation.** Paint testing must be performed on surfaces to be disturbed and surfaces disturbed during work must be repaired.
- ✓ **Lead Hazard Reduction.** Safe work practices must be used when working on areas identified as lead-based paint. Clearance must be performed on work site.
- ✓ **Option.** Presume lead-based paint is present and use safe work practices on all surfaces being disturbed.

Identify and Stabilize Deteriorated Paint

- ✓ **Lead Hazard Evaluation.** Visual assessment must be performed to identify deteriorated paint.
- ✓ **Lead Hazard Reduction.** Paint stabilization of identified deteriorated paint must occur. Safe work practices must be used. Clearance must be performed unit-wide.
- ✓ **Option.** Paint testing on deteriorated paint.

Identify and Control Lead Hazards

- ✓ **Lead Hazard Evaluation.** Paint testing must be performed on surfaces to be disturbed. A risk assessment must be performed on the entire dwelling.
- ✓ **Lead Hazard Reduction.** Interim controls must be performed on identified hazards. Safe work practices must be used. Clearance must be performed unit-wide.
- ✓ **Option.** Presume lead-based paint and/or lead-based paint hazards are present and perform standard treatments.

Identify and Abate Lead Hazards

- ✓ **Lead Hazard Evaluation.** Paint testing must be performed on surfaces to be disturbed. A risk assessment must be performed on entire dwelling.
- ✓ **Lead Hazard Reduction.** Abatement must be performed on identified hazards. Interim controls must be performed on identified hazards on the exterior that are not disturbed by rehabilitation. Safe work practices must be used and clearance must be performed unit-wide.
- ✓ **Option.** Presume lead-based paint and/or lead-based paint hazards are present and perform abatement on all applicable surfaces – deteriorated, impact, friction, chewable surfaces, and surfaces to be disturbed.

Appendix E

Low/Mod Census Tract Map

