

Executive Summary

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

1. Introduction

The City of Independence, Missouri is an entitlement grantee that receives Community Development Block Grant (CDBG) and Home Investment Partnerships (HOME) funding from the United States Department of Housing and Urban Development (HUD).

The City's acceptance of entitlement funds requires the City of Independence prepare and submit to HUD a Five (5)-Year Consolidated Plan that suitably determines a needs analysis of the City's demographics and similarly considers the stated and unmet needs of citizens and stakeholders. The City's 2022-2026 Consolidated Plan was approved by the City Council and submitted to HUD in 2022. It serves as an application for funding and a planning guide for the use of federally funded program activities. The Plan documents the City's efforts to ensure an engaging Citizen Participation process occurred in the planning of these activities.

Each year of the five-year strategy, the City of Independence is required to prepare a one-year Action Plan to notify citizens and HUD of planned (funded) activities for the upcoming program year. Each Annual Action Plan also takes into account citizen and stakeholder input collected during an annual citizen participation process, and all actions proposed for funding must relate directly to the adopted Consolidated Plan. The Annual Action Plan FY July 1, 2024 – June 30, 2025 (FY24 AAP) is the third year implementation plan of the City's 2022-2026 Consolidated Plan.

The FY24 AAP describes the City's sources and details the uses of certain federal grant funds from the U.S. Department of Housing and Urban Development (HUD) including Community Development Block Grant (CDBG) and Home Investment Partnerships Grant (HOME) funds. The FY24 AAP outlines activities that will be undertaken during the program year beginning July 1, 2024 and ending June 30, 2025. CDBG and HOME projects and funding allocations were developed from strategies and priorities identified during the planning process and how the grant funds will be used in the coming year to address the priority needs and local objectives established in the City's 2022-2026 Consolidated Plan.

2. Summarize the objectives and outcomes identified in the Plan

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

The FY24 Annual Action Plan will advance the following specific affordable housing and community development strategies in accordance with the City's 2022-26 Consolidated Plan. These strategies include:

- 1) Increase the supply of affordable housing;
- 2) Rehabilitate existing housing stock affordable to low-income persons;
- 3) Remove barriers to affordable and supportive housing; and
- 4) Support a human services system to address the needs of homeless persons, non-homeless and special needs populations; and
- 5) Promote quality of life for low-income residents, including people with disabilities and the elderly through minor home repairs and improvements concentrating on health and safety code repairs.
- 6) Restore neighborhoods and preserve property values through the removal of blighting conditions and the increase of safety.

3. Evaluation of past performance

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

The City has made progress on the goals and objectives identified in the current 2022-2026 Consolidated Plan. During the 2023 Program Year, CDBG and HOME Program funding was used for administration and general oversight, code enforcement, public service programs that provide meals, transitional and emergency shelter, child abuse prevention, rent and utility assistance, development of affordable housing, and public facility and infrastructure improvements.

4. Summary of Citizen Participation Process and consultation process

Summary from citizen participation section of plan.

The City followed its adopted Citizens Participation Plan as part of the 2022-2026 Consolidated Plan. The City conducted two public hearings (October 19, 2023 and February 28, 2024) in an attempt to solicit citizen comment on the housing and community development needs of the community. In addition to advertising in the community's daily newspaper, The Examiner, the City sends out direct public meeting information to organizations and individuals who have indicated an interest in the housing and community development needs of the low-income, homeless, and special needs populations. The public meetings are advertised on the City's internet webpage, with the public invited to email ideas and suggestions. Consultations were also conducted with a local community

development corporation, neighborhood associations, and other organizations whose missions are to improve housing, services, and economic opportunities for low-income people.

5. Summary of public comments

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

- Need for affordable transitional housing for those looking to move from renter to homeowner.
- Need for critical/minor home repair in the community.
- Code enforcement to address blight.
- Need for safe, affordable housing in general.
- Downpayment assistance for low-income homeowners
- Need for Emergency Assistant Housing, and shelters for Homeless.
- Need for Rent and Utility assistance.
- Collaboration between public service agencies and affordable housing developers to tackle the housing needs of the populations served.
- Need for seniors, disabled, mental illness getting home repair assistance, and other supportive services.
- Support of Public Service agencies with CDBG funds
- Substantial rehab for low-income homeowners with HOME funds
- Need for communication hub for individuals to get support services needed.
- Work with seniors who are on a fixed income.

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

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

7. Summary

The City's 2022-2026 Consolidated Plan identifies goals, objectives and strategies to address Independence's housing and community development needs. These needs were identified through an extensive citizen participation process that involved residents, service providers and other community partners. The Consolidated Plan guides the City's use of CDBG and HOME Program resources towards the goals of ensuring decent and safe housing, a suitable living environment and expanded economic opportunities are made available to low- and moderate-income residents. The City is beginning the third year of its Consolidated Plan, the City of Independence will continue to strive towards these goals by funding and supporting affordable housing programs, services for non-homeless special needs populations, neighborhood stabilization and public improvements, as well as, partnerships with an array of public and homeless service providers. Accomplishments to date, attest to the increasing need and the City's efforts to meet such demand.

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

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

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

Agency Role	Name	Department/Agency
CDBG Administrator	INDEPENDENCE	Community Development Department
HOME Administrator	INDEPENDENCE	Community Development Department

Table 1 – Responsible Agencies

Narrative (optional)

The lead agency responsible for the development of this Action Plan 2022-2023 is the City’s Community Development Department. The Community Development staff is also responsible for the administration of the City’s CDBG and HOME funds.

Consolidated Plan Public Contact Information

Community Development Department

Neighborhood & Housing Services Division

City of Independence

111 E. Maple Ave.

Independence, Mo 64050

816-325-7398

Office Hours: M-F 8:00 a.m.-5:00 p.m.

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

1. Introduction

The 2024-25 Annual Action Plan was developed by the Community Development Department staff in consultation with a wide range of non-profit community stakeholders and Independence residents. Staff developed the plan's priorities with significant consideration given to feedback provided through an extensive community engagement process that adheres to the 2022-26 Citizen Participation Plan.

The City's various departments engage community-based, local agencies and regional planning organizations year-round concerning matters related to the Comprehensive Plan and Annual Action Plan. One of these organizations, the Mid-America Regional Council (MARC), sponsors regular discussion on a number of issues related to our current 22-26 Consolidated Plan and our Annual Action Plan. As the regional planning organization for the Kansas City region, MARC formulates regional approaches to issues such as transportation, homelessness, and public health. Independence's participation in MARC initiatives such as the First Suburbs Coalition and Community for All Ages, contributes valuable insight towards development of the 2024-25 Action Plan.

