



Proposed 2022-2026 Consolidated Plan & Proposed 2022-2023 Annual Action Plan

For CDBG & HOME Programs

Prepared by

**Crystal & Company (www.crystco.com)
for the
City of Independence, MO**

March 18, 2022

Executive Summary

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

1. Introduction

The Consolidated Plan is a document that provides an assessment of the housing and community development needs in the City of Independence. It contains a strategic plan for addressing these needs and a specific one-year action plan for the use of U.S. Department of Housing and Urban Development (HUD) formula grant funds. The formula grant programs guided by the Consolidated Plan includes the Community Development Block Grant (CDBG) and Home Investment Partnerships (HOME) programs. The FY 2022-26 Consolidated Plan has been prepared to address municipal affordable housing needs, community and economic development needs, homeless issues, the needs of special clients (elderly, disabled persons, victims of domestic violence, persons with HIV/AIDs, unaccompanied youth, migrant/seasonal farmworkers, etc.) and community supportive housing issues/needs.

A Market Overview and Needs Assessment of the region has been prepared that indicates the following:

- It is estimated that 46% renter households and 21% owner households earning under 80% of the area median are in need of housing assistance currently.
- To date, available federal, state, local, and private housing resources have assisted only a portion of those in need.
- A recent survey conducted shows significant waiting lists in effect for federal rental assistance programs.
- Approximately 1,425 sheltered and unsheltered homeless were evident in the Kansas City metro area according to the 2021 Point In Time Homeless Report from the Kansas City Continuum of Care (Missouri portion).

2. Summary of the objectives and outcomes identified in the Plan Needs Assessment Overview

From FY 2022 to 2026, the City of Independence plans on accomplishing the following specific objectives:

- Rehabilitate up to 20 homeownership units
- Provide homeownership support for up to 20 households
- Rehabilitate several affordable rental units

- Assist roughly 30,000 persons/ households with a variety of public services, of which some clients may be homeless or persons with special needs
- Assist up to 12,000 persons through public improvements/infrastructure support
- Assist up to 7 businesses and generate 15 jobs through economic development support
- Undertake code inspection and review on up to 11,000 dwelling units in low- and moderate-income regions.

3. Evaluation of past performance

Information on relevant past performance is summarized below from the city's FY 2020-'21 CAPER.

DRAFT

Goal	Category	Source / Amount	Indicator	Unit of Measure	Expected – Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected – Program Year	Actual – Program Year	Percent Complete
Dependable care for those with special needs	Non-Homeless Special Needs	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	5000	3917	78.34%	3000	3917	130.57%
Local AFH Goal 1: Reasonable Accommodations Policy	AFFH Goal and Strategies #1	CDBG: \$ / HOME: \$0	Homelessness Prevention	Persons Assisted	100	0	0.00%			
Local AFH Goal 1: Reasonable Accommodations Policy	AFFH Goal and Strategies #1	CDBG: \$ / HOME: \$0	Other	Other	0	0		1	0	0.00%
Local AFH Goal 2: Rental Ready Program	AFFH goals and Strategies #2	CDBG: \$ / HOME: \$0	Housing Code Enforcement/Foreclosed Property Care	Household Housing Unit	4000	0	0.00%			
Local AFH Goal 2: Rental Ready Program	AFFH goals and Strategies #2	CDBG: \$ / HOME: \$0	Other	Other	0	0		1200	0	0.00%
Local AFH Goal 3: Fairmount Business District Plan	AFFH goals and strategies #3	CDBG: \$0 / HOME: \$0	Jobs created/retained	Jobs	15	0	0.00%			
Local AFH Goal 3: Fairmount Business District Plan	AFFH goals and strategies #3	CDBG: \$0 / HOME: \$0	Businesses assisted	Businesses Assisted	5	0	0.00%	1	0	0.00%
Commitment to preventing and ending homelessness	Homeless	CDBG: \$ / HOME: \$	Homeless Person Overnight Shelter	Persons Assisted	2500	0	0.00%			
Commitment to preventing and ending homelessness	Homeless	CDBG: \$ / HOME: \$	Homelessness Prevention	Persons Assisted	350	2556	730.29%	12000	2556	21.30%

Past Performance 1

Goal	Category	Source / Amount	Indicator	Unit of Measure	Expected – Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected – Program Year	Actual – Program Year	Percent Complete
Local AFH Goal 4: Comprehensive Plan Update	AFFH Goals and Strategies #4		Other	Other	1	0	0.00%			
Ongoing Capacity Building	Program Administration & Capacity Building	CDBG: \$ / HOME: \$	Other	Other	0	0		2	0	0.00%
Quality housing choice for all	Affordable Housing Fair Housing	CDBG: \$ / HOME: \$	Rental units rehabilitated	Household Housing Unit	6	0	0.00%			
Quality housing choice for all	Affordable Housing Fair Housing	CDBG: \$ / HOME: \$	Homeowner Housing Added	Household Housing Unit	24	0	0.00%	2	0	0.00%
Quality housing choice for all	Affordable Housing Fair Housing	CDBG: \$ / HOME: \$	Homeowner Housing Rehabilitated	Household Housing Unit	200	0	0.00%	40	0	0.00%
Quality housing choice for all	Affordable Housing Fair Housing	CDBG: \$ / HOME: \$	Direct Financial Assistance to Homebuyers	Households Assisted	12	0	0.00%			
Reg AFH Goal 1: Expand Use of CDFI/NMTC	Affordable Housing Public Housing Homeless Non-Homeless Special Needs Non-Housing Community Development AFFH Regional Goal 1	CDBG: \$0 / HOME: \$0	Other	Other	0	0		1	0	0.00%
Reg AFH Goal 10: Promote KC Degrees/KC Scholars	Affordable Housing Non-Homeless Special Needs AFFH	CDBG: \$0 / HOME: \$0	Other	Other	0	0		1	0	0.00%
Reg AFH Goal 11: KC Rising Education and Job Train	AFFH	CDBG: \$0 / HOME: \$0	Other	Other	0	0		1	0	0.00%
Reg AFH Goal 12: Transportation Option Partnership	AFFH	CDBG: \$0 / HOME: \$0	Other	Other	0	0		1	0	0.00%
Reg AFH Goal 13: Align Regional Transit to Jobs	AFFH	CDBG: \$0 / HOME: \$0	Other	Other	0	0		1	0	0.00%

Past Performance 2

Goal	Category	Source / Amount	Indicator	Unit of Measure	Expected – Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected – Program Year	Actual – Program Year	Percent Complete
Reg AFH Goal 14: Affordable Hsg Education Material	Affordable Housing AFFH	CDBG: \$0 / HOME: \$0	Other	Other	0	0		1	0	0.00%
Reg AFH Goal 15: Fair Hsg Goals Metrics	Affordable Housing AFFH	CDBG: \$0 / HOME: \$0	Other	Other	0	0		1	0	0.00%
Reg AFH Goal 2: Establish Fair Housing Website	Access to Fair Housing Information	CDBG: \$0 / HOME: \$0	Other	Other	0	0		1	0	0.00%
Reg AFH Goal 3: Fair Hsg Education - Stakeholders	AFFH	CDBG: \$0 / HOME: \$0	Other	Other	0	0		1	0	0.00%
Reg AFH Goal 4: Advocate for Universal Designs	AFFH	CDBG: \$0 / HOME: \$0	Other	Other	0	0		1	0	0.00%
Reg AFH Goal 5: Regional Housing Mobility	Affordable Housing Public Housing AFFH	CDBG: \$0 / HOME: \$0	Other	Other	0	0		10	0	0.00%
Reg AFH Goal 6: Develop Compact Use Zoning	AFFH	CDBG: \$0 / HOME: \$0	Other	Other	0	0		1	0	0.00%
Develop Regional Hsg Locator	Housing AFFH	\$0 / HOME: \$0	Other	Other	0	0		1	0	0.00%
Reg AFH Goal 8: Encourage Affordable TOD by Zoning	Affordable Housing AFFH	CDBG: \$0 / HOME: \$0	Other	Other	0	0		1	0	0.00%
Reg AFH Goal 9: Universal Design Incentive Policy	AFFH	CDBG: \$0 / HOME: \$0	Other	Other	0	0		1	0	0.00%
Self-sufficiency and family success	Non-Housing Community Development	CDBG: \$	Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit	Households Assisted	0	0		100	0	0.00%
Self-sufficiency and family success	Non-Housing Community Development	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	200	0	0.00%			
Self-sufficiency and family success	Non-Housing Community Development	CDBG: \$	Jobs created/retained	Jobs	18	0	0.00%			
Self-sufficiency and family success	Non-Housing Community Development	CDBG: \$	Businesses assisted	Businesses Assisted	5	0	0.00%			
Small Business Assistance	Non-Housing Community Development	CDBG: \$	Jobs created/retained	Jobs	35	0	0.00%			

Past Performance 3

Goal	Category	Source / Amount	Indicator	Unit of Measure	Expected – Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected – Program Year	Actual – Program Year	Percent Complete
Strong, healthy, well-balanced neighborhoods	Affordable Housing Non-Housing Community Development	CDBG: \$ / HOME: \$	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	3000	2405	80.17%	0	2405	
Strong, healthy, well-balanced neighborhoods	Affordable Housing Non-Housing Community Development	CDBG: \$ / HOME: \$	Housing Code Enforcement/Foreclosed Property Care	Household Housing Unit	12000	0	0.00%	2200	0	0.00%

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

Past Performance 4

4. Summary of citizen participation process and consultation process

- A summary of the citizen participation process and consultation process undertaken by the City of Independence follows: Two public hearings were held on November 8, 2021 to solicit input on local needs and resources and on April 6, 2022 to solicit input on the drafts of the FY 2022-26 Consolidated Plan, FY 2022-23 Action Plan, FY 2022-2026 Analysis Of Impediments To Fair Housing Choice and FY 2022-2026 Citizen Participation Plan. Consolidated Plan and Fair Housing internet surveys (in English and Spanish) were prepared and released to solicit input from the public from early December of 2021 through January 1, 2022. Responses were obtained from the general public, housing and social services providers and other key types of stakeholders. Survey questions were drawn predominantly from key information sought (priority needs) for the HUD Consolidated Plan/Action Plan as well as regarding information about the incidence of fair housing violations and knowledge of such by the public. In addition, consultations were undertaken with key stakeholders/entities by phone interview. On August 5, 2021, the City's Homelessness Task Force met to discuss homelessness strategy and updates, review the 2020 homelessness strategies and discuss changes/additions to the homelessness strategy. A 30-day public comment period for public review of the draft FY 2022-26 Independence Consolidated Plan, FY 2022/22 Annual Action Plan, FY 2022-26 Independence Analysis Of Impediments To Fair Housing Choice and FY 2022-26 Citizen Participation Plan. The 30-day comment period commenced on March 21, 2022 and ended on April 21, 2022. Public hearing dates and comment periods were published pursuant to the currently adopted Independence Citizen Participation Plan and applicable HUD regulation on March 19th, 2022. The City of Independence Mayor and City Council reviewed and acted on all of the documents noted herein on Monday, April 18, 2022 and May 2, 2022.

Refer to PR-10 and PR-15 for additional information as/if needed.

**CITY OF INDEPENDENCE, MISSOURI
FY 22-2026 CONSOLIDATED PLAN & ANALYSIS OF
IMPEDIMENTS TO FAIR HOUSING CHOICE
CITIZEN PARTICIPATION MEETING
Monday, November 8, 2021
On-Site At City Hall (100 E. Maple, Independence, MO, 64050) &
Remote Via GotoMeeting, 2P to 3:30PM**

Attendees: Tom Scannell, City of Independence (COI), Miranda Rice (COI), Adrienne Fight (COI), Melanie Collier, Brenda Bair, Joseph Bishop, Kelsi Green, Rich Crystal.

FY 2022-2026 Consolidated Plan Findings

Top Homeowner Issues/Priorities Identified: More ownership affordable housing opportunities for families and more below-market mortgage financing opportunities for lower income residents.

Top Rental Issues/Priorities: Lack of affordable rental inventory to address demand and needs, landlords don't accept rental vouchers from prospective tenants and the need for eviction assistance.

Top Homelessness Issues/Priorities: Need for transitional and emergency shelter facilities, need for enhanced supportive services coupled with shelter support for homeless clients and the need for targeted homeless support for singles and women with children.

Top Special Needs Issues/Priorities: Special needs individuals often fit into multiple categories within this topic.

Top Community Development Issues/Priorities: Lack of transportation facilities for lower income households, need for more child care support and need for legal assistance services.

Overall Top Housing & Community Development Needs/Priorities – The lack of and need for more affordable housing for owners and renters, the need for more support for child care, more transportation assistance for lower income households and more assistance needed for homeless persons.

Housing and Community Development Needs Identified

	Comments
Homeowners	<u>New Construction</u> : <ul style="list-style-type: none">• New affordable housing for families (2). The market is getting saturated with elderly/disabled individuals. <u>Owner Rehabilitation</u> : <ul style="list-style-type: none">• Repairing of existing homes for affordable housing for families <u>Homebuyer Assistance</u> : <ul style="list-style-type: none">• Lack of funding available to assist with mortgage assistance.
Rental Housing	<u>New Construction</u> : <ul style="list-style-type: none">• Lack of available units that are affordable, especially for single individuals. <u>Rental Assistance</u> : <ul style="list-style-type: none">• More landlords to accept Section 8 vouchers is highly needed in JACO not

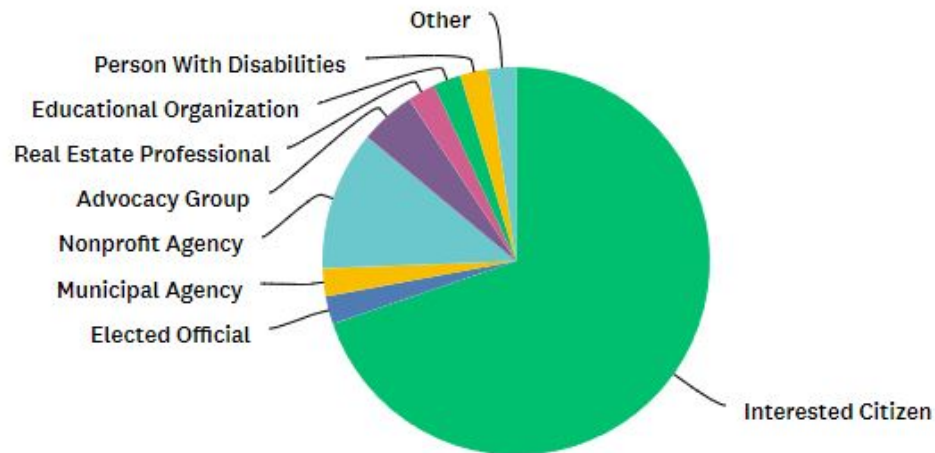
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5. Summary of public comments

Public comments (findings) from the Con Plan/Action Plan internet survey are enclosed as is the summary input from the first Citizen Participation meeting held on November 8, 2021 (Ai subject matter also discussed fyi).

Please indicate your status or who you represent (select one):

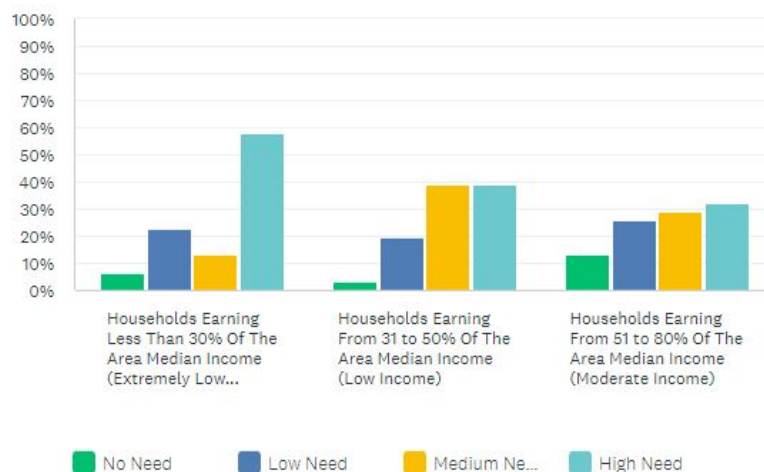
Answered: 43 Skipped: 0



Internet Survey Findings 1

Please note your perspectives on priority HOMEOWNER needs (please check only one box per row).

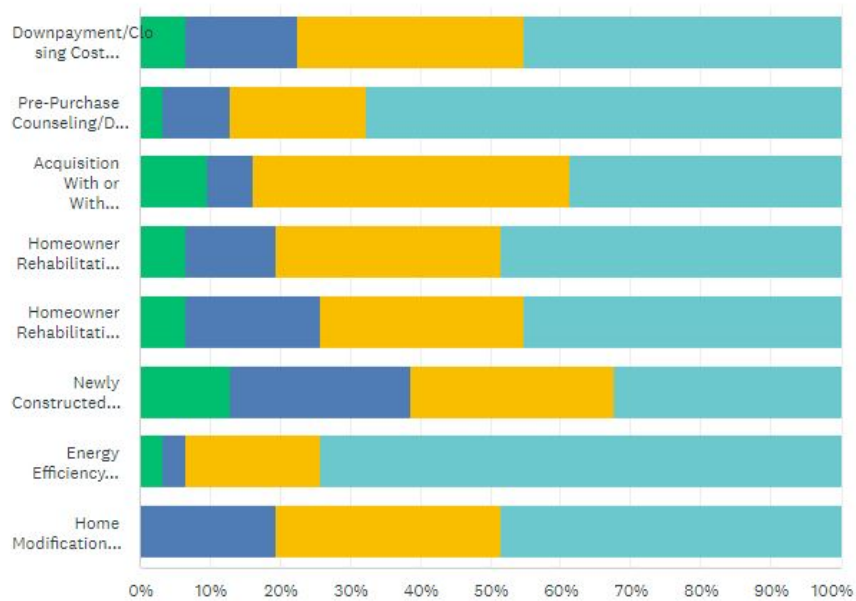
Answered: 31 Skipped: 12



Internet Survey Findings 2

Please note your perspectives on priority HOMEOWNERSHIP program needs for low income persons (please check only one box per row).

Answered: 31 Skipped: 12



■ No Need
 ■ Low Need
 ■ Medium Ne...
 ■ High Need

Internet Survey Findings 3

Please note your perspectives on priority RENTAL housing needs (please check only one box per row).

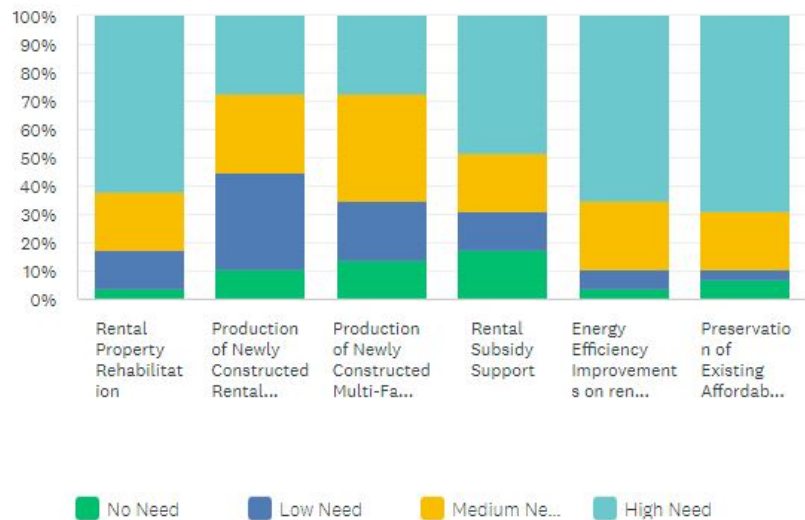
Answered: 29 Skipped: 14



Internet Survey Findings 4

Please note your perspectives on priority RENTAL program needs (please check only one box per row).

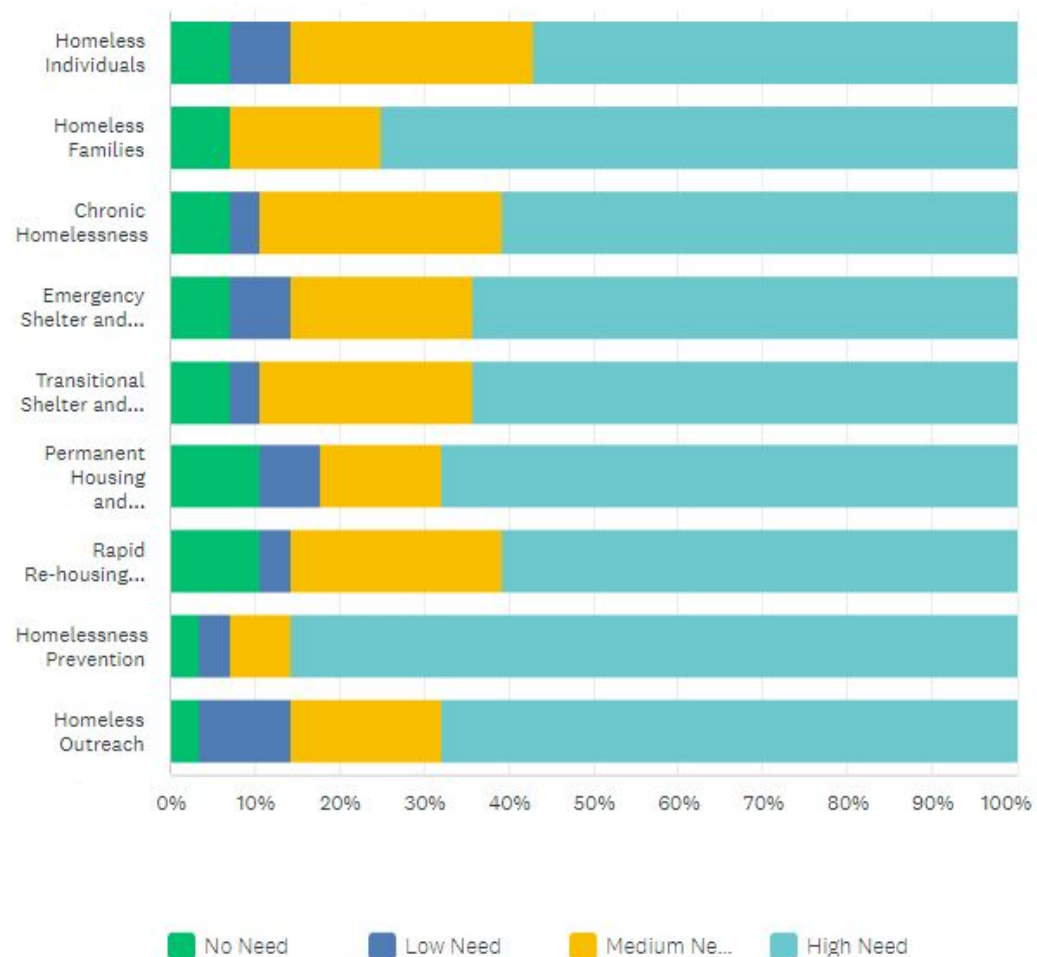
Answered: 29 Skipped: 14



Internet Survey Findings 5

Please note your perspectives on priority needs for HOMELESS I and FAMILIES (please check only one box per row).

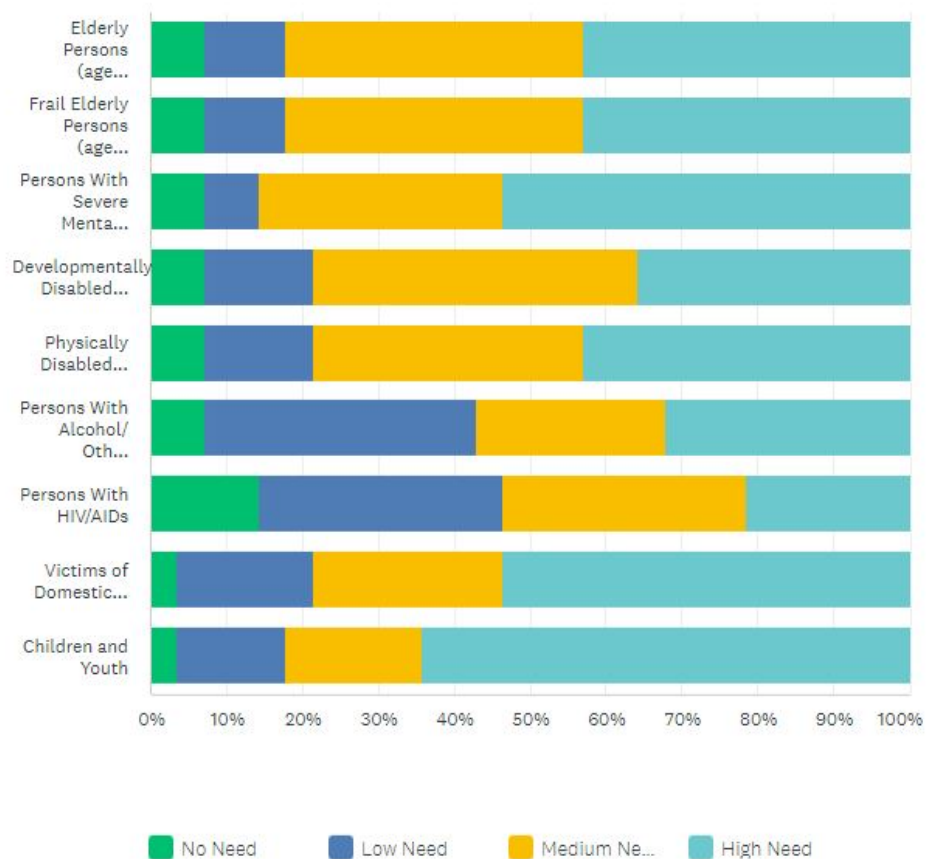
Answered: 28 Skipped: 15



Internet Survey Findings 6

Please note your perspectives on priorities for special populations with SUPPORTIVE HOUSING NEEDS (please check only one box per row).

Answered: 28 Skipped: 15



Internet Survey Findings 7

Please note your perspectives on priorities for a wide array of general and specific community development needs and activities (please check only one box per row).

	NO NEED	LOW NEED	MEDIUM NEED	HIGH NEED	TOTAL
▼ Neighborhood Revitalization/Redevelopment Needs	0.00% 0	11.54% 3	19.23% 5	69.23% 18	26
▼ Acquisition of Slum/Blighted Real Property	3.85% 1	15.38% 4	26.92% 7	53.85% 14	26
▼ Clearance and Demolition of Blighted Properties	0.00% 0	15.38% 4	15.38% 4	69.23% 18	26
▼ Clearance of Contaminated Sites	0.00% 0	34.62% 9	30.77% 8	34.62% 9	26
▼ Graffiti Eradication	3.85% 1	34.62% 9	42.31% 11	19.23% 5	26
▼ Code Enforcement	0.00% 0	20.83% 5	29.17% 7	50.00% 12	24
▼ Senior Center Facility Improvements	0.00% 0	36.00% 9	48.00% 12	16.00% 4	25
▼ Handicapped Center Facility Improvements	0.00% 0	20.83% 5	62.50% 15	16.67% 4	24
▼ Homeless Facility Improvements	4.00% 1	20.00% 5	32.00% 8	44.00% 11	25
▼ Youth Center Facility Improvements	0.00% 0	33.33% 8	33.33% 8	33.33% 8	24
▼ Neighborhood Facility Improvements	4.17% 1	25.00% 6	37.50% 9	33.33% 8	24
▼ Child Care Center Facility Improvements	4.17% 1	37.50% 9	29.17% 7	29.17% 7	24
▼ Healthcare Facility Improvements	8.00% 2	40.00% 10	40.00% 10	12.00% 3	25
▼ Parks and/or Recreation Facility Improvements	8.00% 2	36.00% 9	32.00% 8	24.00% 6	25
▼ Overall Infrastructure Needs	12.00% 3	4.00% 1	48.00% 12	36.00% 9	25
▼ Water & Sewer Improvements	20.00% 5	12.00% 3	24.00% 6	44.00% 11	25

Internet Survey Findings 8

	NO NEED	LOW NEED	MEDIUM NEED	HIGH NEED	TOTAL
▼ Substance Abuse Services	8.00% 2	16.00% 4	28.00% 7	48.00% 12	25
▼ Service For Battered/Abused Spouses	0.00% 0	16.00% 4	36.00% 9	48.00% 12	25
▼ Legal Services	0.00% 0	28.00% 7	48.00% 12	24.00% 6	25
▼ Youth Services	12.00% 3	12.00% 3	36.00% 9	40.00% 10	25
▼ Child Care Services	8.33% 2	12.50% 3	33.33% 8	45.83% 11	24
▼ Transportation Services	0.00% 0	24.00% 6	40.00% 10	36.00% 9	25
▼ Employment/Training Services	0.00% 0	8.00% 2	40.00% 10	52.00% 13	25
▼ Health Services	8.00% 2	24.00% 6	44.00% 11	24.00% 6	25
▼ Lead Hazard Screening	12.00% 3	36.00% 9	32.00% 8	20.00% 5	25
▼ Crime Awareness	12.00% 3	8.00% 2	32.00% 8	48.00% 12	25
▼ Fair Housing Activities	16.00% 4	20.00% 5	32.00% 8	32.00% 8	25
▼ Landlord-Tenant Counseling	12.00% 3	20.00% 5	36.00% 9	32.00% 8	25
▼ Overall Economic Development Needs	8.00% 2	12.00% 3	52.00% 13	28.00% 7	25
▼ Commercial/Industrial Infrastructure Development	12.00% 3	16.00% 4	44.00% 11	28.00% 7	25
▼ Neighborhood Economic Development	4.00% 1	12.00% 3	60.00% 15	24.00% 6	25
▼ Business Facade Renovation/External Code Repairs	12.00% 3	16.00% 4	52.00% 13	20.00% 5	25
▼ Economic Development Assistance to For Profit Entities	20.00% 5	32.00% 8	24.00% 6	24.00% 6	25
▼ Economic Development Technical Assistance	16.00% 4	28.00% 7	44.00% 11	12.00% 3	25
▼ Micro-Enterprise Assistance/Incubators	16.00% 4	28.00% 7	44.00% 11	12.00% 3	25
▼ Business Loans	12.00% 3	20.00% 5	52.00% 13	16.00% 4	25
▼ Business Collateral Loans	12.00% 3	20.00% 5	56.00% 14	12.00% 3	25

Internet Survey Findings 9

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Housing and Community Development Needs Identified

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Rental Housing	<u>New Construction:</u> <ul style="list-style-type: none">• Lack of available units that are affordable, especially for single individuals. <u>Rental Assistance:</u> <ul style="list-style-type: none">• More landlords to accept Section 8 vouchers is highly needed in JACO not

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	<p>just independence</p> <ul style="list-style-type: none"> • Many landlord owners are selling off property to out of state investors and they are not accepting vouchers. <p>Eviction Prevention:</p> <ul style="list-style-type: none"> • Need for assistance with past due bills or rent/evictions.
Homeless individuals and Families	<p>Support Services:</p> <ul style="list-style-type: none"> • Need to be able to provide a holistic and individualized approach. Need to be able to address immediate needs and also wrap them with supportive service to ensure their long term stability. • Partnering agencies can provide the needed support services. • Outreach supportive services are a must. <p>Transitional Housing:</p> <ul style="list-style-type: none"> • Transitional housing would be helpful until permanent supportive housing could be obtained. • More shelters and transitional housing option for women with children. We often get calls for moms who haven't experienced DV and their resources are pretty limited. <p>Emergency Housing:</p> <ul style="list-style-type: none"> • Need emergency shelters for men in the area. • Especially with COVID and the lack of capacity in the area to house in emergency shelter.
Special Populations	<p>Elderly:</p> <ul style="list-style-type: none"> • Have seen several tax credit developer letters in the last two months for elderly housing projects. <p>Multiple Areas:</p> <ul style="list-style-type: none"> • Important to help those most vulnerable that may not have the resources or connections to move beyond their current situation. Most individuals we serve have intersectionality of multiple areas that are considered "high risk" or "special population". <p>Rental Assistance:</p> <ul style="list-style-type: none"> • Every population needs assistance. Sometimes it appears we get too specific with special populations funding and this leaves service gaps for those that don't necessarily "fit" the unique population. <p>Mixed Development:</p> <ul style="list-style-type: none"> • Don't particularly like building housing and limiting that population to a certain building or area. I like mixed developments.
Community Development	<p>Revitalization:</p> <ul style="list-style-type: none"> • Redevelop areas that are declining in safety/increasing in crime <p>Streets/Sidewalks:</p> <ul style="list-style-type: none"> • Streets and sidewalks along with water and sewer services need redeveloped in certain areas of the city. <p>Utilities:</p> <ul style="list-style-type: none"> • Spire is investing a lot of money changing our gas lines and I think the other items are in need as well. I think assistance in moving overhead utilities underground for storms would be great.
Public Services	<p>Transportation and Childcare:</p> <ul style="list-style-type: none"> • Transportation and childcare are the two biggest issues keeping our young mothers that live on our properties from acquiring employment. • Transportation and childcare is essential.

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	<p>Legal Services:</p> <ul style="list-style-type: none"> • Seeing an increase in the need for legal assistance with feeds such as GAL and mediation for divorce cases when there are children involved. <p>Youth and Children:</p> <ul style="list-style-type: none"> • Childcare services need more option for evening sand weekends. Also, childcare is struggling to obtain staff. <p>Job Training:</p> <ul style="list-style-type: none"> • We have a grant to assist with job training and resources.
Other Thoughts	<ul style="list-style-type: none"> • Getting assistance to 1st time offenders and having help getting their record expunged so that they can have a chance to move forward and not backward. • Great that we as a community agencies/representatives are discussing these issues. I wonder if we should also ensure that we are including those with lived experiences in this conversation.

