



City of Grand Island

Tuesday, December 18, 2018

Council Session

Item G-12

#2018-385 - Approving 2017 Consolidated Annual Performance and Evaluation Report (CAPER) for Community Development Block Grant Funding

Staff Contact: Amber Alvidrez

Council Agenda Memo

From: Amber Alvidrez, Community Development

Meeting Date: December 18, 2018

Subject: Approving 2017 Consolidated Annual Performance and Evaluation Report (CAPER) for Community Development Block Grant Funding.

Presenter(s): Amber Alvidrez, Community Development Administrator

Background

The Consolidated Annual Performance & Evaluation Report describes accomplishments and progress throughout the past fiscal year with Community Development Block Grant, Federal funding from Housing & Urban Development. Grand Island began the process of becoming an Entitlement Community in September 2015. All entitlement grantees are required to complete a 3, 4 or 5 year Consolidated Plan that is carried out by an Annual Action Plan, at the end of each fiscal year a Consolidated Annual Performance & Evaluation Report must be completed. The City has chosen to complete a 3-year Consolidated Plan, which is valid from October 2016- October 2019. A separate Annual Action Plan is prepared for each Fiscal Year, in which a Consolidated Plan is not created. All Grantees are to prepare a Consolidated Annual Performance & Evaluation Report each fiscal year in order to show progress towards accomplishments and goals listed throughout the City of Grand Island's Consolidated Plan and Annual Action Plan.

A public comment regarding the 2017 Consolidated Annual Performance & Evaluation Report was completed, with a start date of November 19, 2018 ending on December 18, 2018. This public comment notified the public of the Community Development Division's prepared Consolidated Annual Performance & Evaluation Report; all public comments made throughout the public comment period are recorded and will be submitted to the U.S. Department of Housing and Urban Development (HUD), along with the final 2017 Consolidated Annual Performance & Evaluation Report.

Discussion

The Consolidated Annual Performance & Evaluation Report addresses the \$360,253 in entitlement grant funds under the Community Development Block Grant (CDBG) program and identifies progress towards community development priority needs,

objectives, and activities that were implemented during fiscal year 2017-2018 as a result of Community Development Block Grant Funds.

The proposed Consolidated Annual Performance & Evaluation Report was made available for review at the following locations on November 18, 2018:

- Grand Island City Hall, City Clerk's Office, 100 E. 1st Street, Grand Island, NE 68801.
- City of Grand Island's website at www.grand-island.com categorized under "Regional Planning" then "Community Development"

Alternatives

It appears that the Council has the following alternatives concerning the issue at hand. The Council may:

1. Accept the report on the Community Development Block Grant 2017 Consolidated Annual Performance & Evaluation Report.
2. Do not accept the report on the Community Development Block Grant 2017 Consolidated Annual Performance & Evaluation Report.

Recommendation

City Administration recommends that the Council accept the report on the Community Development Block 2017 Consolidated Annual Performance & Evaluation Report.

Sample Motion

Move to accept the report on the Community Development Block Grant 2017 Consolidated Annual Performance & Evaluation Report.

CR-05 - Goals and Outcomes

Progress the jurisdiction has made in carrying out its strategic plan and its action plan. 91.520(a)

This could be an overview that includes major initiatives and highlights that were proposed and executed throughout the program year.

Throughout the City of Grand Island's second year as an entitlement community, the City expended Community Development Block Grant (CDBG) funds on activities within the community that would create progress on the goals presented in the 2017 Annual Action Plan. Of the 2017 proposed projects the City was able to expend \$129,451.05 on the Public Works Project; the funds were used to complete ADA compliant Ramps on sidewalks in a low to moderate income census tract. The City Of Grand Island was also able to expend \$5168.45 of the \$25,000 that was allocated for Public Services; these funds were awarded to the Multicultural Coalition of Grand Island (MCCof GI). The Multicultural Coalition was able to start their new program which includes the Immigration Legal Services, which will help serve a vulnerable population within the City Of Grand Island. The MC was able to start their new Immigration Legal Services Program. The Immigration Legal Services includes Counseling for immigration clients, completing immigration forms and representing clients at U.S. Citizenship and immigration Services interviews. Pursuant to this the MC was able to secure Department of Justice Accreditation which allow the organization and its accredited representatives the authority to practice immigration Law to support the ever changing demographic if Grand Island.