In addition, the City consults with the Greater Kansas City Coalition to End Homelessness (the HUD Continuum of Care) and Independence Housing Authority. In the preparation of the City's 2022-26 Five Year Consolidate Plan, the City gathered fact finding and statistical data to assess housing needs and conditions from the many agencies including American Community Survey, U.S. Census, Comprehensive Housing Affordability Strategy (CHAS), Housing Authority of Independence, the Independence Council for Economic Development, the Continuum of Care, and Local Investment Commission (LINC). This information supplemented the City's Annual Action Plan document concerning housing and special population needs.

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

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

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

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

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

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

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

The City of Independence is a participating member in the Greater Kansas City Coalition to End Homelessness (GKCCED) which encompasses Kansas City, Independence, Lee's Summit and all unincorporated portions of Jackson County, MO. Coordination of efforts to identify and address the needs of the homeless and at risk homeless is an ongoing effort involving a broad network of local and regional nonprofit and government agencies who are charged with serving the region's homeless. Activities of the CoC include regular membership meetings, planning sessions, plan development, training, service events, funding applications, and completion of the annual Point in Time count that collects information about the regional homeless population that will help to more accurately define the nature and extent of homelessness in the community. Agencies awarded funding through the CoC are called to implement projects and programs that will assist the region in carrying out its coordinated strategy for ending homelessness.

Describe consultation with the Continuum(s) of Care that serves the jurisdiction's area in determining how to allocate ESG funds, develop performance standards for and evaluate

outcomes of projects and activities assisted by ESG funds, and develop funding, policies and procedures for the operation and administration of HMIS

The City of Independence does not receive or administer ESG funding. The City participates in the GKCCED membership meetings, which includes planning sessions, service events and funding application evaluation for ESG funds.

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

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Table 2 – Agencies, groups, organizations who participated

1	Agency/Group/Organization	Housing Authority of Independence
	Agency/Group/Organization Type	PHA
	What section of the Plan was addressed by Consultation?	Public Housing Needs Homeless Needs - Families with children
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	<p>Input received from the IHA Executive Director, Ms. Tina Barlett, states the largest unmet need seen by the PHA is quality affordable housing. She stresses that affordable housing, even LIHTC, needs to be more family-based and not just for older adults. The current waiting list at the time of this consultation for Section 8 was approximately 2,500 applicants; the applicants on the waiting list for Public Housing was well over 400. She states that the IHA has not been able to address the entire public housing waiting list for over 10 years.</p> <p>With housing prices skyrocketing, owners are selling their rentals and the new owners have decided not to accept Section 8 vouchers and instead are renting for current Market rates. The trend is slowly swinging back and the IHA is seeing more landlords willing to accept Section 8 again. But until this happens, low income residents with a fixed budget find it impossible to be able to afford quality housing. She would like to see something be put into writing that Landlords cannot discriminate against source of income (ex. Section 8 Voucher) from prospective tenants as a reason to reject their application.</p> <p>Ms. Barlett also stated the need for funds greatly exceeds the allocations and this is not planned in the near future.</p>
2	Agency/Group/Organization	Truman Heritage Habitat for Humanity
	Agency/Group/Organization Type	Services - Housing

	What section of the Plan was addressed by Consultation?	Housing Need Assessment Non-Homeless Special Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Input received from Christina Leakey, Executive Director related to issues (affordable housing/community development/homeless/special needs) affecting Independence presently and key items going forward. Specifically, discussions included difficulties in finding decent/affordable land for residential infill, challenges for the elderly in "aging-in-place", significant increases in property taxes and insurance is impacting housing affordability, significant challenges in new construction and/or rehab given prevailing pricing issues and the continuing need for homebuyer counseling endeavors. Discussion also included the increase in evictions where households do not have a place to stay after the eviction. These evictions show on their records, which makes it more difficult for these individuals find housing. THHFH continues to see increase requests for minor home repair; the City's aging housing stock and lower-income demographic are large contributors to this need.
3	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

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Direct contact with Brandie Bair related to issues (affordable housing/community development/homeless/special needs) affecting Independence presently and key items going forward. Specifically, discussions focused around the need for more affordable housing with a need for rent and utility assistance in order to keep individuals in their home. They are expanding their outreach programs to help citizens to be able to stay in their homes. Rising food costs for families that are in our outreach programs has become tighter in that food assistance good doesn't go as far as it used to.
4	Agency/Group/Organization	Oikos Development Corporation
	Agency/Group/Organization Type	Services-Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Non-Homeless Special Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Direct contact with Zia Aiello related to issues (affordable housing/community development) affecting Independence presently and key items going forward. Specifically, discussions focused on the need for finding decent/affordable land for residential infill housing and to make ownership feasible of family with limited needs or starter home, need down payment assistance to help make housing affordable.

5	Agency/Group/Organization	Independence District 4 Community Improvement Committee
	Agency/Group/Organization Type	Neighborhood Organization
	What section of the Plan was addressed by Consultation?	Affordable Housing Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Strategy Economic Development Home Repair Code Enforcement
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Direct contact with Wes Epperson and Kerry Kleifoth related to issues (affordable housing/community development) affecting the southwest portion of Independence presently and key items going forward. Specifically, discussions focused on the need to address code enforcement home repair in the areas to address blight in the neighborhood and. Within the southwest portion of the City, they noted at least two abandoned apartment buildings they feel could be used for more housing if it was able to be rehabbed. Mental health and homeless issues are needs that need to be addressed.
6	Agency/Group/Organization	City of Independence
	Agency/Group/Organization Type	Agency - Managing Flood Prone Areas Agency - Management of Public Land or Water Resources Agency - Emergency Management

	<p>What section of the Plan was addressed by Consultation?</p>	<p>Housing Need Assessment Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Strategy Non-Homeless Special Needs Market Analysis Economic Development</p>
	<p>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</p>	<p>Staff from various City agencies provided insights, planning documents, and other information to create various sections of the plan. The City has officials across the City looking to address the needs of the City. City Council holds meetings and hearings to address public needs and input on various matters.</p>
7	<p>Agency/Group/Organization</p>	<p>Mid America Regional Council</p>
	<p>Agency/Group/Organization Type</p>	<p>Services - Housing Services-Children Services-Elderly Persons Services-Education Services-Employment Service-Fair Housing Services - Broadband Internet Service Providers Publicly Funded Institution/System of Care Regional organization Planning organization Neighborhood Organization</p>

	What section of the Plan was addressed by Consultation?	Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Strategy Non-Homeless Special Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The Mid-America Regional Council is a nonprofit association of city and county governments and the metropolitan planning organization for the bistate Kansas City region. Governed by a Board of Directors made up of local elected officials, we serve nine counties and 119 cities. They provide a forum for the region to work together to advance social, economic and environmental progress. MARC convenes partners and coordinates planning efforts on a wide range of issues that are important to communities in the metro, including aging services, early learning, health care, community development, homeland security, emergency services, the regional 911 system and much more. They work with cities, counties and other entities to identify common objectives and achieve our collective goals. The City participates in several different committees discussing aging and health, environmental, broadband and digital equity, transportation and economic focus areas.
8	Agency/Group/Organization	Independence Economic Development Corporation
	Agency/Group/Organization Type	Services - Housing Services-Education Services-Employment
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Market Analysis
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The Independence Chamber of Commerce represents a partnership of more than 700 member businesses and professionals dedicated to promoting the economic growth of Independence. The City participates in policy development and goal setting. The Chamber recently formed a Housing subcommittee focusing on addressing housing needs throughout the community.