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FY 2022-2026 Analysis Of Impediments To Fair Housing Choice Findings

Overall Top Fair Housing Needs/Priorities – People really don't understand what their rights are. Education of both tenants and landlords is key.

Incidence of Fair Housing Discrimination Experienced

Are you aware of any housing discrimination that occurs? If so, what kind?	What are some of the things that can be done to overcome discrimination?
<ul style="list-style-type: none"> • Not rent or sale to certain racial demographics • Not rent to individuals with children • Not rent to someone that has a disability 	<ul style="list-style-type: none"> • Housing authorities are required to review the 4 Factor Analysis of the Safe Harbor Rule by HUD that looks at the top used languages in the area that we serve and provide documents in those languages or interpreters. It is the LEP policy – Limited English Proficiency. • I think the City needs to coordinate with the County and work together on the Fair Housing topic. We all love the new term AFFH.

Housing Market/Supply Conditions Affecting Housing Choice



Is there an adequate supply of livable ownership and rental housing for residents regardless of their income? If not, what is needed?
<ul style="list-style-type: none"> • There is not an adequate of supply of affordable rentals. I think we need to expand in all areas, owner, rental, we need homes that are under \$125,000 for low-income individuals to be able to purchase. Section 8 vouchers can be used to assist in payment of mortgages for Homeownership programs. • The supply of affordable housing that is adequate and meets housing standards needs to be expanded. I feel there are stereotypes and misinformation about low-income housing units and a desire to not have them built as they will impact "resale value" or overall value of a neighborhood.

11-8-21 CP Input Mtg 3

Supply of Housing for Persons with Disabilities

Is there an adequate supply of housing that is accessible to people with disabilities? If not, what is needed?

- I don't specifically have housing for disabled but I do have preferences on our application for Elderly and for people with disabilities to help get them into housing quicker. I only have 528 units with a waiting list of 4,000 – we need more affordable units.

Neighborhood Resident Access to Public Amenities

Are public resources (e.g. parks, schools, roads, police and fire services, etc.) invested equitably throughout neighborhoods? If not, what is needed and where?

- Transit services have decreased their service areas and need to expand and not decrease.
- Infrastructure needs attention in certain areas of the City.
- Police response in certain areas of the City.
- I would agree that certain areas of the City need more attention/repair than others. Expand public transit options and availability.
- We need more retail, businesses in certain areas of the city. Maybe incentives to bring those businesses in to provide jobs close to the low-income developments. Then transportation would not be an issue. Parts of the City that are blighted with manufacturing buildings or warehouses, businesses, houses that are abandoned.

Fair Housing Resources and Mitigation

What type of fair housing services (education, complaint investigation, testing) are in the area?

- Fair housing complaints go to the HUD KC Field Office in KC, KS.
- Our direct service providers in our housing programs educate clients on their housing rights and landlords are given info on VAWA housing rights for tenants. If a client feels they are experiencing an issue and want to file a complaint, they are assisted by their advocate or case manager.

Other Issues

Are there other issues or recommendations related to our discussion you would like to raise?

- We issue all applicants with VAWA housing rights as well as our current tenants at their Annual Reexamination for Continued Services. They sign a form showing they received the information. We also hand out Fair Housing Materials and flyers for both Public Housing and Section 8. We do a Fair Housing Training once a year for all employees.

11-8-21 CP Input Mtg 4

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

All comments and views have been included.

7. Summary

The five-year plan articulates the affordable housing, supportive housing and homeless needs for the City of Independence in addition to the non-housing, community development needs. The plan also incorporates a comprehensive and coordinated strategy for implementation of relevant programs that

include the CDBG and HOME program funds and their proposed expenditure over the ensuing five years in addition to other selected funds being leveraged those identified to address identified priorities. The one-year Action Plan covering FY 2022-23 encompasses specific and detailed expenditures for the first year of the specific implementation of the five-year Consolidated Plan.

The FY 2022-26 Analysis of Impediments To Fair Housing Choice incorporates primary and secondary research associated with the analysis of fair housing issues in Independence, and an action plan strategy to address such. Pursuant to applicable federal regulations, the FY 2022-26 Citizen Participation Plan outlines the timing, process and citizen participation procedures the city will undertake in the ensuing five-years concerning input secured, the review and approval of its future Consolidated Plan, Action Plans, CAPERs (Annual HUD Performance Reports) and substantial amendments thereto.

DRAFT

The Process

PR-05 Lead & Responsible Agencies 24 CFR 91.200(b)

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

The following are the agencies/entities 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

Consolidated Plan Public Contact Information

Mr. Tom Scannell, City of Independence Community Development Director, 111 E. Maple, Independence, MO, 64050. Tel. 816.325.7830

PR-10 Consultation – 91.100, 91.110, 91.200(b), 91.300(b), 91.215(I) and 91.315(I)

1. Introduction

Independence conducted significant consultation with citizens, municipal officials, nonprofit agencies, stakeholders, governmental agencies, and the Continuum of Care in preparing this plan. Consultation was undertaken through a combination of an internet survey with the public and stakeholders, stakeholder interviews, the City's Homelessness Task Force, two public meetings to solicit input and comments on the draft Consolidated Plan and Annual Action Plan. The efforts undertaken and the results generated are summarized in the Citizen Participation sections (ES-05 and PR-15) of this plan.

As indicated in this Consolidated Plan, statistical information from many agencies including the American Community Survey, U.S. Census, Comprehensive Housing Affordability Strategy data, Housing Authority of Independence, the Independence Council for Economic Development, the Independence School District, Kansas City Region Continuum of Care, Local Investment Commission (LINC), the Independence Analysis of Impediments to Fair Housing Choice, FY 2022-2026, Independence Housing Study (January, 2022), policymap.com and other secondary sources, etc.

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)).

Independence is involved in the ongoing development of the regional Kansas City Continuum of Care. Independence supports homeless prevention, outreach, emergency shelter, transitional housing, permanent supportive housing, and support services for homeless people and targets some resources for some of these endeavors. In addition, the city has committed some resources for housing for homeless persons and increasing the stock of affordable housing. The city has also committed social and supportive services to special populations.

In addition, the City of Independence, and the Kansas City area 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 MAACLink. MAACLink is a Homeless Management Information System (HMIS) and social service

software suite developed and maintained by the Mid America Assistance Coalition. Service coordination is further enhanced through local agency participation in the regional Continuum of Care and the Independence Homelessness Task Force both of which focus on serving the unmet housing and social service needs of homeless and at-risk homeless populations.

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

Independence is committed to contributing to address the needs of homeless citizens in relation to both physical and mental/behavioral health needs. The city participates in the regional Continuum of Care plan in collaboration with other jurisdictions in the Kansas City metro region. The City of Independence's Homelessness Task Force seeks to coordinate local efforts to increase community awareness and outreach programs for the homeless. The Task Force members meet on a regular basis in order to maintain open communication and coordinate all services provided. Some Task Force members 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 and evaluate outcomes, and develop funding, policies and procedures for the administration of HMIS

While the City of Independence does not itself secure ESG resources, it consults with the metro Kansas City Continuum Of Care concerning the responsibilities and resource allocation of that agency.

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

Table 2 – Agencies, groups, organizations who participated

1	Agency/Group/Organization	Community Services League
	Agency/Group/Organization Type	Services - Housing Services-Children Services-homeless Services-Health Services-Employment
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homeless Needs - Families with children Non-Homeless Special Needs Community/Neighborhood Development
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Direct contact with agency staff person and discussion of relevant issues (affordable housing/community development/homeless/special needs) affecting Independence presently and key items going forward five years hence (FY 2022-26). Specifically, discussion focused on the unique needs of the blighted northwest section of Independence and the need for targeted neighborhood improvements and ordinances in the region as well as area landlord training and support. Also, increased need for bilingual support for the area. The organization serves a variety of clients 'in-need' in Independence and feels that the availability of affordable housing and healthcare are priority issues for the community and their ability to assist clients. CSL also encouraged the city to convene providers and stakeholders in the jurisdiction to address key affordable housing, homeless and special needs housing/services issues on an ongoing basis.
2	Agency/Group/Organization	SALVATION ARMY
	Agency/Group/Organization Type	Services - Housing
	What section of the Plan was addressed by Consultation?	Homeless Needs - Families with children Non-Homeless Special Needs

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	<p>Direct contact with agency staffer related to issues (affordable housing/community development/homeless/special needs) affecting Independence presently and key items going forward five years hence (FY 2022-26). Specifically, discussions involved the need for transportation, child care, educational, life skills, credit advisory and other support services needed. In addition, discussion also included the need for emergency, transitional and permanent housing options for homeless persons or those at serious risk as well as the need for the City Police Department to re-institute their homeless liaison program.</p>
3	Agency/Group/Organization	TRUMAN HERITAGE HABITAT FOR HUMANITY
	Agency/Group/Organization Type	Housing Services - Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Non-Homeless Special Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	<p>Direct contact with agency staffer related to issues (affordable housing/community development/homeless/special needs) affecting Independence presently and key items going forward five years hence (FY 2022-26). Specifically, discussions included difficulties in finding decent/affordable land for residential infill, challenges for the elderly in "aging-in-place", significant incidence of inordinately high rental rates, significant challenges in executing traditional Habitat new construction and/or rehab given prevailing pricing issues and the continuing need for homebuyer counseling endeavors. Habitat indicated a desire to re-institute the provision of down-payment assistance for affordable housing clients. Discussion also included the need for employment and training services and that some employers would benefit from workforce housing initiatives.</p>

4	Agency/Group/Organization	Housing Authority of Independence
	Agency/Group/Organization Type	Housing PHA Services - Housing Services-Elderly Persons Services-Employment
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Non-Homeless Special Needs Market Analysis
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Direct contact with the Executive Director via input at citizen participation/stakeholder meeting and direct phone contact related to issues (affordable housing/community development/homeless/special needs) affecting Independence presently and key items going forward five years hence (FY 2022-26). Specifically, discussions involved a confirmation of program wait lists, the need for more family affordable housing, more transitional housing, increased serious mentally ill needs, market condition motivating the purchase of rental housing by new owners not necessarily accepting Section 8 clients, efforts associated with Section 504, high incidence of Independence LIHTC for elderly clients, endeavors for Hispanic households to secure PHA programs and the affordable housing development desires of the IHA coupled with support services.
5	Agency/Group/Organization	SALVATION ARMY CROSSROADS SHELTER
	Agency/Group/Organization Type	Services-homeless
	What section of the Plan was addressed by Consultation?	Homelessness Strategy Homeless Needs - Chronically homeless
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Direct contact with agency staffer related to issues (affordable housing/community development/homeless/special needs) affecting Independence presently and key items going forward five years hence (FY 2022-'26). Specifically, discussions included the need for emergency, transitional and permanent housing options for homeless persons or those at serious risk.

6	Agency/Group/Organization	HOPE HOUSE
	Agency/Group/Organization Type	Services-Children Services-Victims of Domestic Violence Services-homeless Services-Employment Services - Victims
	What section of the Plan was addressed by Consultation?	Homeless Needs - Families with children Non-Homeless Special Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Direct contact with agency staffer related to issues (affordable housing/community development/homeless/special needs) affecting Independence presently and key items going forward five years hence (FY 2022-26). Specifically, discussions focused on the need for employment and training, short- and medium- term financial aid, credit assistance and child-care assistance services for their clients (often victims of domestic violence). In addition, the need for LIHTC and shelter facilities were discussed as well as the desire for landlords to go easier on past client credit issues.
7	Agency/Group/Organization	MOTHER'S REFUGE
	Agency/Group/Organization Type	Services - Housing Services-Children Services-Victims of Domestic Violence Services-homeless Services-Education Services-Employment
	What section of the Plan was addressed by Consultation?	Homeless Needs - Chronically homeless Non-Homeless Special Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Direct contact with agency related to input secured via citizen participation/stakeholder meeting regarding issues (affordable housing/community development/homeless/special needs) affecting Independence presently and key items going forward five years hence (FY 2022-'26). Specifically, more childcare services options are needed for evenings and weekends and more staff challenging to find currently.

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

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

Name of Plan	Lead Organization	
Continuum of Care	Greater Kansas City Coalition To End Homelessness	Plan goals to address the incidence of homelessness and prevent such in Independence
City of Independence Capital Improvement Program	City of Independence	Plan goals support and complement the city's Capital Improvement Program.
Independence 353 Redevelopment Plans	Various City approved 353 Redevelopment Corporations	The Consolidated Plan goals and the goals of varying 353 Redevelopment Plans focus
Affirmatively Furthering Fair Housing	City of Independence	The City Analysis of Impediments To Fair Housing Choice, FY 2022-2026 identifies and
PHA Annual Plan	Independence Housing Authority	The IHA five-year and annual plan/s incorporate the PHA's goals and objectives for the Annual Plan was generated to support IHA endeavors.
Citywide Housing Study	City of Independence	The City of Independence Housing Study, 2022 was recently prepared and the City's affordable issues identified derived from this study.

Table 3 – Other local / regional / federal planning efforts

Describe cooperation and coordination with other public entities, including the State and any adjacent units of general local government, in the implementation of the Consolidated Plan (91.215(l))

The City of Independence coordinates with other public entities and adjacent units of local government on a consistent basis through its participation with the Kansas City Regional Continuum of Care entity, Mid-America Regional Council community development and planning efforts as well as varying regional

forums/endeavors on homelessness, affordable housing, community development, public services, special needs and economic development. The city participates in the Eastern Jackson County Planning Committee that meets regularly concerning community development needs in the region. This group includes three entitlement jurisdictions in the region.

Narrative (optional):

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PR-15 Citizen Participation – 91.105, 91.115, 91.200(c) and 91.300(c)

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

The citizen process involved an extensive array of activities for Independence. Efforts involved the execution of two citizen participation meetings on November 8, 2021 to solicit input on the Consolidated Plan/Action Plan/AI and another on April 6, 2022 to secure feedback and comments on the draft Con Plan/Action Plan/AI. Two internet surveys were undertaken on the priorities and strategies for the Consolidated Plan and another on the incidence of fair housing needs/impediments for the AI. The 30-day public comment period for public review of both the draft Consolidated Plan, Annual Action Plan and AI began on March 21, 2022 and extended through April 21, 2022. At the end of the 30-day period, there were ____ comments. The citizen participation activities undertaken by Independence were extensive. Noted earlier in PR-10, the city also executed substantial consultation and research endeavors to prepare its Consolidated Plan/Action Plan/AI documents.

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Public Hearing	<p>Minorities</p> <p>Non-English Speaking - Specify other language: Spanish</p> <p>Persons with disabilities</p>	<p>A public meeting executed as a public hearing was conducted on November 8, 2021. A variety of organizations were in attendance that included but were not limited to the Independence PHA, the city, Hope House, Mother's Refuge, etc. Details of the input secured are presented in Section ES-05 (Executive Summary).</p>	<p>Again, details of the comments secured are presented in depth in the ES-05 Executive Summary section of this plan.</p>	<p>All comments were accepted.</p>	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
2	Public Hearing	<p>Minorities</p> <p>Non-English Speaking - Specify other language: Spanish</p> <p>Persons with disabilities</p> <p>Non-targeted/broad community</p>	A public hearing was held on the draft City of Independence Consolidated Plan, FY 2022/'23 Action Plan and AI was conducted on April 8, 2022. Those in attendance included the city, ____	Refer to ES-05 for the Consolidated Plan and Action Plan comments received.	All comments were accepted.	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
3	Internet Outreach	<p>Minorities</p> <p>Non-English Speaking - Specify other language: Spanish</p> <p>Persons with disabilities</p> <p>Non-targeted/broad community</p>	Two City of Independence surveys were conducted commencing in early December through January of 2022. The first survey solicited citizen input on Consolidated Plan and Action Plan priorities and strategies while the second sought input on the incidence of fair housing impediments evident in the jurisdiction.	Detailed Consolidated Plan and Action Plan survey results are contained in Sections ES-05 and NA-50. Refer to the FY 2022-2026 City of Independence Analysis Of Impediments To Fair Housing Choice comments on the AI.	n/a	

4	Newspaper Ad	<p>Minorities</p> <p>Non-targeted/broad community</p> <p>Residents of Public and Assisted Housing</p>	<p>Not applicable as this endeavor was comprised of a newspaper ad soliciting public comments on drafts of the FY 2022-26 Consolidated Plan, FY 2022-23 Action Plan, FY 2022-26 Citizen Participation Plan and the FY 2022-26 Analysis Of Impediments To Fair Housing Choice. Newspapers notices were initiated at the start of the 30-day public comment period indicating where the aforementioned documents were available, soliciting comment and where/when such comments should be conveyed. Note such information was also</p>	Reflected in ES-05	Reflected in ES-05	
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Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
			conveyed to the Independence PHA.			
5	Public Meeting	Minorities Persons with disabilities Non-targeted/broad community	Two meetings were held by the City Council of Independence concerning their review and action on the FY 2022-26 Consolidated Plan, FY 2022-'2026 Citizen Participation Plan and FY 2022-26 Analysis Of Impediments To Fair Housing Choice.	TBD	All comments accepted.	

Table 4 – Citizen Participation Outreach

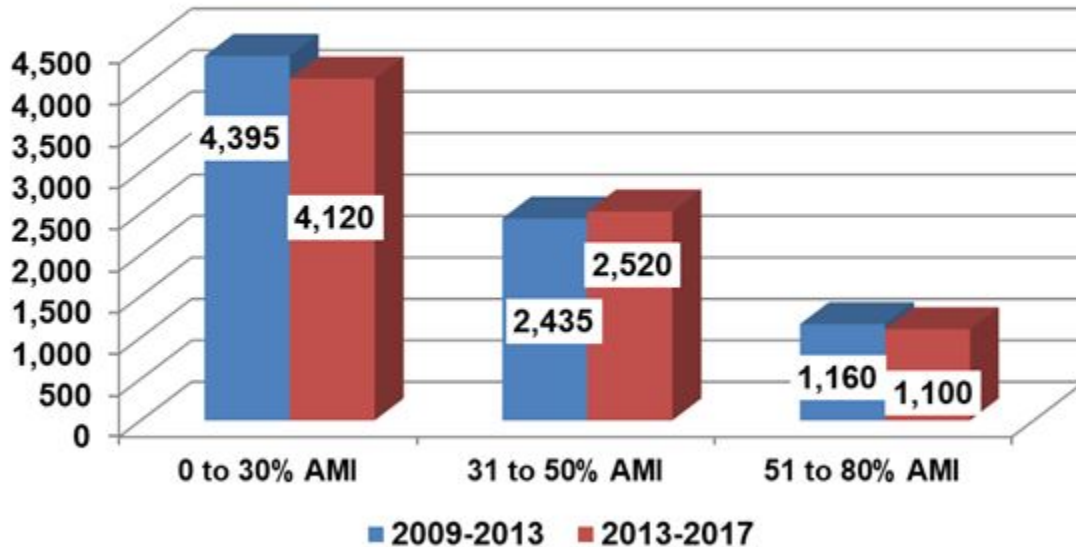
Needs Assessment

NA-05 Overview

Needs Assessment Overview

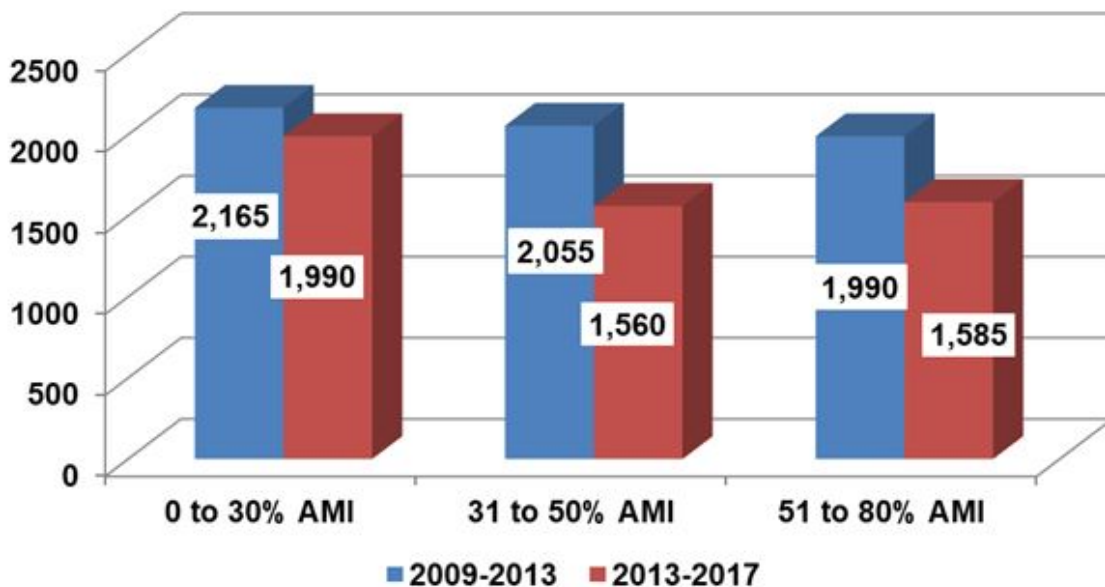
The following data indicates the number of renters and homeowners who experience housing distress based on income level. Defined by HUD, housing distress incorporates a household that may have at least one of the following four problems: (1) cost burden (paying more than 30% of income for housing); (2) living in overcrowded conditions (more than 1.101 persons/room); (3) residing in dwellings lacking plumbing and/or (4) residing in dwellings lacking kitchen facilities. The primary source of data used in this needs assessment is the HUD Comprehensive Housing Affordability Strategy (CHAS) special census runs that incorporate HUD-specified criteria relating to housing needs, HUD-defined income limits (primarily 30, 50, and 80 percent of area median income) and household types. This needs analysis predominantly uses data drawn from HUD's eCon Planning Suite pre-populated with the latest available data (2013-2017) and it should be noted there is a slight data lag. The 2013-2017 data is compared with comparable information from 2009-2013. The latest information contained herein motivates the preparation of the City of Independence housing and community development priorities and both five- and one- year investment strategies.

Number Of Renter Households In Distress, 2009-2017



Renters In Distress

Number Of Owner Households In Distress, 2009-2017



Owners In Distress

NA-10 Housing Needs Assessment - 24 CFR 91.205 (a,b,c)

Summary of Housing Needs

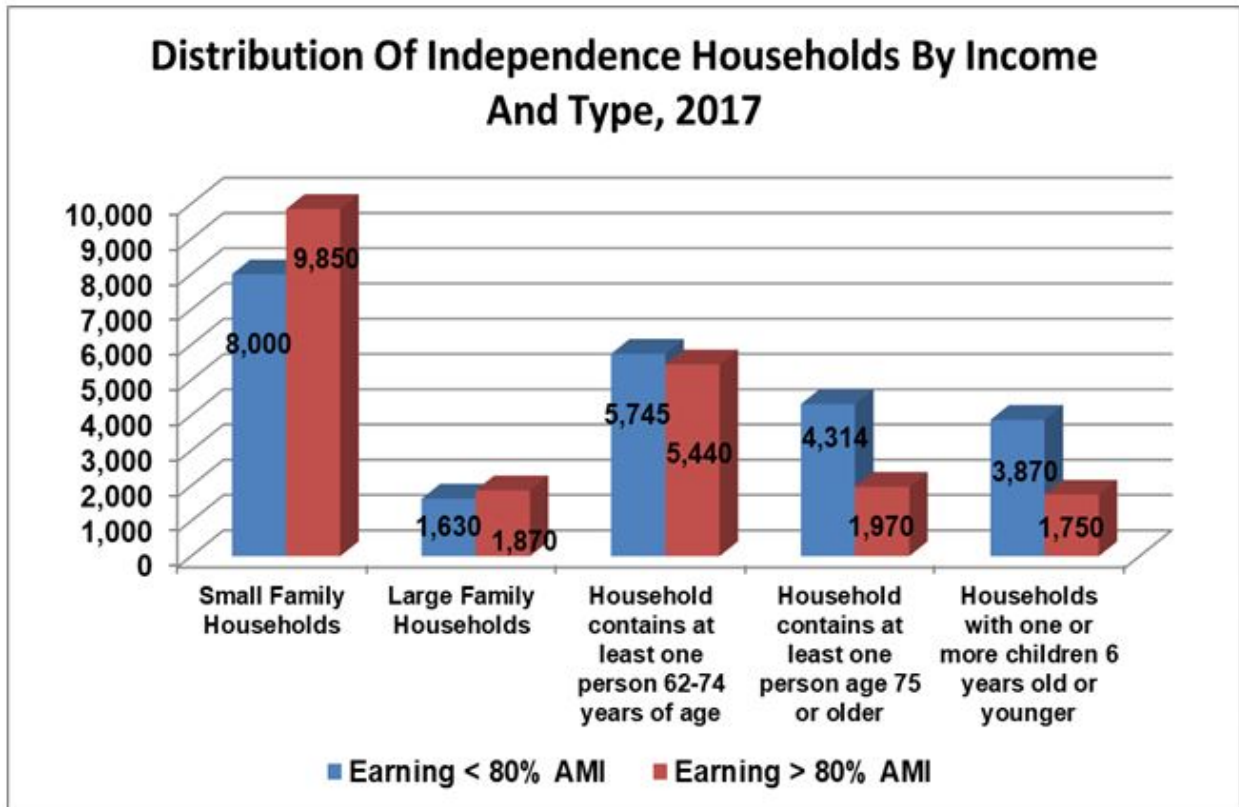
A brief overview of the housing needs assessment for the City of Independence is as follows:

- It is estimated that 7,740 renter households and 5,135 owner households earning under 80% of the area median are in need of housing assistance currently.
- Extrapolating household distributions for those earning less than 80%AMI to the incidence of housing distress in 2017, the greatest need are comprised of small families (2 to 4) and elderly households (>62). Large family household need is not great. Note the average household size for Independence is only 2.4 persons.
- During the five- year planning period, the numbers are anticipated to rise to about a 5% increase.
- Discussions with the Independence Housing Authority indicated 4,500 waiting lists for public housing and 1,800 for rental vouchers. The wait list for public housing is extremely long and about three years for project based rental vouchers.
- Approximately 1,423 sheltered and unsheltered homeless were evident in Independence according to the 2021 Point In Time Homeless Report prepared by the Metro Kansas City Continuum of Care. Special needs residents (frail elderly, disabled, AIDS victims, seriously mentally ill individuals, etc.) all represent major special populations in the community in need of supportive housing facilities and services.

Demographics	Base Year: 2009	Most Recent Year: 2017	% Change
Population	120,409	117,370	-3%
Households	47,298	48,195	2%
Median Income	\$44,196.00	\$46,268.00	5%

Table 5 - Housing Needs Assessment Demographics

Data Source: 2000 Census (Base Year), 2013-2017 ACS (Most Recent Year)



Distribution Of Households By Income ÿ Type

Number of Households Table

	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80-100% HAMFI	>100% HAMFI
Total Households	8,080	7,450	10,710	6,195	15,760
Small Family Households	2,580	1,955	3,465	2,575	7,275
Large Family Households	430	540	660	565	1,305
Household contains at least one person 62-74 years of age	1,680	1,765	2,300	1,200	4,240
Household contains at least one person age 75 or older	924	1,740	1,650	670	1,300
Households with one or more children 6 years old or younger	1,435	1,070	1,365	865	885

Table 6 - Total Households Table

Data 2013-2017 CHAS
Source:

Housing Needs Summary Tables

1. Housing Problems (Households with one of the listed needs)

	Renter					Owner				
	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total
NUMBER OF HOUSEHOLDS										
Substandard Housing - Lacking complete plumbing or kitchen facilities	55	60	55	0	170	15	10	10	20	55
Severely Overcrowded - With >1.51 people per room (and complete kitchen and plumbing)	55	0	0	0	55	0	35	45	0	80
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	160	55	55	15	285	4	40	40	30	114
Housing cost burden greater than 50% of income (and none of the above problems)	2,985	660	15	0	3,660	1,345	429	159	90	2,023

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Housing cost burden greater than 30% of income (and none of the above problems)	865	1,750	980	95	3,690	620	1,045	1,330	275	3,270
Zero/negative Income (and none of the above problems)	570	0	0	0	570	160	0	0	0	160

Table 7 – Housing Problems Table

Data Source: 2013-2017 CHAS

2. Housing Problems 2 (Households with one or more Severe Housing Problems: Lacks kitchen or complete plumbing, severe overcrowding, severe cost burden)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Having 1 or more of four housing problems	3,255	775	120	15	4,165	1,370	519	254	140	2,283
Having none of four housing problems	1,675	2,965	4,175	2,180	10,995	1,050	3,195	6,155	3,855	14,255
Household has negative income, but none of the other housing problems	570	0	0	0	570	160	0	0	0	160

Table 8 – Housing Problems 2

Data Source: 2013-2017 CHAS

3. Cost Burden > 30%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	1,605	835	355	2,795	495	310	435	1,240
Large Related	315	330	15	660	60	100	119	279
Elderly	695	620	245	1,560	1,000	724	429	2,153
Other	1,480	695	425	2,600	429	360	520	1,309
Total need by income	4,095	2,480	1,040	7,615	1,984	1,494	1,503	4,981

Table 9 – Cost Burden > 30%

Data 2013-2017 CHAS
Source:

4. Cost Burden > 50%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	1,355	240	0	1,595	345	80	35	460
Large Related	255	105	0	360	60	0	0	60
Elderly	520	230	25	775	635	249	89	973
Other	1,045	130	0	1,175	319	100	35	454
Total need by income	3,175	705	25	3,905	1,359	429	159	1,947

Table 10 – Cost Burden > 50%

Data 2013-2017 CHAS
Source:

5. Crowding (More than one person per room)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Single family households	215	70	35	10	330	4	75	25	30	134
Multiple, unrelated family households	0	0	20	10	30	0	0	45	0	45

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Other, non-family households	0	0	0	0	0	0	0	10	0	10
Total need by income	215	70	55	20	360	4	75	80	30	189

Table 11 – Crowding Information – 1/2

Data Source: 2013-2017 CHAS

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Households with Children Present	0	0	0	0	0	0	0	0

Table 12 – Crowding Information – 2/2

Data Source
Comments:

Describe the number and type of single person households in need of housing assistance.

The number of single person households in need is estimated at 4,120 by extrapolating the proportion of single person households to the gross housing need noted in this section.

Estimate the number and type of families in need of housing assistance who are disabled or victims of domestic violence, dating violence, sexual assault and stalking.

In 2019 in metro Kansas City, approximately 256 sheltered and unsheltered homeless persons received assistance were victims of domestic violence which may have included dating violence, sexual assault and stalking. Per the 2019 ACS, up to 35,912 persons have physical, mental, cognitive and self-care disabilities in the community. Double-counting is likely evident.

What are the most common housing problems?

Cost burden, or the incidence of households earning less than 80% AMI paying more than 30% of their income for housing, is clearly the greatest problem for Independence residents. Discussed in MA-05 and drawn from the Citywide Independence Housing Study (January, 2022), the community has sizable needs associated with the physical condition and unit amenities associated with its inventory of affordable owner- and renter- dwelling units.

Are any populations/household types more affected than others by these problems?

Again, by extrapolating household type by income category to the incidence of households with problems in 2017 indicates small family households (2-4 persons per household) and elderly households aged 65+ represent those with the highest incidence of housing need.

Describe the characteristics and needs of Low-income individuals and families with children (especially extremely low-income) who are currently housed but are at imminent risk of either residing in shelters or becoming unsheltered 91.205(c)/91.305(c)). Also discuss the needs of formerly homeless families and individuals who are receiving rapid re-housing assistance and are nearing the termination of that assistance

In 2017, approximately 2,985 renter households earning less than 30% AMI in Independence were severely cost burdened or paying more than 50% of their income for housing. These households are those at the greatest risk of imminent homelessness and being forced to reside in shelters of varying types. For metro Kansas City, there are approximately 453 persons in transitional housing with an unknown number nearing termination of assistance.

If a jurisdiction provides estimates of the at-risk population(s), it should also include a description of the operational definition of the at-risk group and the methodology used to generate the estimates:

Noted earlier, in 2017, approximately 2,985 renter households earning less than 30% AMI in Independence were severely cost burdened or paying more than 50% of their income for housing. These households are those at the greatest risk of imminent homelessness and being forced to reside in shelters of varying types.

Specify particular housing characteristics that have been linked with instability and an increased risk of homelessness

While households earning less than 30% AMI and severely cost burden regardless of housing tenure represent the aggregate population in Independence at the greatest risk of homelessness. Within this aggregate population, specific at-risk sub-populations include but are not limited to seriously mentally ill persons, victims of domestic violence, veterans, persons with substance abuse and combinations thereof.

Discussion

To reiterate, It is estimated that 7,740 renter households and 5,135 owner households earning under 80% of the area median are in need of housing assistance currently. Extrapolating household distributions for those earning less than 80% AMI to the incidence of housing distress in 2017, the greatest need are comprised of small families (2 to 4) and elderly households (>62). Large family household need is not great. Note the average household size for Independence is only 2.4

persons. During the five-year planning period, the numbers are anticipated to rise 5% or so.

DRAFT

NA-15 Disproportionately Greater Need: Housing Problems – 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction

HUD defines a disproportionately greater number of housing problems by a racial or ethnic group when a group experiences housing problems at a rate more than 10% greater than the income group as a whole.