The projects listed in the 2016 and 2017 Annual Action Plan are either completed or currently under way. The City continues to make progress towards goals that were set in the 2016-2018 Consolidated Plan. To meet housing Goals the city continues to work with the Housing Development Corporation to continue the Purchase, Rehab, Resell program, This program has allowed a low to moderate income person purchase a home in Grand Island. The Small business Rental Assistance Program and the Revitalization Fund were projects that were Combined. These Projects are making progress to cultivate small and emerging businesses and creates reinvestment opportunities downtown, by aiding small business in the blight and Substandard Area #1. The Small Business Rental Assistance was able to expend \$7560.00 this program year to bring a new business to Downtown Grand Island also making improvements to the Blight and Substandard Area #1. The Small Business Rental Assistance is being administered by the Downtown Business Improvement known as Railside.

CDBG funds were awarded in the form of a public service Grant, the Agency had to be able to meet the national objectives of CDBG and make progress towards the goals set in the 2016-2018 Consolidated Plan. The Grant funds were awarded to the Literacy Council. The TLC is able to offer English as a second language (ESL) and various other forms of education/training to immigrants and refugees who are located in the City Of Grand Island. The Literacy Council of Grand Island used the CDBG funds to hire teachers, offer additional instruction to group classes(reducing their waiting list), and expand their Language Lab by adding equipment and new literacy/ ESL software. Additionally, the Literacy Council of Grand Island will begin offering life skills classes focusing on finances, health, etc. and will expand their office hours to accommodate the growing student demand and availability. The TLC was able to serve 365 illiterate adults within the City of Grand Island.

CAPER

1

OMB Control No: 2506-0117 (exp. 06/30/2018)

Comparison of the proposed versus actual outcomes for each outcome measure submitted with the consolidated plan and explain, if applicable, why progress was not made toward meeting goals and objectives. 91.520(g)

Categories, priority levels, funding sources and amounts, outcomes/objectives, goal outcome indicators, units of measure, targets, actual outcomes/outputs, and percentage completed for each of the grantee's program year goals.

Goal	Category	Source / Amount	Indicator	Unit of Measure	Expected – Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected – Program Year	Actual – Program Year	Percent Complete
Increase and Preserve Affordable Housing	Affordable Housing Public Housing Homeless	CDBG: \$	Homeowner Housing Rehabilitated	Household Housing Unit	100	0	0.00%	0	0	0
Increase and Preserve Affordable Housing	Affordable Housing Public Housing Homeless	CDBG: \$	Direct Financial Assistance to Homebuyers	Households Assisted	25	0	0.00%			
Increase and Preserve Affordable Housing	Affordable Housing Public Housing Homeless	CDBG: \$	Buildings Demolished	Buildings	15	0	0.00%			
Increase and Preserve Affordable Housing	Affordable Housing Public Housing Homeless	CDBG: \$	Housing Code Enforcement/Foreclosed Property Care	Household Housing Unit	15	0	0.00%			

CAPER

2

OMB Control No: 2506-0117 (exp. 06/30/2018)

Increase Economic Opportunities	Non-Housing Community Development	CDBG: \$	Facade treatment/business building rehabilitation	Business	2	0	0.00%		1	
Increase Economic Opportunities	Non-Housing Community Development	CDBG: \$	Jobs created/retained	Jobs	5	0	0.00%		0	
Increase Economic Opportunities	Non-Housing Community Development	CDBG: \$	Businesses assisted	Businesses Assisted	15	0	0.00%		1	
Program Administration	Affordable Housing Public Housing Homeless Non-Homeless Special Needs Non-Housing Community Development	CDBG: \$	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	0	0		480	0	0.00%

CAPER

3

OMB Control No: 2506-0117 (exp. 06/30/2018)

Program Administration	Affordable Housing Public Housing Homeless Non-Homeless Special Needs Non-Housing Community Development	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	0	0		20	0	0.00%
Program Administration	Affordable Housing Public Housing Homeless Non-Homeless Special Needs Non-Housing Community Development	CDBG: \$	Other	Other	1	0	0.00%			
Provide Supportive Services for At-Risk & Homeless	Homeless Non-Homeless Special Needs	CDBG: \$	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	30	0	0.00%			

