

Amended Annual Action Plan (AAP)

For CDBG & HOME Program Year 2021-2022

Prepared by

Community Development Department City of Independence, MO

February 15, 2022

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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 and \$18,034.80 of HOME Program Income.

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

Annual Action Plan 2021 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.

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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

This is an evaluation of past performance that helped lead the grantee to choose its goals or projects.

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

Annual Action Plan

• 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.

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

This could be a brief narrative summary or reference an attached document from the Citizen Participation section of the Con Plan.

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.

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	INDEPENDENCE	Community Development Department		
HOME Administrator	INDEPENDENCE	Community Development Department		

Table 1 – Responsible Agencies

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(l)

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 <u>Strategic Plan-Independence for All</u> and the <u>Comprehensive Plan-Imagine Independence 2040</u>, 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

1	Agency/Group/Organization	Housing Authority of Independence
	Agency/Group/Organization Type	РНА
	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?	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. 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 Ministries of MidAmerica
	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 th 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
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-inc 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 choic both the regional and local level, and outlines specific steps to address and overcome the effects of any impediments. The 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 year period. Overlapping the purposes of the CDBG & HOME Programs, the primary mission of the Housing Authority is to affordable decent, safe and sanitary housing opportunities to low and moderate income families including elderly and disat 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 cu 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 qualit environment.

Name of Plan	Lead	How do the goals of your Strategic Plan overlap with the goals of each plan?
	Organization	
		In 2018, the City attained the Community for All Ages Gold Level recognition from Mid-America Regional Council and has at
	City of	that level since. Communities for All Ages seeks to ensure that older adults are valued, understood, respected and involved
Community For		creating and sustaining a high quality of life in their communities. It facilitates the integration of these opportunities and ch
All Ages	Independence	into all aspects of community life, including design, infrastructure, programs and services, workforce development and com
		engagement. The City incorporates these items into our projects, services and development opportunities.
		The Independence on a Roll Working Group (IRWG) was created for the purpose of advancing initiatives to improve the qua
Independence		life for all of Independence, maximize the historical and cultural attractiveness of Independence, create attraction to
On a Roll	City of	ĨĸŶŔĿŔĿŔĿŔĿŔĿŔĿŔĿŔĿŔĿŔĿŔĿŔĿŔĿŔĿŔĿŔĿŔĿŔĿŔĿ
Working Group	Independence	Independence, promote economic development and job creation, spur private investment and work in collaboration with e
		community efforts. Their area of focus is in the western portion of the City of Independence.

Table 3 – Other local / regional / federal planning efforts

Narrative (optional)

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. Additionally, HOME Program Income in the amount of \$18,034.80 will be reallocated.

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.

Citizen Participation Outreach

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d. Annual Action Plan 18					Annual Action Plan	18	

Sor t O rde r	Mode of Ou treac h	Targe t of O utrea ch	Summ ary of respon se/att endan ce	Summary of comments received	Summa ry of co mment s not accept ed and rea sons	URL (If applicable)
2	Public Meeti ng	Non- target ed/br oad comm unity	The CDBG Adviso ry Commi ttee held public meetin gs virtuall y on May 21 and June 10, 2021.	The discussion of the applications received for CDBG Public Service funding and reviewed each request for alignment with goals outlined in the Comprehensive Plan and Independence For All.	All comme nts receive d where conside red in the Annual Action Plan.	

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4	Public Meeti ng	Non- target ed/br oad comm unity	On A Roll Commi ttee meetin gs were held via Micros oft Teams. They met on August 10, Septe mber 14, Decem ber 14, 2020 and Januar y 8,	Topics discussed included the need to improve connections within and between neighborhoods that improve access to transit, jobs, services, and shopping; the need for transit to provide access to jobs; and strategies for addressing blight in residential neighborhoods and rehabilitation of residential structures. Annual Action Plan 2021	Sons All comme nts receive d where conside red in the Annual Action Plan. 21	
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	Public	target	Micros	Topics discussed include the need for affordable housing options whether	d	
5	Meeti	ed/br	oft	acquiring vacant dangerous buildings to rehab or acquiring vacant properties to	where	
	ng	oad	Teams.	construct affordable housing and the need to address homelessness, the need	conside	
	_	comm	They	for new homeless shelters and services for homeless and those near homeless.	red in	
		unity	met on		the	
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			July		Plan.	
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6	Public Meeti ng	Non- target ed/br oad comm unity	North west Indepe ndenc e Comm unity meetin gs were held via Zoom. They met on Februa ry 12, March 12, and May 4, 2021.	Topics discussed strategies to improve outreach to Spanish speaking citizens strategies to assist homeowners in making repairs to their homes/properties, the need for services Ŀ¿ÿ¿¿¿¿¿¿¿¿¿¿¿¿¿¿¿¿¿	All comme nts receive d where conside red in the Annual Action Plan.	

Sor t O rde r	Mode of Ou treac h	Targe t of O utrea ch	Summ ary of respon se/att endan ce	Summary of comments received	Summa ry of co mment s not accept ed and rea sons	URL (If applicable)
7	Public Meeti ng	Non- target ed/br oad comm unity	Small Busine ss Recove ry Commi ttee meetin gs were held via Zoom. They met on July 20, July 20, July 24, and Novem ber 11, 2020.	Topics included the Covid situation present a threat to many small businesses, strategies to assist small business many of which employ low- to moderate- income individuals, possible grants to help small businesses weather the Covid- 19 pandemic, the need for financial, legal, and marketing services, and workforce training and business coaching.	All comme nts receive d where conside red in the Annual Action Plan.	

Sor t O rde r	Mode of Ou treac h	Targe t of O utrea ch	Summ ary of respon se/att endan ce	Summary of comments received	Summa ry of co mment s not accept ed and rea sons	URL (If applicable)
8	Intern et Outre ach	Non- target ed/br oad comm unity	All Public Meetin g and Public Hearin g inform ation is posted on the City websit e and display ed on the main page calend ar.		All comme nts receive d where conside red in the Annual Action Plan.	www.ci.indepen dence.mo.us/co mdev/CDBG.asx p

Table 4 – 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 unspent 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. A total of \$18,034.80 of HOME Program Income was received in PY 2020. HOME funds will be used for the development of affordable housing.

Anticipated Resources

Program	Source	Uses of Funds	Expec	ted Amoun	t Available Yea	ar 1	Expected	Narrative Description
	of Funds		Annual	Program	Prior Year	Total:	Amount	
			Allocation:	Income:	Resources:	\$	Available	
			\$	\$	\$		Remainder	
							of ConPlan	
							\$	

Program	Source	Uses of Funds	Expec	ted Amoun	t Available Ye	ar 1	Expected	Narrative Description
l	of Funds		Annual	Program	Prior Year	Total:	Amount	
			Allocation:	Income:	Resources:	\$	Available	
			\$	\$	\$		Remainder of ConPlan	
							\$	
CDBG	public -	Acquisition						Based on current and prior trends, the City
	federal	Admin and						has consistently received approximately
		Planning						\$810,000 for the annual allocations. The
		Economic						City will re-allocate \$32,511 of 2019 CDBG
		Development						funds originally targeted for administration
		Housing						to 2021 CDBG home repair program.
		Public						
		Improvements						
		Public Services	821,542	0	32,511	854,053	750,000	
HOME	public -	Acquisition						Based on current allocation and prior
	federal	Homebuyer						trends, the City has received between
		assistance						\$300,000 and \$500,000 for the annual
		Homeowner						allocations.
		rehab						
		Multifamily						
		rental new						
		construction						
		Multifamily						
		rental rehab						
l		New						
l		construction for						
1		ownership						
		TBRA	465,330	18,035	0	483,365	450,000	