0%-30% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	6,110	1,240	730
White	4,535	985	510
Black / African American	625	130	180
Asian	100	0	0
American Indian, Alaska Native	70	0	0
Pacific Islander	15	15	0
Hispanic	590	85	30

Table 13 - Disproportionally Greater Need 0 - 30% AMI

Data Source: 2013-2017 CHAS

*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

30%-50% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	4,080	3,370	0
White	3,060	2,950	0
Black / African American	510	145	0
Asian	20	4	0
American Indian, Alaska Native	0	10	0

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Pacific Islander	0	0	0
Hispanic	460	235	0

Table 14 - Disproportionally Greater Need 30 - 50% AMI

Data 2013-2017 CHAS
Source:

*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

50%-80% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	2,685	8,025	0
White	2,125	6,990	0
Black / African American	240	215	0
Asian	35	75	0
American Indian, Alaska Native	0	35	0
Pacific Islander	0	70	0
Hispanic	215	585	0

Table 15 - Disproportionally Greater Need 50 - 80% AMI

Data 2013-2017 CHAS
Source:

*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

80%-100% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	525	5,665	0
White	440	4,940	0

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Black / African American	25	365	0
Asian	0	55	0
American Indian, Alaska Native	0	10	0
Pacific Islander	0	0	0
Hispanic	0	215	0

Table 16 - Disproportionally Greater Need 80 - 100% AMI

Data 2013-2017 CHAS
Source:

*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

**City of Independence Disproportionate (1)
Minority Housing Assessment, 2017
Households With Problems**

	All Households	White Not Hispanic	Hispanic	Black (Not Hispanic)	Native American (Not Hispanic)	Asian (Not Hispanic)	Hawaiian & Pacific Islander (Not Hispanic)
Earning Less Than 30% AMI	8,080	6,030	705	935	70	100	15
With Housing Problems	6,110	4,535	590	625	70	100	15
% With Housing Problems	75.6%	75.2%	83.7%	66.8%	100.0%	100.0%	100.0%
Earning 31 to 50% AMI	7,450	6,010	695	655	10	24	0
With Housing Problems	4,080	3,060	480	510	0	20	0
% With Housing Problems	54.8%	50.9%	66.2%	77.9%	0.0%	83.3%	0.0%
Earning 51 to 80% AMI	10,710	9,115	800	455	35	110	70
With Housing Problems	2,685	2,125	215	240	0	35	0
% With Housing Problems	25.1%	23.3%	26.9%	52.7%	0.0%	31.8%	0.0%
Earning 81 to 100% AMI	6,190	5,380	215	390	10	55	0
With Housing Problems	525	440	0	25	0	0	0
% With Housing Problems	8.5%	8.2%	0.0%	6.4%	0.0%	0.0%	0.0%

Source: 2013-2017 CHAS.

(1) Per HUD, ethnicities with more than a 10 point difference than the percentage of all households with 'problems' have a disproportionate incidence of 'problems' and are noted in red.

Disproportionate Minority Housing Needs With Problems

Discussion

Noted earlier, HUD defines a disproportionately greater number of housing problems by a racial or ethnic group when a group experiences housing problems at a rate more than 10% greater than the income group as a whole. The following discussion and data highlights the percentage of each minority group experiencing any of four housing problems: cost burden (paying more than 30% of income for housing); overcrowding (more than one person per room); or lacking complete kitchen facilities or complete plumbing facilities (substandard housing). Income categories are broken out by: extremely

low-income (under 30% of HUD Median Family Income [AMI]); low-income (between 30 and 50%); moderate income (between 50 and 80%); and middle-income (between 80 and 100%).

The disproportionate need data were analyzed in depth and are summarized in the enclosed table for the incidence of those households having problems. A percentage marked in red indicates that this ethnic group has disproportionate housing needs given HUD regulations defined as greater than 10 percentage points beyond the statistics for all households in any given income bracket.

For households earning less than 30% of AMI, Native Americans, Asians and Hawaiians/Pacific Islanders were more likely to have problems however it should be noted that there are only a total of 185 households in this group. For households earning from 31 to 50% of AMI, households identifying as Hispanics, Blacks/African Americans and Asians all held disproportionate needs compared to the jurisdiction as a whole. Black/African American households earning between 51 to 80% AMI held a disproportionate need (10 points higher) compared to every other ethnic group in this income category. No specific minority/ethnic group held any disproportionate need in the 81-100% AMI category.

DRAFT

NA-20 Disproportionately Greater Need: Severe Housing Problems – 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction

Severe housing problems offer an insight into the most challenging distress for households by income bracket. The Comprehensive Housing Affordability Strategy (CHAS) data enables a review of distress by virtue of the percentage of each minority group experiencing any of four severe housing problems: cost burden (paying more than 50% of income for housing); overcrowding (more than 1.5 persons per room); and lacking complete kitchen facilities or lacking complete plumbing facilities (substandard housing).

HUD defines a disproportionately greater number of housing problems by a racial or ethnic group when a group experiences housing problems at a rate more than 10% greater than the income group as a whole.

0%-30% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	4,625	2,725	730
White	3,325	2,190	510
Black / African American	570	185	180
Asian	100	0	0
American Indian, Alaska Native	70	0	0
Pacific Islander	4	20	0
Hispanic	440	240	30

Table 17 – Severe Housing Problems 0 - 30% AMI

Data 2013-2017 CHAS
Source:

*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

30%-50% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	1,294	6,160	0
White	874	5,130	0
Black / African American	205	445	0
Asian	0	25	0
American Indian, Alaska Native	0	10	0
Pacific Islander	0	0	0
Hispanic	210	490	0

Table 18 – Severe Housing Problems 30 - 50% AMI

Data Source: 2013-2017 CHAS

*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

50%-80% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	374	10,330	0
White	254	8,855	0
Black / African American	10	450	0
Asian	0	105	0
American Indian, Alaska Native	0	35	0
Pacific Islander	0	70	0
Hispanic	80	720	0

Table 19 – Severe Housing Problems 50 - 80% AMI

Data Source: 2013-2017 CHAS

*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

80%-100% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	155	6,035	0
White	130	5,250	0
Black / African American	0	395	0
Asian	0	55	0
American Indian, Alaska Native	0	10	0
Pacific Islander	0	0	0
Hispanic	0	215	0

Table 20 – Severe Housing Problems 80 - 100% AMI

Data Source: 2013-2017 CHAS

*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

City of Independence Disproportionate (1) Minority Housing Assessment, 2017 Households With Severe Problems

	All Households	White Not Hispanic	Hispanic	Black (Not Hispanic)	Native American (Not Hispanic)	Asian (Not Hispanic)	Hawaiian & Pacific Islander (Not Hispanic)
Earning Less Than 30% AMI	8,080	6,030	705	935	70	100	15
With Severe Housing Problems	4,625	3,325	440	570	70	100	4
% With Severe Housing Problems	57.2%	55.1%	62.4%	61.0%	100.0%	100.0%	26.7%
Earning 31 to 50% AMI	7,450	6,010	695	655	10	24	0
With Severe Housing Problems	1,294	874	210	205	0	0	0
% With Severe Housing Problems	17.4%	14.5%	30.2%	31.3%	0.0%	0.0%	0.0%
Earning 51 to 80% AMI	10,710	9,115	800	455	35	110	70
With Severe Housing Problems	374	254	80	10	0	0	0
% With Severe Housing Problems	3.5%	2.8%	10.0%	2.2%	0.0%	0.0%	0.0%
Earning 81 to 100% AMI	6,190	5,380	215	390	10	55	0
With Severe Housing Problems	155	130	0	0	0	0	0
% With Severe Housing Problems	2.5%	2.4%	0.0%	0.0%	0.0%	0.0%	0.0%

Source: 2013-2017 CHAS.

(1) Per HUD, ethnicities with more than a 10 point difference than the percentage of all households with "problems" have a disproportionate incidence of "problems" and are noted in red.

Minority Housing Assessment For Those With Severe Housing Problems

Discussion

The disproportionate need data were analyzed in depth and are summarized in the table enclosed for the incidence of those households having severe housing problems. A cell noted in red indicates that this ethnic group has disproportionate housing needs given HUD regulations defined as greater than 10 percentage points beyond the statistics for all households in any given income bracket. For households earning less than 30% of AMI, Native Americans and Asians held a disproportionate need while for the 31 to 50% AMI bracket African Americans and Hispanics were disproportionately more likely to have severe problems. In the 51% to 80% AMI income bracket and 81% to 100% AMI categories, no minority/ethnic group held any disproportionate severe needs.

DRAFT

NA-25 Disproportionately Greater Need: Housing Cost Burdens – 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction:

Disproportionately greater need of racial or ethnic groups is based on the incidence of cost burden defined as monthly housing costs (including utilities) exceeding 30% of monthly income. Data is broken down into groups paying under 30% of income for housing, between 31 and 50%, and over 51%. The column labeled “no/negative income” represents households with no income or those paying 100% of their gross income for housing costs.

HUD defines a disproportionately greater number of housing problems by a racial or ethnic group when a group experiences housing problems at a rate more than 10% greater than the income group as a whole.

Housing Cost Burden

Housing Cost Burden	<=30%	30-50%	>50%	No / negative income (not computed)
Jurisdiction as a whole	34,060	7,395	5,968	765
White	29,855	5,875	4,325	515
Black / African American	1,415	640	745	180
Asian	310	55	100	0
American Indian, Alaska Native	100	0	85	0
Pacific Islander	150	4	4	0
Hispanic	1,790	630	575	60

Table 21 – Greater Need: Housing Cost Burdens AMI

Data 2013-2017 CHAS
Source:

City of Independence Disproportionate (1)
Minority Housing Assessment, 2017
Households Cost Burdens

	All Households	White (Not Hispanic)	Hispanic	Black (Not Hispanic)	Native American (Not Hispanic)	Asian (Not Hispanic)	Hawaiian & Pacific Islander (Not Hispanic)
Households By Race/Ethnicity	47,918	40,570	3,055	2,980	185	465	158
With A Cost Burden < 30% (no burden)	34,080	29,855	1,790	1,415	100	310	150
% With A Cost Burden	71.1%	73.6%	58.6%	47.5%	54.1%	66.7%	94.9%
With A Cost Burden 31-50% AMI	7,395	5,875	630	640	0	55	4
% With A Cost Burden	15.4%	14.5%	20.6%	21.5%	0.0%	11.8%	2.5%
With A Cost Burden > 51% AMI	5,988	4,325	575	745	85	100	4
% With A Cost Burden	12.5%	10.7%	18.8%	25.0%	45.9%	21.5%	2.5%

Source: 2013-2017 CHAS.

(1) Per HUD, ethnicities with more than a 10 point difference than the percentage of all households with a cost burden have a disproportionate incidence of 'burdens' and are noted in red.

Disproportionate Minority Assessment For Households With A Cost Burden

Discussion:

A percentage highlighted in red indicates that this ethnic group has disproportionate housing cost burdens given HUD regulations defined as greater than 10 percentage points beyond the statistics for all households.

Disproportionate need was evident for African Americans, Hispanics and Native Americans for households with a cost burden less than 30% evidencing no burden, while no racial/ethnicity disparities were evident for a cost burden greater than 31% to 50% of annual income. Cost burdens exceeding 51% of household income were disproportionately evident for African Americans, Asians and Native Americans. The enclosed chart reflects the findings from data generated by HUD.

NA-30 Disproportionately Greater Need: Discussion – 91.205(b)(2)

Are there any income categories in which a racial or ethnic group has disproportionately greater need than the needs of that income category as a whole?

Indicated on NA15, NA20 and NA25, all ethnicities having housing problems and cost burden, be it severe or not, were compared by income category and the findings are presented in those templates. There were disproportionate needs found and they are discussed in those sections.

If they have needs not identified above, what are those needs?

The City of Independence Analysis Of Impediments To Fair Housing Choice (AI), FY 2022-2026 offers an in-depth analysis of both the location of minorities within the community and their needs. Please refer to the aforementioned document for a detailed assessment. A brief overview of the needs identified in the FY 2022-2026 City of Independence AI are presented below:

- Evidence of Insufficient Income Is Causing Housing Distress And Impeding Fair Housing Choice
- The population center of Independence has access to 22 percent of the region's jobs within a 10-mile radius and Independence exported about 11,000 residents daily to work elsewhere in the region.
- For a 3-person single-parent family with income at 50% of the median income for renters in the region (i.e. metro area), residents in the portion of Independence are the most negatively impacted per the HUD Low Transportation Cost Index.
- The need for targeted neighborhood infrastructure, public improvements and economic development.

Are any of those racial or ethnic groups located in specific areas or neighborhoods in your community?

Race and ethnicity analyzed at the census tract level offer insights into concentrations of minorities within Independence. One of the data items most pertinent are racially/ethnically concentrated areas of poverty (R/ECAP). R/ECAP areas are census tracts where more than half the population is non-White and 40% or more of the population is in poverty OR where the poverty rate is greater than three times the average poverty rate in the area (with revisions to these formula for non-urban areas). No RECAPs currently exist in Independence per the 2010 census.

The segregation or Theil index was generated by HUD and offers an insight into the incidence of such in 2010 (2020 not yet available). If neighborhoods within Independence exhibit a very different racial composition than the city as a whole the Index will be higher, suggesting a higher level of segregation and vice-versa. So the Independence tracts in the west in darker blue represent segregation hotspots

and refer to the FY 2022-2026 Independence Analysis Of Impediments To Fair Housing Choice for further detail as maps are not enabled by HUD within this template.

DRAFT

NA-35 Public Housing – 91.205(b)

Introduction

This segment of the plan discusses the volume and type of assisted housing contained within the City of Independence Housing Authority. Assisted housing is generally considered to be comprised of Section 8 rental support and public housing. These programs are generally, but not always exclusively, administered by the Housing Authorities (PHAs). Within the Independence Housing Authority, approximately 505 public housing units and 1,468 rental vouchers are being administered. More detailed information follows.

Totals in Use

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher		
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers in use	0	0	505	1,468	0	1,456	0	0	0

Table 22 - Public Housing by Program Type

*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

Data Source: PIC (PIH Information Center)

Characteristics of Residents

	Program Type							
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher	
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program
Average Annual Income	0	0	9,835	11,414	0	11,397	0	0
Average length of stay	0	0	4	4	0	4	0	0
Average Household size	0	0	1	2	0	2	0	0
# Homeless at admission	0	0	0	0	0	0	0	0
# of Elderly Program Participants (>62)	0	0	134	177	0	176	0	0
# of Disabled Families	0	0	208	399	0	391	0	0
# of Families requesting accessibility features	0	0	505	1,468	0	1,456	0	0
# of HIV/AIDS program participants	0	0	0	0	0	0	0	0
# of DV victims	0	0	0	0	0	0	0	0

Table 23 – Characteristics of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Race of Residents

Race	Certificate	Mod-Rehab	Public Housing	Program Type					
				Vouchers			Special Purpose Voucher		
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
White	0	0	376	696	0	684	0	0	0
Black/African American	0	0	107	735	0	735	0	0	0
Asian	0	0	4	0	0	0	0	0	0
American Indian/Alaska Native	0	0	15	29	0	29	0	0	0
Pacific Islander	0	0	3	8	0	8	0	0	0
Other	0	0	0	0	0	0	0	0	0
*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition									

Table 24 – Race of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Ethnicity of Residents

Ethnicity	Certificate	Mod-Rehab	Public Housing	Program Type					
				Vouchers			Special Purpose Voucher		
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
Hispanic	0	0	15	30	0	30	0	0	0
Not Hispanic	0	0	490	1,438	0	1,426	0	0	0
*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition									

Table 25 – Ethnicity of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

DRAFT

Section 504 Needs Assessment: Describe the needs of public housing tenants and applicants on the waiting list for accessible units:

There are approximately 4,500 persons on the wait list for public housing, of which it is likely some were for accessible units. The public housing wait time is extremely long. There are 1,800 persons on the Section 8 waitlist and the wait is estimated at about 3 years.

Most immediate needs of residents of Public Housing and Housing Choice voucher holders

The number of persons and families on the waitlist for both public housing and section 8 tenant-based rental assistance are noted above. All types of families are on such waitlists. Per information provided by HUD, of the approximately 505 public housing units, about 26% of such units are occupied by elderly households (> 62) and 41% by disabled families. Virtually all of the Independence PHA residents, regardless of the HUD program, seek accessibility features for their residences. For holders of rental vouchers in Independence, about 12% of occupants are elderly and 27% of all occupants seek accessibility features. The average length of stay for both public housing and rental voucher tenants is about 4 years. The average household size for public housing residents is only 1.0 while over 2.0 for voucher tenants.

Independence assisted housing (public housing and Section 8 vouchers) are oriented to certain targeted populations per the preferences contained within the adopted one- and five- year Independence Public Housing Agency Plan that is made part of this Consolidated Plan by reference. A suitable living environment for residents is connected to the ability of the Independence PHA and associated providers to render access to essential services. The Independence PHA provides residents access to a variety of needed and relevant supportive services.

How do these needs compare to the housing needs of the population at large

With the median income of Independence residents at about \$45,000/annum, the average annual income of \$9,835 for the residents of public housing and \$11,414 for rental vouchers reinforce that the predominant income of occupants is less than 50% AMI and often less than 30% AMI. The incidence of housing distress (CHAS data) and cost burden among Independence households is consistent with the occupancy of both public housing and receipt of rental vouchers by race/ethnicity in the community with one main exception noted in the following discussion.

Discussion

Hispanics were previously under-represented in their receipt of Independence PHA resources (15 public housing units and a miniscule 30 rental vouchers) given their much larger percentage of the community population at lower income levels and incidence of housing distress. Presently, the Independence

Housing Authority indicates that while Hispanics comprise 8.8% of the city population, the Section 8 rental assistance wait list consists of 8% Hispanics and 6% of actual beneficiaries (recipients). For public housing, Hispanics comprise 13% of the wait list and 7% of actual beneficiaries. Thus, Hispanics have substantively increased their proportion of securing assisted housing assistance in Independence.

DRAFT

NA-40 Homeless Needs Assessment – 91.205(c)

Introduction:

This segment of the plan provides a general assessment of the region's homeless population and its needs. Data are generally derived from the 2021 Annual Homeless Assessment Report of the Greater Kansas City Coalition To End Homelessness (GKCCEH) Continuum of Care (CoC) 2021 Point-in-Time Count (PIT)....Kansas City/Independence/Lee's Summit/Jackson County COC. The data is generated in part by the GKCCEH Management Information System (HMIS). The federal McKinney-Vento Homeless Assistance Act of 1987, as amended by S.896 HEARTH Act of 2009, defines homelessness as:

- (1) an individual or family who lacks a fixed, regular, and adequate nighttime residence;
- (2) an individual or family with a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings including a car, park, abandoned building, bus or train station, airport or camp ground;
- (3) an individual or family living in a supervised publicly or privately operated shelter designated to provide temporary living arrangements (including hotels and motels paid for by Federal, State, or local government programs for low-income individuals or by charitable organizations, congregate shelters, and transitional housing);
- (4) an individual who resided in a shelter or place not meant for human habitation and who is exiting an institution where he or she temporarily resided;
- (5) an individual or family who— will imminently lose their housing, has no subsequent residence identified and lacks the resources or support networks needed to obtain other permanent housing; and,
- (6) unaccompanied youth and homeless families with children and youth defined as homeless under other Federal statutes.

Homeless Needs Assessment

Population	Estimate the # of persons experiencing homelessness on a given night		Estimate the # experiencing homelessness each year	Estimate the # becoming homeless each year	Estimate the # exiting homelessness each year	Estimate the # of days persons experience homelessness
	Sheltered	Unsheltered				
Persons in Households with Adult(s) and Child(ren)	435	4	0	0	0	0
Persons in Households with Only Children	4	4	0	0	0	0
Persons in Households with Only Adults	578	400	0	0	0	0
Chronically Homeless Individuals	57	44	0	0	0	0
Chronically Homeless Families	10	0	0	0	0	0
Veterans	67	41	0	0	0	0
Unaccompanied Child	50	16	0	0	0	0
Persons with HIV	0	0	0	0	0	0

Table 26 - Homeless Needs Assessment

Data Source Comments:

The source of the number of persons experiencing homelessness on a given night is derived from the 2021 Point-In-Time Count MO-604M Kansas City/Independence/Lee's Summit/Jackson County COC. Where "0" is noted, refer to the narrative for relevant information available.

Total Households and Persons

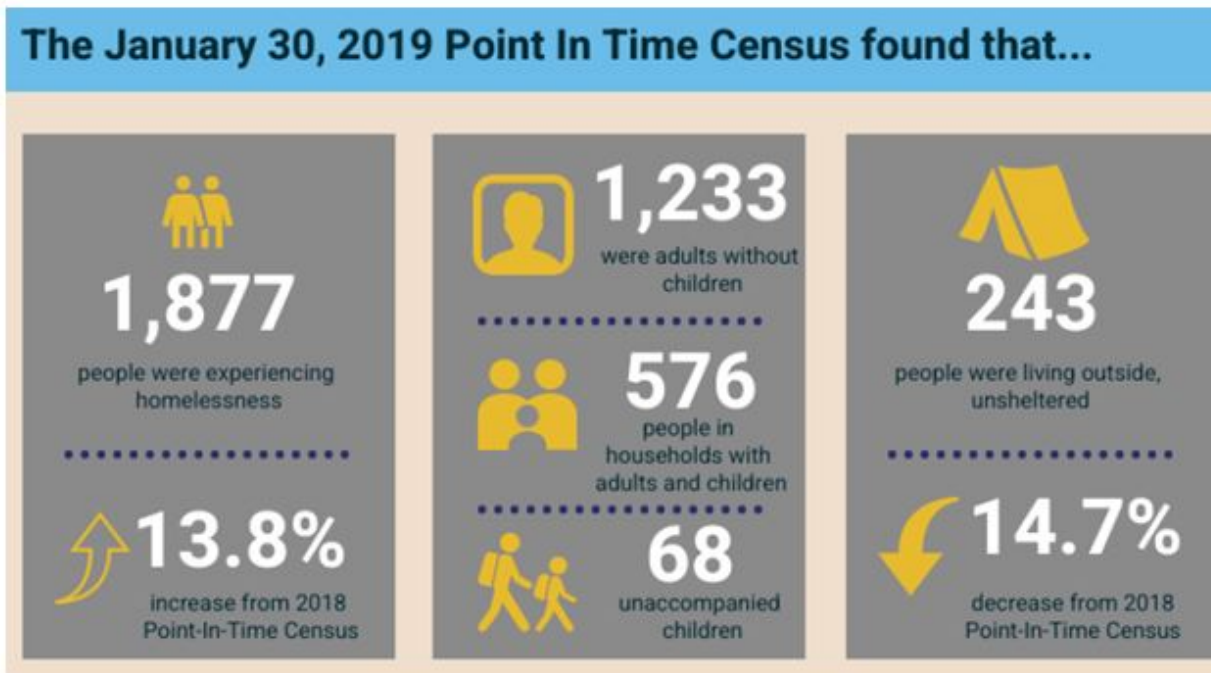
	Sheltered			Unsheltered	Total
	Emergency	Transitional	Safe Haven		
Total Number of Households	401	268	12	395	1,076
Total Number of Persons	552	453	12	408	1,425
Number of Children (under age 18)	136	152	0	6	294
Number of Persons (18 to 24)	41	33	1	12	87
Number of Persons (over age 24)	375	268	11	390	1,044

Gender

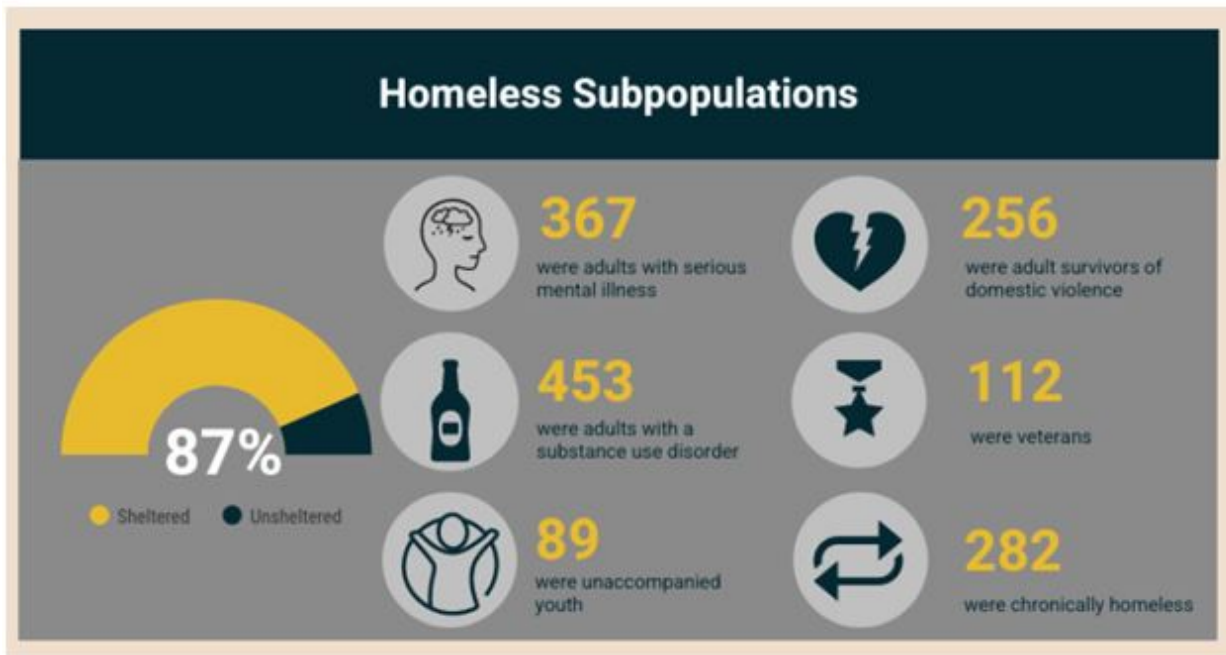
	Sheltered			Unsheltered	Total
	Emergency	Transitional	Safe Haven		
Female	289	185	2	91	567
Male	259	264	10	316	849
Transgender	2	3	0	1	6
Gender Non-Conforming (i.e. not exclusively male or female)	2	1	0	0	3

Total Homeless Persons by Gender, PIT 2021

Per the GKCCEH 2018/'19 Annual Report (latest available with data):



Selected Incidence Of Homeless By Type



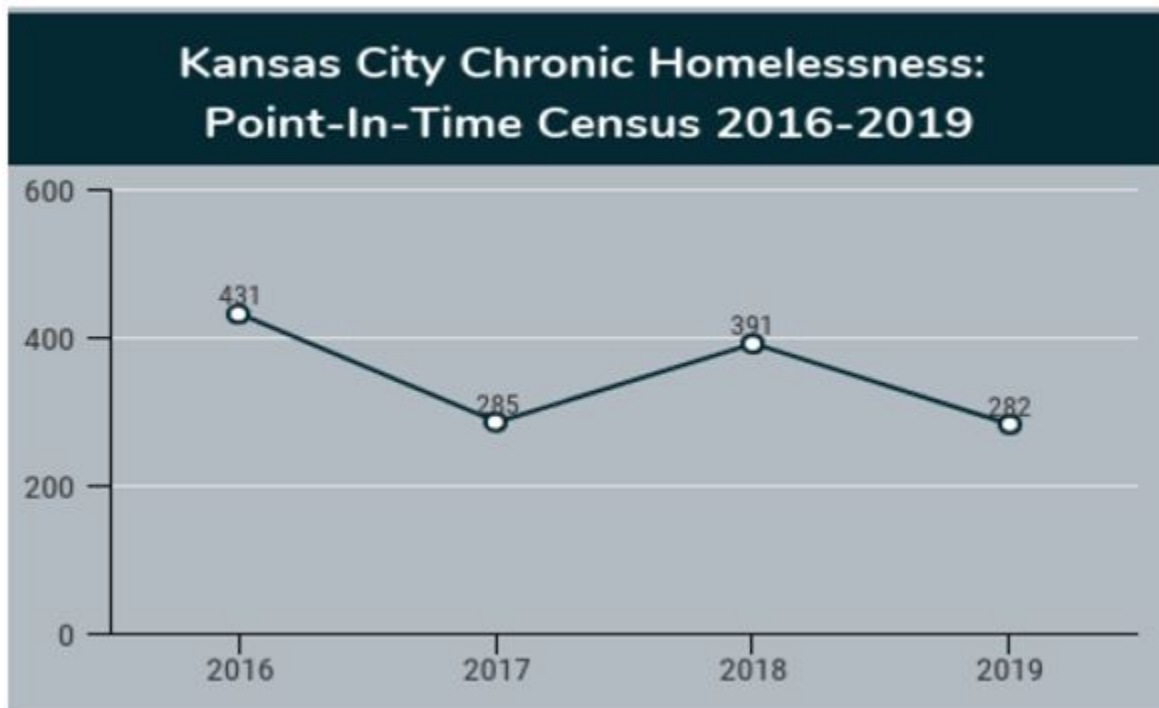
Homeless Subpopulations

Changes in Kansas City Homelessness

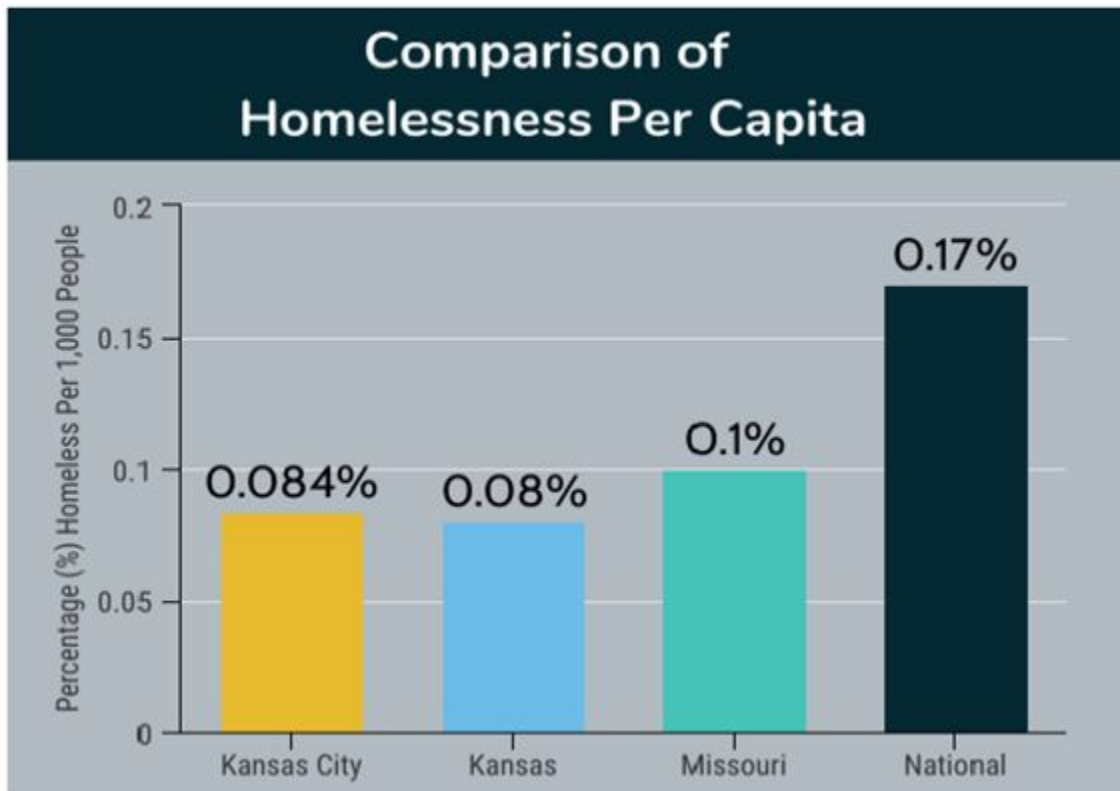


Source: 2015-2019 Point-in-Time (PIT) Count Data accessed via HDX.

Changes In Kansas City Homelessness



Regional Kansas City Chronic Homelessness



Comparison Of Homelessness Per Capita

Indicate if the homeless population is: Has No Rural Homeless

If data is not available for the categories "number of persons becoming and exiting homelessness each year," and "number of days that persons experience homelessness," describe these categories for each homeless population type (including chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth):

Drawn from the 2021 PIT count for metro Kansas City, refer to the tables enclosed (Kansas City/Independence/Lee's Summit/Jackson County CO).

DRAFT

Nature and Extent of Homelessness: (Optional)

Race:	Sheltered:	Unsheltered (optional)
White	536	279
Black or African American	394	94
Asian	1	6
American Indian or Alaska Native	19	4
Pacific Islander	8	5
Ethnicity:	Sheltered:	Unsheltered (optional)
Hispanic	1,541	219
Not Hispanic	93	24

Data Source
Comments:

Kansas City Regional Continuum Of Care, 2021 for race. 2019 PIT Count for ethnicity. Kansas City/Independence/Lee's Summit/Jackson County COC.

Per the GKCCEH 2021 Point-In-Time Count for the total households and persons in the Kansas City metropolitan area, refer to the following information indicating the incidence of homelessness by race and ethnicity.

	Sheltered			Unsheltered	Total
	Emergency	Transitional	Safe Haven		
White	261	271	4	279	815
Black or African-American	234	152	8	94	488
Asian	1	0	0	6	7
American Indian or Alaska Native	13	6	0	4	23
Native Hawaiian or Other Pacific Islander	4	4	0	5	13
Multiple Races	39	20	0	20	79

Incidence Of Regional Homelessness By Race/Ethnicity

Drawn from the 2021 PIT count for metro Kansas City, refer to the following charts for the estimated number and types of families in need.