CAPER

4

OMB Control No: 2506-0117 (exp. 06/30/2018)

Provide Supportive Services for At-Risk & Homeless	Homeless Non-Homeless Special Needs	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	0	0		20	0	0.00%
Provide Supportive Services for At-Risk & Homeless	Homeless Non-Homeless Special Needs	CDBG: \$	Homeless Person Overnight Shelter	Persons Assisted	10	0	0.00%			
Provide Supportive Services for At-Risk & Homeless	Homeless Non-Homeless Special Needs	CDBG: \$	Homelessness Prevention	Persons Assisted	20	0	0.00%			
Revitalize Neighborhoods & Districts	Non-Homeless Special Needs Non-Housing Community Development	CDBG: \$	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	0	0		480	0	0.00%
Revitalize Neighborhoods & Districts	Non-Homeless Special Needs Non-Housing Community Development	CDBG: \$	Other	Other	1	0	0.00%			

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

CAPER

5

OMB Control No: 2506-0117 (exp. 06/30/2018)

Assess how the jurisdiction's use of funds, particularly CDBG, addresses the priorities and specific objectives identified in the plan, giving special attention to the highest priority activities identified.

The City of Grand Island has pursued a variety of strategies to prioritize the identified of the community. The primary obstacle to meeting the underserved needs is the lack of sufficient financial resources. It is evident, even within the City Of Grand Island's first years as an entitlement Community that several qualifying projects will go unfunded or receive only partial funding due to lack of available finances. For this reason, the City has sought to prioritize projects which have the most capacity for making its plans become a reality, and also those which will address some of the largest needs within the community, while using the smallest amount of required resources.

This year the City's Public Works Department was able to use CDBG funds to replace existing curb ramps with new ADA compliant Ramps in a low to moderate income LMI Block. The City of Grand Island was also able to work with the Multicultural Coalition in order to serve a vulnerable population. The MC had secured other funds to help create their new program, a Legal Immigration Center. With the help of the CDBG funding the MC was able to help with Counseling for immigration clients, completing immigration forms and representing clients at U.S. Citizenship and immigration Services interviews. Pursuant to this the MC was able to secure Department of Justice Accreditation which allow the organization and its accredited representatives the authority to practice immigration Law to support the ever changing demographic if Grand Island.

With prior years funding the Literacy Council of Grand Island has used the CDBG funds in order to purchase new equipment for a learning lab to better serve clients. The literacy Council specializes in providing educational services free of charge to all residents of Grand Island which aids in providing economic opportunities for residents within the City Of

CAPER

6

OMB Control No: 2506-0117 (exp. 06/30/2018)

Grand Island. The City worked with Downtown Business Improvement District (BID) in order to create progress in cultivating small and emerging businesses while also creating re-investment opportunities within Grand Island. CDBG funds were used in two projects that were later combined from the 2016 Annual Action Plan. Small Business Rental Assistance and Revitalization fund are both being expended in the Blight and Substandard Area #1.

Another goal prioritized by the City in the 2016-2018 Consolidated Plan is to increase Quality and Affordable Housing in Grand Island. The City was able to use partnerships such as working with the Housing Development Corporation in order to create the Purchase Rehab Resell program. The HDC was able to secure \$500,000 in 2016 from the Nebraska Affordable Housing Trust Fund. The program will purchase sub-standard homes at market rate, and do extensive renovation to them. Once the renovation is completed, the home will be sold to an income qualifying individual or family, for the original purchase price.

CAPER

7

OMB Control No: 2506-0117 (exp. 06/30/2018)

CR-10 - Racial and Ethnic composition of families assisted

Describe the families assisted (including the racial and ethnic status of families assisted).

91.520(a)

	CDBG
White	230
Black or African American	278
Asian	13
American Indian or American Native	0
Native Hawaiian or Other Pacific Islander	0
Total	521
Hispanic	242
Not Hispanic	279

Table 2 – Table of assistance to racial and ethnic populations by source of funds

Narrative

This table represents the number of people served by the Literacy Council (TLC) and the Multicultural Coalition. This year's Public Service Grant Recipient was the Multicultural Coalition (MC). The MC was able to start their new Immigration Legal Services Program. The Immigration Legal Services includes Counseling for immigration clients, completing immigration forms and representing clients at U.S. Citizenship and immigration Services interviews. Pursuant to this the MC was able to secure Department of Justice Accreditation which allow the organization and its accredited representatives the authority to practice immigration Law to support the ever changing demographic if Grand Island. The TLC is an activity from the prior year funding; TLC was able to expend CDBG funds to update its language lab along with hiring more staff to help tutor classes. TLC currently offers life skills classes focusing on finances, health, etc. and was able to expand its office hours to accommodate the growing student demand and availability.