Table 5 - Expected Resources – Priority Table

Annual Action Plan 2021

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	2017	2021	Affordable	City-wide	Home Repair and Energy	HOME:	Homeowner Housing Added: 2
	choice for all			Housing		Efficiency Improvements	\$418,797	Household Housing Unit
				Fair Housing		Vacant Residential		Homeowner Housing
						Properties Reuse		Rehabilitated: 3 Household
								Housing Unit
2	Strong, healthy,	2017	2021	Affordable	CDBG	Code Enforcement and	CDBG:	Housing Code
	well-balanced			Housing	Eligible Area	Blight Removal	\$195,000	Enforcement/Foreclosed
	neighborhoods			Non-Housing	Census			Property Care: 2200 Household
				Community	Tracts			Housing Unit
				Development				

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

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

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

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

Table 6 – Goals Summary

Goal Descriptions
1 Goal Name Quality housing choice for all		Quality housing choice for all
	Goal Description	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.
		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.
2	Goal Name	Strong, healthy, well-balanced neighborhoods
GoalFunds will be used to support residential property maintenance code compliance enforcement in low and modDescriptionneighborhoods, and demolition of dangerous buildings on a spot blight basis.		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		Commitment to preventing and ending homelessness
	GoalFunds will be used to assist homeless and at-risk homeless through the provision of emergency shelter, rent and utiliDescriptionassistance, subsistence level services, case management services, and transitional housing.	
4	Goal Name Self-sufficiency and family success	
GoalFunds will be used to assist a variety of public service programs aimed at increasing self-sufficiency and famDescriptionincluding transitional housing for families in crisis, and transitional housing for pregnant teens.		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		Dependable care for those with special needs
GoalFunds will provide support for direct services to special needs populations including meal programs for senDescriptiondisabled, and supportive services for victims of domestic violence and child abuse.		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
	GoalSupport 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.	

8	Goal Name	Local AFH Goal 1: Reasonable Accommodations Policy				
	Goal Description					
9	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.				
10	Goal Name	Local AFH Goal 3: Fairmount Business District Plan				
Description design team has worked extensively with the design process. An ongoing public input proceed district plan. Client feedback from the City of I Specifically this plan was desired to accomplis neighbors • Create a plan for all forms of transt throughout the area eliminating public safety experience • Protect and restore the natural res		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.				
12	Goal Name	Reg AFH Goal 1: Expand Use of CDFI/NMTC				
	Goal Description					
13	Goal Name	Reg AFH Goal 2: Establish Fair Housing Website				
	Goal Description					

14	Goal Name	Reg AFH Goal 3: Fair Hsg Education -Stakeholders			
	Goal				
	Description				
15	Goal Name	Reg AFH Goal 4: Advocate for Universal Designs			
	Goal	The City of Independence has required Universal Design be achieved in all funded HOME single family developments.			
	Description	Required Universal Design best practices were established in conjunction with the RL Mace Universal Design Institute.			
16	Goal Name	Reg AFH Goal 5: Regional Housing Mobility			
	Goal				
	Description				
17	Goal Name	Reg AFH Goal 6: Develop Compact Use Zoning			
	Goal				
	Description				
18	Goal Name	Reg AFH Goal 7: Develop Regional Hsg Locator			
	Goal				
	Description				
19	Goal Name	Reg AFH Goal 8: Encourage Affordable TOD by Zoning			
	Goal				
	Description				
20	Goal Name	Reg AFH Goal 9: Universal Design Incentive Policy			
	Goal	The City of Independence has required Universal Design be achieved in all funded HOME single family developments.			
	Description	Required Universal Design best practices were established in conjunction with the RL Mace Universal Design Institute.			
21	Goal Name	Reg AFH Goal 10: Promote KC Degrees/KC Scholars			
	Goal				
	Description				
		Annual Action Plan 38			

22	22 Goal Name Reg AFH Goal 11: KC Rising Education and Job Train	
	Goal Description	
23	Goal Name	Reg AFH Goal 12: Transportation Option Partnership
	Goal Description	
24	Goal Name	Reg AFH Goal 13: Align Regional Transit to Jobs
	Goal Description	
25	Goal Name	Reg AFH Goal 14: Affordable Hsg Education Material
	Goal Description	
26	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
2021-22 CDBG Administration
2021-22 CDBG Housing Investment Program
2021-22 CDBG Public Facility and Infrastructure Investments
2021-22 CDBG Public Service Programs
2021-22 HOME Administration
2021-22 HOME Community Housing Development Corporations (CHDO Projects)
2021-22 HOME Community Housing Development Organization Operating Funds
2021-22 HOME Single and Multi-Family Housing Projects

Table 7 - 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
- Stong, 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

1	Project Name	2021-22 CDBG Administration
	Target Area	City-wide
	Goals Supported	Ongoing Capacity Building
	Needs Addressed	Support for the Institutional Delivery System
	Funding	CDBG: \$164,308
	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 ensure 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 exists. This is the central, northwest, northeast and southwestern areas of Independence.	
	Planned Activities	Property Maintenance regulation compliance	
3	Project Name	2021-22 CDBG Public Facility and Infrastructure Investments	
	Target Area	CDBG Eligible Area Census Tracts City-wide	
	Goals SupportedQuality housing choice for all Strong, healthy, well-balanced neighborhoods		
	Needs Addressed	Home Repair and Energy Efficiency Improvements Code Enforcement and Blight Removal Sidewalk and Public Facilities Improvements Access to Basic Services and Public Facilities	
	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	2021-22 CDBG Public Service Programs	
	Target Area	City-wide	

	Goals Supported Needs Addressed	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 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
	Funding.	Domestic Violence Prevention & Services
	Funding Description	CDBG: \$123,231 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	CDBG Eligible Area Census Tracts	
	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	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	An area generally north of 23rd 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.
	Planned Activities	Tax abatement, SF home redevelopment, new SF home construction.
8 Project Name 2021-22 HOME Single and Multi-Family Housing Pro Target Area City-wide		2021-22 HOME Single and Multi-Family Housing Projects
		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: \$343,765
	Description	Development and or redevelopment of affordable housing units. Focused on Council Districts 1 and 4 to coordinate housing investment with the newly establish SW Independence Tax Abatement 353 and Englewood Planning Area.

	Target Date	6/30/2022
	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 8 - 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

Annual Action Plan

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 will continue to focus its efforts in supporting the development and rehabilitation of affordable housing. Addressing the affordable housing need continues to be a high priority in Independence and efforts will encompass a variety of the proposed activities to ensure there is quality affordable housing available in Independence. The activities will include support to Community Housing Development Organizations (CHDOs) for the development of new affordable housing construction and rehabilitation of existing single-family homes to make them safe and sanitary, remove lead-based hazards. These efforts will help reduce slum blight with those improvements and provide homeowners with a safe and affordable home.

In PY 2021, the City will allocate significant funding for minor home repair program aimed to improve the quality of life for low-income residents, including people with disabilities and the elderly. The Program provides assistance in the form of a grant for minor home repairs and improvements concentrating on health and safety code repairs to extend their longevity and to increase their safety and livability.

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.

One Year Goals for the Number of Households to be Supported		
Homeless	0	
Non-Homeless	43	
Special-Needs	10	
Total	53	
Table 9 - One Year Goals for Affordable Housing by Support Requirement		

Table 9 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through	
Rental Assistance	30
The Production of New Units	1
Rehab of Existing Units	22
Acquisition of Existing Units	0
Total	53

Table 10 - One Year Goals for Affordable Housing by Support Type

Discussion

It is anticipated that the City will be assisting affordable housing through rent assistance, HOME Affordable Housing Rehabilitation/Development Program and the minor home repair program activities.