Persons in Households with at least one Adult and one Child				
	Sheltered		Unsheltered	Total
	Emergency	Transitional		
Total Number of Households	66	72	2	140
Total Number of persons (Adults & Children)	210	225	4	439
Number of Persons (under age 18)	134	150	2	286
Number of Persons (18 - 24)	17	10	0	27
Number of Persons (over age 24)	59	65	2	126

Gender (adults and children)	Sheltered		Unsheltered	Total
	Emergency	Transitional		
Female	142	141	4	287
Male	68	84	0	152
Transgender	0	0	0	0
Gender Non-Conforming (i.e. not exclusively male or female)	0	0	0	0

Regional Homelessness For Families With Children

For Veterans and their families with one child, refer to the following information.

Date of PIT Count: 1/27/2021

Population: Sheltered and full unsheltered count

Total Households and Persons

	Sheltered			Unsheltered	Total
	Emergency	Transitional	Safe Haven		
Total Number of Households	16	31	12	40	99
Total Number of Persons	24	31	12	41	108
Total Number of Veterans	16	31	12	40	99

Gender

	Sheltered			Unsheltered	Total
	Emergency	Transitional	Safe Haven		
Female	3	0	2	3	8
Male	13	30	10	37	90
Transgender (male to female)	0	1	0	0	1
Transgender (female to male)	0	0	0	0	0

Veteran Family Homelessness

Unaccompanied Youth

Drawn from the 2021 PIT count for metro Kansas City, refer to the following charts for the estimated number and type of unaccompanied youth in need.

Population: Sheltered and full unsheltered count

Unaccompanied Youth Households

	Sheltered			Unsheltered	Total
	Emergency	Transitional	Safe Haven		
Total Number of unaccompanied youth households	24	25	1	15	65
Total number of unaccompanied youth	24	25	1	16	66
Number of unaccompanied children (under age 18)	0	2	0	4	6
Number of unaccompanied young adults (age 18 to 24)	24	23	1	12	60

Gender (unaccompanied youth)	Sheltered			Unsheltered	Total
	Emergency	Transitional	Safe Haven		
Female	13	10	1	4	28
Male	9	12	0	12	33
Transgender	1	2	0	0	3
Gender Non-Conforming (i.e. not exclusively male or female)	1	1	0	0	2

Unaccompanied Youth Homelessness

Chronic Homelessness

Drawn from the 2021 PIT count for metro Kansas City, refer to the following charts for the estimated number the persons chronically homeless.

Chronically Homeless	Sheltered			Unsheltered	Total
	Emergency	Transitional	Safe Haven		
Total number of persons	57		0	44	101

Chronic Homelessness

Estimate the number and type of families in need of housing assistance for families with children and the families of veterans.

Drawn from the 2021 PIT count for metro Kansas City, refer to the following charts for the estimated number and types of families in need (Kansas City/Independence/Lee's Summit/Jackson County COC).

Describe the Nature and Extent of Homelessness by Racial and Ethnic Group.

Drawn from the 2021 PIT count for metro Kansas City, refer to the following charts for the estimated number of homeless persons By Race & Ethnicity (Kansas City/Independence/Lee's Summit/Jackson County COC).

Describe the Nature and Extent of Unsheltered and Sheltered Homelessness.

Refer to the enclosed tables associated with the sheltered and unsheltered totals of homeless persons in the Kansas City metro area derived from the 2021 Continuum of Care. Factors which cause or contribute to homelessness in the region and throughout the U.S. include, but are not limited to:

- The incidence and vulnerability of persons in severe poverty.
- Shortages of affordable housing (predominantly rental).
- The incidence and vulnerability of persons battered from domestic violence.
- The incidence and vulnerability of lower income persons plagued with chemical dependency.
- Combinations of the above.

In regards to the number of sheltered homeless persons in the Kansas City metro region, it is estimated that approximately 681 - 1,017 emergency and transitional beds exist which are likely at full capacity. The demographics of sheltered homeless persons are noted throughout this section.

Discussion:

Specifically for the City of Independence, it should be noted that the latest 2017 Comprehensive Housing Affordability (CHAS data) for renter households in distress (with Problems) earning less than 30% AMI represent the population “at-risk” for homelessness given the prospective onset of adverse economic or other circumstances affecting them going forward. The estimated number of those households and persons ‘at-risk’ in Independence is estimated at 4,120, while about 2,985 renters earn less than 30% AMI and are severely cost burdened or paying more than 50% of their income for housing. These, 2,985 persons are “at-the-greatest-risk for homelessness”. Executing sustained homeless prevention endeavors are needed to protect these residents. Per the Citywide Independence Housing Study (January, 2022), “stakeholders raised concerns about the homeless population in Independence and that there is a perception that the problem is growing or at least becoming more visible as it spreads east and becomes more scattered throughout the community. There are a lack of shelter beds in or near Independence and a very limited supply of transitional and/or supportive housing for homeless or formerly homeless persons.” Discussions with the Salvation Army indicate their Emergency Shelter is booked with wait lists being used.

NA-45 Non-Homeless Special Needs Assessment - 91.205 (b,d)

Introduction:

A variety of non-homeless special needs populations are in need of varying types of housing and supportive services assistance. These groups include but are not limited to elderly and frail elderly persons, persons with serious mental illness, disabled persons, victims of domestic violence, persons with HIV/AIDs, etc. Discussed earlier, many of these special needs populations in possible greatest need of support are derived from 6,100 owner- and renter- households earning less than 30% AMI with housing problems (CHAS data). The types of assistance needed are discussed later in this section.

Describe the characteristics of special needs populations in your community:

- Elderly (Age 62-74) and frail elderly (greater than 75) in need of shelter and have housing problems and also in need of supportive services. Housing problems are defined as being cost burdened, residing in overcrowded or substandard housing. The need for supportive housing was defined as those elderly households beset with a mobility or self-care limitation.
- Seriously Mentally Ill (SMI) persons are defined as such by the medical community. Inadequate housing is can be as persons residing in non-recovery-oriented environments including many of the "Supervisory Care Homeless" that tend to warehouse residents, residing in homeless shelters, residing with inappropriate partners; and/or residing in the governmental hospital or facilities other higher levels of care because no lower levels or appropriate housing options are available. National studies and local experience affirm that untreated mental illness can cause individuals to become paranoid, anxious, or depressed, making it difficult or impossible to maintain employment, pay bills, or maintain supportive social relationships. State perspectives on housing gaps facing SMI persons include gaps in the treatment and housing continuum, ex-offenders leaving correctional facilities and alcohol and drug addiction.
- Developmentally disabled persons - Developmentally disabled persons are typically diagnosed with autism, cerebral palsy, epilepsy or mental retardation which was manifested before the age of 18 and is likely to continue indefinitely, and have substantial limitations in at least three in self-care, communication with others, learning, mobility, capacity for independent living and economic self-sufficiency. Obviously, this group may often require appropriate housing with an array of supportive services.
- Persons infected with the HIV virus where the transmission of HIV infections exemplifies the "at risk" population for infection. The following adolescent/adult groups are the most "at risk": gay or bisexual men, IV drug user, gay/IV drug user, hemophiliac, heterosexual contact, transfusion with blood, other/unknown. People living with HIV and AIDS face challenges finding and maintaining safe and

affordable housing for a variety of complex and interrelated health and social reasons. Studies indicate that one-third to one-half of these residents are in imminent danger of homelessness. Declining health, loss of employment and subsequent decline in income, chemical dependency, lack of family support and other issues face this target group.

What are the housing and supportive service needs of these populations and how are these needs determined?

These needs are derived from discussions with providers, survey/community input and other research.

- Elderly (Age 62-74) – Permanent housing support, case management, counseling, adult day services, homecare, home delivered meals, befriending services.
- Frail Elderly (>75) – Permanent housing support, assisted housing support, 24 hour-hour shelter/health care, hospice care/coordination, case management, counseling, adult day services, homecare, home delivered meals, befriending services, health services, nurse/medical services, etc.
- Persons With Serious Mental Illness (SMI) – Varying housing support ranging from permanent housing to assisted living, outreach and identification, treatment, health care, income support, rehabilitation services.
- Persons With Developmental Disabilities – Alternative types of shelter support, assistive technology, employment and training, information and referral services, transportation, case management.
- Persons With Physical Disabilities – Again, varying types of shelter assistance, assistive technology, employment and training, information and referral services, transportation, case management for the disabled, etc.
- Persons with Alcohol or Other Drug Addiction – Emergency and transitional shelter support, monitoring, screening, information and referral, detox medication, education, self-help groups, counseling.
- Persons With HIV/AIDs - Short- and long- term rental subsidy support, other types of shelter support, case management, emergency financial assistance, food, transportation, early

Discuss the size and characteristics of the population with HIV/AIDS and their families within the Eligible Metropolitan Statistical Area:

In 2021, 2 new cases of HIV were reported to Independence Health Department (IHD) and they indicated no known trends. Refer to the enclosed charts in ____ from the State of Missouri concerning HIV in the Kansas City region.

People living with HIV and AIDS face challenges finding and maintaining safe and affordable housing for a variety of complex and interrelated health and social reasons. To reiterate, studies indicate that one-third to one-half of these residents are in imminent danger of homelessness. Declining health, loss of employment and subsequent decline in income, chemical dependency, lack of family support and other factors mean many people with AIDS can no longer live independently, and subsequently need supportive housing assistance.

With respect to the supportive housing needs of HIV patients, the following highlights the needs of this target: adult foster care (room and board and personal care, etc.), case management providing continuous monitoring and assessment of those in need, group home care with support services, home health agency support providing skilled nursing services and other therapeutic services to people under the care of a physician, in-patient hospice support providing palliative and supportive care for terminally ill persons and their families or care-givers, hospice services rendered at the place of residence of a terminally ill person, nursing care from a licensed health care institution that provides inpatient beds or resident beds and nursing services to persons, residential care from an institution that provides resident beds and health related services for persons who do not need inpatient nursing care, respite care for family members rendering care to clients in foster homes and private homes to provide an interval of rest and relief and other supportive services that include nutrition counseling, meals, housekeeping and general maintenance and transportation.

Discussion:

Mentioned earlier, many of these special needs populations in possible greatest need of support are derived from 6,100 owner- and renter- households earning less than 30% AMI with housing problems (CHAS data) in Independence.

NA-50 Non-Housing Community Development Needs – 91.215 (f)

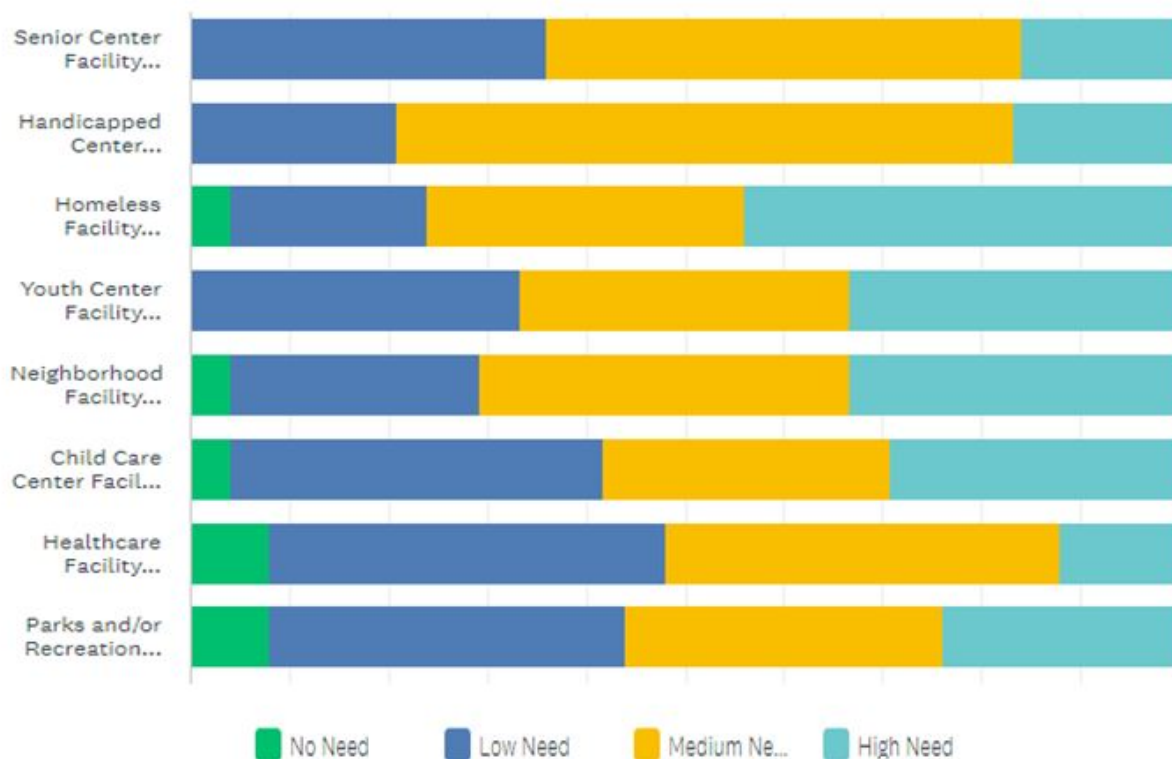
Describe the jurisdiction's need for Public Facilities:

Independence currently offers a wide variety of public facilities both city and non-profit owned, including civic & recreation centers, parks and athletic fields, walking and biking paths, nonprofit social service centers, and public libraries. These public facilities can be found city-wide and are generally connected and accessible by way of public transportation systems provided by both the City of Independence and the Kansas City Area Transportation Authority. However, the jurisdiction does have needs and priorities for public facilities and they are noted in the chart enclosed.

How were these needs determined?

The need for public facilities improvements and investments was identified through the Consolidated Plan Citizen Participation Process and consultation with city departments and community partners. An online survey of interested citizens produced public facility priorities that offered a strong insight into community perspectives regarding public facility needs.

Priority Public Facilities Needed



Priority Public Facilities Needed

Describe the jurisdiction's need for Public Improvements:

Western Independence is the area of greatest need for public improvements for low- and moderate-income populations. It represents the City's urban core and its infrastructure is often quite old. Streets, sidewalks, curbs, gutters, storm water, sewer and water systems require sustained updating to accommodate the density and age of area housing. Neighborhoods dating between 1960-90 in the eastern half of the City are also showing significant need for reinvestment. Many of the City's older commercial corridors are suffering from vacancy and property owner disinvestment, making it difficult to attract commercial and residential tax base to these areas needed to support residential reinvestment. Again, a survey of interested citizens and their perspectives on the need/priorities for public improvements are noted in the chart enclosed.

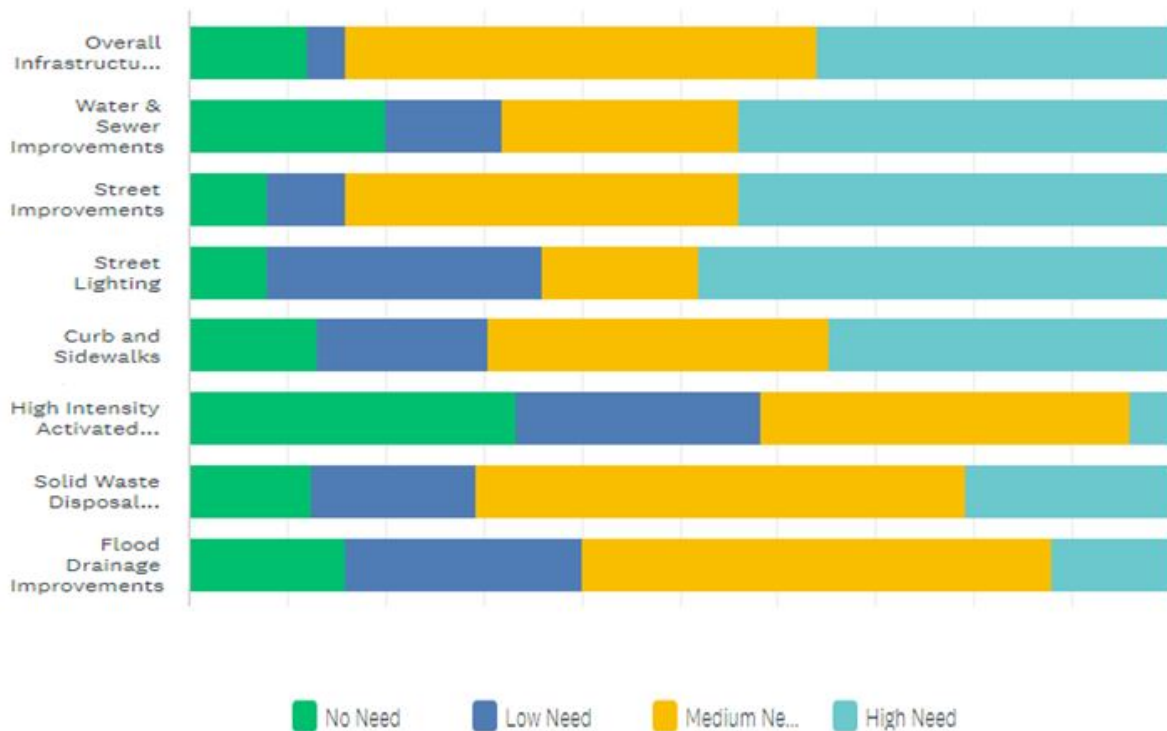
Past community needs identified still exist to varying degrees and include:

- Reinvestment in older commercial corridors, vacant buildings, infrastructure (24Hwy-east & west, 23rd Street, Maywood & Englewood)
- Expansion of Public Transportation city-wide (increased service and extended hours)
- Sidewalk repair and installation programs, particularly near schools and along commercial corridors
- Code enforcement, including commercial properties; repair or removal of dilapidated structures in the community
- Western Independence gateway improvements and enhancements
- Traffic calming and parking improvements in the Fairmount Business District

How were these needs determined?

The need for public improvements was identified through the Consolidated Plan Citizen Participation Process and consultation with city departments and community partners. An online survey of interested citizens produced public improvement priorities that offered a strong insight into community perspectives regarding needs.

Priority Public Improvements Needed



Priority Public Improvements Needs

Describe the jurisdiction's need for Public Services:

Independence continues to benefit from a strong and comprehensive network of experienced public service providers. As is typically the case however, the community need always exceeds the available resources. Past community needs identified still exist to varying degrees and include:

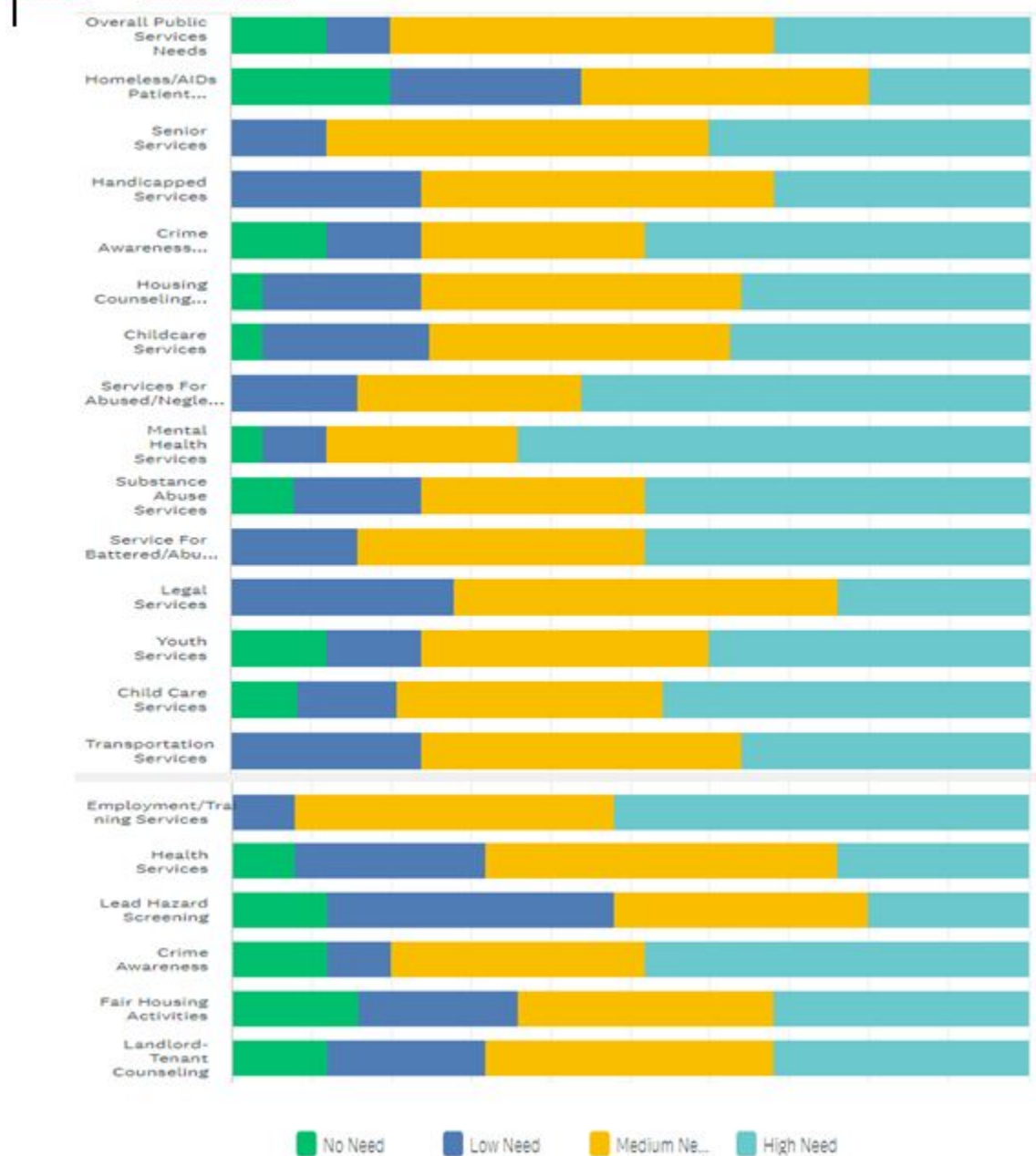
- Targeted rent and utility assistance
- Skilled job training and employment readiness programs for the unemployed and underemployed
- Credit support from banks and credit counselors
- Affordable preschool services nearby (Northwest Independence)
- Prisoner reentry program, assistance with housing, job placement, substance abuse, and social
- Access to fresh and healthy food and culturally relevant grocery store (Fairmount)
- Access to medical services and other needed businesses (Northeast Independence)
- Legal services (immigration, credit, landlord-tenant) for families in crisis
- Public safety and crime reduction programs
- Social enterprise assistance
- Classes to learn how to do-it-yourself for home fixes
- Domestic violence and child abuse prevention and emergency services

- Youth and young adult services (e.g. educational programming, college assistance, mentoring, GED classes, budgeting, savings programs)
- Sports and other recreational/social programs for neighborhood youth
- Volunteer and employment opportunities for people with disabilities

How were these needs determined?

The need for public services was identified through the Consolidated Plan Citizen Participation Process and consultation with city departments and community partners. An online survey of interested citizens produced public services priorities that offered a strong insight into community perspectives regarding needs.

Priority Public Services Needs



Priority Public Services Needs

Housing Market Analysis

MA-05 Overview

Housing Market Analysis Overview:

Per the Citywide Independence Housing Study (January, 2022), the average home sales price has risen from \$110,000 in 2016 to about \$175,000 resulting in a 60% increase. The average days on the market to sell have dropped substantially from 69 days in 2016 to 17 days in 2021. Sales volume has ranged from 1,770 to 2,090 per annum from 2016 to 2021.

Again, per the aforementioned housing study, Independence has an abundant supply owner of ownership dwellings valued between \$50,000 to \$150,000. With a median home value of \$140,000 in Independence, about half of owner units fall within this price point. While quite affordable to low- and moderate- income households within the community, the condition of many of such units are substantively lacking as well as unit amenities. These factors are often aggravated by the location of such units in neighborhoods lacking viable infrastructure and area amenities.

The housing report indicates a substantial supply of affordable rental properties (70% of the community rental inventory) in generally poor condition. Apparently, investors have been purchasing a substantive portion of affordable, single-family properties and turning them into rentals. The report states that, “While this can, at times, be a benefit in diversifying residential uses community-wide, speculative buyers in struggling areas may have little incentive to renovate properties until the surrounding neighborhood improves.” For affordable rental housing, poor unit conditions and amenities are often apparent as well as neighborhoods lacking viable infrastructure and area amenities.

MA-10 Number of Housing Units – 91.210(a)&(b)(2)

Introduction

This section describes the number, type, tenure and size of housing in Independence for both the market and assisted inventory. The market rate inventory has grown by just over 1,311 dwelling units since 2010 or a 2.4% hike since 2017.. Most (73%) of the gain was evident among single family property types. Per the Citywide Independence Housing Study (January, 2022), the affordable rental supply is estimated at 4,860 units consisting of public housing, rental vouchers, 1,830 LIHTC units and other subsidized properties.

All residential properties by number of units

Property Type	Number	%
1-unit detached structure	38,865	73%
1-unit, attached structure	2,800	5%
2-4 units	2,875	5%
5-19 units	5,650	11%
20 or more units	2,420	5%
Mobile Home, boat, RV, van, etc	990	2%
Total	53,600	100%

Table 27 – Residential Properties by Unit Number

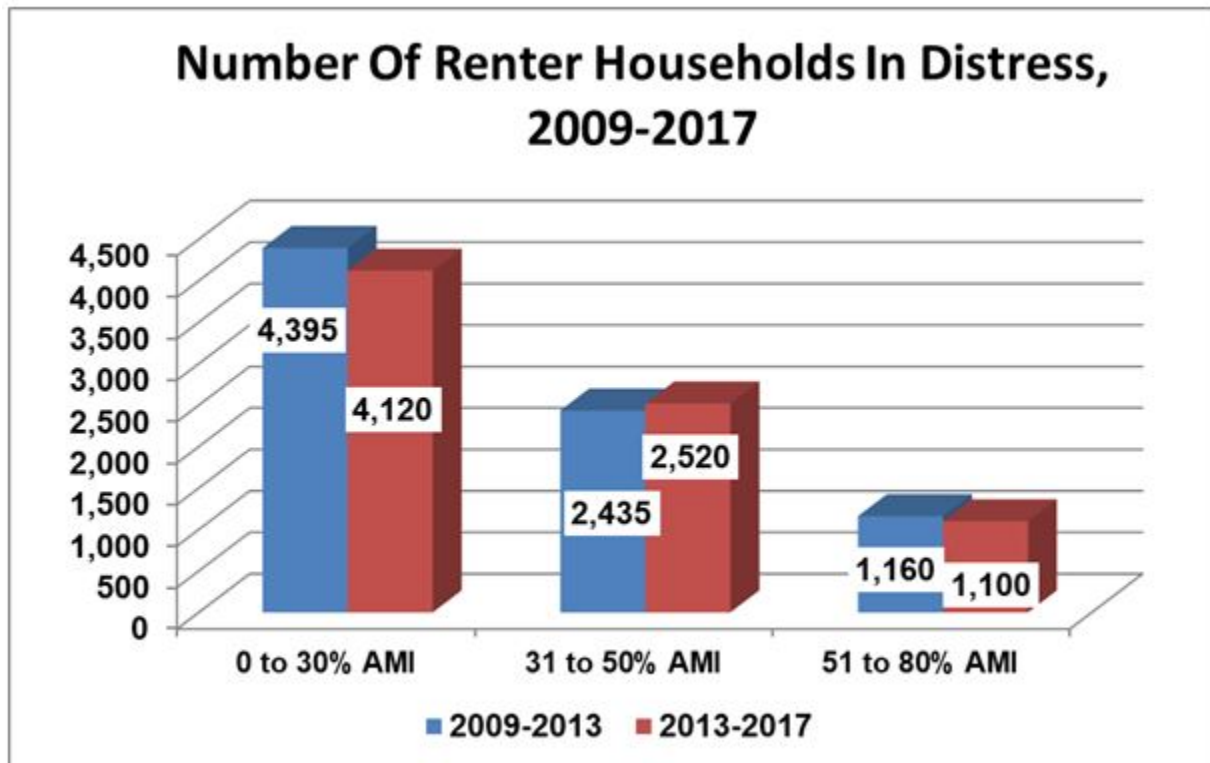
Data Source: 2013-2017 ACS

Unit Size by Tenure

	Owners		Renters	
	Number	%	Number	%
No bedroom	65	0%	785	4%
1 bedroom	490	2%	4,210	22%
2 bedrooms	6,240	21%	7,455	40%
3 or more bedrooms	22,650	77%	6,304	34%
Total	29,445	100%	18,754	100%

Table 28 – Unit Size by Tenure

Data Source: 2013-2017 ACS



Renetrs In Distress, 2009-2017

Describe the number and targeting (income level/type of family served) of units assisted with federal, state, and local programs.

According to A Picture Of Subsidized Housing, 2020 generated by the US Department of HUD, it is estimated that at least 3,034 assisted units exist within the confines of Independence at occupancy levels of 93%. The inventory is comprised of public housing, Section 8 vouchers, project-based Section 8 vouchers, Sections 202 and 811 multi-family housing. Noted earlier, about 1,830 LIHTC units exist within the community and an unknown volume of city assisted units. Some facts about the assisted inventory (public housing and rental voucher assisted properties) are noted below:

- 1) Average occupancy at about 93%.
- 2) About 2.0 persons per unit assisting about 5,428 persons.
- 3) Average tenant household income of \$11,995.
- 4) Approximately 76% are comprised of female-headed households.

Provide an assessment of units expected to be lost from the affordable housing inventory for any reason, such as expiration of Section 8 contracts.

Some units assisted with Federal, state or local programs may be lost from the inventory during the five-year planning period. This is because several public housing and/or assisted housing HUD contracts may have expiration dates during the planning period.

Does the availability of housing units meet the needs of the population?

Households currently residing in assisted housing are not cost burdened as federal and local rules clients may not expend more than 30% of their income for housing. Since cost burden predominantly motivates housing distress regardless of income category, the maintenance of the assisted inventory is critical to those presently in need but does not penetrate the 7,740 renter households earning less than 80% AMI who are distressed (cost burdened, overcrowded and/or without kitchen or bath facilities) without the opportunity of securing assisted housing to date. The distribution of housing distress for renters by income is enclosed.

Describe the need for specific types of housing:

Two methods were used to analyze and determine relative need by household type. One was to evaluate types of low and moderate income households by their proportion of total households by income class. Using this approach, low and moderate income small families (31%) and elderly households (38%) had the greatest need for assistance. The second method evaluated the distribution and volume of households in distress by tenure (CHAS data) and applied the distribution of household types mentioned earlier. Using described methods noted earlier to evaluate relative housing needs by household type, the following household types, in no particular order, were judged to be most in need of assistance:

- Low and moderate income, small families needing rental support for 1-2 bedroom units and somewhat higher for ownership dwellings.
- Low and moderate income, elderly household rental support suggesting 1-2 bedroom units, with an emphasis on 1 bedroom dwellings.
- Substantially fewer low and moderate income, large families needing rental assistance suggesting 3 bedroom+ units in most housing types.
- Existing low and moderate income homeowners needing home repairs in predominantly single-family properties.
- Small household, moderate income households desiring to be home buyers in 2 to 4 bedroom properties in predominantly single-family properties.
- Homeless persons, very low income families and those with special needs (especially frail elderly) requiring rental assistance, support facilities and services motivating varying housing types and one to two bedroom mixes based on the unique target group being served.
- Low- and moderate- income elderly households face challenges aging in place in their dwellings.

Discussion

Discussed earlier in MA-05, Independence has very definitive needs associated with the physical condition and unit amenities associated with its sizable inventory of affordable owner- and rental dwelling units.

MA-15 Housing Market Analysis: Cost of Housing - 91.210(a)

Introduction

The median home value in 2016 of \$109,600 rose to \$121,900 in 2019, accounting for a gain of 11%. During the same period, median gross rent levels rose from \$764 to 873 or 14%. Compare this to median income rising from \$45,970 in 2016 to \$52,325 or 14%. Presented in MA-05 (Market Conditions), note that the average purchase price in Independence in December of 2021 is about \$175,000 and the median home value of \$149,000. Despite the fact that median income is growing at about the same rate as home values and rents, insight into housing affordability for low- and moderate income households is best analyzed through the incidence of housing cost burden and the incidence of housing distress (problems) by income level in the community.