CR-15 - Resources and Investments 91.520(a)

Identify the resources made available

Source of Funds	Source	Resources Made Available	Amount Expended During Program Year
CDBG	CDBG	623,671	241,551.78

Table 3 - Resources Made Available

Narrative

Throughout the program year, the City of Grand Island received an allocation amount of \$360,253.00 of CDBG. As shown in the table above 241,551.78 was expended throughout this program year.

Identify the geographic distribution and location of investments

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description
Blight & Substandard Area #1	32	19	
City of Grand Island	45	38	
LMI Census Tracts	23	43	

Table 4 – Identify the geographic distribution and location of investments

Narrative

The Table above represents funding that has been expended to date. CDBG funds that have been used were expended as follows: The Public Works project and Lion Club Park project was able to use funds in a LMI census tract. The Publics work project has expended CDBG funds to replace existing curb ramps with new ADA compliant Ramps in a low to moderate income LMI Block, while Lions Club Park was able to replace old and broken Park equipment with a new ADA compliant Playground in a Low to Moderate Area.

Leveraging

Explain how federal funds leveraged additional resources (private, state and local funds), including a description of how matching requirements were satisfied, as well as how any publicly owned land or property located within the jurisdiction that were used to address the needs identified in the plan.

AS an entitlement Community the City of grand Island does not require leveraged funds. Even so, out of the 2017 Annual Action Plan projects proposed, the Public Service Grant was awarded to Multicultural Coalition, who was able to leverage \$149,400 in order to create their new Immigration Services. In prior year funding the Housing Development Corporation used the CDBG fund that were awarded to them as matching funds in order to receive a grant from the Nebraska Affordable Housing Trust Fund. Those funds along with CDBG were able to create their Purchase Rehab, Resell program that will allow the HDC to help provide suitable housing for low-to-moderate income persons within the City of Grand Island. The City of Grand Island always encourages recipients to use matching funds and leveraged funds in order for the project to have the most impact as possible within the community.

CR-20 - Affordable Housing 91.520(b)

Evaluation of the jurisdiction's progress in providing affordable housing, including the number and types of families served, the number of extremely low-income, low-income, moderate-income, and middle-income persons served.

	One-Year Goal	Actual
Number of Homeless households to be provided affordable housing units	10	0
Number of Non-Homeless households to be provided affordable housing units	40	0
Number of Special-Needs households to be provided affordable housing units	0	0
Total	50	0

Table 5 – Number of Households

	One-Year Goal	Actual
Number of households supported through Rental Assistance	0	0
Number of households supported through The Production of New Units	0	0
Number of households supported through Rehab of Existing Units	2	1
Number of households supported through Acquisition of Existing Units	0	0
Total	2	1

Table 6 – Number of Households Supported

Discuss the difference between goals and outcomes and problems encountered in meeting these goals.

At this time the City of Grand Island is currently working on making progress towards meeting housing goals that were prioritized within the 2016-2018 consolidated Plan. In prior years the City had allocated CDBG funds to Habitat for Humanity and Housing Development Corporation. CDBG funds that were expended to Habitat for Humanity have gone towards lot acquisition, although due to the low number of available real estate listings, Habitat for Humanity encountered some environmental issues with lots that were available. Due to these issues, Habitat for Humanity has purchased a large lot that will hold 22 homes that will be made

CAPER

11

OMB Control No: 2506-0117 (exp. 06/30/2018)

available to Low income families. The Habitat for Humanity has worked with the City Of Grand Island in order to change zoning regulations for each plot that will hold a home. The City has failed to complete an environmental review for the land purchased by Habitat for Humanity, at this time the City has completed repayment of CDBG funds to HUD.