9	Agency/Group/Organization	Cricket Wireless
	Agency/Group/Organization Type	Services – Wireless Phone Provider
	What section of the Plan was addressed by Consultation?	Housing Need Assessment
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Direct contact with Brooke Gard at Cricket Wireless related to issues around providing wireless services to low- to moderate-income individuals and key items going forward. Cricket Wireless recently merged with AT&T and offers affordable pre-paid plans available to give low-income households reliable cell phone service. The City is mostly covered by their service but there are some areas where services were lagging. One of the services they are working on is to offer a low cost plan to senior citizens.
10	Agency/Group/Organization	Xfinity (Comcast)
	Agency/Group/Organization Type	Services - Broadband Internet Service Providers
	What section of the Plan was addressed by Consultation?	Broadband Internet Service Providers
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	City staff consulted with Xfinity internet service representatives, regarding the need for affordable Broadband internet services for low income households. Currently, Xfinity is offering their internet Essentials plan for \$9.95 a month for up to 50 Mbps. This plan is available to individuals that participate in assistance plans like the National School Lunch program, housing assistance, Medicaid, SNAP and other government plans. The City is mostly covered by this service, but there are some areas where service is lacking. Xfinity is also offering a low cost cell phone plan with the internet plan (\$15.00 per month for unlimited Talk & text for 2 phones) and low cost laptops. Their goal is to offer fast, reliable & affordable service for all families to work, learn and stream from home.
11	Agency/Group/Organization	Mother’s Refuge
	Agency/Group/Organization Type	Services-Pregnant/Parenting young women Services-homeless

	What section of the Plan was addressed by Consultation?	Homeless Needs - Families with children
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Direct contact with Kelsi Green related to issues (affordable housing/community development/homeless/Pregnant/Parenting young women) affecting Independence presently and key items going forward. Specifically, discussions focused on the need for employment and training, short- and medium- term financial aid, credit assistance, child-care assistance services for their clients as well as continued support for homeless shelters and housing.
12	Agency/Group/Organization	Greater Kansas City Coalition to End Homelessness
	Agency/Group/Organization Type	Continuum of Care
	What section of the Plan was addressed by Consultation?	Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The Greater Kansas City Coalition to End Homelessness (GKCCEH) is the HUD Continuum of Care (CoC) Lead Agency for Jackson County, Missouri and Wyandotte County, Kansas (CoC MO-604). City of Independence attends the monthly Greater Kansas City Homeless Coalition meeting to glean from training opportunities that help us to serve the needs of homeless and underserved residents throughout the region. Our efforts to collaborate with this group foster grant making opportunities and data analysis. Meetings are held every third Wednesday of the month.

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

All applicable agency types are in the process of being consulted.

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

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	Homeless Services Coalition of Greater Kansas City	Plan goals established to serve the unmet needs of the homeless and at-risk homeless in Independence strive to support the regional strategy of the Continuum of Care.
Capital Improvement Program 2024-2030	City of Independence	Where feasible, Plan goals are established to supplement and complement the goals of the City's Capital Improvement Program.
PHA Annual Plan	Independence Housing Authority	Like the ConPlan, the IHA's Annual Plan is used to express the Public Housing Authority's quantifiable goals and objectives for the 5-year period. Overlapping the purposes of the CDBG & HOME Programs, the primary mission of the Housing Authority is to provide affordable decent, safe and sanitary housing opportunities to low- and moderate-income families including elderly and disabled persons, while supporting programs to foster economic self-sufficiency.
Community For All Ages	City of Independence	In 2018, the City attained the Community for All Ages Gold Level recognition from Mid-America Regional Council and has maintained that level since. Communities for All Ages seeks to ensure that older adults are valued, understood, respected and involved in creating and sustaining a high quality of life in their communities. It facilitates the integration of these opportunities and challenges into all aspects of community life, including design, infrastructure, programs and services, workforce development and community engagement. The City incorporates these items into our projects, services and development opportunities
Imagine Independence Comprehensive Plan	City of Independence	The General Plan and Community Plans create a vision for future development activities. The planning process provides an opportunity for residents and stakeholders to participate in creating a vision for the future and sharing their ideas.

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
CityWide Housing Study	City of Independence	Independence’s City-Wide Housing Study was undertaken to create a baseline understanding of what the city’s housing needs and challenges are, both currently and for the foreseeable future. The ultimate goal of this study is to help City staff, elected officials, housing partners, and community members understand key aspects of the housing market, as well housing issues that impact the overall health of the City. It is also intended to serve as the basis for future strategies and policy decisions a basis for formulating community specific housing priorities, policy alternatives, and intervention strategies.
2023-24 Independence Action Plan	City of Independence	The Independence City Council developed their newest set of strategic priorities to guide future policy and funding decisions. Considerable effort has been made to develop a strategic plan that includes a purpose, purpose statements, and action items that are based on input following months of collaborative discussions from a wide cross-section of the community.

Table 3 – Other local / regional / federal planning efforts

Narrative (optional)

The City of Independence is focused on providing a wide variety of opportunities for residents to participate in the City's Consolidated Planning and Annual Action Plan process.

AP-12 Participation – 91.105, 91.200(c)

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

The City recognizes the importance of citizen participation in the development and execution of 2024-25 Annual Action Plan. During the AAP planning process, the City followed its Citizen Participation Plan, which was developed and adopted in accordance with the Housing and Community Development Act.

The development of the 2022 Annual Action Plan. The public was encouraged to participate in the development of the 2024-25 Annual Action Plan through multiple modes, including two (2) public meetings (held on October 18, 2023 and February 28, 2024), legal notices, website updates, email outreach, social media, and other communication methods. These varied and wide-reaching methods provided notification of public opportunities to participate in the development process. Notifications for the public meetings and public comments were published in both English and Spanish in The Examiner, which is a local newspaper, to notify the public of the two public meetings and where comments could be received as well. The City also advertised the availability of interpretation services available upon request for the public hearings/meetings held.

Copies of the Annual Action Plan in both English and Spanish were held at several community locations for the purpose of public view during the public comment period. These locations included the Public Housing Authority of Independence, Mid-Continent Public Library Independence Branches (3), Palmer Senior Center, and the Fairmont Community Center as well as the City's website.