Cost of Housing

	Base Year: 2009	Most Recent Year: 2017	% Change
Median Home Value	108,800	102,800	(6%)
Median Contract Rent	517	606	17%

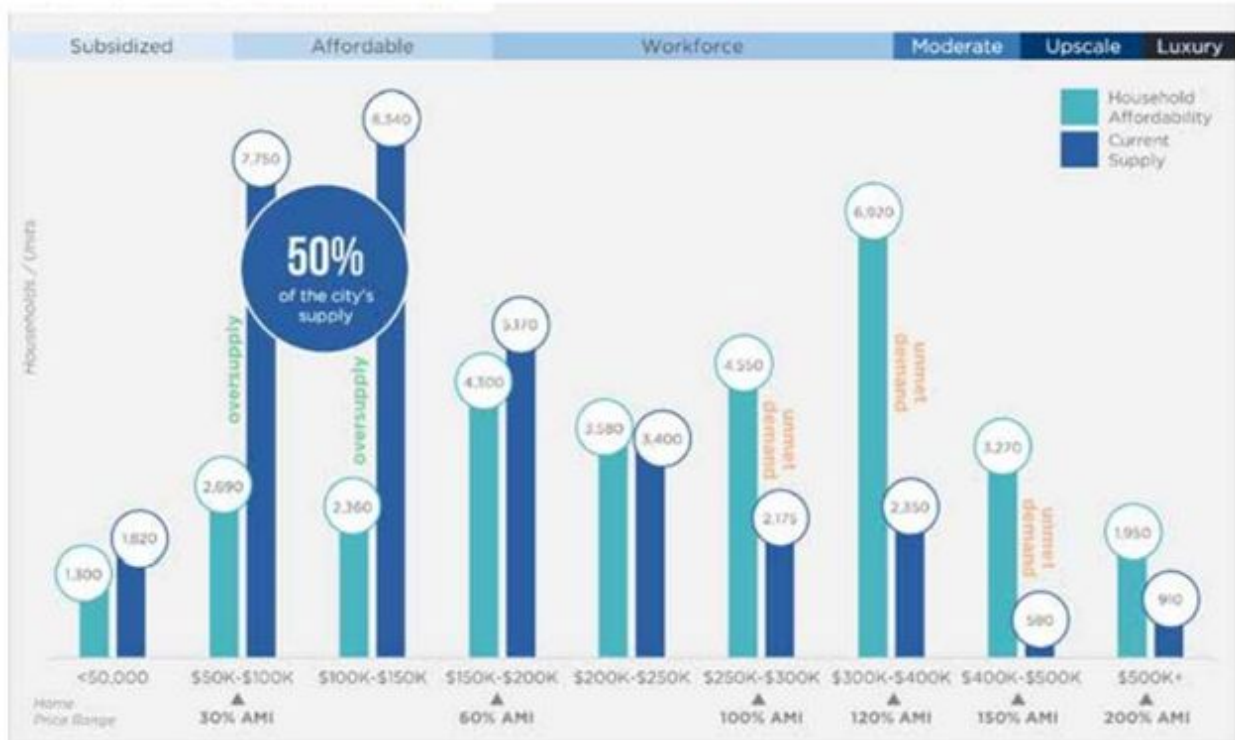
Table 29 – Cost of Housing

Data Source: 2000 Census (Base Year), 2013-2017 ACS (Most Recent Year)

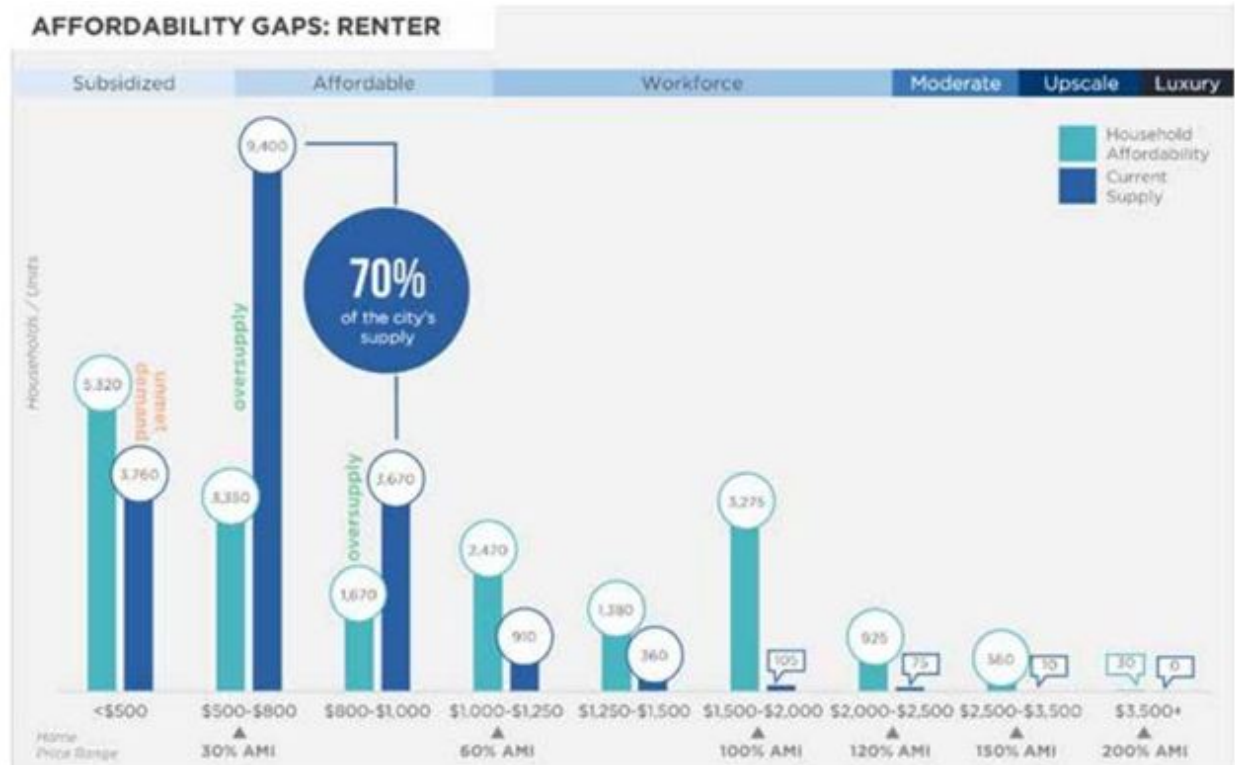
Rent Paid	Number	%
Less than \$500	5,619	30.0%
\$500-999	12,069	64.4%
\$1,000-1,499	909	4.9%
\$1,500-1,999	50	0.3%
\$2,000 or more	90	0.5%
Total	18,737	99.9%

Table 30 - Rent Paid

Data Source: 2013-2017 ACS



Owner Housing Affordability By Income Category



Renter Affordability By Income Category

Housing Affordability

% Units affordable to Households earning	Renter	Owner
30% HAMFI	1,990	No Data
50% HAMFI	7,675	5,780
80% HAMFI	14,055	12,632
100% HAMFI	No Data	16,722
Total	23,720	35,134

Table 31 – Housing Affordability

Data Source: 2013-2017 CHAS

Monthly Rent

Monthly Rent (\$)	Efficiency (no bedroom)	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
Fair Market Rent	640	786	953	1,286	1,457
High HOME Rent	640	786	953	1,286	1,457
Low HOME Rent	640	775	931	1,075	1,200

Table 32 – Monthly Rent

Data Source: HUD FMR and HOME Rents

Is there sufficient housing for households at all income levels?

The sufficiency of dwellings for low- and moderate- income households in Independence is a function of the affordability and pricing of the dwellings in addition to their condition. Per the Citywide Independence Housing Study (January, 2022), there is an over-current supply of ownership dwellings for households earning less than 80% AMI (refer to the enclosed charts). Discussed in MA-20 (Condition of Housing), the over-supply in the lower income categories is compromised by the often-poor condition of such units and lack of amenities. There is a deficit in the supply of housing for owner households earning greater than 80% AMI in Independence. Noted in NA-10 (Housing Needs Assessment), despite the over-supply of affordable units to low- and moderate- income households, the incidence of housing distress via cost burden is quite significant.

Again, per the Citywide Independence Housing Study (January, 2022), there is a current over-supply of rental dwellings for households earning less than 60% AMI (refer to the enclosed chart). Discussed in MA-20 (Condition of Housing), the over-supply in the lower income categories is compromised by the often-poor condition of such units and lack of amenities. There is a deficit in the supply of housing for renter households earning greater than 60% AMI in Independence. Noted in NA-10 (Housing Needs Assessment), despite the over-supply of affordable units to low- and moderate- income households, the incidence of housing distress via cost burden is quite significant.

How is affordability of housing likely to change considering changes to home values and/or rents?

Housing affordability is a function of a wide variety of factors that vary by geography. While increases in both rents and home valuations appear to be consistent with gains in median income from 2016 to 2019. Given the significant onset of inflation in the labor market, housing market and other areas, the future is a best murky going forward. However, as inordinately low interest rates are likely to rise shortly per the Federal Reserve, this could increase rent levels needed by investors. A wide variety of other factors will affect housing supply and demand and costs within Independence and the Kansas City metro area.

How do HOME rents / Fair Market Rent compare to Area Median Rent? How might this impact your strategy to produce or preserve affordable housing?

Per the recent Citywide Independence Housing Study, according to HUD, a decent two bedroom market-rate apartment in the Kansas City MSA costs \$1,021 (with \$200 in utilities). Both the HUD HOME and Fair Market Rents appear somewhat reasonable for the Independence Market however the recent influx of rental real estate investors could alter this scenario going forward. Regardless, a major challenge in Independence is the significant lower income renter population and their incidence of cost burden notwithstanding the condition of available dwellings to them.

Discussion

For both low- and moderate income owner- and renter- households in Independence, there appears to be an over-supply of affordable housing inventories however the condition of such units are often problematic. Stakeholder interviews also indicated challenges in finding reasonably priced buildable land in the urban core as well as the desire/need to re-institute municipal downpayment assistance support and accessing the State of Missouri programs in this regard appear worthy of exploration.

MA-20 Housing Market Analysis: Condition of Housing – 91.210(a)

Introduction

Discussed earlier in MA-05 and drawn from the Citywide Independence Housing Study (January, 2022), the community has sizable needs associated with the physical condition and unit amenities associated with its inventory of affordable owner- and renter- dwelling units.

Definitions

The City of Independence determination of substandard condition is defined as a combination of incomplete kitchen or plumbing facilities, missing windows or exterior doors, severely compromised foundations, outdated electrical infrastructure, holes in floors or walls, and holes in roof or severely compromised roofing materials preventing closure from weather penetration. Many units with a combination of one of these conditions may be unfit for human occupation. Some may be candidates for rehabilitation, others may not be. Substandard condition suitable for rehabilitation would be units where the home is determined to be 60% deteriorated or the cost of the combination of needed repairs of all conditions does not exceed the estimated after-rehabilitation value of the house.

Condition of Units

Condition of Units	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
With one selected Condition	5,890	20%	7,570	40%
With two selected Conditions	90	0%	410	2%
With three selected Conditions	10	0%	0	0%
With four selected Conditions	0	0%	0	0%
No selected Conditions	23,450	80%	10,775	57%
Total	29,440	100%	18,755	99%

Table 33 - Condition of Units

Data Source: 2013-2017 ACS

Year Unit Built

Year Unit Built	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
2000 or later	2,969	10%	1,145	6%
1980-1999	5,260	18%	3,365	18%
1950-1979	15,910	54%	10,850	58%
Before 1950	5,295	18%	3,389	18%
Total	29,434	100%	18,749	100%

Table 34 – Year Unit Built

Data Source: 2013-2017 CHAS

Risk of Lead-Based Paint Hazard

Risk of Lead-Based Paint Hazard	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
Total Number of Units Built Before 1980	21,205	72%	14,239	76%
Housing Units build before 1980 with children present	1,455	5%	850	5%

Table 35 – Risk of Lead-Based Paint

Data Source: 2013-2017 ACS (Total Units) 2013-2017 CHAS (Units with Children present)

Vacant Units

	Suitable for Rehabilitation	Not Suitable for Rehabilitation	Total
Vacant Units	0	0	0
Abandoned Vacant Units	0	0	0
REO Properties	0	0	0
Abandoned REO Properties	0	0	0

Table 36 - Vacant Units

Data Source: 2005-2009 CHAS

Need for Owner and Rental Rehabilitation

Per the study noted above, Independence has an abundant supply owner of ownership dwellings valued between \$50,000 to \$150,000. With a median home value of \$140,000 in Independence, about half of owner units fall within this price point. While quite affordable to low- and moderate- income households within the community, the condition of many of such units are substantively lacking as well as unit amenities. A substantial supply of affordable rental properties (70% of the community rental inventory) are in generally poor condition. Apparently, investors have been purchasing a substantive portion of affordable, single-family properties and turning them into rentals. Thus, rehabilitation with and without acquisition for both owner- and renter- units affordable to lower income households is warranted.

Estimated Number of Housing Units Occupied by Low or Moderate Income Families with LBP Hazards

The data shows that the number of housing units in Independence built prior to 1980, and potentially where lead-based paint hazards might be found, includes 72 percent of all owner housing and 76 percent of rental housing. About five percent of owner-occupied housing units and five percent of rental units built prior to 1980 are occupied by families with children, a total of 1,455 housing units. Typically, with some exceptions, the oldest neighborhoods found are where the poorest residents are found. As a result, it is reasonable to assume that most of the 1,455 units in Independence built prior to 1980 and

occupied by families with children are likely occupied by low-or moderate-income families. These units are 'at-risk' of LBP Hazards.

Discussion

The data shows that the number of housing units in Independence built prior to 1980, and potentially where lead-based paint hazards might be found, includes 72 percent of all owner housing and 76 percent of rental housing. About five percent of owner-occupied housing units and five percent of rental units built prior to 1980 are occupied by families with children, a total of 1,455 housing units. Typically, with some exceptions, the oldest neighborhoods found are where the poorest residents are found. As a result, it is reasonable to assume that most of the 1,455 units in Independence built prior to 1980 and occupied by families with children are likely occupied by low-or moderate-income families. These units are 'at-risk' of LBP Hazards.

MA-25 Public and Assisted Housing – 91.210(b)

Introduction

The Independence Housing Authority operates a total of 528 public housing units and 1,647 vouchers, all of which are tenant-based, in their efforts to assist low-income residents of Independence. The agency operates three public housing developments.

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 funds, from HUD, are provided by formula and expenditure decisions are made by the IHA Board. Capital funds from HUD are also provided by formula and expenditure decisions are made by the IHA Board with approval from HUD. The IHA also receives HUD funding for Housing Choice Vouchers (HCV – Section 8).

The City does not involve itself in the hiring, contracting and procurement practices and processes of the PHA. Nor does it normally review proposed capital improvements except through normal City plan and permit review processes. If there were plans to develop, demolish or dispose of public housing, it may become involved, as such actions would affect the supply of affordable housing in the city. Moreover, such actions should be consistent with the Consolidated Plan. As a matter of regulation and of practice, if the PHA was planning major changes to its housing stock, it must consult with local government. The PHA would need City approval for demolition, development or other major changes to its housing stock.

Totals Number of Units

	Certificate	Mod-Rehab	Public Housing	Program Type					
				Total	Project -based	Tenant -based	Vouchers		
							Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers available			528	1,647			0	0	0
# of accessible units									

***includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition**

Table 37 – Total Number of Units by Program Type

Data Source: PIC (PIH Information Center)

Describe the supply of public housing developments:

Describe the number and physical condition of public housing units in the jurisdiction, including those that are participating in an approved Public Housing Agency Plan:

The Independence Housing Authority has 528 public housing units. Public housing units are in need of energy efficiency updates, on-going roof repairs per normal material lifecycles, parking lot resurfacing and signage updates. The three properties which include Hocker Heights, Pleasant Heights, and Southview Manor all require minor paint and furniture updates to common areas, heating and cooling upgrades, and playground equipment updates. These needs are primarily because of the aging properties and funding restrictions. The IHA 2020-24 five-year capital improvement plan has a detailed listing of property-specific needs and goals.

Public Housing Condition

Public Housing Development	Average Inspection Score
Derived From HUD, 2021	92

Table 38 - Public Housing Condition

Describe the restoration and revitalization needs of public housing units in the jurisdiction:

Per the IHA Annual Plan commencing in April of 2021, IHA continues modernization efforts at Hocker Heights. IHA anticipated applying for a HUD Choice Neighborhoods Planning Grant and LIHTC funding, and if selected, will design the Hocker Heights area for redevelopment and then go after a Choice Neighborhoods Implementation Grant in 2022 (for demolition and new construction of 140 units). IHA has completed interior work on Section 504 ADA units and will be planning exterior parking lots/ramps in the next two CFP grants after elevators on Southview Manor and Pleasant Heights buildings are replaced. In addition, safety and security improvements will be undertaken at Hocker Heights and Elderly/Disabled designations shall be pursued at Pleasant Heights and Southview Manor. IHA plans on pursuing RAD. IHA intends on designating some of its ultimately redeveloped housing to Elderly/Disabled only.

Describe the public housing agency's strategy for improving the living environment of low- and moderate-income families residing in public housing:

According to its proposed 5 Year Plan, the Independence Housing Authority strategy for addressing current public housing needs includes:

- Maximize occupancy of the Public Housing dwelling units by responsible families.
- Enforce screening and eviction policies to ensure that only responsible families receive assistance.
- Maintain the Public Housing inventory in decent, safe condition, and determine the long-term viability of current stock.
- Maximize utilization of Section 8 housing assistance funding and assist as many families as possible with that funding by holding down per family assistance costs.
- Work with industry organizations and Congress toward increasing housing assistance funding in order to help more families.
- Work with the City of Independence and other affordable housing groups to increase the availability of such housing locally.
- Seek out new funding avenues in order to directly preserve existing housing and increase affordable housing inventory.

Discussion:

The PHA has improved Public Housing occupancy to over 97% and on average maintains that level on a monthly basis. The PHA also works diligently to maximize utilization of the Section 8 voucher housing

assistance funding provided annually by Congress, which is most recently sufficient to assist only approximately 92% (1,515) of the 1,647 base line vouchers the agency is supposed to be able to assist. Note there apparently are about 1,850 LIHTC assisted units in Independence.

MA-30 Homeless Facilities and Services – 91.210(c)

Introduction

The Salvation Army Crossroads Shelter is the only family emergency shelter in Eastern Jackson County (outside Kansas City limits). The facility is always at capacity and consistently turns away many persons per month. Many of those served/turned away are not Independence residents. There is a regional need for additional emergency shelter beds in the Kansas City regional area which may reduce the homeless population migrating to Independence seeking services and resources in the community.

Facilities and Housing Targeted to Homeless Households

	Emergency Shelter Beds		Transitional Housing Beds	Permanent Supportive Housing Beds	
	Year Round Beds (Current & New)	Voucher / Seasonal / Overflow Beds	Current & New	Current & New	Under Development
Households with Adult(s) and Child(ren)	112	0	24	0	0
Households with Only Adults	16	0	0	0	0
Chronically Homeless Households	0	0	0	0	0
Veterans	0	0	0	0	0
Unaccompanied Youth	0	0	14	0	0

Table 39 - Facilities and Housing Targeted to Homeless Households

Data Source Comments:

Describe mainstream services, such as health, mental health, and employment services to the extent those services are used to complement services targeted to homeless persons

Both Emergency Shelter facilities and Transitional Living facilities in Independence use case-based management of clients, offering comprehensive services of transportation vouchers, access to education, life skill classes and other supportive services to help clients find or improve employment. Health services, counseling and legal services are offered through Hope House, the domestic violence victim shelter. Money management skills classes are required at all Transitional Living facilities, encouraging clients to become or return to being self-sufficient.

In the Kansas City metro area, the following types of services are rendered to homeless clients:

- The provision of case management, outreach, housing search and placement, legal services mediation and credit repair services to foster needed housing relocation and stabilization for clients.
- Utility payments and deposits, mortgage payments to prevent eviction, and first month's rent payment and rental deposit payments for those who are homeless.
- The delivery of quality health care to homeless people through street outreach, integrated primary care, mental health services, substance abuse services, case management, and nutrition services.
- The continuing commitment HOME, ESG, CDBG, general fund and other local resources to support key emergency, transitional and permanent housing facilities in addition to needed support services for clients in or cycling through homelessness.
- Encourage Housing First programs that are enriched with comprehensive social services.
- Encourage the development and implementation of Housing First units for homeless individuals and families.
- Continue to provide rental housing to people that are very low income (<30% Median Family Income) to prevent homelessness.

List and describe services and facilities that meet the needs of homeless persons, particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth. If the services and facilities are listed on screen SP-40 Institutional Delivery Structure or screen MA-35 Special Needs Facilities and Services, describe how these facilities and services specifically address the needs of these populations.

In Independence, Comprehensive Mental Health Services provide 16 beds to adult males struggling with addiction issues, Hope House Domestic Violence Shelter provides 52 women and their children emergency and transitional housing and assistance becoming stable households, Mother's Refuge provides 12 pregnant teens transitional housing and supportive services up to the time the child reaches 6 months of age and Hillcrest Transitional Housing services approximately 24 families who have been in shelter at least 60 days a rent-free, utility-free apartment and supportive services, returning 97% of those to independent living.

The City of Independence embraces the ongoing commitment and efforts by the GKCCEH to continually strengthen the Continuum of Care process.

- **Emergency Shelter Facilities** - There continues to be a need to sustain emergency facilities serving homeless individuals, often beset by substance abuse, mental illness, HIV, inadequate discharge by the correctional system, or combinations thereof. Emergency shelter facilities are often regional in nature. Priorities often include needed supportive services, operations support and facility acquisition/rehabilitation.
- **Transitional Shelter Facilities** – There continues to be a need to sustain and produce transitional beds for individuals and families. The need for transitional facilities serving homeless individuals and families often beset by substance abuse, mental illness, HIV, other problems, or combinations thereof, represent both regional and local needs. Support to be provided is subject to the unique and changing needs of providers with respect to operations assistance, supportive services and facility acquisition and/or rehabilitation.
- **Permanent Supportive Housing** – Sustain and increase permanent supportive housing inventories/facilities like Single Room Occupancy (SRO), Shelter Plus Care and the Supportive Housing programs. Sustain the development of a long-term, cost-effective and reliable housing stock for clients in need coupled with appropriate services; the cost-effective operation of the stock; and, service models that maximize the ultimate self-sufficiency of clients.
- **Prevention of Homelessness** – Continue to address through short-term rental/foreclosure aid coupled with needed supportive services (employment and training, information and referral, crisis counseling, day care, etc.). Sustain prevention efforts through the Emergency Solutions Grant (medium to long term rental assistance, security and utility deposits and payments, etc.) for clients in need.
- **Chronic Homelessness (for Sheltered and Unsheltered)** - To assist persons who have been on the streets for a significant period of time, sustain consistent outreach efforts, and permanent housing with targeted supportive services to be provided.

MA-35 Special Needs Facilities and Services – 91.210(d)

Introduction

A portion of the lower income population is made up of individuals and families with needs requiring specialized services and/or facilities. Included are physically and mentally disabled persons, frail elderly persons, persons affected by domestic violence, persons with HIV/AIDS, low income families with children, persons with alcohol and drug abuse problems, and children. Such facilities and services for such persons include units that are barrier free and physically accessible, units with onsite supportive services such as case management, counseling and healthcare, and units that are affordable to persons on a fixed or limited income.

Including the elderly, frail elderly, persons with disabilities (mental, physical, developmental), persons with alcohol or other drug addictions, persons with HIV/AIDS and their families, public housing residents and any other categories the jurisdiction may specify, and describe their supportive housing needs

- Elderly (Ages 62-74) and Frail Elderly (>75) – Permanent housing support, case management, counseling, adult daycare, homecare, home delivered meals, befriending services is needed for elderly persons. For frail elderly persons, permanent housing support, assisted housing support, 24 hour-hour shelter/health care, hospice care/coordination, case management, counseling, adult day services, homecare, home delivered meals, befriending services, health services, nurse/medical services, etc. are needed. The elderly population with housing needs continue to increase in Independence. CDBG funds will continue to be used to provide home repair assistance to senior and elderly homeowners needed to allow them to remain in their homes for as long as possible.
- Persons With Disabilities – For those with Serious Mental Illness (SMI), varying housing support ranging from permanent housing to assisted living, outreach and identification, treatment, health care, income support and rehabilitation services are needed. For those with Developmental Disabilities , alternative types of shelter support, assistive technology, employment and training, information and referral services, transportation and case management are needed. For those with Physical Disabilities, varying types of shelter assistance, assistive technology, employment and training, information and referral services, transportation, case management for disabled persons, etc. are needed. In Independence, accessibility retrofits tend to be expensive and homes with such features tend to be higher in value representing a problem for this group often comprised of lower income households. Independence continues to partner with Truman Heritage Habitat Humanity, a local Habitat affiliate, and Developmental Disabilities Services of Jackson County EITAS to build barrier-free single-family housing units in the city’s urban core for tenants receiving supportive services through State programming
- Persons with Alcohol or Other Drug Addiction – Emergency and transitional shelter support, monitoring, screening, information and referral, detox medication, education, self-help groups, and counseling are needed. In Independence, Comprehensive Mental Health Services, Inc. (CMHS) is

certified by the State of Missouri as a community mental health and substance abuse treatment center and is the primary provider of supportive services, including housing services, for addressing needs in the region.

- Persons With HIV/AIDs - Short- and long- term rental subsidy support, other types of shelter support, case management, emergency financial assistance, food, transportation, early intervention, education, wellness and nutrition., etc. The Greater Kansas City Continuum of Care (CoC) does receive funding awards from HUD to serve such needs on a regional level. Through participation in CoC strategy development, development of funding applications, and implementation, Independence's service providers advocate for HIV/AIDS supportive housing needs for residents.
- Victims of Domestic Violence - Alternative types of shelter noted above for both short and longer term stabilization and permanent housing assistance with support services. In Independence, most of the services for this group related to shelter and counseling are provided through Hope House, a shelter for female victims of domestic violence and their children. Through consultation with Hope House, it is understood that the need far outweighs the availability of local and regional resources. Targeted training for private landlords is needed (re: fair housing, violence against women, stigma being homeless, etc).
- Other Groups - Runaway, unaccompanied youth, and adult children that have aged out of foster care also require similar housing and counseling services.

Describe programs for ensuring that persons returning from mental and physical health institutions receive appropriate supportive housing

Comprehensive Mental Health Services, Inc. (CMHS), located in Independence, is certified by State of Missouri as a community mental health and substance abuse treatment center and is the primary provider of supportive services, including housing services, for serving this need. CMHS's Community Services Program is a home and community-based program which provides assistance to adults with serious and persistent mental illnesses, empowering them to maintain and/or successfully gain their desired level of independent living and functioning in the community. Prior to discharge, the preparation of individualized needs assessment, including housing, employment and support services, government agency coordination and monitoring will continue to be undertaken. Discharges will continue to be made when appropriate facilities and services are provided for clients in concert with their individualized needs assessments.

Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. 91.315(e)

Refer to narrative below as these two questions are identical.

For entitlement/consortia grantees: Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. (91.220(2))

Activities to be undertaken during the next year to address the housing and supportive service needs with respect to non-homeless special needs populations include the provision of emergency and minor home repair programs, including energy efficiency repairs, weatherization and accessibility improvements, administered by local non-profit housing service providers with funding allocated through a competitive proposal process. Projects are expected to benefit non-homeless special needs populations including elderly, frail elderly, and those with disabilities that are currently homeowners. Refer to AP-20 and AP-35 For Annual goals and Project descriptions linked to anticipated allocations.

MA-40 Barriers to Affordable Housing – 91.210(e)

Negative Effects of Public Policies on Affordable Housing and Residential Investment

Barriers to affordable housing exist when the cost of housing or the incentives to develop, maintain, or improve affordable housing are affected by public policies, particularly those of the local jurisdiction.

The following is a summary of these barriers:

- **Zoning Ordinances** – Zoning can be a barrier to affordable housing, as they restrict density and limit housing types in locations that would otherwise be suitable for affordable housing – ultimately excluding lower income households from many neighborhoods.
- **Rental & Deposit Fees** - Security deposits, utility deposits, and high rent fees are a barrier to affordable housing, since many lower income households cannot afford to pay both the deposit/fee and the rent at the same time.
- **Lack of Quality Housing** - The lack of quality housing units, particularly energy efficient and sufficient for large families, for lower income persons is a barrier to affordable housing.
- **Lead Based Paint** - Lead based paint (LBP) is a barrier to affordable housing, as many homes in Independence were built prior to 1978. LBP can be a serious health hazard, particularly for young children. Contracting work on houses with documented LBP can be expensive and thus a deterrent to successful rehabilitation.
- **Age & Condition Of Housing Inventory** - The age and condition of housing stock is a barrier, as many homes are 50 years old or older which substantially increases the cost of maintenance and rehabilitation. Moreover, those interested in architectural or historical preservation are met with resistance because of fears of gentrification. For the elderly, the cost of maintenance is a burden, and some have either converted their single-family home into a duplex or multifamily structure or simply let the home deteriorate beyond repair. In some cases, properties are simply abandoned, and taxes are not paid, ultimately attracting vandals or other nuisances.
- **Financing** - Financing is a barrier to the production of affordable housing, as many owners and occupants do not have the resources to pay for housing rehabilitation. Moreover, persons with special needs do not have the resource to make their housing fully accessible.

Refer to SP-55 for the strategies to mitigate the affordable housing barriers noted herein.

MA-45 Non-Housing Community Development Assets – 91.215 (f)

Introduction

This non-housing section relates to the City of Independence community and economic development needs and possible activities over the ensuing five years.

Economic Development Market Analysis

Business Activity

Business by Sector	Number of Workers	Number of Jobs	Share of Workers %	Share of Jobs %	Jobs less workers %
Agriculture, Mining, Oil & Gas Extraction	100	16	0	0	0
Arts, Entertainment, Accommodations	6,538	6,294	14	19	5
Construction	2,861	1,091	6	3	-3
Education and Health Care Services	7,634	7,052	17	21	4
Finance, Insurance, and Real Estate	3,251	2,052	7	6	-1
Information	939	507	2	1	-1
Manufacturing	4,783	3,320	11	10	-1
Other Services	1,630	1,241	4	4	0
Professional, Scientific, Management Services	4,623	1,452	10	4	-6
Public Administration	0	0	0	0	0
Retail Trade	7,055	9,425	16	28	12
Transportation and Warehousing	2,819	569	6	2	-4
Wholesale Trade	2,944	878	7	3	-4
Total	45,177	33,897	--	--	--

Table 40 - Business Activity

Data Source: 2013-2017 ACS (Workers), 2017 Longitudinal Employer-Household Dynamics (Jobs)

Labor Force

Total Population in the Civilian Labor Force	57,553
Civilian Employed Population 16 years and over	53,965
Unemployment Rate	6.24
Unemployment Rate for Ages 16-24	16.07
Unemployment Rate for Ages 25-65	4.23

Table 41 - Labor Force

Data Source: 2013-2017 ACS

Occupations by Sector	Number of People
Management, business and financial	9,180
Farming, fisheries and forestry occupations	2,394
Service	5,795
Sales and office	15,500
Construction, extraction, maintenance and repair	5,160
Production, transportation and material moving	4,230

Table 42 – Occupations by Sector

Data Source: 2013-2017 ACS

Travel Time

Travel Time	Number	Percentage
< 30 Minutes	31,755	62%
30-59 Minutes	17,849	35%
60 or More Minutes	1,855	4%
Total	51,459	100%

Table 43 - Travel Time

Data Source: 2013-2017 ACS

Education:

Educational Attainment by Employment Status (Population 16 and Older)

Educational Attainment	In Labor Force		Not in Labor Force
	Civilian Employed	Unemployed	
Less than high school graduate	3,520	450	2,825

Educational Attainment	In Labor Force		Not in Labor Force
	Civilian Employed	Unemployed	
High school graduate (includes equivalency)	15,035	1,164	5,720
Some college or Associate's degree	15,460	645	4,400
Bachelor's degree or higher	9,540	310	1,585

Table 44 - Educational Attainment by Employment Status

Data Source: 2013-2017 ACS

Educational Attainment by Age

	Age				
	18–24 yrs	25–34 yrs	35–44 yrs	45–65 yrs	65+ yrs
Less than 9th grade	99	320	719	760	1,025
9th to 12th grade, no diploma	1,555	1,489	1,065	2,445	1,458
High school graduate, GED, or alternative	3,735	4,954	4,454	12,520	8,650
Some college, no degree	3,000	4,310	3,675	7,575	4,535
Associate's degree	478	1,195	1,244	2,570	1,055
Bachelor's degree	564	2,100	1,910	4,258	2,275
Graduate or professional degree	0	565	780	1,810	1,584

Table 45 - Educational Attainment by Age

Data Source: 2013-2017 ACS

Educational Attainment – Median Earnings in the Past 12 Months

Educational Attainment	Median Earnings in the Past 12 Months
Less than high school graduate	75,915
High school graduate (includes equivalency)	95,760
Some college or Associate's degree	132,990
Bachelor's degree	153,700
Graduate or professional degree	99,910

Table 46 – Median Earnings in the Past 12 Months

Data Source: 2013-2017 ACS

Based on the Business Activity table above, what are the major employment sectors within your jurisdiction?

The top employment sectors for both jobs and employees with the County jurisdiction (1) Retail, (2) Education, (3) Arts/Entertainment/Accommodations, (4) Manufacturing, (5) Finance/Insurance & Real

Estate. and (6) Professional/Scientific/Management. Combined, these sectors account for 75% to 88% of jobs and employment activity.

Describe the workforce and infrastructure needs of the business community:

When we compare the share of jobs versus workers in the Independence, some imbalances were evident. It appears there is a need for employees in retail as they are currently being imported from other areas, while some employees in most other business sectors are being exported to other locales in varying degrees. Drawn from the prior Consolidated Plan, “Historically, Independence has had a high percentage of blue collar jobs, but as of 2014 figures, blue collar jobs represent 24.7% of all jobs, white collar jobs make up the majority at 57.3%. Services make up the remainder at 18.1%. The data suggests a concern that, as this growing sector of white collar jobs will generally have higher requirements for educational attainment, these jobs will likely be filled by persons living outside the community.”

In terms of infrastructure needed to attract and retain businesses, Independence has an identified need for land and buildings equipped to suit industrial operations. Much of Independence’s undeveloped land with good highway access is designated flood plain, making it difficult and cost prohibitive for businesses to build. The lack of executive housing has also been identified as a barrier to attracting various industries, and the City’s demographic and lack of disposable income has become a significant barrier to attracting new service related businesses to many areas of town. Many older commercial districts and neighborhood commercial centers in areas of low and moderate income concentration suffer from vacancy and business disinvestment due to negligent building owners unwilling to maintain or improve leasable space, aging and blighted area neighborhood conditions, perceptions of crime, lack of pedestrian improvements, and poor consumer market conditions.