The City of Grand Island has also been a supporter of the Housing Development Corporation and has allocated CDBG funds to HDC's Purchase, Rehab, and resell program. HDC has a goal of impacting more than ten households. HDC was able to secure additional funding from other sources rather than two homes will go to LMI people or people who fit in the criteria of 80% AMI. HDC secured additional funding and since created their Purchase, Rehab, Resell program which has completed renovations on one house which has been sold to a Low to moderate income person.

Discuss how these outcomes will impact future annual action plans.

The City of Grand Island works hard to continue progressing towards the housing goals set in the 2016-2018 Consolidated Plan. The Habitat for Humanity program will be hard to fund again in future years, even with the idea that more affordable housing will be available. The City Of Grand Island may not have more adequate available space in the next few program years. Therefore the City may continue to go in other directions such as Housing Development Corporations Purchase, Rehab, and Resell. As this program purchases houses within the community and "rehab" them, which in turn aides not only LMI persons but can help the appeal of a neighborhood. The revitalization Fund and Small Business Rental Assistance programs also continue to help meet goals that were set in the 2016-2018 Consolidated Plan by continuing to make progress in revitalizing neighborhoods and districts.

Include the number of extremely low-income, low-income, and moderate-income persons served by each activity where information on income by family size is required to determine the eligibility of the activity.

Number of Households Served	CDBG Actual	HOME Actual
Extremely Low-income	30	0
Low-income	11	0
Moderate-income	5	0
Total	46	0

Table 7 – Number of Households Served

Narrative Information

In this year's 2017 Annual Action Plan's allocation to the Multicultural Coalition has been able to service families and households that are a vulnerable population. MC has been completing income surveys and the numbers in the above chart reflects the clients they have served. The actives from prior year funding such as Housing Development Corporation will continue to use funds to help LMI persons. At this time activities are still in process and have not been fully completed, as they progress these numbers will increase. The Literacy Council of Grand Island does not track low-income persons although the Literacy council serves refugees and illiterate adults as well as other minority groups by offering services free of charge to anyone who is in need of educational help.

CR-25 - Homeless and Other Special Needs 91.220(d, e); 91.320(d, e); 91.520(c)

Evaluate the jurisdiction's progress in meeting its specific objectives for reducing and ending homelessness through:

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

Throughout this program year, the City of Grand Island did not partake in any projects that specifically targeted homelessness. The City continues to support local area Continuum of Care (CoC) by having a staff member from the Community Development Division attend the meetings. The CoC has several local agencies that serve homeless persons. Agencies such as Salvation Army and Hope Harbor are available within the City Of Grand Island. Both agencies are well suited for helping reduce the amount of homelessness in the community.

Addressing the emergency shelter and transitional housing needs of homeless persons

The City of Grand Island did not use any CDBG funds in addressing the emergency shelter and transitional housing needs of homeless persons. The City of Grand Island continues to support local non-profits such as the Continuum of Care (CoC) to help address these needs within the community.

Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: likely to become homeless after 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); and, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs

The City of Grand Island did not use any CDBG funds in regards to homeless persons. The City of Grand Island does support local agencies such as the Continuum of Care and other Local non-profits to continue seeking financial help from other State and Federal Entities.

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 of Grand Island did not use any CDBG funds in regards to homeless persons. The City of

Grand Island does support local agencies such as the Continuum of Care and other Local non-profits to continue seeking financial help from other State and Federal Entities.

CR-30 - Public Housing 91.220(h); 91.320(j)

Actions taken to address the needs of public housing

The City of Grand continues to support agencies such as the Hall County Housing Authority. The Hall County Housing Authority (HCHA) currently has the Public Housing Program which allows the HCHA to offer 391 apartments and scattered homes in the Hall County area at an income based rate.

The City Of Grand Island was working with Hall County Housing Authority and other non-profits in developing the Housing Improvement Partnership (HIP) with funds that were allocated from the 2016 Annual Action Plan. At this time the HIP will no longer continue as the leveraging funds that will be needed are no longer be a possible. The City will continue to work with the Housing Development Corporation in order to continue to create housing programs.

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

The City of Grand Island continues to coordinate with the Continuum of Care (CoC) in order to partner with other non-profits to meet needs that are within the Community of Grand Island.