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	Internet Outreach	<p>Non-English Speaking - Specify other language: Spanish</p> <p>Non-targeted/broad community</p>	<p>All Public Meeting and information is posted on the City website and displayed on the main page calendar. The 24-25 Annual Action Plan was posted to the city website in both English and Spanish during the entirety of their respective public comment periods according to the City's 22-26 Citizen Participation Plan.</p>		<p>All comments received where considered in the Annual Action Plan.</p>	<p>independencemo.gov/cdbghomigrants</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 Distribution of Plan	<p>Non-English Speaking - Specify other language: Spanish</p> <p>Non-targeted/broad community</p> <p>Residents of Public and Assisted Housing</p>	<p>Copies of both the Annual Action Plan in both English and Spanish were held at several community locations for the purpose of public view during the public comment period. These locations included the Public Housing Authority of Independence, Mid-Continent Public Library Independence Branches (3), Palmer Senior Center, and the Fairmont Community Center.</p>		<p>All comments received were considered in the Annual Action Plan.</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)
3	Public Meetings	Non-targeted/broad community	General meeting to discuss the Annual Action Plan and needs of the Independence Community were held both virtually/in person at City Hall on October 18, 2023 and February 28, 2024	Topics discussed included critical home repair, affordable housing development, infill lots opportunities, transitional housing opportunities (affordable rental unit development), and homelessness.	All comments received were considered in the Annual Action Plan.	

4	Newspaper Ad	<p>Non-English Speaking - Specify other language: Spanish</p> <p>Non-targeted/broad community</p>	<p>A Public Notice was run in The Examiner, a newspaper of general circulation on March 14, 2024 to publicize the 30 days of public comment on the proposed 2024-25 Annual Action Plan to begin on March 20th, 2024.</p> <p>A Public Notice will run in The Examiner, a newspaper of general circulation on March 14, 2024 to publicize the 30 days of public comment on the proposed 2024-</p>	<p>No Comments Received.</p>		
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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)
			25 Annual Action Plan to begin on March 20, 2024, and will close on April 22, 2024			

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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)
5	Newspaper Ad	<p>Non-English Speaking - Specify other language: Spanish</p> <p>Non-targeted/broad community</p>	<p>A Public Notice was run in The Examiner, a newspaper of general circulation on September 30, 2023 and February 13, 2024 to publicize and inform the public of a Annual Action Plan Public Meeting held virtually and at City Hall on October 18, 2023 and February 28, 2024.</p>	No Comments Received.		

Table 4 – Citizen Participation Outreach

Expected Resources

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

Introduction

The City of Independence receives federal assistance from the U.S. Department of Housing and Urban Development (HUD) under its primary allocation programs, CDBG and HOME. The City anticipates allocating approximately \$6,750,000 through these programs over its five-year Consolidated Plan period beginning in 2022 and ending in 2026. This Annual Action Plan is the third year of the five-year Consolidated Plan.

The Annual Action Plan identifies federal, state, local and private resources expected to be made available to the City of Independence to address priority needs and specific objectives identified in the Strategic Plan. These resources are summarized in SP35. Due to the delay in the receipt of annual appropriations by HUD, the City is using estimated funding levels; it's estimating \$845,000 in CDBG funding and \$535,000 in HOME funding for the 2024-25 program year. The SP38 will indicate any adjustments to project funding levels from the estimated funding levels to match actual allocation amounts.

CDBG funds will be used for community development activities including code enforcement, minor home repair, public services, and administration of the City's CDBG program. HOME funds will be used for the development of affordable housing for low- to moderate-income households.

The information noted in this section outlines the estimated volume of HOME and CDBG resources available to Independence for the FY 2022-26 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	\$845,000	0	\$4,781.53	\$849,781.53	\$2,530,775 - \$845,000	<p>Amounts represent estimated CDBG allocation for FY 2024-25 due to the delay in the receipt of annual appropriations by HUD. The SP38 will indicate any adjustments to project funding levels from the estimated funding levels to match actual allocation amounts.</p> <p>Amounts represent the annual CDBG allocation based on the FY 2024-25 program year plus \$4,781.53 of prior year CDBG funds. This funding will be invested in preservation of affordable housing units, public improvement facilities, and public services.</p>

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	\$535,000	\$7,000.52	0	\$542,202.52	\$1,420,421 - 535,000	<p>Amounts represent estimated CDBG allocation for FY 2024-25 due to the delay in the receipt of annual appropriations by HUD. The SP38 will indicate any adjustments to project funding levels from the estimated funding levels to match actual allocation amounts.</p> <p>Amounts represent the annual HOME allocation based on the FY 2024-25 program year plus \$7000.52. This funding will be invested in the development and/or rehabilitation of single family and/or multi-family rental housing.</p>

Table 5 - 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

HOME and CDBG funds are leveraged with City general funds and other local financial resources. Agencies that receive CDBG and HOME funds must provide leverage with other local, state, and federal sources. Target area Code Enforcement includes matching funds from the City’s General Fund. Public service activities leverage CDBG funds with a mix of agency funds, grants, state funds, and private foundations as well as

donation funding. On average over the last program year, each HUD dollar leveraged approximately \$20.79 in other federal, state, local, and private funds.

The HOME Program requires participating jurisdictions to provide a 25 percent match on most HOME entitlement funds expended each program year. This match is a permanent contribution to affordable housing of non-federal funds. Applicants for HOME-CHDO set-aside funds are encouraged to demonstrate matching funds. Matching funds are reported and approved by the City's Community Development Department annually.

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

While the City does own a number of properties, not all properties are suitable for housing projects. The City maintains available city real estate on the City's website and has received interest from private parties. In addition, the Land Trust of Jackson County is a governmental corporation established by state law to sell properties within Jackson County that have failed to sell on the courthouse steps to satisfy unpaid taxes. Land Trust maintains on their website an interactive map showing the location of all available lots in Independence as well as purchase procedure information. Over the last few years, the Land Trust has sold some properties. In addition, the City has worked with a few housing developers who have expressed interest in Land Trust properties in Independence.

Discussion

The City will collaborate with local service provider agencies to enhance its affordable housing and supportive service delivery. The goal of this effort will be maximizing available resources in the leveraging of additional private, local, state, or federal funding sources. The City will continue to use HUD and local funding sources to support a variety of eligible projects to meet high priority needs and goals.