Describe any major changes that may have an economic impact, such as planned local or regional public or private sector investments or initiatives that have affected or may affect job and business growth opportunities during the planning period. Describe any needs for workforce development, business support or infrastructure these changes may create.

The Independence Economic Development Council, local partners and elected officials collaborate on an ongoing basis to explore and promote opportunities for business retention, expansion and attraction; property development; workforce development; foreign trade; and entrepreneurial growth. Through their collective efforts the following major economic development initiatives have been secured for Independence for the immediate future:

Newtown at Harmony: Newtown at Harmony is a New Urbanism mixed-use development that in full build out will cover nearly 3000 acres of land located on the eastern edge of Independence. The first phase which includes development of 150-acres began in 2015 and when completed will include 900 new homes and commercial space in a pedestrian- and social-oriented designed neighborhood.

Unilever Expansion: Unilever is moving its Wishbone salad dressing operation elsewhere, keeping its ice tea mix operation and bringing in production of soups, sauces, gravies and side dishes from Canada. It expects to keep the current 180 jobs and add another 70. The total investment is estimated at \$110 million.

How do the skills and education of the current workforce correspond to employment opportunities in the jurisdiction?

The jobs available in Independence tend to be oriented to workers with lower education and skills requirements, however this appears to be somewhat changing. With 44% of the city's adult population having an educational attainment of High School Equivalency or less a substantive portion of the labor force would be employed in sectors requiring minimal education and skills. However, educational attainment in Independence is on the rise and has increased of consequence (14 percentage points) since the last Consolidated Plan. The Independence employment market is rich with jobs that offer wages at or above our per-capita median income yet local employers are continually challenged to attract and retain employees to fill high-quality career paths within their companies. Independence strategies will seek to connect employers to the workforce by innovating traditional human resource practices. The city will consider possible uses of CDBG resources toward this end.

To reiterate, since 44% of the city's population lacks a secondary and post-secondary education, there is a presumed demand for adult basic education, workforce training and other education opportunities to match some of the needs of the business community with skilled employees. There are a number of private and public educational institutions, as well as, workforce training initiatives, available in the region to address this need.

Describe any current workforce training initiatives, including those supported by Workforce Investment Boards, community colleges and other organizations. Describe how these efforts will support the jurisdiction's Consolidated Plan.

Workforce training initiatives in Independence are primarily provided by the Full Employment Council and the Metropolitan Community College. The mission of the Full Employment Council, Inc. is to seek public and private sector employment for the unemployed and the underemployed residents of the Greater Kansas City area. Metropolitan Community College also provides job skill training focused on the technical and personal skills through the Institute for Workforce Innovation. The specific services they provide in support of the Consolidated Plan Goals are as follows:

Full Employment Council, Inc.:

- Customized Training programs to meet industry needs
- On-the-Job, classroom training and internships for skills for needed for in-demand jobs like information technology, healthcare and construction.
- Workshops for skill building like resume writing, interviewing skills and others.

Metropolitan Community College

The Institute for Workforce Innovation helps people develop basic workplace skills, including teamwork, communication and overall professionalism. In academics, this applies to literacy, GED tutoring, and other preparation to become not just better employees, but more accomplished individuals. Finally, students get the social support they need to be successful, such as transportation and childcare that allows them to complete the coursework.

Does your jurisdiction participate in a Comprehensive Economic Development Strategy (CEDS)?

Yes

If so, what economic development initiatives are you undertaking that may be coordinated with the Consolidated Plan? If not, describe other local/regional plans or initiatives that impact economic growth.

Independence supports and is supported by the Comprehensive Economic Development Strategy created by the Mid-America Regional Council for the Kansas City Metropolitan area. The following summarizes the goals and objectives of this strategy.

Regional Economic Development & Workforce Initiatives—Regional Workforce Intelligence Network (RWIN) - The Regional Workforce Intelligence Network of Greater Kansas City is a regional workforce and economic data exchange system convened by Mid-America Regional Council (MARC) to encourage greater collaboration among the region's workforce data and information professionals. RWIN is a collaboration of economic development professionals, one-stop centers, workforce centers, community colleges and universities that meets on a regular basis to share information on current workforce development activities.

Greater Kansas City Chamber of Commerce Big 5 Initiative - Led by the Greater Kansas City Chamber of Commerce, the Big 5 initiative elevates the Kansas City region onto the world stage and makes the area one of America's best places to work, live, start a business, and grow a business.

Entrepreneurship—Urban Business Growth Initiative - The Urban Business Growth Initiative features training programs and technical assistance provided by the UMKC Small Business & Technology Development Center and the Missouri Procurement Technical Assistance Center. The initiative targets these services to low- to moderate-income individuals in the urban core who wish to start or grow businesses.

Workforce—Kansas City Women in Technology

KCWIT's mission is to inspire young girls to join the technology field and help shape career opportunities through educational workshops, provide mentoring for young women entering the workforce, and to maintain a network for professional women in technology career paths in the Kansas City area.

Incubators—Ennovation Center - The Independence Regional Ennovation Center is a mixed-use business incubator which focuses on three core areas for the development of new businesses: bio-tech, kitchen/ culinary, and business and technology.

Local Economic Development and Workforce Initiatives - In addition to the initiatives of the Kansas City regional CEDS, the Independence Economic Development Corporation adopts annually a business plan, the objectives of which can be supported by, and support, the City's Consolidated Plan. The following details objectives of IEDC's current plan that may be supported with funding through the Community Development Block Grant Program.

Create jobs and increase capital investment by growing the Ennovation Center (small business incubator) --provide business expansion assistance to graduates ready to take their business to the next level of production.

Discussion

Efforts over the next five years may focus on the following:

- Assistance for entrepreneurs and micro-enterprise businesses
- Workforce training—including skilled training programs and job readiness
- Living-wage job creation and retention
- Transportation system enhancements
- Development of workforce housing

MA-50 Needs and Market Analysis Discussion

Are there areas where households with multiple housing problems are concentrated? (include a definition of "concentration")

Drawn from CPD Maps, areas where a concentration of multiple housing problems were analyzed by income category and were most often evident by the incidence of having one or more severe cost housing problems per 2017 CHAS data. . Concentration levels vary by income bracket. For households earning less than 30% of the Area Median Income (AMI) with severe problems , cost concentration was defined as exceeding 86% on the enclosed maps, exceeding 67 to 80% for households earning from 31% to 50% AMI with at least one severely problem and 30-43% % households earning from 51% to 80% AMI with one severe housing problem.

Are there any areas in the jurisdiction where racial or ethnic minorities or low-income families are concentrated? (include a definition of "concentration")

While Independence does not include any regions with HUD designated R/ECAPs, the segregation or Theil index enclosed generated by HUD offers an insight into the incidence of minority or low income concentration in 2010 (2020 not yet available). If neighborhoods within Independence exhibit a very different racial composition than the city as a whole the Index will be higher, suggesting a higher level of segregation and vice-versa. So the Independence tracts in the west in darker blue (23 to 32%) represent segregation concentration hotspots.

What are the characteristics of the market in these areas/neighborhoods?

The City's low- moderate-income neighborhoods are characterized by older moderate and high density single-family homes, scattered site multi-family housing primarily created through conversion of single-family homes to rental, large single family structures and low-rise multi-family structures. There are areas of antiquated neighborhood-level commercial districts and other service activities along the City's major corridors such as 24-Highway, Truman Road, and 23rd Street. These areas provide some retail and social services but the vast majority of neighborhoods lack access to affordable grocery stores and a full range of other basic services.

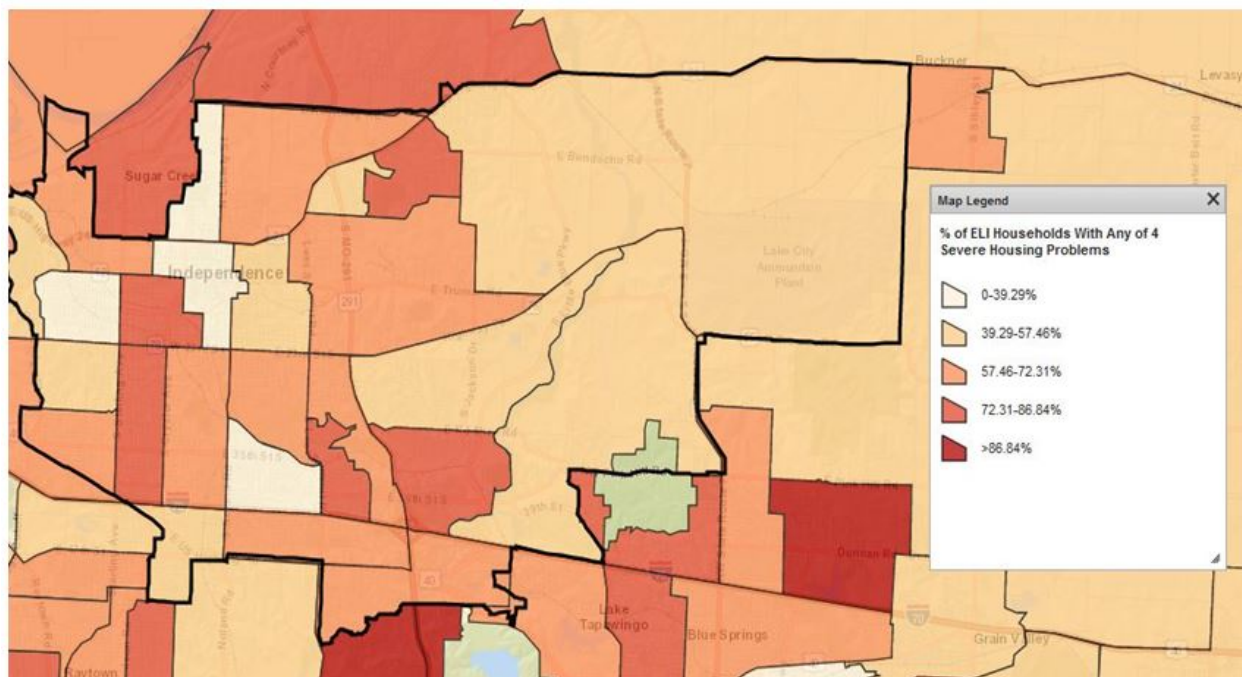
These areas are characterized by few employment opportunities.. Additionally, the older housing stock and lower quality of housing means these younger families do not find Independence a desirable place to live. This area does have access to public transportation giving residents access to jobs in Kansas City and other parts of Independence.

Are there any community assets in these areas/neighborhoods?

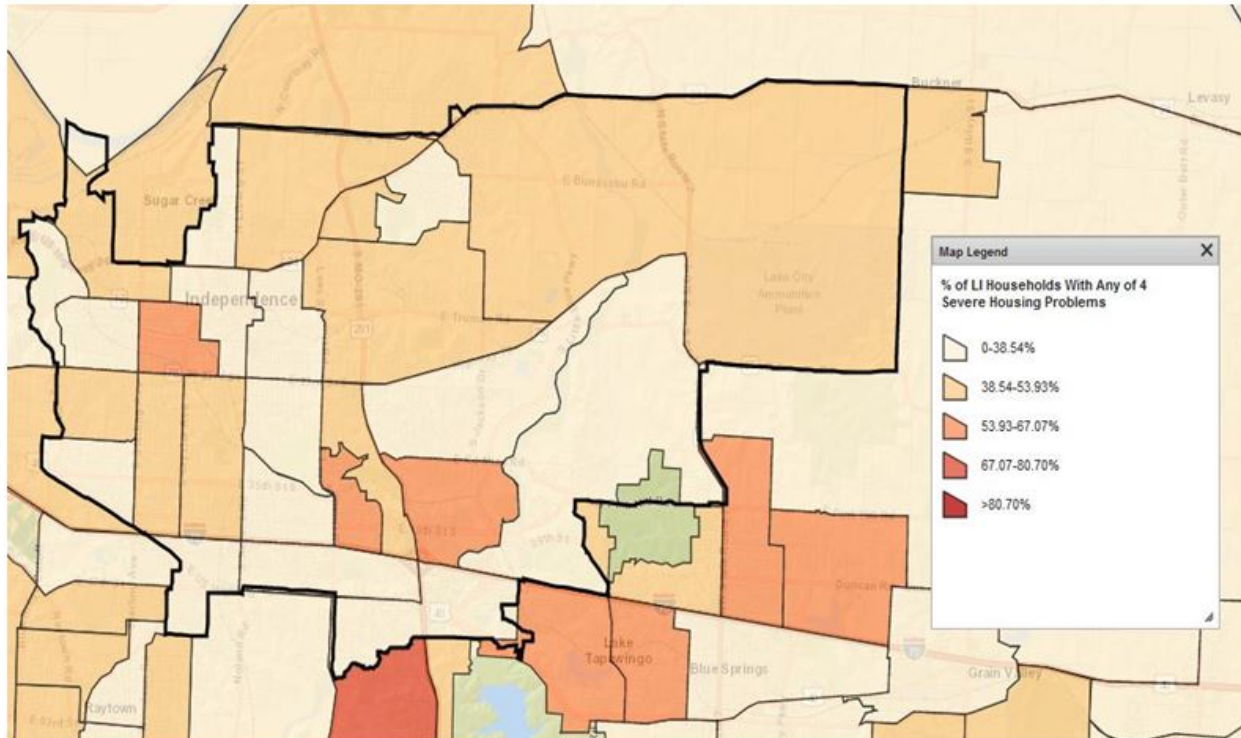
These areas do have community assets, including community centers, parks, and other public facilities. Much of the publicly subsidized housing and one of the three public housing facilities operated by the Independence Housing Authority is also located within these neighborhoods.

Are there other strategic opportunities in any of these areas?

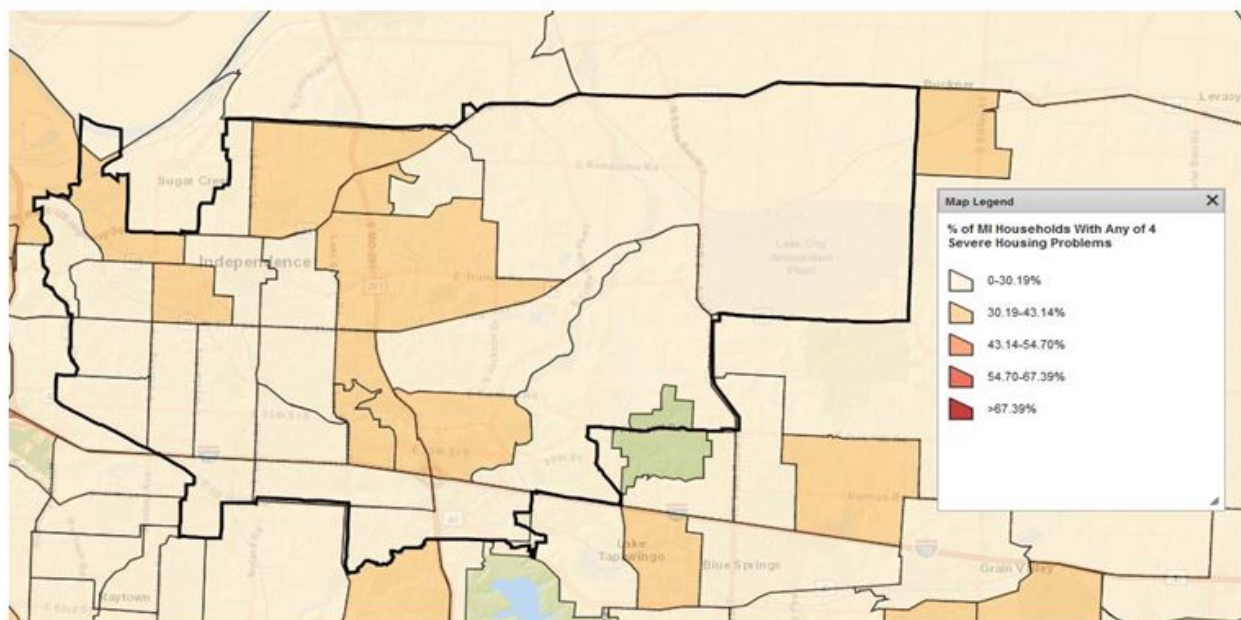
There may be opportunities for redevelopment of older housing units that have been converted from single family homes into multi-unit structures. This should include private and non-profit developers to provide homes for a range of household incomes, including lower and upper income households. This would aid in stabilizing many of these areas by bringing in more people into the neighborhoods and improving the housing stock available in the market.



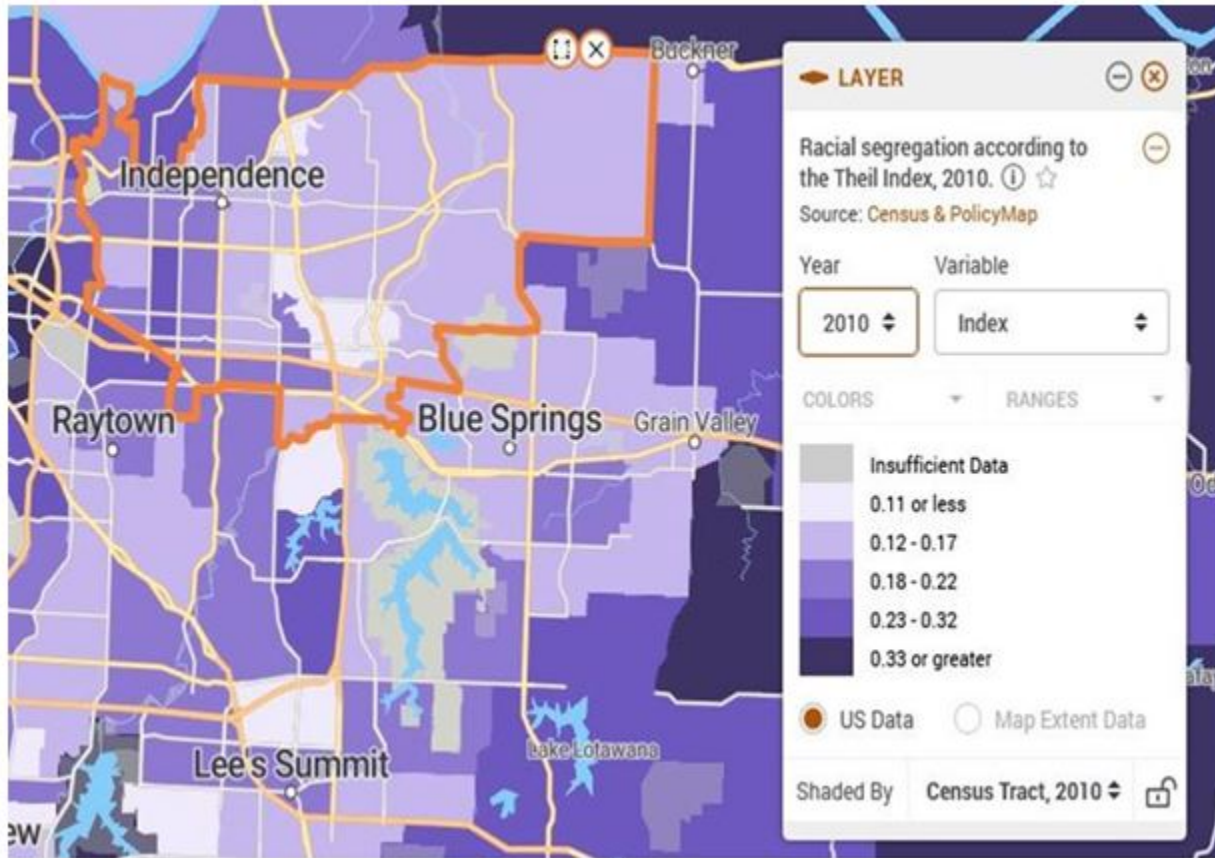
Extremely Low Income With Housing Problems



Low Income With Housing Problems



Moderate Income With Housing Problems



Racial-Ethnic Segregation Hotspots

MA-60 Broadband Needs of Housing occupied by Low- and Moderate-Income Households - 91.210(a)(4), 91.310(a)(2)

Describe the need for broadband wiring and connections for households, including low- and moderate-income households and neighborhoods.

Broadband providers in Independence include AT&T, xFinity, T-Mobile Home Internet, Viasat, HughesNet, EarthLink, Google Fiber, Spectrum, packetlayer, Wisper Internet, KCCoyote, TurboNet and KW Web. The area appears well served.

Describe the need for increased competition by having more than one broadband Internet service provider serve the jurisdiction.

The area appears served by many providers.

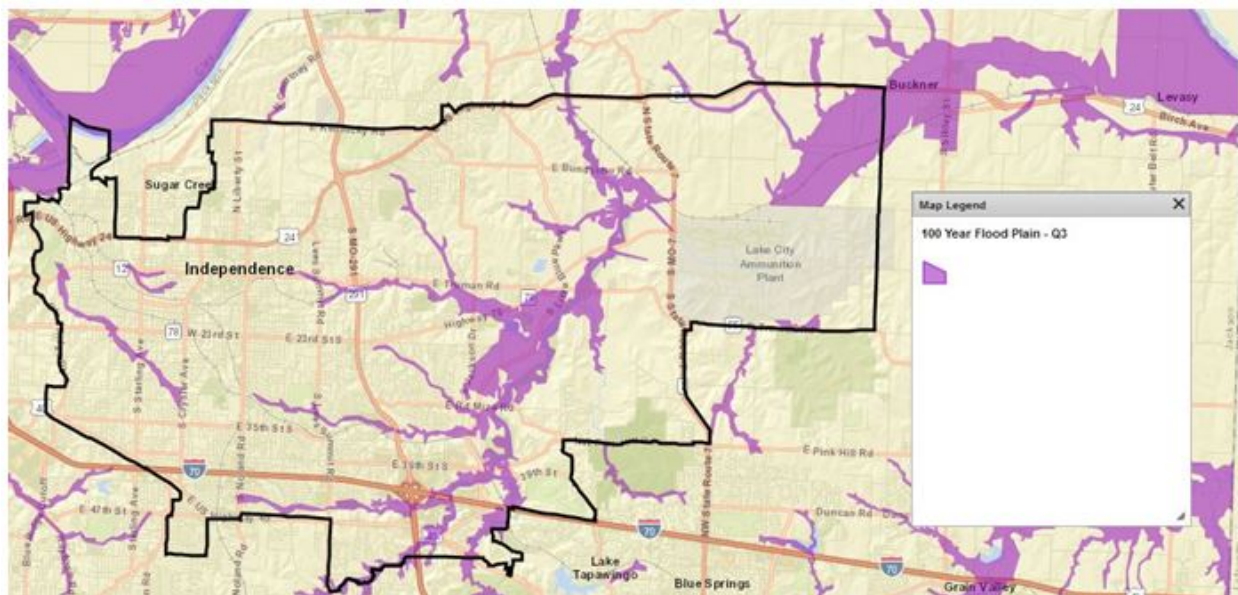
MA-65 Hazard Mitigation - 91.210(a)(5), 91.310(a)(3)

Describe the jurisdiction's increased natural hazard risks associated with climate change.

Drawn from policymap.com, a map of the Independence 100 year flood plain is provided as well another map indicating other environmental issues that include the location of 3 Brownfields and 3 Superfund sites in the community.

Describe the vulnerability to these risks of housing occupied by low- and moderate-income households based on an analysis of data, findings, and methods.

With low- and moderate income households often residing in the central and western portions of Independence, the three Brownfields and one Superfund site represent a possible risk to low- and moderate- income households as well as some areas incorporating the 100-year floodplain in the jurisdiction.



Independence Floodplains



Independence Brownfields

Strategic Plan

SP-05 Overview

Strategic Plan Overview

The following Section outlines efforts Independence will execute in managing its federal grant funds received by establishing relevant priorities and goals, identifying and leveraging resources expected to be available to meet needs, addressing prevailing market conditions, articulating the geographic distribution of resources expected to be available to meet needs, the system in place for delivering services and the barriers in meeting identified goals and priorities and how such barriers will be mitigated. This Section also includes a discussion of homelessness, public housing and lead- based paint issues as well as city anti-poverty efforts and ongoing endeavors to monitor federal program compliance and performance.

SP-10 Geographic Priorities – 91.215 (a)(1)

Geographic Area

Table 47 - Geographic Priority Areas

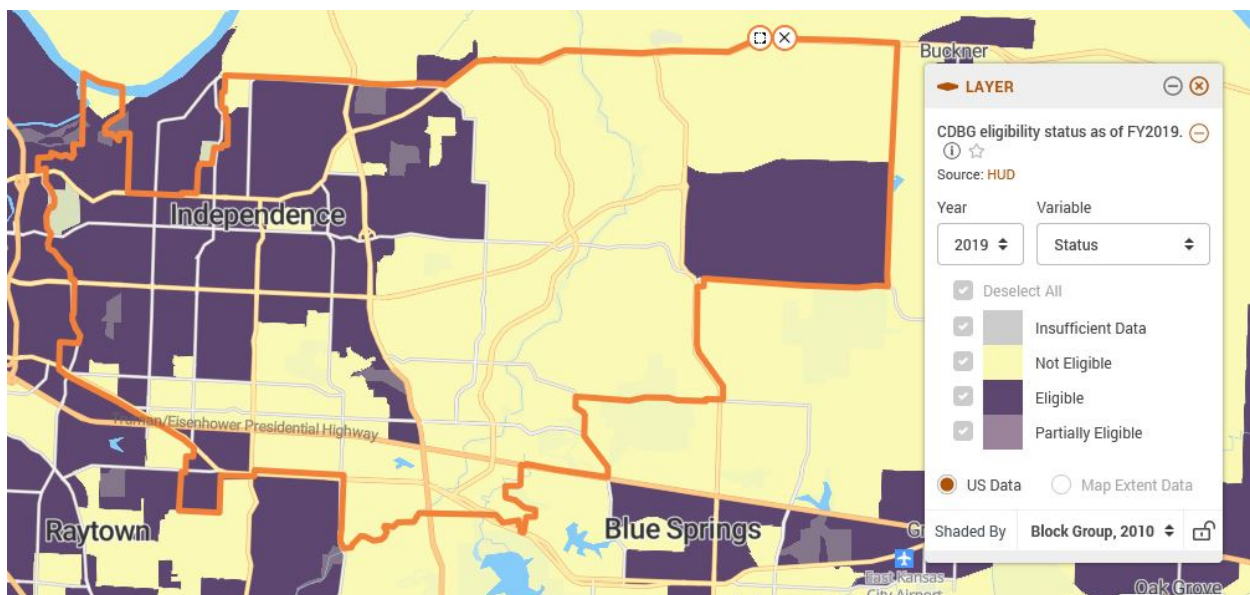
1	Area Name:	CDBG Eligible Area Census Tracts
	Area Type:	CDBG Eligible Census Tracts
	Other Target Area Description:	CDBG Eligible Census Tracts
	HUD Approval Date:	
	% of Low/ Mod:	
	Revital Type:	
	Other Revital Description:	
	Identify the neighborhood boundaries for this target area.	
	Include specific housing and commercial characteristics of this target area.	
	How did your consultation and citizen participation process help you to identify this neighborhood as a target area?	
	Identify the needs in this target area.	
	What are the opportunities for improvement in this target area?	
	Are there barriers to improvement in this target area?	
2	Area Name:	City-wide
	Area Type:	City-wide
	Other Target Area Description:	City-wide
	HUD Approval Date:	
	% of Low/ Mod:	
	Revital Type:	
	Other Revital Description:	
	Identify the neighborhood boundaries for this target area.	
	Include specific housing and commercial characteristics of this target area.	

How did your consultation and citizen participation process help you to identify this neighborhood as a target area?	
Identify the needs in this target area.	
What are the opportunities for improvement in this target area?	
Are there barriers to improvement in this target area?	

General Allocation Priorities

Describe the basis for allocating investments geographically within the jurisdiction (or within the EMSA for HOPWA)

The City of Independence will allocate CDBG resources for projects/activities within eligible CDBG area census tracts as well as for eligible CDBG and HOME projects citywide. Subject to refinement by HUD per census data, note the CDBG eligible areas within Independence in 2019 for informational purposes.



CDBG Eligible Areas, 2019

SP-25 Priority Needs - 91.215(a)(2)

Priority Needs

Table 48 – Priority Needs Summary

1	Priority Need Name	Capacity Building
	Priority Level	High
	Population	Extremely Low Low Moderate Large Families Families with Children Elderly Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse veterans Persons with HIV/AIDS Victims of Domestic Violence Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Persons with HIV/AIDS and their Families Victims of Domestic Violence Non-housing Community Development
	Geographic Areas Affected	CDBG Eligible Census Tracts City-wide
	Associated Goals	Single & Multi Family Residential Rehabilitation Community Public Services For All Types Of Clients Economic Development Development Of New Affordable Housing & Facilities Homeownership Support Capacity Support

	Description	Strengthen the delivery of community affordable housing, community and economic development, neighborhood revitalization, homeless and special needs programs and services by the public, private and non-profit sectors in the community. Involves costs associated the administration of the CDBG and HOE programs by the city as well as the administration, training and support services rendered by non-profit CHDOs in the community.
	Basis for Relative Priority	Public hearings, data analysis, consultation and surveys.
2	Priority Need Name	Code enforcement and blight removal
	Priority Level	High
	Population	Extremely Low Low Moderate Large Families Families with Children Elderly Non-housing Community Development
	Geographic Areas Affected	CDBG Eligible Census Tracts City-wide
	Associated Goals	Community Code Enforcement and Blight Removal
	Description	Strengthen code enforcement and blight removal in the community.
	Basis for Relative Priority	Public hearings, data analysis, consultation and surveys.
3	Priority Need Name	Rehabilitation and Energy Efficient Improvements
	Priority Level	High
	Population	Extremely Low Low Moderate Large Families Families with Children Elderly

	Geographic Areas Affected	CDBG Eligible Census Tracts City-wide
	Associated Goals	Single & Multi Family Residential Rehabilitation
	Description	Strengthen the durability, longevity, safety and quality of the older and/or dilapidated residential housing inventory through rehabilitation and energy efficient improvements.
	Basis for Relative Priority	Public hearings, data analysis, consultation and surveys.
4	Priority Need Name	Community Infrastructure
	Priority Level	High
	Population	Extremely Low Low Moderate Middle Large Families Families with Children Elderly Public Housing Residents Non-housing Community Development
	Geographic Areas Affected	CDBG Eligible Census Tracts
	Associated Goals	Community Infrastructure Support
	Description	The need for targeted community infrastructure.
	Basis for Relative Priority	Public hearings, data analysis, consultation and surveys.
5	Priority Need Name	Community Facilities
	Priority Level	High

	Population	Extremely Low Low Moderate Middle Large Families Families with Children Elderly Public Housing Residents Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Persons with HIV/AIDS and their Families Victims of Domestic Violence Non-housing Community Development
	Geographic Areas Affected	CDBG Eligible Census Tracts
	Associated Goals	Community Facilities Support
	Description	The need for targeted community facilities.
	Basis for Relative Priority	Public hearings, data analysis, consultation and surveys.
6	Priority Need Name	Vacant Property Re-Use
	Priority Level	High
	Population	Extremely Low Low Moderate Large Families Families with Children Elderly
	Geographic Areas Affected	CDBG Eligible Census Tracts City-wide

	Associated Goals	Community Code Enforcement and Blight Removal Single & Multi Family Residential Rehabilitation Community Infrastructure Support Development Of New Affordable Housing & Facilities Capacity Support
	Description	The need for vacant property re-use through rehabilitation and/or demolition and new construction.
	Basis for Relative Priority	Public hearings, data analysis, consultation and surveys.
7	Priority Need Name	Homebuyer Assistance
	Priority Level	High
	Population	Extremely Low Low Moderate Large Families Families with Children Elderly
	Geographic Areas Affected	CDBG Eligible Census Tracts City-wide
	Associated Goals	Homeownership Support Capacity Support
	Description	The need for homebuyer assistance support with and without non-traditional financing aid.
	Basis for Relative Priority	Public hearings, data analysis, consultation and surveys.
8	Priority Need Name	Emergency/Transitional Shelter Support + Services
	Priority Level	High

	Population	Extremely Low Low Large Families Families with Children Elderly Rural Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse veterans Persons with HIV/AIDS Victims of Domestic Violence Unaccompanied Youth
	Geographic Areas Affected	CDBG Eligible Census Tracts City-wide
	Associated Goals	Single & Multi Family Residential Rehabilitation Community Public Services For All Types Of Clients Development Of New Affordable Housing & Facilities
	Description	The need for emergency and transitional shelter support in the community with targeted support services and case management for homeless persons and those at-risk of becoming homeless in the community.
	Basis for Relative Priority	Public hearings, data analysis, consultation and surveys.
9	Priority Need Name	Special Needs Housing & Services
	Priority Level	High

	Population	Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Persons with HIV/AIDS and their Families Victims of Domestic Violence
	Geographic Areas Affected	CDBG Eligible Census Tracts City-wide
	Associated Goals	Single & Multi Family Residential Rehabilitation Community Public Services For All Types Of Clients Development Of New Affordable Housing & Facilities
	Description	The need for dependable shelter and housing support in the community for persons with special needs in addition to needed supportive services and case management.
	Basis for Relative Priority	Public hearings, data analysis, consultation and surveys.
10	Priority Need Name	Subsistence Housing & Utility Support
	Priority Level	High

	Population	Extremely Low Low Large Families Families with Children Elderly Rural Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse veterans Persons with HIV/AIDS Victims of Domestic Violence Unaccompanied Youth Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Persons with HIV/AIDS and their Families Victims of Domestic Violence
	Geographic Areas Affected	CDBG Eligible Census Tracts City-wide
	Associated Goals	Single & Multi Family Residential Rehabilitation Community Public Services For All Types Of Clients Development Of New Affordable Housing & Facilities
	Description	Provide targeted subsistence housing and utility assistance for homeless persons, special needs clients and other low income persons in need of such.
	Basis for Relative Priority	Public hearings, data analysis, consultation and surveys.
11	Priority Need Name	Commercial Revitalization
	Priority Level	Low
	Population	Non-housing Community Development

	Geographic Areas Affected	CDBG Eligible Census Tracts
	Associated Goals	Community Code Enforcement and Blight Removal Community Infrastructure Support Community Facilities Support Economic Development
	Description	The need for targeted neighborhood commercial district revitalization in CDBG eligible tracts and designated governmental redevelopment areas.
	Basis for Relative Priority	Public hearings, data analysis, consultation and surveys.
12	Priority Need Name	Economic Development
	Priority Level	Low
	Population	Extremely Low Low Moderate Non-housing Community Development
	Geographic Areas Affected	CDBG Eligible Census Tracts City-wide
	Associated Goals	Community Code Enforcement and Blight Removal Community Infrastructure Support Community Facilities Support Community Public Services For All Types Of Clients Economic Development
	Description	The need for targeted job creation, retention and expansion as well as job training.
	Basis for Relative Priority	Public hearings, data analysis, consultation and surveys.
13	Priority Need Name	Crime Reduction
	Priority Level	Low

	Population	Extremely Low Low Moderate Middle
	Geographic Areas Affected	CDBG Eligible Census Tracts City-wide
	Associated Goals	Community Facilities Support Community Public Services For All Types Of Clients
	Description	The need for targeted crime reduction and public safety services in the community.
	Basis for Relative Priority	Public hearings, data analysis, consultation and surveys.
14	Priority Need Name	Public Services
	Priority Level	High
	Population	Extremely Low Low Moderate Large Families Families with Children Elderly Public Housing Residents
	Geographic Areas Affected	CDBG Eligible Census Tracts City-wide
	Associated Goals	Community Public Services For All Types Of Clients Homeownership Support Capacity Support
	Description	The need for targeted transportation, education, legal and self-sufficiency public services for lower income households in need of such .
	Basis for Relative Priority	Public hearings, data analysis, consultation and surveys.