The City of Grand Island welcomes and encourages the participation of all of its citizens in the development of these plans and in the review of progress in implementing plan activities. The City particularly encourages involvement by low and moderate income households, individuals residing in areas targeted for program activities, minorities and non-English speaking persons, as well as persons with disabilities. In addition, residents of public housing and other assisted housing groups are encouraged to participate. We encourage local and regional institutions and other organizations including businesses, neighborhoods associations, housing developers including the hall County Housing Authority, and Community and Faith Based organizations to become involved in the planning process.

Opportunities for citizen involvement occur in the initial stages of developing the long range plan and the Annual Action Plan as well as during the implementation of activates.

These opportunities include:

- Participation in public hearings to discuss needs, available funds and project/program activities
- Participation in meetings with committees and focus groups involved in planning housing and community development activities.
- Review and comment on proposed plans and activities such as: The Fair Housing Plan,

The Citizen Participation Plan, The Consolidated Plan, the Annual Action Plan,
Amendments to the Plans, Consolidated Annual Performance Reports (CAPERS)

Actions taken to provide assistance to troubled PHAs

The City of Grand Island has no plans of Action in this specified area at this time.

CR-35 - Other Actions 91.220(j)-(k); 91.320(i)-(j)

Actions taken 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. 91.220 (j); 91.320 (i)

The City of Grand Island continues to work with the Housing Development Corporation, and local developers to create affordable Housing the city continues to use the new ordinance to amend Chapter 36, article V of the Grand Island City code specifically, to add section 36-64.1 creating a new zoning district classification of medium density small lot zoning district. Habitat for Humanity was able to benefit from this by purchasing a lot which will be able to hold up to 22 housing units in the future.

Actions taken to address obstacles to meeting underserved needs. 91.220(k); 91.320(j)

In the 2017 Annual Action Plan the City of Grand Island allocated funds that would repair sidewalks in a LMI census track. These repairs placed many ADA compliant sidewalk curb ramps to help serve vulnerable populations in the designated area. The City was also able to use funds to help to redesign Lions club Park in Grand Island. The park is located in a LMI census tract and was in need of many repairs, the new playground will be ADA accessible to serve children with special needs. Lions Club Park is not yet completed but work has begun.

The City of Grand Island continues to find new ways to develop affordable housing and economic opportunities. The City continues to provide support to many organizations within the community as well as organizations that are receiving CDBG funds from prior years. While working collaboratively with other organizations the City continues to expend CDBG funds on projects such as the Small business Rental Assistance Program in order to help the Downtown Business Improvement District also known as Railside acquire new businesses in the area. This helps the community economically along with continuing the progress of revitalization of neighborhoods and districts. As the City continues to work with other organizations well suited for meeting the goals by using activities which meet national objectives and serve the needs of developing stable neighborhoods and/ or addressing housing needs or income-qualifying senior citizens.

Actions taken to reduce lead-based paint hazards. 91.220(k); 91.320(j)

With prior funding the City of Grand Island funds multiple housing programs including payment assistance and owner occupied rehabilitation programs; all of which require a lead based paint inspection on all homes built prior to 1978. Homes that were built prior to 1978 are presumed or tested to have lead-based paint.

The City Of Grand Island did not directly operate any rehabilitation efforts during 2016 or 2017 Annual action plan period. For this reason, the Leas based Paint Guidelines which apply are those directly related to sub-recipients of CDBG funds. The following actions are included in the City's Community Development Policy and Procedures Document:

"At a minimum, sub-recipient is required to:

- a) Notify a purchaser or lessee of the presence of any known lead-based paint and/or; lead-based paint hazards;
- b) paint test surfaces to be disturbed or removed during rehabilitation for the presence of lead-based paint, or presume lead-based paint and notify the occupants of the results within 15 days of when the evaluation report is received or the presumption is made;
- c) Provide each occupied dwelling unit discussed in (a) and (b) in the preceding section with the EPA-approved lead hazard information pamphlet Protect Your Family from Lead in Your Home or EPA- approved equivalent;
- d)Reduce Lead Hazards as required by the applicable subparts of Part 35(full description of Part 35 is available in the Community Development Policy and Procedures, it states the varying levels of requirements, in relation to the level of financial assistance provided0; and
- e) Perform clearance testing, including dust testing, before re-occupancy after all but minimal ("de minimis") amounts of paint disturbances."

It should also be noted that the Community Development Policy and Procedures states that "Where regulations differ, Sub-recipients are held to the stricter of the standards."