The rent assistance will assist an estimated 30 households by providing up to six months of rental assistance or \$5,000 to the landlord of selected applicants. It is anticipated the households served by this assistance would fall into the extremely low and low-income categories.

At least three affordable single-family units will be redeveloped in partnership with OIKOS Development Corporation and Truman Heritage Habitat for Humanity, both of which are 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 its surrounding properties. Universal Design best practices will be required with funding to encourage aging in place and address needs of those with disabilities. It is anticipated the households served by the HOME program would be in the moderate income category.

Approximately 20 low- or moderate-income homeowners will receive home repairs from CDBG funding anticipated to be awarded in 2021. The minor home repair program will be a significant program in helping low-income residents remain in their homes. Slightly over 50% of the households in Independence are considered low income and assisting with home repairs of their property can ensure they can remain safely in their homes and ensure future affordable housing stock is in safe and sanitary condition. Additional efforts, including neighborhood clean ups, infrastructure improvements, and other efforts to reduce slum and blight can also help improve the existing housing stock and neighborhoods. There are also continued efforts to assist with the construction of new single family homes in existing vacant infill lots, which will help boost the number of new affordable housing options.

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 evaluation. Contributing 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 longterm 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.

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

Annual Action Plan

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 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

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 nonprofit 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 subrecipients 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 Leadbased 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.

Discussion:

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.

 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 The amount of proceeds from section 108 loan guarantees that will be used during the year to 	0
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

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%

0

HOME Investment Partnership Program (HOME) Reference 24 CFR 91.220(I)(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.

Attachments

Citizen Participation Comments

Public Meetings Citizen Participation Comments On A Roll Committee

Meetings held via Microsoft Teams. Met on August 10, September 14, December 14, January 8, and March 8. Topics discussed included the need to improve connections within and between neighborhoods that improve access to transit, jobs, services and shopping; the need for transit to provide access to jobs; and strategies for addressing blight in residential neighborhoods and rehabilitation of residential structures.


On A Roll Working Group Agenda

August 10, 2020, 4:00 pm - 5:00 p.m.

Virtual Meeting

- I. Call to Order
- II. Square Streetscape Project
 - a. Next Steps
 - b. Can the Square Design be completed with in-house staff? If not, why not?
 - c. If outside consulting needed, what are the qualifications sought?
- III. Truman Connected Project
 - a. Update
 - b. With project moving forward, what dollar leveraging/savings could materialize?
- IV. Other Business/Board Comments
- V. Adjournment

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INDEPENDENCE

On A Roll Working Group Agenda

September 14, 2020, 4:00 pm - 5:00 p.m.

Virtual Meeting via Microsoft Teams, also streamed on City7 https://www.ci.independence.mo.us/city7/livevideo and YouTube https://www.youtube.com/user/IndependenceMissouri/live

- I. Call to Order
- II. Approval of Minutes from August 10, 2020 Meeting
- III. Square Streetscape Project Economic Impact
- IV. On A Roll PowerPoint for 9/28/20 City Council Meeting
- V. National Park Service Visitors Center Update
- VI. Other Business/Board Comments
- VII. Adjournment

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Annual Action Plan 2021

On a Roll Work Group Minutes from August 10, 2020 Meeting

- Call to Order: Meeting called to order at 4:00 pm by CM Perkins. Others in attendance virtually included Laurie Wiley, Dan O'Neil, Adam Norris, Tom Scannell, Samantha Morris, Mike Winkler, Lisa Phelps, Eric Urfer, Mark Randall.
- II. Square Streetscape Project: Adam Norris made a report on the status of the Project, including next steps, and addressed the question as to whether or not design work could be done in-house, and what qualifications would be needed. Regarding next steps, Adam reported that we have a Concept Design completed previously by Confluence, which has since been updated. Survey work has also been completed. Next will come the preparation of Final Design and Construction Documents.

Regarding design work, Adam and Lisa indicated that it would be better to have it done outside rather than in-house. Municipal Services and other departments are stretched thin at present, and the job could be done better and quicker through the use of outside engineers. Mike added that City staff would be involved assisting in the project, particularly in utility coordination, locates and other aspects of the job. In answer to a timeframe question from Laurie, Adam indicated that a decision had been made to switch from a Design-Build to a traditional Design-Bid-Build project. This will likely mean a 3-6 month RFQ process to select the engineer, followed by a design process involving On a Roll input and Council approvals of specific elements. He noted that the engineering and design may run \$300,000, but that is a very rough estimate. He indicated that he would be coming back with more detailed estimates and schedules. Dan asked what the Council opinion is regarding the timeline of the project, to which CM Perkins replied that is to be seen after future discussions. CM Perkins drew the groups attention to how plans call for leveraging other funding sources to match City funds. Adam echoed this and explained how CDBG and STP funds would be employed, and Mark added that the Square CID will provide streetscape amenities and maintenance to further stretch City tax dollars. Laurie asked if at a future meeting the group could see more detail on leveraging as well as information about the economic benefits from a Downtown streetscape project.

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Annual Action Plan 2021

I.

She said there is sometimes criticism for doing work on the Square, so it would be helpful to have fact sheets showing leveraging of other funds and economic impact benefits. She felt this kind of information would help "sell" the streetscape. CM Perkins said this would be brought forward at a future meeting.

- III. Truman Connected Project: CM Perkins led a discussion about the status of the Truman Connected Project including an overview of a concept plan funded through a PSP Grant which was presented at the previous Council meeting by consultants at WSP. The plan showed how the cycle track and shared use path sections could be designed from Truman Library to Truman Sports Complex, crossing through the Square and Englewood. Eric Urfer explained how the plan could be tweaked to provide a connection to the National Frontier Trails Museum and Truman Depot. Staff reported that Phase I is already funded from Truman Library to Englewood with an STP Grant, and a grant request has been submitted for an STP Grant for Phase II.
- IV. Other Business/Board Comments: Lauric asked what is the Next Big Thing once the Square and Truman Connected are complete. CM Perkins said he felt 24 Highway improvements and revitalizing plans for Fairmount rise to the top in his thinking. During discussion it was noted that several projects could advance in parallel.
- V. Adjournment: There being no other business, CM Perkins adjourned the meeting at 4:47 pm.

For more information about Independence Boards and Commissions visit: http://www.ci.independence.mo.us/BoardsCom

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INDEPENDENCE

On A Roll Working Group Agenda

December 14, 2020, 4:00 pm - 5:00 p.m.