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	Community Code Enforcement and Blight Removal	2022	2026	Affordable Housing Non-Homeless Special Needs	CDBG Eligible Area Census Tracts	Code enforcement and blight removal Vacant Property Re-Use Commercial Revitalization Economic Development	CDBG: \$195,000	Housing Code Enforcement/Foreclosed Property Care: 1,800 Household Housing Unit
2	Single & Multi Family Residential Rehabilitation	2022	2026	Affordable Housing Homeless Non-Homeless Special Needs	CDBG Eligible Area Census Tracts	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	HOME: \$0 CDBG: \$359,031 Estimated funding amount. See SP-38	Homeowner Housing Rehabilitated: 12 Housing Units Rehabilitated

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
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: \$0	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 0 Persons Assisted
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: \$0	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 0 Persons 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: \$126,750	Public service activities for Low/Moderate Income Housing Benefit: 7,700 Households Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
6	Economic Development	2022	2026	Non-Housing Community Development	CDBG Eligible Area Census Tracts City-wide	Capacity Building Commercial Revitalization Economic Development	CDBG: \$0	Jobs created/retained: 0 Jobs Businesses assisted: 0 Businesses Assisted
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	HOME: \$461,750.52 Estimated funding amount. See SP-38	Affordable Housing Added: 4 Housing Units
8	Homeownership Support	2022	2026	Affordable Housing	CDBG Eligible Area Census Tracts City-wide	Capacity Building Homebuyer Assistance Public Services Fair Housing Support	HOME: \$0	Direct Financial Assistance to Homebuyers: 0 Households Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
9	Capacity Support	2022	2026	Affordable Housing Homeless Non-Homeless Special Needs Non-Housing Community Development	CDBG Eligible Area Census Tracts City-wide	Capacity Building Rehabilitation and Energy Efficient Improvements Homebuyer Assistance Special Needs Housing & Services Public Services	CDBG: \$169,000 HOME: \$53,500	Affordable Housing Added: 4 Housing Units Other: 12 Housing Units Rehabilitated

Table 6 – Goals Summary

Goal Descriptions

1	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. 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	Sidewalk and public facility improvements in low to moderate income neighborhoods and areas to improve access to basic services, public facilities and public transportation.

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 91.215(b)

Projected Total Assisted: 4

The City will use HOME funds for the acquisition and rehabilitation and/or new construction of 4 housing units. All HOME funds will be for homeownership opportunities. It is estimated that all households assisted will be moderate-income households.

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Projects

AP-35 Projects – 91.220(d)

Introduction

Based on data collected through the development of the 2022-26 Consolidated Plan as well as through public meetings and consultations, 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 in low to moderate income neighborhoods and to improve the quality of life for low-income residents, including people with disabilities and the elderly.

CDBG funding will be used for administration and general oversight; minor home repair; 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.

The administration of the minor home repair program and all public service projects will be solicited via competitive Request for Proposal 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 2024-25 CDBG Project Administration
2	FY 2024-25 CDBG Housing Code Enforcement
3	FY 2024-25 CDBG Minor Home Repair Program
4	FY 2024-25 CDBG Public Services Program Assistance
5	FY 2024-25 HOME Administration
6	FY 2024-25 HOME Community Housing Development Corporations (CHDO Projects)
7	FY 2024-25 HOME Community Housing Development Organization Operating Funds
8	FY 2024-25 HOME Single and Multi-Family Housing Projects

Table 7 - Project Information

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

needs

The allocation of funding for the projects has been determined based on overall priority needs identified in the City's Consolidated 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.

In assigning priorities for allocating federal funds, the City places a high priority on accessing, maintaining and providing housing to low- to moderate-income households, improving the quality of life for low-income residents, including people with disabilities and the elderly, and public services to low- to moderate-income clients.

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. The recent dramatic increase in the cost of housing hamper the community's ability to fully address unmet needs.

Obstacles to meeting underserved needs in the area of housing include: the high cost of housing units for homeownership, with most new construction, and even older existing housing units, being out of the reach of low-income households; the high cost of rental units; the high cost and scarcity of residential in-fill lots in older neighborhoods for development by nonprofit organizations, and the difficulty in siting facilities for special needs populations in neighborhoods.

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. 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

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1	Project Name	FY 2024-25 CDBG Project Administration
	Target Area	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
	Needs Addressed	Capacity Building Code enforcement and blight removal Rehabilitation and Energy Efficient Improvements Community Infrastructure Community Facilities 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: \$169,000 estimated; this project funding amount will be adjusted to 20% of the actual CDBG funding amount.
	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	6/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	Administration expenses support all beneficiaries reported throughout the Annual Action Plan.
	Location Description	City-wide
	Planned Activities	All
2	Project Name	FY 2024-25 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; this project funding amount will not change with the change in the actual CDBG amount.
	Description	Residential code complaint investigation, inspection, and enforcement in deteriorating areas; addressing blighting conditions in low to moderate income neighborhoods.
	Target Date	6/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 1,800 housing units will be inspected, violations addressed and re-inspected for compliance with housing property maintenance 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 2024-25 CDBG Minor Home Repair Program
	Target Area	CDBG Eligible Area Census Tracts City-Wide
	Goals Supported	Single & Multi Family Residential Rehabilitation
	Needs Addressed	Rehabilitation and Energy Efficient Improvements Fair Housing Support
	Funding	CDBG: \$359,031.53 estimated; this project funding amount will change based on actual CDBG funding amount.
	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 \$4,781.53 of prior year CDBG funds from administration funds not drawn from previous years.
	Target Date	6/30/2025

	Estimate the number and type of families that will benefit from the proposed activities	It is estimated twelve (12) homeowners will benefit from the proposed activity.
	Location Description	CDBG Eligible Area Census Tracts 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 2024-25 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 Fair Housing Support Emergency/Transitional Shelter Support + Services Special Needs Housing & Services Subsistence Housing & Utility Support Crime Reduction Public Services
	Funding	CDBG: \$126,750 estimated; this project funding amount will be adjusted to 15% of the actual CDBG funding amount.
	Description	Funding assistance for public service activities that provide direct support to low-moderate income and special needs populations.
	Target Date	6/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 7,700 families below the poverty line will be assisted by the network of public service organizations in Independence.
	Location Description	City-wide

	Planned Activities	Public Service programs will provide congregate and home delivered meals to seniors/domestic abuse victims; rent/utility assistance; homeless prevention and case management; emergency and transitional housing operational support; child abuse prevention and domestic violence programs.
5	Project Name	FY 2024-25 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: \$53,500 estimated; this project funding amount will be adjusted to 10% of the actual HOME funding amount.
	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	6/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	Administration expenses support all beneficiaries reported throughout the Annual Action Plan.
	Location Description	City-wide
	Planned Activities	Administration of HOME program.
6	Project Name	FY 2024-25 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: \$80,250 estimated; this project funding amount will be adjusted to 15% of the actual HOME funding amount.
	Description	Affordable housing development by eligible Community Development Housing Organizations (CHDO) with a focus on Englewood if possible.
	Target Date	6/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	It is estimated four (4) low- to moderate-income families will be provided affordable housing unit opportunities.
	Location Description	City-wide
	Planned Activities	The acquisition and/or rehabilitation of rental housing; new construction of rental housing; acquisition and/or rehabilitation of homebuyer properties; new construction of homebuyer properties; and direct financial assistance to purchasers of HOME-assisted housing units. Projects selected for HOME Program funding through a competitive RFP process.
7	Project Name	FY 2024-25 HOME Community Housing Development Organization Operating Funds
	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 Public Services Fair Housing Support
	Funding	HOME: \$26,750 estimated; this project funding amount will be adjusted to 5% of the actual HOME funding amount.