15	Priority Need Name	Fair Housing Support
	Priority Level	High
	Population	Extremely Low Low Moderate Large Families Families with Children Elderly Public Housing Residents Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Persons with HIV/AIDS and their Families Victims of Domestic Violence
	Geographic Areas Affected	CDBG Eligible Census Tracts City-wide
	Associated Goals	Single & Multi Family Residential Rehabilitation Community Public Services For All Types Of Clients Development Of New Affordable Housing & Facilities Homeownership Support Capacity Support
	Description	The need for targeted fair housing educational, counseling and training services in the community.
	Basis for Relative Priority	Public hearings, data analysis, consultation, surveys and the <u>City of Independence Analysis Of Impediments To Fair Housing Choice, FY 2022-2026.</u>

Narrative (Optional)

Independence has elected to utilize the following definitions to assign priority. They are as follows:

- High Priority – The city plans to use funds made available for activities assigned this priority that address unmet needs during the planning period covered in the FY 2022-2026 Consolidated Plan.
- Low Priority – If funds are available, activities to address unmet needs may be funded by the city during the planning period covered in the FY 2022-2026 Consolidated Plan.

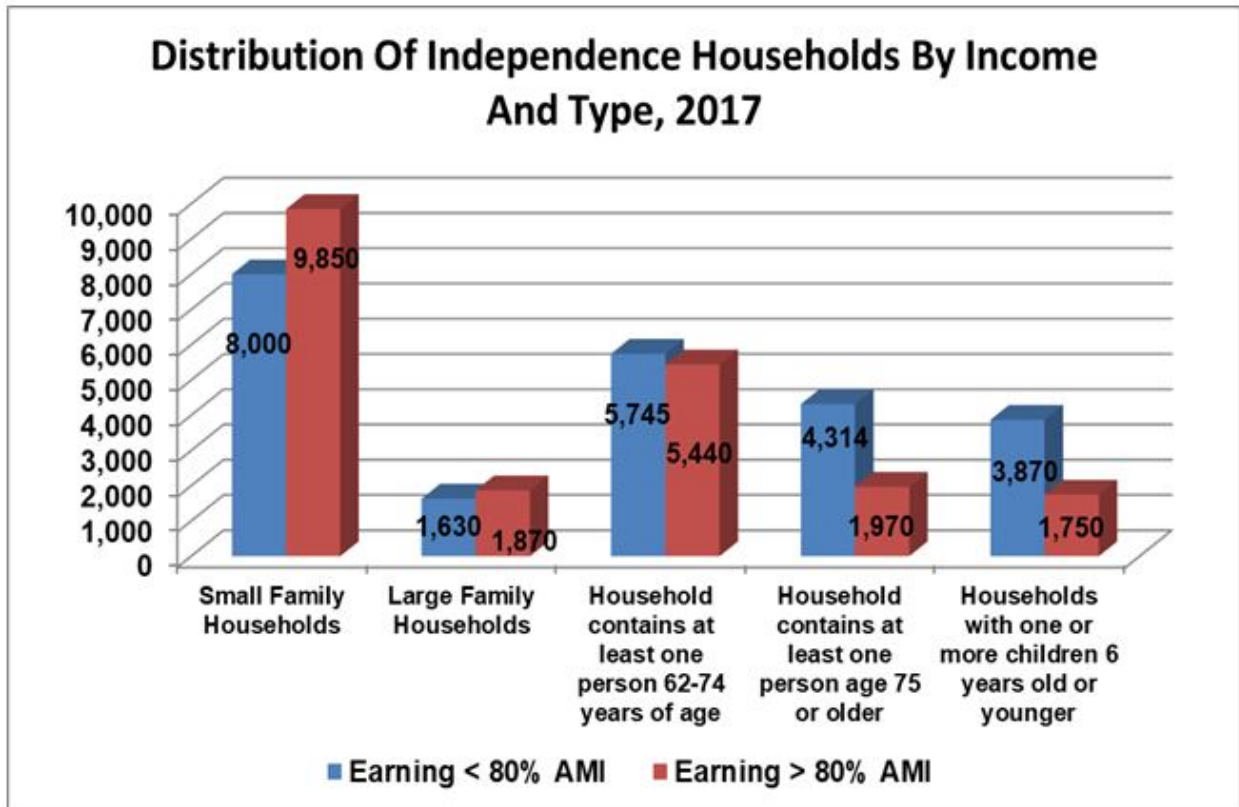
SP-30 Influence of Market Conditions – 91.215 (b)

Influence of Market Conditions

Affordable Housing Type	Market Characteristics that will influence the use of funds available for housing type
Tenant Based Rental Assistance (TBRA)	The demand for TBRA exceeds the supply. The rental market in Independence is viable for rental vouchers given the 1,647 units currently occupied and being administered by the Independence PHA. Should the city and/or its contractor elect to use relevant municipal federal resources for such, the market viability of this endeavor is great.
TBRA for Non-Homeless Special Needs	Needs identified in this Consolidated Plan indicate demand for TBRA for non-homeless, special needs households. The rental market in Independence is viable for rental vouchers given the 1,647 units currently occupied and being administered by the Independence PHA. Should the city and/or its contractor elect to use relevant municipal federal resources for TBRA for non-homeless, special needs households, the market viability of this endeavor is great. Wrap-around support services would need to be provided for this client group.
New Unit Production	New dwelling unit production in Independence is viable and varies based on geography and the viability of securing subsidies to enable units affordable to low- and moderate- income households. The City does not anticipate utilizing HOME funds for new unit production except in cases where rehabilitation of existing housing units acquired for redevelopment is determined infeasible due to structural deterioration or deficiencies, to encourage residential infill development that compliments the surrounding neighborhood, or when gap financing is needed to allow for the conversion of a vacant building to new affordable housing units being supported through the LIHTC or a Historic Preservation Tax Credit program. The City will continue to provide Certificates of Consistency upon request for projects proposing production of new affordable housing units when consistent with the City's Consolidated Plan.

Affordable Housing Type	Market Characteristics that will influence the use of funds available for housing type
Rehabilitation	<p>Needs identified in the Consolidated Plan indicated that the rehabilitation of the existing housing stock, particularly vacant and abandoned single family homes, deteriorated occupied units, and vacant buildings that are candidates for conversion to housing or mixed-use projects were identified as high priorities. Particular consideration was given to the need for rehabilitation that will reduce utility burden and assist with neighborhood sustainability efforts in western Independence. Consolidated Plan efforts will focus on funding rehabilitation projects and programs that will reduce vacancy of existing units, improve housing quality and reduce utility burden for occupants.</p> <p>Per the recent Independence Housing Study, the city has an abundant supply owner of ownership dwellings valued \$50,000 to \$150,000. With a median home value of \$140,000 in Independence, about half of owner units fall within this price point. While quite affordable to low- and moderate- income households within the community, the condition of many of such units are substantively lacking as well as unit amenities. A substantial supply of affordable rental properties (70% of the community rental inventory) are in generally poor condition. Apparently, investors have been purchasing a substantive portion of affordable, single-family properties and turning them into rentals. Thus, rehabilitation with and without acquisition for both owner- and renter- units affordable to lower income households is warranted.</p>
Acquisition, including preservation	<p>The support of acquisition activities for new unit production when gap financing is needed to allow for the conversion of a vacant building to new affordable housing units being supported through the LIHTC or a Historic Preservation Tax Credit program; and for rehabilitation projects and programs that will reduce vacancy of existing units, improve housing quality and reduce utility burden for occupants. Noted above, rehabilitation with and without acquisition for both owner- and renter- units affordable to lower income households is warranted.</p>

Table 49 – Influence of Market Conditions



Distribution Of Households By Income ÿ Type

SP-35 Anticipated Resources - 91.215(a)(4), 91.220(c)(1,2)

Introduction

The information noted in this section outlines the estimated volume of HOME and CDBG resources available to Independence for the FY 2022 to FY 2026 Consolidated Plan period (and yearly Action Plans) and the general basis on which such resources shall be invested in the community.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	825,000	0	138,596	963,596	3,300,000	Amounts represent the estimated annual CDBG allocation based on the FY2021/'22 program year. For FY 2022-'23, \$138,596 has been allocated from unused resources from the prior fiscal year.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	406,067	850	0	406,917	1,624,268	Amounts represent the estimated annual HOME allocation based on the FY2021/'22 program year. Excludes the one-time HOME-ARP allocation of \$1,684,853 subject to an ultimate FY 2021 Action Plan Substantial Amendment ultimately incorporating the HOME-ARP Allocation Plan. Program Income in the amount of \$849.50

Table 50 - Anticipated Resources

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

The City allocation of CDBG and HOME resources during the Consolidated Plan period will be determined by the identification of needs and priorities generated from the annual citizen participation process and from Independence grant advisory committee evaluation of competitive grant applications submitted by eligible sub-recipients and third-party developers selected for funding in the city's forthcoming Annual Action Plans. Generally, redevelopment planning, affordable housing rehabilitation and development, infrastructure improvements and economic development activities are typically concentrated in City identified areas, and are always in qualifying CDBG low and moderate income areas.

City initiated activities may also be targeted for 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.

City driven CDBG and HOME activities will continue to focus on supplementing City initiated redevelopment efforts throughout western Independence including designated 353 Tax Abatement Program boundaries, the Independence School District's 2007 annexation areas, and areas of African American and Hispanic minority concentration. These geographic priorities encompass much of the City's low- and moderate-income population and are often areas of greatest need.

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

Subject to availability, the investment of publically owned land or property by Independence may be undertaken as/if needed based on city staff and relevant advisory board input all subject to the ultimate review, analysis and action by the Independence City Council.

Discussion

The information noted herein offers insights to the commitment of forthcoming HOME and CDBG projects by Independence covering the FY 2022 to FY 2026 Consolidated Plan period as well as individual Independence Action Plans generated during this period.

SP-40 Institutional Delivery Structure – 91.215(k)

Explain the institutional structure through which the jurisdiction will carry out its consolidated plan including private industry, non-profit organizations, and public institutions.

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served

Table 51 - Institutional Delivery Structure

Assess of Strengths and Gaps in the Institutional Delivery System

The City of Independence relies on a well-developed institutional structure to effectively implement the Goals and Priority Objectives of the Consolidated Plan. Independence benefits from a comprehensive and experienced network of subrecipients, providers, agencies and community representatives that provide a proven support system for addressing the needs of the low and moderate income community. The following provides a summary of the strengths and weakness of the community's institutional delivery system:

Strengths in the delivery system include:

- Extensive supply of experienced service providers, local and regional, servicing a broad range of social service and housing needs
- Shared regional data network available to service providers provides for fair and efficient service delivery
- Strength and support of the City's faith-based community
- Experience of City Program Staff in administering federally funded program
- Strong commitment to volunteerism within the community
- Strength of the Independence School District
- Community affordability attracts investment
- Local public transit system that is connected to the regional system
- Local agency participation in regional Continuum of Care efforts
- Support from community banks

Potential gaps in the service delivery system include:

- Shortage of public and private funding resources to support and meet individual, community, and agencies' needs
- Shortage of experienced non-profit housing developers for rental projects
- Shortage of resources and capacity to supply much needed tenant based rental assistance programs
- Lack of shelter facilities to serve the full range of homeless populations

Availability of services targeted to homeless persons and persons with HIV and mainstream services

Homelessness Prevention Services	Available in the Community	Targeted to Homeless	Targeted to People with HIV
Homelessness Prevention Services			
Counseling/Advocacy	X	X	
Legal Assistance	X		
Mortgage Assistance	X		
Rental Assistance	X		
Utilities Assistance	X		
Street Outreach Services			
Law Enforcement	X	X	
Mobile Clinics	X		
Other Street Outreach Services			
Supportive Services			
Alcohol & Drug Abuse	X		
Child Care	X		
Education	X		
Employment and Employment Training	X		
Healthcare	X		
HIV/AIDS	X		
Life Skills	X		
Mental Health Counseling	X		
Transportation	X	X	
Other			
	X		

Table 52 - Homeless Prevention Services Summary

Describe how the service delivery system including, but not limited to, the services listed above meet the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth)

Independence benefits from a solid network of experienced housing and social service providers who together provide a fairly comprehensive safety net for residents in need, including the homeless and persons with HIV. Independence and its network agencies benefit from the experience and resources of the larger Kansas City region and are actively involved in expanding the outreach and impact of the Continuum's efforts. Within the limits of available resources, Independence homeless service providers are readily available to assist, or connect to assistance, homeless and persons with HIV.

In general, the most significant local challenges in meeting the needs of the homeless and persons with HIV are insufficient annual funding resources to serve all who are in need and to make a meaningful impact, locating and reaching homeless populations that are not actively seeking services, and being able to transition the homeless to permanent housing in a timely fashion.

Describe the strengths and gaps of the service delivery system for special needs population and persons experiencing homelessness, including, but not limited to, the services listed above

The service delivery system for persons with special needs and persons experiencing homelessness in Independence benefits from the following strengths:

- A comprehensive network of agencies covering the broad range of underserved needs is available to some degree, if not locally, within the region
- The service delivery system for very low income, homeless and special needs persons benefits from the shared use of a regional case management database called MAACLink that is available to non-profit social service providers and helps to ensure fair and efficient service is available to beneficiaries
- Many service providers have built effective local and regional collaborative partnerships designed to leverage resources and avoid duplication of services in order to better serve beneficiaries and the community as a whole
- Many service providers have worked to develop niche programs and services in order to fill underserved needs and insure the sustainability of the organization

Gaps identified in the current service delivery system include the following:

- While generally eligible to be served by local social service agencies, there are certain categories of special needs populations, including persons with HIV/AIDS, unaccompanied youth, and persons with disabilities that do not have a strong, stand-alone, institutional advocate within the City that is actively partnering to address their specific underserved needs.
- Homeless shelter programs in Independence generally prioritize for certain categories of beneficiaries, namely families and women with children, leaving unaccompanied youth, single men and persons with mental illness or substance abuse issues un-served at the local level.
- Employment services and job training programs, a significant unmet need identified during the Consolidated Plan development process, are not effectively addressing the unemployment, underemployment, and education needs of the community. The delivery system needs programs that will ensure beneficiaries will have the opportunity to earn a living wage are needed.

Provide a summary of the strategy for overcoming gaps in the institutional structure and service delivery system for carrying out a strategy to address priority needs

In order to overcome gaps in the institutional structure and service delivery system the following strategy is employed on an ongoing basis:

- Promote an awareness among members within the existing institutional structure of the identified gaps in our delivery system and the significance of unmet needs
- Encourage through the issuance of requests for funding proposals projects that offer a meaningful response to identified gaps in the delivery system
- Support the development of new agencies or the expansion of an existing agency to serve identified

underserved needs

- Pursue additional funding opportunities through local, state and federal sources that will assist in closing any gaps in the service delivery system

SP-45 Goals Summary – 91.215(a)(4)

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Community Code Enforcement and Blight Removal	2022	2026	Affordable Housing Non-Homeless Special Needs	CDBG Eligible Area Census Tracts City-wide	Code enforcement and blight removal Vacant Property Re-Use Commercial Revitalization Economic Development	CDBG: \$975,000	Housing Code Enforcement/Foreclosed Property Care: 11000 Household Housing Unit
2	Single & Multi Family Residential Rehabilitation	2022	2026	Affordable Housing Homeless Non-Homeless Special Needs	CDBG Eligible Area Census Tracts City-wide	Capacity Building Rehabilitation and Energy Efficient Improvements Vacant Property Re-Use Emergency/Transitional Shelter Support + Services Special Needs Housing & Services Subsistence Housing & Utility Support Fair Housing Support	CDBG: \$300,000 HOME: \$1,015,167	Rental units rehabilitated: 12 Household Housing Unit Homeowner Housing Rehabilitated: 12 Household Housing Unit
3	Community Infrastructure Support	2022	2026	Affordable Housing Non-Housing Community Development	CDBG Eligible Area Census Tracts	Community Infrastructure Vacant Property Re-Use Commercial Revitalization Economic Development	CDBG: \$875,000	Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit: 1000 Households Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
4	Community Facilities Support	2022	2026	Affordable Housing Non-Housing Community Development	CDBG Eligible Area Census Tracts	Community Facilities Commercial Revitalization Economic Development Crime Reduction	CDBG: \$875,000	Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit: 1000 Households Assisted
5	Community Public Services For All Types Of Clients	2022	2026	Affordable Housing Homeless Non-Homeless Special Needs	CDBG Eligible Area Census Tracts City-wide	Capacity Building Emergency/Transitional Shelter Support + Services Special Needs Housing & Services Subsistence Housing & Utility Support Economic Development Crime Reduction Public Services Fair Housing Support	CDBG: \$600,000	Public service activities for Low/Moderate Income Housing Benefit: 1000 Households Assisted
6	Economic Development	2022	2026	Non-Housing Community Development	CDBG Eligible Area Census Tracts City-wide	Capacity Building Commercial Revitalization Economic Development	CDBG: \$30,000	Jobs created/retained: 15 Jobs Businesses assisted: 7 Businesses Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
7	Development Of New Affordable Housing & Facilities	2022	2026	Affordable Housing Homeless Non-Homeless Special Needs	CDBG Eligible Area Census Tracts City-wide	Capacity Building Vacant Property Re-Use Emergency/Transitional Shelter Support + Services Special Needs Housing & Services Subsistence Housing & Utility Support Fair Housing Support	CDBG: \$1 HOME: \$1,015,167	Rental units constructed: 1 Household Housing Unit Homeowner Housing Added: 12 Household Housing Unit
8	Homeownership Support	2022	2026	Affordable Housing	CDBG Eligible Area Census Tracts City-wide	Capacity Building Homebuyer Assistance Public Services Fair Housing Support	CDBG: \$37,500 HOME: \$37,500	Direct Financial Assistance to Homebuyers: 1 Households Assisted
9	Capacity Support	2022	2026	Affordable Housing Homeless Non-Homeless Special Needs	CDBG Eligible Area Census Tracts City-wide	Capacity Building Vacant Property Re-Use Homebuyer Assistance Public Services Fair Housing Support	HOME: \$115,000	Other: 1 Other

Table 53 – Goals Summary

Goal Descriptions

1	Goal Name	Community Code Enforcement and Blight Removal
	Goal Description	Strengthen residential code enforcement and blight removal in Independence to foster neighborhood revitalization.
2	Goal Name	Single & Multi Family Residential Rehabilitation
	Goal Description	Strengthen housing quality via single- or multi- family rehabilitation with or without acquisition. Clients assisted will be low- and moderate- income persons, homeless persons or persons with special needs. Congregate housing is included in this category for residential use purposes.
3	Goal Name	Community Infrastructure Support
	Goal Description	Execute targeted community infrastructure support in CDBG eligible tracts and designated governmental redevelopment areas.
4	Goal Name	Community Facilities Support
	Goal Description	Execute targeted public and community facilities support in CDBG eligible tracts and governmentally designated redevelopment areas.
5	Goal Name	Community Public Services For All Types Of Clients
	Goal Description	Enhance the availability of public services for lower income residents that improve their livability and access to basic needs. Such service may also assist homeless and special needs clients.
6	Goal Name	Economic Development
	Goal Description	Strengthen the creation, retention and expansion of targeted business opportunities in the community.
7	Goal Name	Development Of New Affordable Housing & Facilities
	Goal Description	Expand community affordable housing opportunities through new single- or multi- family construction with or without acquisition and/or demolition. Congregate care housing is also included as are homeless facilities and facilities for clients with special needs.

8	Goal Name	Homeownership Support
	Goal Description	Foster targeted homeownership opportunities through direct financial assistance.
9	Goal Name	Capacity Support
	Goal Description	Strengthen the design, delivery and implementation capacity of public, private and/or non-profit affordable housing, neighborhood revitalization, community and economic development, homeless and special needs endeavors in the community.

Estimate the number of extremely low-income, low-income, and moderate-income families to whom the jurisdiction will provide affordable housing as defined by HOME 91.315(b)(2)

From 2022 through 2026, Independence anticipates assisting 14,000 extremely low-income (earning 0-30% AMI), 6,000 low-income (31-50% AMI) and 4,000 moderate-income (51-80% AMI) families as defined by HOME 91.315(b)(2). It is estimated that approximately 5 renter households will be assisted and 20 homeowner households (earning less than 80% AMI). Middle income households are not generally anticipated to be assisted with the relevant HUD federal entitlement resources. Refer to goal 4 for the number of homeless persons anticipated to be assisted.

SP-50 Public Housing Accessibility and Involvement – 91.215(c)

Need to Increase the Number of Accessible Units (if Required by a Section 504 Voluntary Compliance Agreement)

IHA has completed interior work on Section 504 ADA units and will be planning exterior parking lots/ramps in the next two CFP grants after elevators on Southview Manor and Pleasant Heights buildings are replaced.

Activities to Increase Resident Involvements

In order to increase resident involvement, the Independence Housing Authority holds resident meetings regarding development of the annual and 5-Year Capital Plan and Annual Action plans at all three public housing sites. Input is also solicited via advertisement and during the public hearing held by the Board of Commissioners. The Independence PHA will continue to extensively involve the residents of their assisted housing inventory using the following approach:

- Improve the overall management of the assisted housing inventory
- Protect and preserve resident rights
- Create community and a social support systems on-site
- Empower residents as a group and individually
- Enable residents to build skills based on their participation

The Independence PHA will continue to undertake the following strategies:

- Preserve a system of checks and balances in the management of subsidized housing to protect both the housing stock and those who live in it.
- Organize and fund opportunities for residents to meet, learn and strategize with their peers.
- Increase the number and percentage of employed persons..
- Partner with local service providers to increase resident's access to educational programs, job training, healthcare, daycare, homebuyer assistance and other services.
- Organize and fund opportunities for residents to meet, learn and strategize with their peers.

Is the public housing agency designated as troubled under 24 CFR part 902?

No

Plan to remove the 'troubled' designation

Not applicable.

SP-55 Barriers to affordable housing – 91.215(h)

Barriers to Affordable Housing

Barriers to affordable housing exist when the cost of housing or the incentives to develop, maintain, or improve affordable housing are affected by public policies, particularly those of the local jurisdiction.

The following is a summary of these barriers:

- **Zoning Ordinances** – Zoning can be a barrier to affordable housing, as they restrict density and limit housing types in locations that would otherwise be suitable for affordable housing – ultimately excluding lower income households from many neighborhoods.
- **Rental & Deposit Fees** - Security deposits, utility deposits, and high rent fees are a barrier to affordable housing, since many lower income households cannot afford to pay both the deposit/fee and the rent at the same time.
- **Lack of Quality Housing** - The lack of quality housing units, particularly energy efficient and sufficient for large families, for lower income persons is a barrier to affordable housing.
- **Lead Based Paint** - Lead based paint (LBP) is a barrier to affordable housing, as many homes in Independence were built prior to 1978. LBP can be a serious health hazard, particularly for young children. Contracting work on houses with documented LBP can be expensive and thus a deterrent to successful rehabilitation.
- **Age & Condition Of Housing Inventory** - The age and condition of housing stock is a barrier, as many homes are 50 years old or older which substantially increases the cost of maintenance and rehabilitation. Moreover, those interested in architectural or historical preservation are met with resistance because of fears of gentrification. For the elderly, the cost of maintenance is a burden, and some have either converted their single-family home into a duplex or multifamily structure or simply let the home deteriorate beyond repair. In some cases, properties are simply abandoned, and taxes are not paid, ultimately attracting vandals or other nuisances.
- **Financing** - Financing is a barrier to the production of affordable housing, as many owners and occupants do not have the resources to pay for housing rehabilitation. Moreover, persons with special needs do not have the resource to make their housing fully accessible.

Refer to SP-55 for the strategies to mitigate the affordable housing barriers noted herein.

Strategy to Remove or Ameliorate the Barriers to Affordable Housing

With respect to public policies, the City of Independence adopted a Unified Development Ordinance (UDO) in June 2009 which combined the City's previous Zoning Ordinance and Subdivision Regulations into one document. The UDO was developed after much public input. The UDO's public policies and development standards are designed to protect and promote the public health, safety and general welfare; enhance residents' quality of life; protect the character of established residential neighborhoods; promote mixed-use, pedestrian-oriented development patterns; maintain orderly and compatible development patterns that promote an appropriate mix of land uses and protect and

conserve property values; promote rehabilitation and reuse of older buildings; and maintain a range of housing choices and options.

The city executes a variety of other strategies on a sustained basis involving the use and expenditure of CDBG and HOME resources, etc to address the other barriers as noted below:

- Rental & Deposit Fees - Sub-recipients using CDBG funds continue to off-set barrier costs such as security deposits, utility connection/reconnection fees, and high late rent fees with financial help and emergency assistance payments.
- Lack Of Quality Housing - The City utilizes federal funds through HUD to construct and rehabilitate quality homes, reclaiming abandoned and nuisance properties through acquisition and rehabilitation, stimulating private developers and other public resources to invest in existing housing stock and to create mixed-income housing opportunities, and continuing to support the home repair programs of local nonprofits that allow persons to remain in their homes with the assistance of grant funds to repair and replace much needed building components such as roofs, mechanical systems, windows and insulation.
- Lead Based Paint - The City utilizes a multi-faceted approach to address this barrier, including looking at other cities and their approach to contracting for LBP remediation, looking for additional funding for LBP remediation, targeting families with children under the age of six specifically for LBP remediation.
- Age & Condition Of Residential Inventory - The City utilizes a multifaceted approach to address this barrier, including rehabilitation assistance with the elderly, disabled and families with children receiving priority funding, marketing of homeownership programs to public housing tenants to support housing choice, counseling to homeowners to educate them on basic maintenance to prevent further deterioration, and an ordinance requiring that blighted or abandoned vacant properties be registered with the City.
- Financing Issues - Financing is a barrier to the production of affordable housing, as many owners and occupants do not have the resources to pay for housing rehabilitation. Moreover, persons with special needs do not have the resource to make their housing fully accessible.

SP-60 Homelessness Strategy – 91.215(d)

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

Outreach and assessment are critical components in engaging and stabilizing homeless people, especially those who are chronically homeless. The Greater Kansas City Coalition To End Homelessness (GKCCEH) and Independence execute and/or support an array of outreach activities with the goal of assisting resistant individuals in accessing services. Often, chronically homeless persons distrust the system, have barriers such as mental illness and/or substance abuse that impede their ability to follow program rules or meet program requirements. Under the auspices of the Regional Continuum of Care, a Coordinated Assessment System designed to assess and provide needed shelter and supportive services for homeless individuals. The continual development and refinement of this system offers significant opportunity in addressing the unique needs of these clients.

Addressing the emergency and transitional housing needs of homeless persons

Independence has made an ongoing commitment to identifying and addressing, to the extent possible, the emergency shelter and transitional housing needs of homeless persons. The Consolidated Plan's strategic goals and priority needs objectives call for providing support and funding assistance through the Community Development Block Grant Program to local service providers who provide emergency shelter and transitional housing for a wide variety of homeless populations including families, pregnant teenage girls, victims of domestic violence and their children, and homeless children that have aged out of the foster care system. Stakeholder interviews suggested the reinstatement of the Independence Police Force liaison.

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.

Consolidated Plan goals for preventing and ending homelessness call for providing funding to assist homeless and at-risk homeless through the provision of emergency shelter, rent and utility assistance, subsistence level services, case management services, and transitional housing. Plan goals for increasing self-sufficiency and family success call for providing funds to assist a variety of public service programs that benefit the homeless including transitional housing for families in crisis, unaccompanied youth, and transitional housing for pregnant teens. HOME funds will also be used to provide homebuyer assistance to low- and moderate-income families, including currently homeless and at-risk homeless, in partnership with the City's HOME affordable housing production program. As projects become viable, HOME Program gap financing assistance will be made available to increase the supply of quality affordable

housing units, both single and multi-family; and Certificates of Consistency will be issued by the City for affordable housing development projects that propose to reduce or prevent homelessness when found to be consistent with the City's Consolidated Plan.

Help low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families who are likely to become homeless after being discharged from a publicly funded institution or system of care, or who are receiving assistance from public and private agencies that address housing, health, social services, employment, education or youth needs

The City's strategic plan goals contribute to helping homeless and at-risk homeless persons, in general, make the transition to permanent housing and independent living by providing funds for facilities and programs operated by agencies that serve these populations, and by expanding affordable housing options to these populations as opportunities become viable. The Plan goals also contribute by providing assistance to projects and programs aimed at developing self-sufficiency for individuals and ensuring future success for families. Within its means, the City will provide funding and technical support to any such opportunity when found to be consistent with the Goals and Priority Needs of the Consolidated Plan. For more information concerning the specific homeless assistance and prevention activities to be funded, and the relative plan Goals and Priority Objectives hoped to be achieved, refer to Section AP-35: Projects.

SP-65 Lead based paint Hazards – 91.215(i)

Actions to address LBP hazards and increase access to housing without LBP hazards

Independence will follow the procedures articulated below.

1. For pre-1978 properties receiving less than or equal to \$5,000 per unit, members will provide families with a copy of Renovate Right or other EPA approved documents, conduct paint testing or presume the presence of lead-based paint. If paint testing indicates the painted surfaces are not coated with lead-based paint, safe work practices and clearance are not required.

Implement safe work practices during rehabilitation work and repair paint that is disturbed. After completion of any rehabilitation activities disturbing painted surfaces, perform a clearance examination of the worksite(s). Clearance is not required if rehabilitation did not disturb painted surfaces of a total area more than set forth in HUD regulations.

2. For pre-1978 properties receiving more than \$5,000 and up to \$25,000 in Federal rehabilitation assistance, members will provide families with a copy of Renovate Right or other EPA approved document, conduct paint testing or presume the presence of lead-based paint, perform a risk assessment in the dwelling units receiving painted surfaces before rehabilitation begins, perform interim controls of all lead-based paint hazards identified, implement safe work practices during the rehabilitation work and repair any paint that is disturbed and is known or presumed to be lead-based paint and undertake ongoing maintenance activities as required if the rehabilitation assistance is HOME funded.

3. For pre-1978 properties receiving more than \$25,000 per unit in Federal rehabilitation assistance, members will provide families with a copy of Renovate Right or other EPA approved document, perform a risk assessment in the dwelling units receiving Federal assistance and in associated common areas and exterior painted surfaces before rehabilitation begins, abate all lead-based paint hazards identified by the paint testing or risk assessment. Interim controls are acceptable on exterior paint surfaces that are not disturbed by rehabilitation activities and on lead-paint hazards that have an area smaller than the minimum limits specified in HUD Regulations. If abatement is required, it is necessary to abate only the surface area with hazardous conditions and implement safe work practices during rehabilitation work and repair any paint that is disturbed and is known or presumed to be lead-based paint.

In addition, Independence will continue to execute the following actions:

- Ensure compliance with applicable provisions of the Lead Safe Housing Rule in administration of the City's Affordable Housing Investment Plan.
- Distribution of Lead Hazard information to all landlords upon licensing with the City. A Landlord/Tenant Guide, which includes the HUD's lead brochure, is required to be given by landlords to all tenants upon lease.
- Training of CDBG and HOME Programs staff on the Lead Safe Housing Rule and EPA's Repair Renovate and Paint Rule to assist with administration of CDBG & HOME funded housing rehabilitation activities

subject to lead hazard assessment and treatment.