Virtual Meeting via Microsoft Teams, also streamed on City7 https://www.ci.independence.mo.us/city7/livevideo and YouTube https://www.youtube.com/user/IndependenceMissouri/live

- I. Call to Order
- II. Approval of Minutes from September 14, 2020 Meeting
- III. Truman Connected and Square Streetscape Update
- IV. Update on Englewood Roundabout
- V. Other Business/Board Comments
- VI. Adjournment

For more information about Independence Boards and Commissions visit: http://www.ci.independence.mo.us/BoardsCom

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On a Roll Working Group Minutes from the September 14, 2020 Meeting

- Call to Order: Meeting called to order at 4:00 pm by CM Perkins. Others members in attendance virtually included CM Huff, CM Steinmeyer, Laurie Wiley, and Dan O'Neil. Others attending virtually included Zach Walker, Adam Norris, Eric Urfer, Tom Scannell, Lisa Phelps, Samantha Morris, Jeff Rogers, and Mark Randall.
- Approval of Minutes from the August 10, 2020 meeting: Motion by CM Perkins, seconded by CM Steinmeyer, motion passed.
- III. Square Streetscape Project Economic Impact: Jeff Rogers, Executive Director of Independence Square Association, addressed the group about the anticipated economic impact of the proposed Streetscape project, and provided information he would present to Council at the Study Session. He noted that national statistics show a 25 or 30 to 1 reinvestment ratio for every dollar spent to revitalize downtowns. Many communities around the country, including Lec's Summit and Overland Park in our own area, have seen great economic benefits from revitalized downtowns. Jeff noted that our Square is already a major economic engine in Independence, with scores of businesses and 1.700 jobs, and a new streetscape would preserve and build on that economic activity. CM Perkins asked about benefits arising from our participation in Missouri Main Street. Jeff noted that thanks to a grant from the City, Independence joined the Missouri Main Street program, and has advanced to "Affiliate" status and is pursuing full accreditation. He explained that the Program is built around the National Trust for Historic Preservation's "Main Street 4 Point Approach", which has been the blueprint for successful downtown revitalization all over the country. After Jeff concluded his remarks, Laurie Wiley made a motion for the On A Roll Working Group to go on record in support of the Square Streetscape Project, which was seconded by CM Perkins. The motion was approved by a voice vote of "Aye" by the members, no "Nays" were recorded.
- IV. On A Roll PowerPoint Presentation for 9/28/20 City Council Meeting: CM Perkins reported that this presentation had been delayed for some time due to COVID, but was now on track for the 9/28/20 City Council meeting. He then went through the presentation and took questions. CM asked about the "Municipal Lease" listed among funding sources. CM Perkins indicated that was referring to the "mini-bond"

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issued previously to advance various public works projects. Laurie Wiley asked if something to could be done to highlight the leveraging of outside sources of funding. CM Perkins suggested the funding slide be changed slightly by showing leveraged funds in bold. Mark indicated he would make the change.

- V. National Park Service Visitors Center Update: Mark provided an update on this project. According to NPS officials, this project is a high priority, with a total budget of approximately S8 million. While NPS works on design, they have asked the City to vacate an alley on the property being donated for the project. This is in process and should be done in October. There is also an issue with a transformer and other utilities on the west side of the lot. It's hoped, and anticipated, that these utilities will not have to be moved, and can be included in an easement.
- VI. Other Business/Board Comments:
- VII. Adjournment: There being no other business, CM Perkins adjourned the meeting at 4:47 pm.

For more information about Independence Boards and Commissions visit: http://www.ci.jndependence.mo.us/BoardsCom

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INDEPENDENCE

On A Roll Working Group Agenda

March 8, 2021, 4:00 pm - 5:00 p.m.

Virtual Meeting via Microsoft Teams, also streamed on City7 https://www.ci.independence.mo.us/city7/livevideo and YouTube https://www.youtube.com/user/IndependenceMissouri/live

- I. Call to Order.
- II. Approval of Minutes from January 11, 2021 Meeting.
- III. Update on Square Streetscape Project.
- IV. Update on Truman Connected Project.
- V. Other Business/Member Comments.
- VI. Adjournment.

For more information about Independence Boards and Commissions visit: http://www.ci.independence.mo.us/BoardsCom

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INDEPENDENCE

On a Roll Working Group Minutes from the January 11, 2021 Meeting

- Call to Order: Meeting called to order at 4:00 pm by Council Member Perkins, Chairman
 of the Working Group. Others members in attendance virtually included CM Huff, Dan
 O'Neill, and Laurie Dean Wiley. Others in attendance included Adam Norris, Lisa
 Phelps, Tom Scannell, Eric Urfer, Mike Winkler, J.D. Kehrman, Samantha Morris, Steve
 Wagner, Mark Randall.
- II. Approval of Minutes from the December 14, 2020 meeting: Motion by Dan, seconded by CM Huff, motion passed.
- Update on recent transportation grant applications and impact on recommended projects, III. including Truman Connected, Englewood Roundabout, and Truman/Winner intersection: Lisa Phelps & Mike Winkler reported on the outcome of the City's recent grant applications. Funds totaling \$719,085 were obtained to extend the project from where Phase I will end (Winner & Sterling) south to Sterling & 23rd. A grant of \$1,428,000 also obtained for the Truman & Winner Intersection Project. Unfortunately, the roundabout planned on the west side of Englewood on Winner was not approved. CM Perkins said it was a bit of a long shot anyway as the project was unlikely to get a high score for regional significance and was more of a local project. Mike Winkler echoed comments made at the last meeting to the effect that staff would be working with residents and business owners in Englewood to evaluate other alternatives. Laurie suggested looking at stop signs to protect pedestrians and slow traffic. Mike said stop signs would be an option, but might not meet warrant requirements. He said they are also looking into possible elimination of the 18th Street segment of the intersection. Dan asked about speed bumps, and Mike replied that they couldn't be used on Winner as it's a primary emergency route. CM Perkins indicated that he and Lisa met with Englewood community members about various ideas, including enhanced, artistic crosswalks as well as stop signs. He said options will be brought back to the Working Group for discussion at a future meeting.
- IV. Update on Square Streetscape: CM Perkins & Adam Norris reported on the status of the project. Adam mentioned that a contract was being prepared for Council consideration for design of both the Streetscape and Truman Connected. It was thought that using the same design firm for both projects would increase efficiencies and result in a better

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project. Laurie asked CM Perkins if the City Council was generally in favor of the project. He replied that Council opinion was still evolving. Laurie suggested that the Streetscape Project was important to the whole community, not just the Square area. CM Perkins echoed that thought, saying improvements on the Square would have a community-wide impact, just as a revived Englewood has. He mentioned several groups have voiced support, and encouraged On A Roll Members to continue to promote it as well.

V. Update on Truman Depot Restoration and Trail Project: Mike Winkler & Eric Urfer reported on the status of the project, which included Depot improvements and a trail segment to the Trails Museum, utilizing a grant just over \$500,000. The project has been delayed for years due to concerns by Union Pacific. The railroad continues to be concerned about the trail crossing the tracks, and have thus far declined to sign off on the project. Mike said a third extension has been obtained for the project for another year. Eric pointed out that much work has managed to get done, including Design and MODOT review. CM Perkins added that AMTRAK has also weighed-in, indicating that they are looking forward to the completion of the project. Eric agreed that AMTRAK would like to see this develop into a major stop, and a serious marketing effort is called for once the improvements are made. Dan mentioned that security is a major concern for rail passengers and would have to be addressed. Eric replied that plans called for more cameras, better lighting, and station staff. The plan is to replicate the experience in Kirkwood, which is a very popular stop with the public. CM Perkins suggested that brush cutting would also help. Eric said that will be included in the new plans, which might also call for relocation of the caboose. CM Perkins said the trail segment would be really great. Eric agreed, adding that the trail plan might have to be tweaked to satisfy Union Pacific, but a trail connection with Truman Connected is essential.

- VI. Other Business/Board Comments: Mark called attention to the updated On A Roll Project Chart which was sent out with the Agenda. CM Perkins suggested to Municipal Services staff that a 24 Highway update would be welcome at an upcoming meeting. Laurie welcome JD Kehrman to the meeting, and noted that the EDC can be very helpful in advancing the agenda of the On A Roll Working Group. J.D. thanked Laurie and echoed her comments about the role the EDC can play in advocating these important projects.
- VII. Adjournment: There being no other business, the meeting was adjourned by CM Perkins after a motion by CM Huff, seconded by Laurie, and unanimously approved by the members present.