At this point and time, the City of sees the implementation and enforcement of the above guidelines as actively attempting to reduce Lead Based Paint Hazards.

Actions taken to reduce the number of poverty-level families. 91.220(k); 91.320(j)

The projects from the 2017 Annual Action Plan such as the Public Service Grant that was awarded to the Multicultural Coalition (MC) of Grand Island. The MC was able to start their new Immigration Legal Services Program. The Immigration Legal Services includes Counseling for immigration clients, completing immigration forms and representing clients at U.S. Citizenship and immigration Services interviews. Pursuant to this the MC was able to secure Department of Justice Accreditation which allow the organization and its accredited representatives the authority to practice immigration Law to support the ever changing demographic if Grand Island. The goal of this program is to help families have appropriate documentation to gain access to jobs and other needs they may have.

Projects from the 2016 Annual Action plan that have continued to this program year and also had a goal in reducing the number of poverty level families is the Literacy Council of Grand Island which was able to complete their program throughout this program year. The TLC was able to use fund to provide more tutoring services, this was done by hiring more staff/tutors and updating lab equipment. Other projects from the 2016 Annual Action Plan such as Purchase Rehab Resell by the Housing Development Corporation continues to achieve progress in reducing the number of poverty level families within the City of Grand Island.

Additionally, other Sectors of Grow Grand Island are working to address the needs of Poverty Level families, including workforce initiatives and education initiatives. The City of Grand Island's Emergency Management Department, police Department and Fire Department also has various programs that support poverty-level families. It is the intent of the City to continue to support the progress in its efforts to address the poverty needs.

Actions taken to develop institutional structure. 91.220(k); 91.320(j)

The City of Grand Island Continues to work closely with community partners through the local and regional Continuum of Care groups. The City continues to support agencies such as the Salvation Army, Hope Harbor, Housing Development Corporation and Hall County Housing Authority. With these Partnerships, the City Continues to make progress towards providing services to vulnerable populations. Although current progress in serving homeless or poverty stricken persons is achieved through these partnerships due to the different expertise each agency offers. The City has also worked closely with the Grand Island Area Economic Development Corporation (GIAEDC). The GIAEDC was able to fund and complete the current Housing Study for the City the Grand Island. This allowed the City and partnering agencies to continue progress in addressing the needs of homeless and poverty stricken persons within the City of Grand Island.

Actions taken to enhance coordination between public and private housing and social service agencies. 91.220(k); 91.320(j)

The City of Grand Island continues to participate in monthly meetings with the local Continuum of Care. The City and other non-Profit partners within the CoC continue to cooperate in finding ideas to meet the housing and residential needs within the community of Grand Island.

Identify actions taken to overcome the effects of any impediments identified in the jurisdictions analysis of impediments to fair housing choice. 91.520(a)

Lack of affordable housing is influenced by a very broad range of public and private sector factors. According to the 2014 Housing Study and workforce housing needs survey, the primary impediments to affordable housing are:

For Homeowners:

- Housing prices
- Cost of utilities
- Lack of sufficient homes for sale
- Wages

For Renters:

- Cost of rent
- Lack of decent rental units in price range
- Cost of utilities
- Wages

Municipal regulations such as zoning ordinances and subdivision regulations can provide restrictive parameters for the development of new affordable housing and residential investment.

In regard to furthering affordable housing, the City continues to work towards providing for a range of housing types and densities for all economic segments of the population. The City encourages equal and fair access to housing for renters and homeowners.

The City also promotes accessibility by providing affordable housing by formulating innovative policies, regulations and practices, and establishing secure funding mechanisms and targeting affordability programs toward household with income considered low to moderate income.

In order to overcome these impediments the City Of Grand Island works towards making progress on goals that were prioritized by the City in the 2016-2018¹ Consolidated Plan, which were to increase affordable housing options within the city and provide support services for neighborhoods and vulnerable populations. Progress towards goals was made by working with local partnerships such as the continuum of care, Housing Development Corporation, Habitat for Humanity and Hall County Housing Authority. The Following Annual Action Plan activities were funded during the 2016 CDBG program year to address housing issues: Habitat for Humanity was able to purchase a lot that will later hold homes for persons or families meeting LMI standards; Housing Development Corporation used funds to create a program that will purchase sub-standard homes at market rate, and do an extensive renovation to them. Once

the renovation is complete, the home will be sold to an income qualifying individual or family, for the original purchase price.