- The City offers tax abatement in exchange for rehabilitation, including lead abatement, of residential properties located in target redevelopment areas of the City. These neighborhoods have been targeted for reinvestment in part due to their aging and deteriorated housing stock and growing low-income rental population.

How are the actions listed above related to the extent of lead poisoning and hazards?

Homes constructed prior to 1978 are assumed to contain lead-based paint. According to the 2017 American Community Survey 73.6%, or 35,444 (21,205 owners and 14,239 renters) of all Independence households occupy units constructed prior to 1980. With approximately 54% of Independence's population representing the low and moderate income community, and 73.6% of households living in pre-1980 units, lead hazard monitoring and mitigation are important issues for the community in general and especially those at the lower end of the income spectrum.

How are the actions listed above integrated into housing policies and procedures?

The City of Independence mandates full compliance and enforcement of lead based paint regulations listed in 24 CFR Part 35. Subrecipients, contractors and other partners are informed of LBP regulations and staff work with them before and after testing, inspections and abatement endeavors. Community outreach is undertaken when needed and a variety of community partners are utilized for the dissemination of information. Members provide lead poisoning prevention information to families and residents receive written information about LBP per HUD requirements. As a matter of policy, houses proposed for acquisition, repair or rehabilitation through the City's CDBG and HOME programs are assessed for lead hazards and, if hazards are discovered, are handled in accordance with the Lead Rule. Requirements for compliance with the Lead Safe Housing Rule are included as provisions in all development and sub recipient agreements where the potential to encounter lead paint hazards exists.

SP-70 Anti-Poverty Strategy – 91.215(j)

Jurisdiction Goals, Programs and Policies for reducing the number of Poverty-Level Families

According to the 2019 American Community Survey data, Independence a poverty rate of 17.2%, with 19,820 persons living at or below the poverty level. About 14.4% of all families, 30.5% of all children under the age of 18, and 11.2% of persons 65 years and over were in poverty in 2019. Since 2010, poverty statistics in Independence have not changed of consequence.

In the forthcoming five years, Independence will undertake the following efforts to address the incidence of poverty:

- Execute existing Family Self Sufficiency (FSS) programs and foster employment opportunities for low-income persons residing within Independence public housing and Section 8 programs pursuant to the local PHA plan. The PHA will continue to institute security improvements and anti-crime support services under the public housing program to enable residents to reside in safe and stable living environments and achieve the maximum degree of self-sufficiency, foster cooperative and positive relationships between governmental public safety personnel and tenant organizations, pursue HUD funding for the residents of public housing to reduce the incidence of poverty and deliver comprehensive economic and social support services.
- Reduce poverty levels through employment and training program operations, Workforce Investment Act (WIA) programs, strengthening links between WIA employment and training services, assisted housing and local transportation services and integrating WorkForce Investment Act (WIA) employment and training resources into ongoing FSS initiatives.
- Reduce poverty levels through the strategic commitment of CDBG, HOME and other resources for anti-crime, employment and training and other support services. Subject to local preferences and approved applications for CDBG funding, the city will commit CDBG resources for public facilities, services and economic development projects, explore the receipt of New Market Tax Credit Program, Youthbuild resources, training resources to attract targeted Industries, etc.
- The city will seek to foster the reduction of poverty by fostering client access to the Community Assistance Programs (CAPs) , Head Start programs, Weatherization/LIHEAP programs, provision of food boxes and clothing, etc., utility assistance, repair/replacement and deposits for those in need, case management, counseling, energy education, employment related assistance, education referrals, etc., support the provision of Head Start services for children in need at emergency and transitional shelters as well as in assisted housing, provide accessible learning environments to foster to family self-sufficiency and support Head Start initiatives that tutor children.
- Offer jobs and procure services/materials for low- income persons as well as designated MBE/WBE business enterprises.

How are the Jurisdiction poverty reducing goals, programs, and policies coordinated with this affordable housing plan

Noted earlier, Independence will seek to foster the economic independence of assisted households currently being assisted in conformance with the Independence Public Housing Agency plan, the strategic investment of CDBG public services resources to, among other things, reduce poverty, investment of resources to prevent homelessness and foster rapid re-housing endeavors, sustain the continuing commitment of assisted housing and preserve the current supply of affordable housing, execute targeted neighborhood revitalization and redevelopment efforts to induce employment for low- and moderate- income workers and cultivate the economic vitality of targeted neighborhoods through the strategic investment of public improvements, facilities and infrastructure, etc.

Independence's affordable housing program and community development programs are often carried out through written agreements with local non-profit housing development organizations and sub recipients who also provide supportive services to the low and moderate income community including those below the poverty line. These agencies and their partners typically offer a range of services including housing counseling, family financial counseling, financial assistance, community center programs, and other support designed to insure beneficiaries are successful at achieving and sustaining affordable housing as well as targeted community and economic development endeavors that may assist those below the poverty line.

SP-80 Monitoring – 91.230

Describe the standards and procedures that the jurisdiction will use to monitor activities carried out in furtherance of the plan and will use to ensure long-term compliance with requirements of the programs involved, including minority business outreach and the comprehensive planning requirements

Requests for funding are reviewed for eligibility with regulations. The City's Grant Advisory Committee is advised of the capacity of each applicant to administer the proposed project in compliance with federal and local regulations before formulating its recommendation to Council. Sub-grantee Agreements detail benchmarks and relevant regulatory requirements. Performance and compliance are considered for future funding.

City staff uses annual reviews, desk monitoring, meetings, site visits, and correspondence to track program goals. Sub recipients submit a report quarterly at a minimum. Direct technical assistance is provided as needed. For annual performance reviews of sub recipients, a written notice is sent to the sub recipient advising of the monitoring visit to conduct a comprehensive review of appropriate records and processes including monitoring Davis-Bacon, environmental, fair housing, and Uniform Relocation Act requirements. The Division sends a letter to a representative of the agency, within thirty days, explaining the results of the review. If the sub recipient disagrees with the results, there is a 30-day period for response to the Division.

Information from the sub-recipient's drawdown request provide the data needed for input into the Integrated Disbursement and Information System (IDIS) for preparation of the annual year-end report. This Information is used to track the expenditure rate and the progress of activities. Performance measures monitored include the number of low-income persons becoming homeowners, the number of units rehabilitated, and the percentage of funds expended from our total CIP budget. The Division monitors and ensures that funded single-family and multi-family housing activities comply with local code requirements. Homeowner rehabilitation activities are initially monitored and inspected by the appropriate building inspector and rehabilitation inspector during the construction phase. Multi-family projects (HOME Projects) under a long-term agreement are monitored annually for compliance with the terms and conditions of the agreement.

For multi-family projects, staff inspect housing units for compliance with housing quality standards and examine tenant files for income eligibility purposes, and review rental information to confirm that tenants are still within the eligible HOME rent categories. Multi-family projects must also submit annual reports to the Division to confirm on-going compliance with program requirements. These reports also provide valuable data such as a profile of tenants, income levels, and rents charged to tenants.

An annual outside audit is performed for the City in accordance with generally accepted accounting standards and single audit requirements. All CDBG Sub-recipients, HOME participants, and CHDOs are

advised that participants are contractually bound prior to receiving any funds to provide a schedule of reports required by the City; monitoring visits to inspect records pertaining to programs; disbursements are made on a reimbursement basis; and that there are long term commitments when accepting entitlement funds from the City.

Expected Resources

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

Introduction

The information noted in this section outlines the estimated volume of HOME and CDBG resources available to Independence for the FY 2022 to FY 2026 Consolidated Plan period (and yearly Action Plans) and the general basis on which such resources shall be invested in the community.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	825,000	0	138,596	963,596	3,300,000	Amounts represent the estimated annual CDBG allocation based on the FY2021/'22 program year. For FY 2022-'23, \$138,596 has been allocated from unused resources from the prior fiscal year.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	406,067	850	0	406,917	1,624,268	Amounts represent the estimated annual HOME allocation based on the FY2021/'22 program year. Excludes the one-time HOME-ARP allocation of \$1,684,853 subject to an ultimate FY 2021 Action Plan Substantial Amendment ultimately incorporating the HOME-ARP Allocation Plan. Program Income in the amount of \$849.50

Table 54 - Expected Resources – Priority Table

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

The City allocation of CDBG and HOME resources during the Consolidated Plan period will be determined by the identification of needs and priorities generated from the annual citizen participation process and from Independence grant advisory committee evaluation of competitive grant applications submitted by eligible sub-recipients and third-party developers selected for funding in the city's forthcoming Annual Action Plans. Generally, redevelopment planning, affordable housing rehabilitation and development, infrastructure improvements and economic development activities are typically concentrated in City identified areas, and are always in qualifying CDBG low and moderate income areas. City initiated activities may also be targeted for 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.

City driven CDBG and HOME activities will continue to focus on supplementing City initiated redevelopment efforts throughout western Independence including designated 353 Tax Abatement Program boundaries, the Independence School District's 2007 annexation areas, and areas of African American and Hispanic minority concentration. These geographic priorities encompass much of the City's low- and moderate-income population and are often areas of greatest need.

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

Subject to availability, the investment of publically owned land or property by Independence may be undertaken as/if needed based on city staff and relevant advisory board input all subject to the ultimate review, analysis and action by the Independence City Council.

Discussion

The information noted herein offers insights to the commitment of forthcoming HOME and CDBG projects by Independence covering the FY 2022 to FY 2026 Consolidated Plan period as well as individual Independence Action Plans generated during this period.

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	Capacity Support	2022	2026	Affordable Housing Homeless Non-Homeless Special Needs			HOME: \$23,267	Homeowner Housing Added: 2 Household Housing Unit Homeowner Housing Rehabilitated: 2 Household Housing Unit
2	Community Code Enforcement and Blight Removal	2022	2026	Affordable Housing Non-Homeless Special Needs		Code enforcement and blight removal Vacant Property Re-Use Commercial Revitalization Economic Development	CDBG: \$195,000	Housing Code Enforcement/Foreclosed Property Care: 2200 Household Housing Unit
3	Single & Multi Family Residential Rehabilitation	2022	2026	Affordable Housing Homeless Non-Homeless Special Needs	CDBG Eligible Area Census Tracts City-wide	Rehabilitation and Energy Efficient Improvements Vacant Property Re-Use	CDBG: \$138,596 HOME: \$23,267	Homeowner Housing Rehabilitated: 12 Household Housing Unit

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
4	Community Infrastructure Support	2022	2026	Affordable Housing Non-Housing Community Development		Community Infrastructure Vacant Property Re-Use	CDBG: \$350,000	Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit: 1 Households Assisted
5	Community Public Services For All Types Of Clients	2022	2026	Affordable Housing Homeless Non-Homeless Special Needs	CDBG Eligible Area Census Tracts City-wide	Capacity Building Emergency/Transitional Shelter Support + Services Special Needs Housing & Services Subsistence Housing & Utility Support Crime Reduction Public Services Fair Housing Support	CDBG: \$120,000	Public service activities for Low/Moderate Income Housing Benefit: 17000 Households Assisted
6	Homeownership Support	2022	2026	Affordable Housing	CDBG Eligible Area Census Tracts City-wide		HOME: \$382,800	Homeowner Housing Added: 10 Household Housing Unit

Table 55 – Goals Summary

Goal Descriptions

1	Goal Name	Capacity Support
	Goal Description	Approximately \$23,267 of HOME support falls within goal concerning local CHDO administrative support. Administrative resources committed to HOME (\$45,000) and CDBG (\$160,000) program administration fall within this category realizing dollar amounts for such have not been noted.
2	Goal Name	Community Code Enforcement and Blight Removal
	Goal Description	Residential code complaint investigation, inspection, and enforcement in deteriorating areas; addressing blighting conditions in low to moderate income neighborhoods.
3	Goal Name	Single & Multi Family Residential Rehabilitation
	Goal Description	The City's home repair program is designed to provide assistance to eligible homeowners for correction of health and safety deficiencies and code violations for low-income homeowners within the City. The Program provides this grant assistance (up to \$25,000) that is used to pay the cost of necessary repairs that will provide the homeowner with a healthy, safe, sanitary, and code compliant home. The CDBG allocation is from the prior fiscal years.
4	Goal Name	Community Infrastructure Support
	Goal Description	Sidewalk and Public Facilities Improvements in low to moderate income neighborhoods and areas to improve access to basic services and public facilities.
5	Goal Name	Community Public Services For All Types Of Clients
	Goal Description	Funding assistance for public service activities that provide direct support to low-moderate income and special needs populations.
6	Goal Name	Homeownership Support
	Goal Description	Development and/or redevelopment of affordable housing units. Focused on Council Districts 1 and 4 to coordinate housing investment with other targeted investments.

Projects

AP-35 Projects – 91.220(d)

Introduction

Based on data collected through the development of the 2022-2026 Consolidated Plan, projects have been selected that meet community needs. These projects will bring additional affordable homeownership housing options to the City of Independence, support for community organizations in meeting community needs, addressing blight and public facility and infrastructure improvements in low to moderate income neighborhoods.

CDBG funding will be used for administration and general oversight; public facility and infrastructure improvements in low to moderate income neighborhoods; code enforcement in eligible areas; and public service programs 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.

All construction projects and all public service projects will be solicited via competitive application process. Opportunities to apply for both CDBG and HOME funds will be advertised via the City's website, posting in local newspapers, sharing through partner networks, and via social media. Applications will be reviewed for alignment with Consolidated Plan Goals, internal city policies and strategies, capacity of the applicant, financial strength, feasibility, and other qualifications before funds are awarded.

Projects

#	Project Name
1	FY 2022-2023 CDBG Project Administration
2	FY 2022-23 CDBG Housing Code Enforcement
3	FY 2022-2023 CDBG Home Repair Program
4	FY 2022- 2023 CDBG Public Facility and Infrastructure Investments
5	2022-23 CDBG Public Services Program Assistance
6	FY 2022- 2023 HOME Administration
7	FY 2022- 2023 HOME Community Housing Development Corporations (CHDO Projects)
8	FY 2022- 2023 HOME Community Housing Development Organization Operating Funds
9	FY 2022-2023 HOME Single and Multi-Family Housing Projects

Table 56 – Project Information

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

The allocation of funding for the projects has been determined based on overall priority needs identified

in the Con Plan process. Analysis of data, consultation with stakeholders, public input, alignment with the Independence for All Strategic Plan and the recently completed City-Wide Housing Study contributed to establishing these priority needs. Other considerations in determining funding allocation included the ability to leverage additional funding sources with HUD funds and the availability and readiness of upcoming activities to ensure timeliness thresholds are met.

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 supply chain constraints and the dramatic increase in the cost of housing hamper the community's ability to fully address unmet needs.

While the share of single family rental (SFR) to the total rental housing stock has been relatively consistent over the last decade, there has been a recent rise in institutional and investor-driven activity in the SFR market. From first quarter 2020 to first quarter 2021, investor purchases of single-family homes increased by five percent, comprising 14 percent of total single family sales. In fact, investor-driven purchases captured more than 20 percent of lower-priced homes (lower third of the housing stock in any locality in the US). This speculative buying has made it difficult for the non-profit housing developers to acquire properties and/or units for rehab thus potentially delaying the HOME projects.

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	FY 2022-2023 CDBG Project Administration
	Target Area	CDBG Eligible Area Census Tracts City-wide
	Goals Supported	Community Code Enforcement and Blight Removal Single & Multi Family Residential Rehabilitation Community Infrastructure Support Community Public Services For All Types Of Clients Homeownership Support Capacity Support
	Needs Addressed	Capacity Building Code enforcement and blight removal Rehabilitation and Energy Efficient Improvements Community Infrastructure Vacant Property Re-Use Homebuyer Assistance Emergency/Transitional Shelter Support + Services Special Needs Housing & Services Subsistence Housing & Utility Support Public Services Fair Housing Support
	Funding	CDBG: \$160,000
	Description	CDBG Administration budget will use 20% of anticipated CDBG funds necessary for the successful administration of the grant program and to ensure compliance with federal regulations.
	Target Date	6/30/2023
	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	Citywide
	Planned Activities	All CDBG funded activities.
2	Project Name	FY 2022-23 CDBG Housing Code Enforcement
	Target Area	CDBG Eligible Area Census Tracts
	Goals Supported	Community Code Enforcement and Blight Removal
	Needs Addressed	Code enforcement and blight removal

	Funding	CDBG: \$195,000
	Description	Residential code complaint investigation, inspection, and enforcement in deteriorating areas; addressing blighting conditions in low to moderate income neighborhoods.
	Target Date	6/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 2,200 housing units will be inspected, violations addressed and re-inspected for compliance with housing codes.
	Location Description	Focus will be in Council 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 in low to moderate income Census Tracts only.
	Planned Activities	Property Maintenance regulation compliance.
	3	
	Project Name	FY 2022-2023 CDBG Home Repair Program
	Target Area	City-wide
	Goals Supported	
	Needs Addressed	Rehabilitation and Energy Efficient Improvements Fair Housing Support
	Funding	CDBG: \$138,596
	Description	The City's home repair program is designed to provide assistance to eligible homeowners for correction of health and safety deficiencies and code violations for low-income homeowners within the City. The Program provides this grant assistance (up to \$25,000) that is used to pay the cost of necessary repairs that will provide the homeowner with a healthy, safe, sanitary, and code compliant home. This activity includes \$138,596 of prior year CDBG funds from administration funds not drawn from previous years.
	Target Date	6/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 6-8 income eligible homeowners.
	Location Description	City-wide

	Planned Activities	Eligible home improvements, including bringing homes up to code, safety and accessibility improvements, and renovations necessary to preserve existing housing that is serving households under 80% AMI.
4	Project Name	FY 2022- 2023 CDBG Public Facility and Infrastructure Investments
	Target Area	CDBG Eligible Area Census Tracts City-wide
	Goals Supported	Community Infrastructure Support
	Needs Addressed	Community Infrastructure Community Facilities
	Funding	CDBG: \$350,000
	Description	Sidewalk and Public Facilities Improvements in low to moderate income neighborhoods and areas to improve access to basic services and public facilities
	Target Date	6/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	Although it is difficult to determine actual locations of sidewalk and public facility improvements, the project will be targeted in low to moderate census tracts where the benefit will be designated area-wide improvements.
	Location Description	CDBG eligible tracts in Independence and citywide.
	Planned Activities	Sidewalk repair/replacement and other public facility improvements in low to moderate income neighborhoods and areas.
5	Project Name	2022-23 CDBG Public Services Program Assistance
	Target Area	City-wide
	Goals Supported	Community Public Services For All Types Of Clients
	Needs Addressed	Capacity Building Emergency/Transitional Shelter Support + Services Special Needs Housing & Services Subsistence Housing & Utility Support Crime Reduction Public Services Fair Housing Support
	Funding	CDBG: \$120,000
	Description	Funding assistance for public service activities that provide direct support to low-moderate income and special needs populations.

	Target Date	6/30/2023
	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	Citywide
	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.
6	Project Name	FY 2022- 2023 HOME Administration
	Target Area	City-wide
	Goals Supported	Single & Multi Family Residential Rehabilitation Homeownership Support
	Needs Addressed	Capacity Building Rehabilitation and Energy Efficient Improvements Vacant Property Re-Use Homebuyer Assistance Fair Housing Support
	Funding	HOME: \$45,000
	Description	HOME Administration budget will use 10% of anticipated HOME funds necessary for the successful administration of the grant program and to ensure compliance with federal regulations. General administration costs for the HOME Affordable Housing Partnership, including staff salary and benefits.
	Target Date	6/30/2023
	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	Citywide
	Planned Activities	Administration of HOME program.
7	Project Name	FY 2022- 2023 HOME Community Housing Development Corporations (CHDO Projects)

	Target Area	City-wide
	Goals Supported	Single & Multi Family Residential Rehabilitation Homeownership Support
	Needs Addressed	Capacity Building Rehabilitation and Energy Efficient Improvements Community Facilities Vacant Property Re-Use Homebuyer Assistance Fair Housing Support
	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	6/30/2023
	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.
	8 Project Name	FY 2022- 2023 HOME Community Housing Development Organization Operating Funds
	Target Area	City-wide
	Goals Supported	Single & Multi Family Residential Rehabilitation Homeownership Support Capacity Support
	Needs Addressed	Capacity Building Rehabilitation and Energy Efficient Improvements Vacant Property Re-Use Homebuyer Assistance Public Services Fair Housing Support
	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	6/30/2023
	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 2-4 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. 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	Single Family home rehab/redevelopment and new Single Family home construction.
9	Project Name	FY 2022-2023 HOME Single and Multi-Family Housing Projects
	Target Area	City-wide
	Goals Supported	Single & Multi Family Residential Rehabilitation Homeownership Support
	Needs Addressed	Rehabilitation and Energy Efficient Improvements Vacant Property Re-Use Homebuyer Assistance Fair Housing Support
	Funding	HOME: \$313,000
	Description	Development and/or redevelopment of affordable housing units. Focused on Council Districts 1 and 4 to coordinate housing investment with other targeted investments.
	Target Date	6/30/2023

Estimate the number and type of families that will benefit from the proposed activities	Two to four low to 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

Refer to SP-10 for the 2019 CDBG eligible geographic tracts where FY 2022-'23 CDBG and HOME resources will, in part, be allocated/targeted. These geographic regions incorporate substantive concentrations of low-income and minority concentrations. Refer to the FY 2022-2026 Analysis Of Impediments To Fair Housing Choice for information affirming these conditions.

Geographic Distribution

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

Table 57 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

The basis for allocating investments is 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 was determined by the annual citizen participation process, and through committee evaluation of competitive grant applications submitted by eligible sub-recipients and third-party developers. Approximately 20% of available CDBG project funds and 90% of HOME funds are awarded through formal RFP process. The basis for determining these awards includes basic project eligibility, applicant capacity, and proposed benefit for the low and moderate income community, and leveraging of other funding resources. City initiated activities including redevelopment planning, program administration, code compliance, housing and infrastructure improvements and economic development activities typically account for the remaining 50% of projects. City initiated activities are also targeted at community needs identified during the annual citizen participation process and Council support of priorities identified in the City's Comprehensive and Capital Improvement Plan processes. Public service projects selected for funding will provide a direct benefit for low to moderate income clientele City-wide. These benefits are targeted to all persons whose household income falls below 80% of the median income and whose residence lies within the city limits, and the regions' homeless. Targeted housing, economic development and public facilities assistance will be directed first to the low to moderate income census tracts and block groups eligible for CDBG assistance. Projects proposed outside of a CDBG eligible area will be considered when a direct benefit for low- and moderate-income beneficiaries will be achieved. HOME funded affordable housing development projects and CDBG assisted housing rehabilitation will be considered city-wide in an effort to affirmatively further fair

housing and be fairly responsive to the needs of all qualifying households.

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

This section describes the City's one-year goals for FY 2022-23 and the specific actions steps it will execute to implement the affordable housing strategy contained within its Consolidated Plan. In addition, this section incorporates the number of persons assisted associated with Consolidated Plan strategies addressing homeless and the supportive housing needs of non-homeless populations (for more specific detail refer to AP-65). Per NA-35, note that a total of 1,973 renters in the city are supported via section 8 vouchers and public housing by the Independence Housing Authority.

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

One Year Goals for the Number of Households to be Supported	
Homeless	0
Non-Homeless	6
Special-Needs	3
Total	9

Table 58 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through	
Rental Assistance	0
The Production of New Units	1
Rehab of Existing Units	8
Acquisition of Existing Units	0
Total	9

Table 59 - One Year Goals for Affordable Housing by Support Type

Discussion

Low-mod households will be given direct assistance of rent and utility through sub-recipients to help keep low income families in their home.

At least four 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.

Approximately five (5) low- to moderate-income homeowners will receive home repairs from CDBG funding anticipated to be awarded in 2022. The minor home repair program will be a significant program in helping low-income residents remain in their homes. Approximately 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

This section describes what actions will be taken during the 2022-23 program year to carry out the public housing portion of the Strategic Plan. The public housing program for the City is owned and managed by the Independence Housing Authority. 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 state law authorizing the establishment of the IHA and also in relevant federal (HUD) regulations. Operating funds for the IHA from HUD are provided by formula and expenditure decisions are made by the IHA Board. Capital funds from HUD for the IHA are also provided by formula and expenditure decisions are made by the IHA Board with approval from HUD. The IHA also receives HUD funding for Housing Choice Vouchers (HCV Section 8) as well.

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

In addition, the the Independence PHA will continue to undertake the following strategies:

- Preserve a system of checks and balances in the management of subsidized housing to protect both the housing stock and those who live in it.
- Organize and fund opportunities for residents to meet, learn and strategize with their peers.
- Increase the number and percentage of employed persons..
- Partner with local service providers to increase resident's access to educational programs, job training, healthcare, daycare, homebuyer assistance and other services.

- Organize and fund opportunities for residents to meet, learn and strategize with their peers.

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

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

- Maximizing occupancy of the existing Public Housing dwelling units by responsible families
- Enforcing screening and eviction policies to ensure that only responsible families receive assistance
- Maintaining the Public Housing inventory in decent, safe condition, and determine the long-term viability of current stock
- Maximizing utilization of Section 8 housing assistance funding and assist as many families as possible with that funding by holding down per family assistance costs
- Working with industry organizations and Congress toward increasing housing assistance funding in order to help more families
- Working with the City of Independence and other affordable housing groups to increase the availability of such housing locally
- Seeking out new funding avenues in order to directly preserve existing housing and increase affordable housing inventory

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

The PHA encourages resident involvement with agency management in a number of ways, including having a resident serve on the PHA Board of Commissioners, monthly solicitation of resident input from all three sites resident councils, providing each resident council an office, office equipment, internet and phone service, and special meetings with residents and resident councils during development of the Annual Agency Plan and 5-Year Capital Plans. The IHA will continue the Section 8 voucher homeownership program, which to date has helped 10 families purchase homes.

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

Not troubled so n/a.

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 describes the City's one-year goals and the specific actions steps it will undertake in the program year to address the homeless and supportive housing needs of non-homeless populations contained within its Strategic Plan of the FY 2022-23 Consolidated Plan.

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 provides 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 out to the homeless population and to assess their unmet needs. The following will be undertaken in FY 2022-23 subject to resource availability:

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.
6. 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.
7. Participation in the National Hunger and Homelessness Awareness Week providing a variety of events during a week in November to help convey existing needs.

Addressing the emergency shelter and transitional housing needs of homeless persons

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

The City will continue to support the endeavors of the following entities and, in some instances, with public services resources:

- 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

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:

- Operational funds (via 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 Oikos Development Corporation and Truman Heritage Habitat For Humanity for rehab or construction of single family homes to provide homeownership opportunities for families up to 50% AMI.

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:

- 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:

The City is committed 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.

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

The City will undertake the following endeavors to support the availability of affordable housing:

- Ongoing amendments to the new Unified Development Ordinance (UDO) to incorporate recommendations laid out in the City's current Analysis of Impediments to Fair Housing
- City continues to transition to City Works, a GIS based data and work management system that enables the City to streamline development and building approval and permitting processes for the benefit of residential and commercial development, including affordable housing.
- Continuation of ongoing efforts towards implementing the Independence Comprehensive Plan and the City-Wide Housing Study.
- 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.
- Continued implementation of residential rehabilitation and property tax abatement redevelopment programs for 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

Discussion:

The city will continue to identify and mitigate barriers to affordable housing in the ensuing five years.

AP-85 Other Actions – 91.220(k)

Introduction:

This section the City's efforts in addressing underserved needs, fostering and preserving affordable housing, reducing lead-based paint hazards, reducing the number of poverty-level families, and developing institutional structures for delivering housing and community development activities.

Actions planned to address obstacles to meeting underserved needs

- 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
- Implementation of program changes when necessary that add value and efficiency, and that encourage the leveraging of other resources, in order to improve the effectiveness of CDBG and HOME Program investments
- Encourage collaborative partnerships between City Departments, local service providers and non-profit housing development agencies to avoid duplication of efforts and to maximize the impact of CDBG and HOME Program investments.

Actions planned to foster and maintain affordable housing

As opportunities become available, the following actions will be undertaken to foster and maintain affordable housing:

- Issuance of Certificates of Consistency for proposed affordable housing development projects found to be consistent with the Goals and Priorities of the Consolidated Plan
- Provide funding assistance through the City's CDBG and HOME Programs to qualified sub recipients and developers of affordable housing projects to assist with project costs including, but not necessarily limited to, predevelopment loans (restricted to Community Housing Development Organizations), property acquisition, rehabilitation, energy efficiency upgrades and minor home repairs, lead abatement, new construction, and disposition.
- 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.
- Implementation of a Rental Ready Program, requiring landlords to hire a city-approved inspector for basic health and safety issues upon renewal of Landlord business licensing.

Actions planned to reduce lead-based paint hazards

Independence will continue to comply with all lead-based paint (LBP) requirements imposed by HUD and will continue to direct resources to eliminate lead-paint in its housing. The city will approach all pre-

1978 units with a presumption of lead-paint hazards and contract with Environmental Protection Agency (EPA) certified lead paint firms for assessment and abatement activities as/if needed. The city will follow the procedures articulated in section SP-65 (LBP Hazards) and the endeavors noted below.

1. All housing programs (rental and owner occupied) funded by the City, including emergency home repair programs, require that the funded housing stock be evaluated for the presence of lead paint hazards and that appropriate action is taken as required by the federal Lead-based Paint Regulation. The City has developed a proactive plan with 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 advised that if deteriorated paint surfaces are discovered the owner will be required to correct the deficiencies using lead safe work practices and/or be required to provide testing indicating that the surface is free of LBP. In any case the City will provide occupants and prospective occupants/purchasers of income qualified housing units of potential lead paint hazards and appropriate methods for lead hazard reduction.

2. All housing projects/programs and contracts administered by the City and contracts/projects with sub recipients 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 in the Appendix to this document.]

3. The City will continue to provide general information to landlords, residents, and businesses regarding the hazards of lead-based paint. Efforts to this end include: information in the Landlord-Tenant Guide, posting the EPA's "Protect Your Family From Lead in Your Home" brochure; dissemination of educational materials through public service agencies and community partners.

4. The City will continue outreach and training efforts for home renovation contractors with regards to EPAs Renovation, Repair and Paint Rule and requirements for contractor certification on lead hazard reduction.

Actions planned to reduce the number of poverty-level families

The following endeavors will continue to be undertaken by Independence to reduce the number of poverty level families.

- Support projects that provide job training and employment readiness for low and moderate income

persons, particularly those that offer the opportunity to earn a living wage

- Support empowerment and self-sufficiency programs for low-income persons to reduce generational poverty
- Support homebuyer training programs and homebuyer assistance programs for low and moderate-income persons, including special needs populations and homeless/at-risk homeless
- Support public private partnerships for increasing homeownership among low and moderate income persons, including development of non-traditional financing mechanisms
- Assist the Independence Housing Authority in targeting eligible public housing residents and recipients of Housing Choice Vouchers for homebuyer assistance
- Support existing weatherization and energy conservation retrofit programs and encourage new programs that further reduce home and rental unit utility costs
- Support programs that encourage improved rental property conditions for low and moderate income families

Actions planned to develop institutional structure

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 interests
- Provide technical assistance to new and existing service providers and non-profit 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
- Encourage the development of new City programs and incentives that will effectively respond to the unmet needs of the community

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, the City's Homelessness Task Force meets to discuss additions and/or changes to the City's strategies. In addition to implementing the FY 2022-2026 Independence Analysis Of Impediments To Fair Housing Choice action plan, the City collaborates with

other jurisdictions to overcome regional barriers to fair housing choice.

Discussion:

On a sustained basis, the City of Independence will continue to implement the items noted herein during the FY 2022 Action Plan period.

Program Specific Requirements

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

Introduction:

Enclosed find the program specific requirements requested, and after, attachments to the Consolidated & Action Plan.

Community Development Block Grant Program (CDBG)

Reference 24 CFR 91.220(I)(1)

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

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

Other CDBG Requirements

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

HOME Investment Partnership Program (HOME)

Reference 24 CFR 91.220(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:

The following will serve as the guidelines that will be used for resale or 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 Term, the HOME assistance will be subject to Resale or 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 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
 - If the buyer wishes to sell before the end of the Affordability Term, the HOME assisted unit must be sold to a buyer that has a total household income that is between 50% and 80% of the Area Median Family Income at the time of sale. The new buyer must also occupy the HOME assisted unit as the household's principal residence. Additionally, the buyer must agree that:
 - The sales price must be "affordable" to the new buyer. Affordability requires that the buyer's total housing payment (payment, interest, taxes, and insurance) will not exceed 35% of the buyer's total household income. Under no circumstances may the "affordable" sales price exceed the area HOME Homeownership Value Limit for existing single-family homes established by HUD at the time of purchase. Net proceeds from the sale must provide BUYER a "fair return" on their investment. Fair return shall be defined as: The amount of any cash contributions including the down payment and principal payments made; The cost of any capital improvements, documented with receipts, and including but not limited to: Any additions to the home such as a bedroom, bathroom, or garage; Replacement of heating, ventilation, and air conditioning systems; Accessibility improvements such

as bathroom modifications for disabled or elderly, installation of wheel chair ramps and grab bars,

any and all of which must have been paid for directly by the Owner and which were not installed through a federal, state, or locally-funded grant program; and Outdoor improvements such as a new driveway, walkway, retaining wall, or fence.

- 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.

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.

The aforementioned describe the City of Independence policies associated with the use of HOME funds as requested.

Appendix - Alternate/Local Data Sources