For more information about Independence Boards and Commissions visit: http://www.ci.independence.mo.us/BoardsCom

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Annual Action Plan 2021 Small Business Recovery Committee

Meetings held via Zoom. Met on July 20, July 24, November 11. Topics included the Covid situation present a threat to many small businesses, strategies to assist small business many of which employ low- to moderate-income individuals, possible grants to help small businesses weather the Covid-19 pandemic, the need for financial, legal and marketing services, and workforce training and business coaching. Housing and Homeless Strategy Committee

Meeting held via Microsoft Teams. Met on July 21, July 28, August 27 and September 24. Topics discussed include the need for affordable housing options whether acquiring vacant dangerous buildings to rehab or acquiring vacant properties to construct affordable housing and the need to address homelessness, the need for new homeless shelters and services for homeless and those near homeless.



Inter-Departmental Homelessness Task Force

Agenda

- I. Welcome and Call to Order
- II. Updates
 - a. Update on Homeless population/Survey Information/What are we seeing out there?
 - b. Law Enforcement Issues
 - c. Parks & public spaces/clean-up issues
- III. Discussion of Homelessness Strategies Summary
- IV. Adjournment

For more information about Independence Boards and Commissions visit: http://www.ci.independence.mo.us/BoardsCom

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Annual Action Plan 2021 Northwest Independence Community Meeting

Meeting held via Zoom. Met on February 12, March 12, May 4. Topics discussed strategies to improve outreach to Spanish speaking citizens strategies to assist homeowners in making repairs to their homes/properties, the need for services – childcare, food services, financial services, and job training, strategies to address blight, crime and homelessness, and the need to coordinate a neighborhood clean up to address trash/debris and overgrown vegetation.



Funding Briefing and Technical Assistance Workshop/ Community Meeting on Housing and Community Needs CDBG/HOME

> April 21, 2021 3:30 – 5:00 p.m. Virtually via Microsoft Teams

Staff Introductions Overview of HOME Program and CDBG Program projects Request for community housing needs input from citizens Adjournment

> 111 EAST MAPLE AVE. • INDEPENDENCE, MO 64050 INDEPENDENCEMO.ORG

Grantee Unique Appendices

Appendix A Authorizing Ordinance CDB07 Plan-Year 47 2021-2022 06/11/21 - JF

BILL NO. 21-035 ORDINANCE NO. 1923

AN ORDINANCE APPROVING THE AMENDED 2020-2021 ANNUAL ACTION PLAN FOR PROGRAM YEAR 46, AND THE 2021-22 ANNUAL ACTION PLAN FOR PROGRAM YEAR 47 FOR THE CDBG AND HOME PROGRAMS, AUTHORIZING APPLICATIONS TO THE DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT (HUD) FOR THE COMMUNITY DEVELOPMENT BLOCK GRANT (CDBG) PROGRAM YEAR 47 AND THE HOME INVESTMENT PARTNERSHIPS ACT (HOME) PROGRAM YEAR 27; AUTHORIZING EXECUTION OF A WRITTEN AGREEMENT AND ACCEPTANCE OF CDBG AND HOME PROGRAM FUNDS UNDER THE HOUSING AND COMMUNITY DEVELOPMENT ACT OF 1974; AND MAKING THE NECESSARY APPROPRIATIONS.

WHEREAS, the City Council of the City of Independence, Missouri, has indicated an intent to submit an amended application to the Department of Housing and Urban Development for Entitlement funds for Program Year 46 of the Community Development Block Grant to account for the allocation of \$607,507 of CDBG-CV funds; and,

WHEREAS, the City Council of the City of Independence, Missouri, has indicated an intent to submit an application to the Department of Housing and Urban Development for Entitlement funds for Program Year 47 of the Community Development Block Grant and Program Year 27 of the HOME Investment Partnerships Act; and,

WHEREAS, the City Council agrees to conform to and comply with the regulations of the Housing and Community Development Act of 1974, and other pertinent federal regulations; and,

WHEREAS, the City Council has authorized and required public hearings to secure citizen input and formulated a reasoned application for available funding by applying for an estimated \$821,542 in CDBG funds and \$465,330 in HOME funds and utilizing \$32,511 of prior year CDBG funds; and

WHEREAS, the required 2021-2022 Annual Action Plan for CDBG Program Year 47 and HOMB Program year 27 has been formulated; and,

WHEREAS, the activities and programs initiated and undertaken through the CDBG and HOME Programs will hencfit the citizens of Independence, will promote a more viable and healthful community; and are deemed by the City Council to be in the best interest of the citizens of this City;

NOW, THEREFORE, BE IT ORDAINED BY THE COUNCIL OF THE CITY OF INDEPENDENCE, MISSOURI, AS FOLLOWS:

<u>SECTION 1.</u> That the City Manager is hereby authorized and directed to make application for funding to the Department of Housing and Urban Development (HUD) for Program Year 47 of the Community Development Program (CDBG), and Program Year 27 of the HOME Investment Partnership Act (HOME) Program, to be submitted with the City's 2021-2022 Annual Action Plan and recommending the following projects and programs for the 2021-2022 Program Year:

CDBG Plan-Year 47 2021-2022 36/11/21 – 3F

CDBG PROGRAM YEAR 46 FFY 2020-2021

CDBG Administration	\$162,831.00
Housing Code Compliance	\$195,000.00
Public Facility Improvements	\$ 440,272.00
Public Services	\$ 729,630.00**
Total	\$1,527,733.00

**Denotes amounts adjusted by HUD COVID19 Waivers and CDBG-CV Funding

CDBG PROGRAM YEAR 47

FFY 2021-2022	
CDBG Administration	\$164,308.00
Housing Code Compliance	\$195,000.00
Home Rehabilitation	\$ 371,514.00
Public Services	\$ 123,231.00
CDBG Total	\$ 854,053.00
HOME Administration	\$ 46,533.00
Community Housing Development Organization (CIIDO)	\$ 69,800.00
CHDO Operating Funds	\$ 23,267.00
Single & Multi-Family Housing Projects	\$ 325,730,00
HOME Total	\$ 465,330.00

SECTION 2. That upon HUD's acceptance of the City's application, the City Manager is authorized to exercise any and all necessary powers available to him to obtain CDBG and HOME Program funding, and to implement those projects listed in the Annual Action Plan, including execution of HUD funding agreements and sub-grant Agreements for the administration of said projects.

SECTION 3. That upon the final execution of funding agreements between the City and HUD, appropriations are hereby authorized to be increased for the purposes and from the sources listed on this ordinance. CDBG Plan-Year 47 2021-2022 05/11/21 - JF

PASSED THIS DAY OF THE CITY OF INDEPENDENCE, MISSOURI.

> Presiding Officer of the City Council of the City of Independence, Missouri

2021, BY THE CITY COUNCIL OF

ATTEST:

APPROVED FORM AND LEG ALITY:

Acting City Counselor

REVIEWED B

City Manager

I hereby certify that there is a balance, otherwise unencumbered, to the credit of the appropriation to which the foregoing expenditure is to be charged, and a cash balance, otherwise unencumbered, in the Treasury, to the credit of the fund from

which payment is to be made, sufficient

to meet the obligation hereby incurred. Source is: As Indicated

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Director of Finance and Administration City of Independence will summy

Appendix B Citizen Participation Plan Revised April 2020

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 moderateincome 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. <u>This document may be amended by the City Council.</u>

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 May 18, 2020.

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 HUDprovided 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 <u>http://www.ci.independence.mo.us/comdev/CDBG.aspx</u>.