	Description	Support will be provided for new or expanding Community Housing Development Organizations (CHDOs) to establish or maintain required staffing and capacity.
	Target Date	6/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	It is estimated four (4) low- to moderate-income families will be provided affordable housing unit opportunities.
	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 Station Redevelopment area.
	Planned Activities	Support for new or existing CHDO(s) in the acquisition and/or rehabilitation of rental housing; new construction of rental housing; acquisition and/or rehabilitation of homebuyer properties; new construction of homebuyer properties; and direct financial assistance to purchasers of HOME-assisted housing units. Projects selected for HOME Program funding through a competitive RFP process.
8	Project Name	FY 2024-25 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: \$381,500.52; this project funding amount will be adjusted to be the remaining actual HOME funding amount minus the Administration, CHDO Reserve and CHDO Operating.
	Description	Development and/or redevelopment of affordable housing units. Focused on Council Districts 1 and 4 to coordinate housing investment with other targeted investments. This activity includes \$7,000.52 of Program Income collected during the 2023-24 Program Year.
	Target Date	6/30/2025

Estimate the number and type of families that will benefit from the proposed activities	It is estimated four (4) low- to moderate-income families will be provided affordable housing unit opportunities.
Location Description	Vacant properties identified city-wide.
Planned Activities	The acquisition and/or rehabilitation of rental housing; new construction of rental housing; acquisition and/or rehabilitation of homebuyer properties; new construction of homebuyer properties; and direct financial assistance to purchasers of HOME-assisted housing units. 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

The City does not specifically target the goals and associated strategies in this Plan by geography. Allocated funds are distributed based on identified needs and the agreed upon priorities and goals set forth in the City’s 2022-2026 Consolidated Plan.

Refer to SP-10 of the City’s Consolidated Plan for the CDBG eligible geographic tracts where FY 2024-25 CDBG and HOME resources will, in part, be allocated/targeted. These geographic regions incorporate where greater than 50% of the residents are low- to moderate-income. 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.

Geographic Distribution

Target Area	Percentage of Funds
CDBG Eligible Area Census Tracts	40
City-wide	60

Table 8 - 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 as well as applicable sections of the City’s 2022-26 Consolidated Plan.

Discussion

The City encourages development of affordable housing in areas of the city that will benefit low- to moderate-income residents and not perpetuate concentration, exclusion or segregation. HOME funded affordable housing development projects will be considered city-wide in an effort to affirmatively further fair housing and be fairly responsive to the needs of all qualifying households.

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.

Code enforcement addressing blight and minor home repair will be targeted in low to moderate income census tracts. The rationale for assigning funding priorities was determined by the annual citizen participation process. The NA and MA sections of the City’s 2022-26 Consolidated Plan, as well as the Strategic SP sections of the Plan, identify the need to be strategic through targeting funding, including

geographically in the hardest hit census tracts. Code enforcement is performed low- to moderate-income census tracts, together with public or private improvements, rehabilitation, or other services to arrest the decline of the area.

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

The City will continue to invest in the development of new affordable housing and the preservation of existing housing units. Rehabilitation of older housing units, infill and new construction helps to meet the housing needs of low- to moderate-income households who wish to have housing options in the City.

One Year Goals for the Number of Households to be Supported	
Homeless	0
Non-Homeless	9
Special-Needs	7
Total	16

Table 9 - 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	4
Rehab of Existing Units	12
Acquisition of Existing Units	0
Total	16

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

Discussion

The City's low- moderate-income neighborhoods are characterized by older single-family homes on narrow lots. Interspersed in these neighborhoods are moderate and high density low-rise multi-family, scattered site multi-family housing primarily created through conversion of single-family homes to rental, and vacant infill lots where housing units once stood.

It is estimated that four (4) affordable housing units will be redeveloped in partnership with certified Community Housing Development Organizations (CHDOs). Vacant or abandoned housing units 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.

In addition, it is anticipated the City’s CDBG Minor Home Repair program will be able to assist approximately twelve (12) low- to moderate-income homeowners with correction of health and safety

deficiencies and code violations that will provide the homeowner with a healthy, safe, sanitary, and code compliant home.

Additional efforts implemented by the City include the continuation of the building permit fee waiver program. The Program will waive the building permit fees (i.e., building fees, electrical, mechanical and plumbing fees) for new single family home construction and substantial rehabilitation of single-family residences within low- to moderate-income neighborhoods. The Program seeks to:

- Attract infill and redevelopment investment in a distressed area
- Encourage projects that will help reduce neighborhood blight
- Stimulate and facilitate proper design through planned redevelopment

AP-60 Public Housing – 91.220(h)

Introduction

This section describes what actions will be taken during the FY 2024-25 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, which 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 Independence Housing Authority (IHA) is currently operating under its 2023-2027 Five Year Action Plan. 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;
- Provide improved living conditions for very low and low income families while maintaining their rent payments at an affordable level;
- 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;
- Ensure compliance with Title VI of the Civil Rights Act of 1964 and all other applicable Federal laws and regulations;

In addition, IHA 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 residents' 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

In the upcoming fiscal year, IHA will implement a variety of strategies to address the shortage of affordable housing. IHA's strategies emanate from the Agency's 5-Year Plan goals and objectives and

are aligned with HUD’s strategic framework. IHA’s Plan is also consistent with the City of Independence’s Consolidated Plan and the State of Missouri Consolidated Plan.

Core strategies include: maximizing affordable housing opportunities through continuous program improvements and management efficiencies; leveraging additional resources to replace public housing units and implement mixed-finance, mixed-income redevelopment; and generating new housing opportunities by applying for additional vouchers should they become available – including special purpose vouchers for targeted groups such as the elderly, disabled, veterans, homeless and foster youth.

IHA plans to revise its preferences to include a local preference for applicants who live, work or attend educational or job training in Jackson County. Current preferences for Elderly or Disabled, Homeless, Veteran and Displaced by Natural Disaster will not be removed.

IHA will also be reviewing its option to look for funding to renovate all three properties and reclassify or merge some of its OBR units in both developments, which includes 159 – OBR units at Pleasant Heights, along with 2 – OBR units at Hocker Heights, which is a family site. It is the intention of merging 2 – OBR units together for the most part, but some are aligned beside a 1BR unit that will create additional 2BR units for this property. The current layout for Pleasant Heights is 176 – OBR units; 56 -1BR units; 9 – 2BR units. Any units count reduction will be put in a Conversion Awaiting Transfer and used in future acquisition or development.

IHA plans to update ADMIN and ACOP policies to be compliant with Federal Regulation regarding changes in NSPIRE inspections, HOTMA provisions, and Small Area Fair Market Rent changes. Changes will be in place by October 2024.

IHA has restarted the Resident Opportunity and Self-Sufficiency program utilizing the remainder of the previous grant. The agency has hired a full-time ROSS Coordinator and is trying to garner additional funding through an upcoming grant that will also cover the position into the RAD Conversion.