CR-40 - Monitoring 91.220 and 91.230

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

The City of Grand Island executes contracts for all CDBG activities. These contracts meet the applicable program and federal requirements. The City monitors contracts for compliance with these program requirements, including general management, performance goals, financial management, data collection, reporting, eligibility determinations, non-discrimination, fair housing, affirmative marketing, Davis-Bacon labor compliance, etc.

In accordance with 24 CFR Part 85.36(e) and 84.44(b), the City will take all necessary affirmative steps to assure that minority firms, women's business enterprises, and labor surplus area firms are used when possible.

Community Development Division staff is responsible for monitoring program activities to assure timely use of the funds and compliance with HUD regulations and guidelines in implementing program activities under the programs. Basic tools used to accomplish this include, Contractual obligations of grant recipients which consists of a written document outlining what is expected of both sub-recipient and the City of Grand Island. Each Sub-recipient is required to complete quarterly reporting which includes the amount of clients/households/ business that have been served, progress to meeting national objective, as well as a brief explanation of progress and/ or lack of progress and updates. Every six months the Community Development Division will conduct an on-site monitoring for each sub-recipient in order to ensure that all compliances are being followed such as retention of files and financials are being kept according to contractual obligations.

Citizen Participation Plan 91.105(d); 91.115(d)

Describe the efforts to provide citizens with reasonable notice and an opportunity to comment on performance reports.

The most recent version of the Citizen Participation Plan was adopted by City Council on April 26, 2016 to include all new and additional parameters as identified in regard to becoming an Entitlement Community. The Citizen Participation Plan intends to make the community aware

of CDBG projects and processes, as well as to make the pathway for becoming involved with review of CDBG funding as accessible as possible. A copy of the citizen participation plan, which includes public hearing time frames and varying methods in which the Community Development Division will make information available is accessible on the City of Grand Island's website at www.grand-island.com, under the Community Development section or available in print from the Community Development Division directly at Grand Island City Hall, 100 E. 1st Street, Grand Island, Nebraska.

Outside of the public hearing process, opportunities to comment on proposed plans and other documents are available to the general public and other persons affected by the activities of the programs. A notice will be published in the Grand Island Independent in English, with directions for translation in Spanish, providing 30 calendar days for the public to comment on the Citizen Participation Plan, Consolidated Plan, Annual Action Plan, Plan Amendments and the Consolidated Annual Performance Evaluation Report.

At this time no comments have been received for the 2018 Consolidated Annual Performance Evaluation Report.

CR-45 - CDBG 91.520(c)

Specify the nature of, and reasons for, any changes in the jurisdiction's program objectives and indications of how the jurisdiction would change its programs as a result of its experiences.

The City of Grand Island continues to focus on the objectives and goals that were outlined in the 2016-2018 Consolidated plan and 2017 Annual Action plan, at this time there are no changes.

Does this Jurisdiction have any open Brownfields Economic Development Initiative (BEDI) grants?

No

[BEDI grantees] Describe accomplishments and program outcomes during the last year.

RESOLUTION 2018-385

WHEREAS, on August 25, 2015, the City of Grand Island became an Entitlement Community; and

WHEREAS, the United States Department of Housing and Urban Development requires multiple certifications in order to comply with the Community Development Block Grant Program requirements; and

WHEREAS, all grantees are required to report on accomplishments and progress toward Consolidated Plan goals in the Consolidated Annual Performance and Evaluation Report (CAPER) ; and

WHEREAS, the Community Development Division created the required documentation to serve under the Entitlement Program and completed 30 day public comment per program requirements.

NOW, THEREFORE, BE IT RESOLVED BY THE MAYOR AND COUNCIL OF THE CITY OF GRAND ISLAND, NEBRASKA that the City of Grand Island, Nebraska is hereby approves and adopts Community Development Block Grant, 2017 Consolidated Annual Performance & Evaluation Report; and the Mayor is hereby authorized to sign such certifications on behalf of the City of Grand Island.

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Adopted by the City Council of the City of Grand Island, Nebraska, December 18, 2018.

Roger G. Steele, Mayor

Attest:

RaNae Edwards, City Clerk

Approved as to Form	☐ _____
December 14, 2018	☐ City Attorney