E.) Provide for at least two (2) public hearings (including virtual options) 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. 4.) Upon determination of urgent need, the Citizen Participation Plan allows expedited procedures to draft, propose, or amend consolidated plans. Expedited procedures must include notice and reasonable opportunity to comment of no less than 5 days. The 5-day period can run concurrently for comments on the action plan amendment and amended citizen participation plans.

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:

 A change in the City's allocation priorities or a change in the method of distribution of funds covered by the Consolidated Plan;

 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
 - Public Facilities
 - iii. Public Services
 - iv. Economic Development
 - v. Planning
 - vi. Program Administration
- 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.

 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 five (5) 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 digital

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:

- Access to all forms, guidelines and time schedules pertaining to the annual consolidated planning process.
- 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.
- Information regarding the location of all applicable federal rules and regulations.

Appendix C Affidavit of Publication

AFFIDAVIT OF PUBLICATION

STATE OF MISSSOURI) County of Jackson) } SS.

I, __Danelle Sousley__, being duly sworn according to law, state that I am the __Legal Clerk____ and agent of THE EXAMINER, a daily newspaper of general circulation in the County of Jackson, State of Missouri, where located; which newspaper has been admitted to the Post Office as a periodical class matter in the City of Independence, Missouri, the city of publication; which newspaper has been published regularly and consecutively for a period of three years and has a list of bona fide subscribers, voluntarily engaged as such who have paid or agreed to pay a stated price for a subscribin for a definite period of time, and that such newspaper has complied with the provisions of Section 493.050, Revised Statutes of Missouri 2000; The affixed notice appeared in said newspaper in the following issues:

Commencing on May 27, 2021

and ending on May 27, 2021 , being the issues of:

May 27, 2021

being Volume 117

Numbers.

dla Legal Clesk Danelle Sousley

Subscribed and sworn to before me on this _____ day of

Notary Public, Deneane Marie Hy

My commission expires October 12, 2024



Annual Action Plan 2021 99

CORRECTED PUBLIC NOTICE CITY OF INDEPENDENCE, MISSOURI CDBG & HOME Programs Proposed 2021-22 Annual Action Plan

Notice is given that on a before August, 16, 2021 the City of Independence will submit the 2021-22 Annual Action Plan for the Commulty Development Block Grent (CDBG) and HOME Investment Fatherships Act programs, sull orized by the Housing and Community Development Act of 1974, to the US. Department of Housing and Urban Development (HUD). A dott of the Plan will be available for vaxing beginning May 20, 2021 in the Community Development Department, City Hall 111 E. Masle, during regular business nours, and domine at <u>troughwaves</u> independence mouse and the submitted in writing to Tom Scamell, 111 F. Magle independence. Mescuri 64050: All will be comments received by Arie 28, 2021 will be addressed in the final Action Plan document. If accommodations are required due to a disability, limited English proficiency, or other special need, contact Minands Rice at ST&225, 2758. S less commissionation are submitted in a balled bits 245, 7988.

Bibliotovise
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CDBG PROGRAM YEAR 47 - FF	Y 2021-2022
CDBG	
Administration	\$164,308,00
Housing- Code Compliance	\$195,000.00
Home Rehabilitation	\$371,514.00
Public Service Programs	\$123,231.00
Intal	\$854.053.00
HOME	and the second
Administration	\$ 46,533.00
Community Housing Development Organization (CHDO)	\$ 69,800,00
CHDO Operating Funck	\$ 25,257.00
Single & Multi Kamily Housing Projects	\$ 325,730.00
Total	\$ 465,330.00
Total	\$ 1,319,383.00
PUBLISH DATE: May 27, 2021	

Appendix D	
CDBG Areas Map	



Appendix E Lead Hazard Reduction Plan

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 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 leadhazard 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 Community Development 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; and cooperation with the Jackson County Health Department to promote availability of free lead screening for children.

	Rehabilitation (Subpart J)		TBRA (Subpart M)	A,L,SS,O (Subpart K)	
	<u><</u> \$5,000	\$5000-\$2500	>\$25,000		Homebuyer and Special Needs*
Approach to Lead Hazard Evaluation and Reduction	1. Do no harm	 Identify and control lead hazards 	 Identify and abate lead hazards 	2. Identify and Stabilize deteriorated paint	 Identify and Stabilize deteriorated paint
Notification	Yes	Yes	Yes	Yes	Yes
Lead Hazard Evaluation	Paint Testing (of surfaces to be disturbed)	Paint Testing and Risk Assessment	Paint Testing and Risk Assessment	Visual Assessment	Visual Assessment
Lead Hazard Reduction	Repair surfaces disturbed during rehabilitation	Interim Controls	Abatement (Interim Controls on exterior surfaces not disturbed by rehabilitation	Paint Stabilization	Paint Stabilization
	Safe work practices Clearance	Safe work practices Clearance	Safe work practices Clearance	Safe work practices Clearance	Safe work practices Clearance
Ongoing Maintenance	For HOME rental only	For HOME rental only	For HOME rental only	Yes	Yes (if ongoing relationship)
EIBLL Requirements	No	No	No	Yes	No
Options	Presume lead- based paint Use safe work practices on all surfaces	Presume lead- based and/or hazards Use Standard treatments	Presume lead- based and/or hazards Abate all applicable surfaces	Test deteriorated paint Use safe work practices only on lead-based paint surfaces	Test deteriorated paint Use safe work practices only on lead-based paint surfaces



ATTACHMENT 13-3

Four Approaches to Implementing Lead Hazard Evaluation and Reduction

APPROACH 1. DO NO HARM				
Lead Hazard Evaluation	Lead Hazard Reduction	Options		
 Paint testing performed on surfaces to be disturbed. 	 Repair surfaces disturbed during work. Safe work practices used when working on areas identified as lead-based paint. Clearance performed. 	 Presume lead-based paint is present and use safe work practices on all surfaces being disturbed. 		
APPROACH 2. IDENTIFY AND	STABILIZE DETERIORATED PAINT			
Lead Hazard Evaluation	Lead Hazard Reduction	Options		
 Visual assessment performed to identify deteriorated paint. 	 Paint stabilization of identified deteriorated paint. Safe work practices used. Clearance performed. 	 Perform paint testing on deteriorated paint. Safe work practice requirements only apply to lead-based paint. 		
APPROACH 3. IDENTIFY AND	APPROACH 3. IDENTIFY AND CONTROL LEAD HAZARDS			
Lead Hazard Evaluation	Lead Hazard Reduction	Options		
 Paint testing performed on surfaces to be disturbed. Risk assessment performed on entire dwelling. 	 Interim controls performed on identified hazards. Safe work practices used. Clearance performed. 	 Presume lead based paint and/or lead based paint hazards are present and perform standard treatments. 		
APPROACH 4. IDENTIFY AND ABATE LEAD HAZARDS				
Lead Hazard Evaluation	Lead Hazard Reduction	Options		
 Paint testing performed on surfaces to be disturbed. Risk assessment performed on entire dwelling. 	 Abatement performed on identified hazards. Interim controls performed on identified hazards on the exterior that are not disturbed by rehabilitation. Safe work practices used. Clearance performed. 	 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. 		

Basically CDBG for States (July 2012) HUD, Office of Block Grant Assistance

CERTIFICATIONS

In accordance with the applicable statutes and the regulations governing the consolidated plan regulations, the jurisdiction certifies that:

Affirmatively Further Fair Housing -- The jurisdiction will affirmatively further fair housing.