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

Community Services League (CSL), a HUD-Certified Housing Counseling Agency and City of Independence partner, offers different programs assisting low- to moderate-income families with the potential for homeownership. Through this program, CSL assist low- to moderate-income families with educational classes on the steps how to be a new homeowner. CSL’s educational services include:

- Pre-purchase counseling.
- Financial management and budget counseling
- Homebuyer education workshops
- Fair housing pre-purchase workshops

This program is open available to all low – moderate income families, individuals as well as those in

public housing.

IHA continues the HUD Job Plus program to local public housing residents. This program provides onsite job search and resume assistance; multi-community agency support; local banking services and financial education including budgeting classes, and 1st Time home buyers workshops. In addition to, IHA host several events to encourage IHA residents to become more involved with the management of their facilities.

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

The PHA is not designated as 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

There are multiple organizations that aid in homelessness and preventing homelessness. Many of these organizations are members of the Greater Kansas City Coalition to End Homelessness (GKCCEH). The Continuum of Care meets regularly to discuss issues that affect the community, collaborates on solutions, and provides funding to address homelessness.

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

The City is a member of the GKCCEH and will continue to support efforts to reduce and end homelessness in the community and collaborate when necessary. The Greater Kansas City Coalition to End Homelessness is an organization dedicated to eliminating homeless in the Greater Kansas City Area. GKCCEH is a HUD Continuum of Care Lead Agency for Jackson County MO. The City of Independence works closely with GKCCEH as a CoC membership organization, participating in the various initiatives GKCCEH organizes to combat homelessness and provide wrap around services to homeless population in the area. The City of Independence will continue to participate in the National Point in Time Homeless Count in January and July, where volunteers visit libraries, encampments, the Bus Transit and other locations in order to locate homeless individuals and families. Through these efforts individual and families are interviewed, data is collected, and referrals are made.

In 2023, the City through an interdepartmental collaboration started the Alternative Response for Community Health (ARCH) program. This team is a 911 community response unit that is designed to place community paramedics with clinical social workers in the “margins” of 911 operations, responding to 911 requests alongside and sometimes in place of traditional first responders.

This Program:

- Connects community members to the most-appropriate resources and services.
- Meets people where they are in the midst of challenge, with the hope of providing support that can lead to lasting positive outcomes.
- Provides clinical mental health assessments to guide on-scene crisis mitigation and definitive care transport options.
- Gives in-the-moment support through providing crisis intervention and actively extending empathy during some of our community members’ most challenging life experiences.
- Provides extended care and support through follow-up visits with individuals who have used our services.

ARCH supports community members experiencing:

- Houselessness
- Challenges/crisis related to mental health
- Poverty

ARCH promotes community health and well-being through helping local resources utilized by those most in need of their services.

In 2023, Community Services League (CSL) in partnership with the City have developed a strategic partnership to implement a pilot project to provide meaningful job opportunities to homeless residents of COI by providing temporary jobs and steps in securing both a permanent job and stable housing. A challenge for many individuals is to transition from homelessness to housed without substantial support, including the opportunity to consistently earn a wage. All workers will be offered a minimum wage of \$15/hour that will be paid daily, with \$3/hour being deposited into their housing support account. CSL will connect its homeless workers to mainstream benefits, resources, coaching, new skills, full-time employment, and attempt to place the workers in permanent housing. This program has been continued for 2024-25.

Addressing the emergency shelter and transitional housing needs of homeless persons

The City will provide CDBG public service funding assistance for the following activities and objectives to address the emergency shelter and transitional housing needs of homeless persons:

reStart Inc provides critical outreach, financial assistance and wraparound supports and resources to address issues causing homelessness, and transition clients into sustainable housing. This program provides people experiencing homelessness with food, shelter, hygiene kits, transportation, and other necessities. These services reach out to unsheltered homeless individuals and families, connect them with emergency shelter, housing or critical services and provide urgent, non-facility-based care if they are unable or unwilling to access emergency shelter, housing, or an appropriate health facility.

Salvation Army Crossroads Emergency Family Shelter is the only family emergency shelter in Eastern Jackson County. Crossroads facilitates a number of individuals seeking shelter from other outlying metro communities.

Salvation Army Emergency Assistance (EA) program helps prevent program participants from becoming homeless by providing assistance with utility disconnects and rental assistance to prevent eviction. Crisis case management is provided to ensure assistance provided will sufficiently resolve the emergency situation.

The City will continue to participate in the GKCCEH, 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 with CDBG public services resources.

Community Service League's Homeless Outreach & Prevention Program addresses emergency and transitional housing needs, helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) connect to housing resources, and helping low-income individuals and families avoid becoming homeless. This program addresses this priority by working with police on the streets to locate, identify and connect with the growing population of homeless.

Mother's Refuge provides a shelter for homeless, pregnant, and parenting young ladies, between 12 and 21-years old, along with their babies. The girls served for extremely dysfunctional families and are often victims of abuse or neglect by boyfriends and or family. Individuals are required to attend all in-house educational classes which cover topics including self-improvement, pregnancy, and parenting, health and nutrition, and career and finance building. The young women take part in job readiness courses, interview skills and resume building.

Metro Lutheran Ministries Housing and Emergency Assistance Program assists approximately 100 Independence residents with rent and or utility assistance each year. This program will provide preventative assistance for those in danger of losing their homes in the form of rent or utility assistance, combined with case management, food pantry and employment counselling during the program year.

Hope House provides comprehensive supportive services to survivors of domestic abuse. An integral part of this support is healthy and nutritious meals for survivors and their dependents who reside at Hope House's residential shelter facilities as well as off-site placement as needed.

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:

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.

- Hope House, Meals on Wheels, Child Abuse Prevention Association, ReStart Housing, Mother's Refuge, and the Salvation Army Crossroads Family Shelter are each assisting a unique target group of homeless persons and/or individuals with disabilities.
- 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.

The City will provide gap funding for affordable housing development with the HOME allocation to eligible Community Development Housing Organizations (CHDOs) 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 certified CHDOs for rehab or construction of single family homes to provide homeownership opportunities for families up to 50% AMI.

In addition, the City will partner with the two (2) agencies selected through a competitive Request for Proposal process to implement the City's HOME-ARP Allocation Plan, which seeks to help low-income individuals and families avoid becoming homeless and providing support services to those individuals and families.

Discussion

The City of 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 City will continue to partner with the Greater Kansas City Coalition to End Homelessness, 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. 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.

The City will continue the Alternative Response for Community Health (ARCH) program utilizing resources from the City's general fund and other grant opportunities to sustain the endeavor.

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

In 2022, the City initiated the Building Permit Fee Waiver Program in low- to moderate-income neighborhoods to support infill housing as well as substantial rehabilitation of single family residential. The City will continue to build from these initiatives to implement incentives, waive fees (where applicable), pursue in-fill housing programs and consult adjacent communities in an effort to eliminate barriers to affordable housing. The City will also continue to enforce building codes and update zoning codes (as needed).

In 2023, the City updated the Unified Development Ordinance (UDO) to amend the regulations pertaining to homeless shelters and transitional housing. These regulations were developed with assistance from operators of homeless shelters and transitional housing. The goal of the amendment is to streamline and modernize the regulations.

In 2024, the City continued City-initiated rezonings. This initiative researches low- to moderate-income neighborhoods and identifies residential properties that are mis-zoned (i.e., the current zoning would not allow the current use to be rebuilt). The purpose of this initiative is to correct the zoning to the current residential use and assist in stabilization of these neighborhoods.

In addition, 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
- Continuation of ongoing efforts towards implementing the Independence Comprehensive Plan and the City-Wide Housing Study.
- Support affordable housing initiatives through our CDBG and HOME Programs, including the production of affordable housing units.
- Partner with tenant advocacy groups to assist in resolving issues and developing protections for tenants.
- 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 on a continuing basis.

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

Some obstacles that are occurring to meet underserved needs would include the availability of resources such as the lack of livable wages. The cost of housing has also skyrocketed and affordable housing is scarce. The housing market is strained with high prices due to lack of houses on the market. This all affects resident's ability to afford rent and/or the purchase and maintenance of a home in the City. Some developments taking place in the area that will assist in these obstacles are:

East Gate Commerce Center – This development encompasses approximately 1,200 acres with approximately 10 million square feet of business park and industrial space. It is estimated that approximately 5,000 jobs will be generated with this development. As part of the initial building, there will be a 20,000 square feet Career Development space with the purpose of providing workforce development training, which opened in 2024.

In addition, The City will:

- Apply for, and provide support for partner agencies applications, to grants and other types of funding assistance for housing and community development initiatives from private, state and federal resources.
- Continue administration of the Chapter 353 tax abatement programs to encourage private investment in housing and community development initiatives.
- 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

In order to maintain and foster affordable housing, the City is going to continue to partner with its local CHDOs to rehabilitate existing housing stock and build new affordable housing for income eligible buyers. In addition, the City will:

- continue to publicize the Building Permit Fee Waiver Program;
- continue the City initiated rezonings to correct the zoning of low- to moderate-income

neighborhoods;

- amend the UDO to remove barriers to affordable housing;
- Administer the 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;
- Continued 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; and
- Continued enforcement of the Vacant Structure Registration Program to speed the rehabilitation and re-occupation of such properties.

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 HOME 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 LBP hazards and, as new requirements are identified, the city will continue to integrate these into our housing policies and programs.

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. 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.

Actions planned to reduce the number of poverty-level families

The City of 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 ensure 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.

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. The City will continue to form partnerships with respect to neighborhood development, institutional structure and sustainability of neighborhoods by providing technical assistance and guidance. The City will continue to offer housing rehabilitation and/or new construction of homes in order to expand home ownership opportunities for income eligible homebuyers.

Discussion:

On a sustained basis, the City of Independence will continue to implement the items noted herein during the FY 2024-25 Action Plan period. All of the foregoing issues and activities serve to strengthen the City's efforts to carry out the goals and policies established in the City's 2022-2026 Consolidated Plan.

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 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:

If the HOME-assisted housing is transferred, whether voluntarily or involuntarily, during the affordability period, such sale or disposition of the property during the affordability period triggers repayment of the direct HOME subsidy the buyer received when first purchasing the property. Recapture is triggered even if the sale or transfer is to another income eligible household.

If the original homeowner sells their HOME-assisted housing during the affordability period, the amount of HOME assistance recaptured by the city will be based on a pro rata basis, calculated by the length of time the housing was occupied versus the length of the affordability period. The reduction in the amount due will occur annually on the anniversary of the closing of the loan. The annual reduction will be calculated by dividing one by the number of years in the affordability period and reducing the award amount by that amount every year for the term of the loan.

If the City only provides HOME assistance to develop the unit and HOME funds are not used to lower the purchase price from fair market value to an affordable price, a resale provision will be used. The resale provisions will be consistent with the HOME requirements established at 92.254(a)(5)(i). The resale provision will be enforced through the use of a deed restriction that runs with the land.

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:

- 5 years when the per unit HOME investment is under \$15,000
- 10 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 an executed agreement between the City and homebuyer. 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.

5. If applicable to a planned HOME TBRA activity, a description of the preference for persons with special needs or disabilities. (See 24 CFR 92.209(c)(2)(i) and CFR 91.220(l)(2)(vii)).
6. If applicable to a planned HOME TBRA activity, a description of how the preference for a specific category of individuals with disabilities (e.g. persons with HIV/AIDS or chronic mental illness) will narrow the gap in benefits and the preference is needed to narrow the gap in benefits and services received by such persons. (See 24 CFR 92.209(c)(2)(ii) and 91.220(l)(2)(vii)).
7. If applicable, a description of any preference or limitation for rental housing projects. (See 24 CFR 92.253(d)(3) and CFR 91.220(l)(2)(vii)). Note: Preferences cannot be administered in a manner that limits the opportunities of persons on any basis prohibited by the laws listed under 24 CFR 5.105(a).

The City utilizes a competitive Request for Proposal (RFP) process in soliciting HOME Program Affordable Housing Rehabilitation/Development Projects. To facilitate this process, the City is requesting proposals that align with our housing development objectives delineated by the City's Consolidated Five Year Action Plan, the City's Comprehensive Plan, City's Strategic Plan, input received from community meetings, and the City's Housing Study. Housing objectives include housing preservation that will arrest the deterioration of existing housing stock and newly developed affordable for-sale housing units. Applicants that wish to submit a proposal must comply with the HOME Investment Partnerships Program regulations found at, the 24 Code of Federal Regulations, Part92. For profit, non-profit organizations, and Community Housing Development Organizations (CHDO) are encouraged to submit a proposal.

First, the City holds a Citizen Planning and Participation Public Meeting that allows for comments regarding the use of HOME funds. After this Public Meeting, City staff develops the HOME Program Affordable Housing Rehabilitation/Development Projects RFP. The City publishes a Public Notice of Availability of Home Investment Partnerships Program Funds for the development of affordable housing units at or below 80% of the area median income.

Next, the City publishes the HOME RFP application package. This outlines the Scope of Services (includes available funding for specific activities, HOME Program mandates, application guidelines, and target development areas), includes the detailed application, outlines the Evaluation Criteria, outlines the detailed submission requirements, the Evaluation Process and Contract Award. As part of the RFP process, holds a pre-proposal HOME Funding Terms and Conditions Q&A Workshop for interested parties. After the RFP has closed, an evaluation team will review and rank all proposals individually according to the criteria established in this RFP. The team may contact proposers if any clarification is needed on the proposal.