Uniform Relocation Act and Anti-displacement and Relocation Plan -- It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, (42 U.S.C. 4601-4655) and implementing regulations at 49 CFR Part 24. It has in effect and is following a residential anti-displacement and relocation assistance plan required under 24 CFR Part 42 in connection with any activity assisted with funding under the Community Development Block Grant or HOME programs.

Anti-Lobbying -- To the best of the jurisdiction's knowledge and helief:

1. No Federal appropriated funds have been paid or will be paid, by or on behalf of it, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement;

2. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employce of any agency, a Member of Congress, an officer or employce of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, it will complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions; and

3. It will require that the language of paragraph 1 and 2 of this anti-lobbying certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

Authority of Jurisdiction --The consolidated plan is authorized under State and local law (as applicable) and the jurisdiction possesses the legal authority to carry out the programs for which it is seeking funding, in accordance with applicable HUD regulations.

Consistency with plan -- The housing activities to be undertaken with Community Development Block Grant, HOME, Emergency Solutions Grant, and Housing Opportunities for Persons With AIDS funds are consistent with the strategic plan in the jurisdiction's consolidated plan.

Section 3 -- It will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u) and implementing regulations at 24 CFR Part 75.

uthorized Official

Manager
		10000000000000000000000000000000000000			CDBG	Expiration Date: 12/31/20
Application for	Federal Assista	ince SF-424				
* 1. Type of Submiss	lan:	* 2. Type of Application:	• 11	Revision, select appropriate letter(s)		
Preapplication		New				
Application		Continuation	•0	ther (Specify):		
Changed/Com	ected Application	Revision	L			
* 3. Date Received:		4. Applicant Identifier:	1.7			
07/13/2021						
Se. Federal Entity Ide	entilier:			5b. Federal Award Identifier:		
State Use Only:					1923	
6 Date Received by	State:	7. State Application	on Ide	entifier:		
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* b. EmployeoTaxpa	yer Identification Nu	imber (EIN/TIN):	- L	a UEI: DUWS		
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d. Address:					S. Maria	
* Street1	111 E. Naple	Ave				
Street2:						
* City	Independence					
County/Parish:	Jackson					
* State:	MO: Missouri					
Province						
Country:	OSA: UNITED	STATES				
* Zip / Postal Code:	64050-3066		_			
e. Organizational	Unit:					
Department Name:			_	Division Name:		
Community Deve	elopment			Naighborhood Services		
f. Name and conta	et information of	person to be contacted on	n mat	ters involving this application:		
Profix: Mr.		* First Na	ame:	Tan		
Middle Name:						
* Last Name: Sc	annell					
Suffix:						
Tide: Community	Development	Department Director				
Organizational Affili					1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1	
	endence, MO					
City of Indep		0		Fax Number:		
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* Telephone Number	816-325-783					

OMB Number: 4040-0004

Application for Federal Assistance SF-424	
9. Type of Applicant 1: Select Applicant Type:	
2: City or Township Government	
yps of Applicant 2: Select Applicant Type:	
Ype of Applicant 3: Select Applicant Type:	
Other (specify):	
10. Name of Faderal Agency:	
U.S. Department of Housing and Orban Deve	lopment
1. Catalog of Federal Domestic Assistance Number:	
14.218	
CFDA Tille:	
Community Development Block Grant	
12. Funding Opportunity Number:	
320%22-90002	
Tille:	
13. Competition Identification Number:	
Title:	
14. Areas Affected by Project (Cities, Counties, States	s, etc.):
	Add Attachment Delete Attachment View Attachment
* 15. Descriptive Title of Applicant's Project:	
Administration, Housing Code Compliance,	Home Rehebilization and Public Services.
Attach supporting documents as specified in agency instruct Add Attachments Delete Attachments View	cione w Atlachmente

Congressi	onal Districts Of:					
a. Applicant	HODE 4			* b. Progrem/Project	ND804	
	onal list of Program/Project Con	ersesional Districts if neaded			in the second se	
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17. Proposed I	Deplect				Letter	
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18. Estimated	Funding (\$):		1.10			
a Federal		821,542.00	1.1.1.1			
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ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4040-0009 Expiration Date: 02/28/2022

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0042), Washington, DC 20503.

PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.

NOTE: Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the Awarding Agency. Further, certain Federal assistance awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duty authorized representative of the applicant:, I certify that the applicant

- Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
- Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
- 3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
- Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
- 5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
- Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
- Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.

Previous Edition Usable

 Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards of merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).

COBG

- Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4901 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
- 10. Will comply with all Federal statutes relating to nondiscrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1984 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681 1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29) U.S.C. §794), which prohibits discrimination on the basis of handlcaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee 3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statue(s) under which application for Federal assistance is being made; and () the requirements of any other nondiscrimination statue(s) which may apply to the application.

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Standard Form 424D (Rev. 7-97) Prescribed by OMB Circular A-102

- 11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-848) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
- Will comply with the provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.
- Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding labor standards for federally-assisted construction subagreements.
- 14. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
- 15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1959 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of

Federal actions to State (Clean Air) implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-206).

- Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §\$1271 et sec) related to protecting components or potential components of the national wild and scenic rivers system.
- Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1968, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§459a-1 et seq).
- Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1998 and CMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
- Will compty with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
- 20. Will comply with the requirements of Section 105(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards uncer the eward.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL	TITLE
Sachsury Walker	City Manager
e fine	
APPLICANT ORGANIZATION	DATE SUBMITTED
City of Independence, NO	07/13/2021

SF-424D (Rev. 7-97) Back

Application for Federal Assistance SF-424					HOME	Expiration Date: 12/31/20:
PreapDication New Application Continuation "Other (Socity): Changex/Corrected Application Applicant Identifier: 7: Date Reselved: 4 Applicant Identifier: Social Entity Identifier: Do: Foceral Award Identifier: Social Entity Identifier: Identifier: State Use Only: 0.000 Received by State: 7. State Application Identifier: Social Entity Identifier: Identifier: Identifier: State Use Only: 0.000 Received by State: 7. State Application Identifier: Social Entity Identifier: Identifier: Identifier: State Use Only: 0.000 Received by State: 7. State Application Identifier: Social Entity Identifier: Identifier: Identifier: State Use Only: 0.000 Received by State: Identifier: State: Diversition Aumeer (EIN/TM): * 0.000 Proceed Application * 0.000 Proceed Application State: Diversition Aumeer (EIN/TM): * 0.000 Proceed Application * 0.000 Proceed Application State: Diversition Aumeer (EIN/TM): * 0.000 Proceed Application * 0.000 Proceed Application State: Divertitwork Divertitwork	Application for	Federal Assista	ance SF-424			
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*Email iscannell@indepnc.org	* Email: Lacanne	116indepus.or	4			

OMB Number: 4040-0004

Application for F	ederal Assistance SF-424
9. Type of Applicar	t 1: Select Applicant Type:
C: City or Town	thip Government
Type of Applicant 2: Se	Hect Applicant Type:
Type of Applicant 3: S	lect Applicant Type:
Other (specify):	
10. Name of Federa	I Agency:
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11. Catalon of Feder	al Domestic Assistance Number:
14.239	
CFDA The:	
HORR	
12. Funding Oppor	unity Number:
x-20-NC-29-0207	
• Title:	
13. Competition Ide	tification Number:
Title:	
te Amon Affected b	y Project (Cities, Counties, States, etc.):
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	Add Attachment Delete Attachment View Attachment
* 16. Descriptive Tit	e of Applicant's Project:
	housing development and rehabilitation for resals.
	uments as specified in agency instructions.
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	for Federal Assistance	e SF-424				
16. Congressi	onal Districts Of:					
a Applicant	90004			 b. Program/Project. 	MC004	
Attach an addit	onal list of Program/Project C	Congressional Districts if need	ed.			
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17. Proposed	Project:			and the second		
a. Start Date:	07/01/2021			* b. End Date:	06/30/2022	
18. Estimated	Funding (\$):					
a. Federal		465,330.00				
b. Applicant						
c. State						
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ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4040-0009 Expiration Date: 02/28/2022

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0042), Washington, DC 20503.

PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.

NOTE: Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the Awarding Agency. Further, certain Federal assistance awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant; I certify that the applicant

- Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
- Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
- 3. Will not dispose of, modify the use of, or change the terms of the real property tile or other interest in the sile and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the protect.
- Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
- 5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
- Will initiate and complete the work within the applicable time frame after receipt of approval of the swarding agency.
- Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.

Previous Edition Usable

Authorized for Local Reproduction

 Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards of merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).

HOME

- Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4501 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
- 10. Will comply with all Federal statutes relating to nondiscrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1984 (P.L. 88-352) which prohibits discrimination on the basis of race. color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681 1583, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29) U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee 3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale. rental or financing of housing: (i) any other nondiscrimination provisions in the specific statue(s) under which application for Federal assistance is being made: and (i) the requirements of any other nondiscrimination statue(s) which may apply to the application.

Standard Form 424D (Rev. 7-97) Prescribed by OMB Circular A-102

- 11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
- Will comply with the provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.
- Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding labor standards for federally-assisted construction subagreements.
- Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
- 15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11968; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of

Federal actions to State (Clean Air) implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of enclangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).

- Will comply with the Wild and Scenic Rivers Act of 1958 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
- Will assist the awarding agency in assuring compliance with Section 108 of the National Historic Preservation Act of 1966; as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §\$469a-1 et seq).
- Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
- Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
- 20. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant sward recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL	TITLE
Sachary Walker	City Manager
APPLICANT ORGANIZATION	DATE SUBMITTED
City of Independence, MC	07/13/2021

SF-424D (Rev. 7-97) Back

CERTIFICATIONS

In accordance with the applicable statutes and the regulations governing the consolidated plan regulations, the jurisdiction certifies that:

Affirmatively Further Fair Housing -- The jurisdiction will affirmatively further fair housing.

Uniform Relocation Act and Anti-displacement and Relocation Plan -- It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, (42 U.S.C. 4601-4655) and implementing regulations at 49 CFR Part 24. It has in effect and is following a residential anti-displacement and relocation assistance plan required under 24 CFR Part 42 in connection with any activity assisted with funding under the Community Development Block Grant or HOME programs.

Anti-Lobbying -- To the best of the jurisdiction's knowledge and belief:

1. No Federal appropriated funds have been paid or will be paid, by or on behalf of it, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement;

2. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, it will complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions; and

3. It will require that the language of paragraph 1 and 2 of this anti-lobbying certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

Authority of Jurisdiction --The consolidated plan is authorized under State and local law (as applicable) and the jurisdiction possesses the legal authority to carry out the programs for which it is seeking funding, in accordance with applicable HUD regulations.

Consistency with plan --The housing activities to be undertaken with Community Development Block Grant, HOME, Emergency Solutions Grant, and Housing Opportunities for Persons With AIDS funds are consistent with the strategic plan in the jurisdiction's consolidated plan.

Section 3 -- It will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u) and implementing regulations at 24 CFR Part 135.

7/13/20

Signature of Authorized Official

City Manager Title

Specific Community Development Block Grant Certifications

The Entitlement Community certifies that:

Citizen Participation -- It is in full compliance and following a detailed citizen participation plan that satisfies the requirements of 24 CFR 91.105.

Community Development Plan -- Its consolidated plan identifies community development and housing needs and specifies both short-term and long-term community development objectives that that have been developed in accordance with the primary objective of the CDBG program (i.e., the development of viable urban communities, by providing decent housing and expanding economic opportunities, primarily for persons of low and moderate income) and requirements of 24 CFR Parts 91 and 570.

Following a Plan -- It is following a current consolidated plan that has been approved by HUD.

Use of Funds -- It has complied with the following criteria:

1. Maximum Feasible Priority. With respect to activities expected to be assisted with CDBG funds, it has developed its Action Plan so as to give maximum feasible priority to activities which benefit low- and moderate-income families or aid in the prevention or elimination of slums or blight. The Action Plan may also include CDBG-assisted activities which the grantee certifies are designed to meet other community development needs having particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community, and other financial resources are not available (see Optional CDBG Certification).

2. Overall Benefit. The aggregate use of CDBG funds, including Section 108 guaranteed loans, during program year(s) _______ [a period specified by the grantee of one, two, or three specific consecutive program years], shall principally benefit persons of low and moderate income in a manner that ensures that at least 70 percent of the amount is expended for activities that benefit such persons during the designated period.

3. Special Assessments. It will not attempt to recover any capital costs of public improvements assisted with CDBG funds, including Section 108 loan guaranteed funds, by assessing any amount against properties owned and occupied by persons of low and moderate income, including any fee charged or assessment made as a condition of obtaining access to such public improvements.

However, if CDBG funds are used to pay the proportion of a fee or assessment that relates to the capital costs of public improvements (assisted in part with CDBG funds) financed from other revenue sources, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds.

In addition, in the case of properties owned and occupied by moderate-income (not low-income) families, an assessment or charge may be made against the property for public improvements financed by a source other than CDBG funds if the jurisdiction certifies that it lacks CDBG funds to cover the assessment.

Excessive Force -- It has adopted and is enforcing:

 A policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in non-violent civil rights demonstrations; and

A policy of enforcing applicable State and local laws against physically barring entrance to or exit from a facility or location which is the subject of such non-violent civil rights demonstrations within its jurisdiction. **Compliance with Anti-discrimination laws** -- The grant will be conducted and administered in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d) and the Fair Housing Act (42 U.S.C. 3601-3619) and implementing regulations.

Lead-Based Paint – Its activities concerning lead-based paint will comply with the requirements of 24 CFR Part 35, Subparts A, B, J, K and R.

Compliance with Laws -- It will comply with applicable laws.

achory Wal 1 Signature of Authorized Official

7 13 2021 Date

City Manager

Title

OPTIONAL Community Development Block Grant Certification

Submit the following certification only when one or more of the activities in the action plan are designed to meet other community development needs having particular urgency as specified in 24 CFR 570.208(c):

The grantee hereby certifies that the Annual Plan includes one or more specifically identified CDBGassisted activities which are designed to meet other community development needs having particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community and other financial resources are not available to meet such needs.

Signature of Authorized Official

City Manager Title

Specific HOME Certifications

The HOME participating jurisdiction certifies that:

Tenant Based Rental Assistance -- If it plans to provide tenant-based rental assistance, the tenant-based rental assistance is an essential element of its consolidated plan.

Eligible Activities and Costs -- It is using and will use HOME funds for eligible activities and costs, as described in 24 CFR §§92.205 through 92.209 and that it is not using and will not use HOME funds for prohibited activities, as described in §92.214.

Subsidy layering -- Before committing any funds to a project, it will evaluate the project in accordance with the guidelines that it adopts for this purpose and will not invest any more HOME funds in combination with other Federal assistance than is necessary to provide affordable housing;

charge Walker 0 Signature of Authorized Official

7 13 2021 Date

City Manager Title

APPENDIX TO CERTIFICATIONS

INSTRUCTIONS CONCERNING LOBBYING CERTIFICATION:

Lobbying Certification

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.