



City of Grand Island

Tuesday, March 23, 2021

Council Session

Item G-19

**#2021-70 - Approving 2019 CDBG Consolidated Annual
Performance and Evaluation Review**

Staff Contact: Amber Alvidrez

Council Agenda Memo

From: Amber Alvidrez, Community Development

Meeting Date: March 23, 2021

Subject: Approving 2019 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. 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 (CAPER) must be completed.

A public comment regarding the 2019 Consolidated Annual Performance & Evaluation Report was completed, with a start date of February 19, 2021. 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 2019 Consolidated Annual Performance & Evaluation Report.

The Community Development Division did not receive any written public comments.

Discussion

The Consolidated Annual Performance & Evaluation Report addresses the \$413,557 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 2018-2019 as a result of Community Development Block Grant Funds.

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 2019 Consolidated Annual Performance & Evaluation Report.
2. Do not accept the report on the Community Development Block Grant 2019 Consolidated Annual Performance & Evaluation Report.

Recommendation

City Administration recommends that the Council accept the report on the Community Development Block 2019 Consolidated Annual Performance & Evaluation Report.

Sample Motion

Move to accept the report on the Community Development Block Grant 2019 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.

The City of Grand Island has had success in meeting goals identified in the 2019-2023 consolidated plan with the use of CDBG funds throughout the 2019 Program year below outlines activities that have contributed to each specific goal.

Goal 1: Increase Quality and Affordable housing options

Although funding has been made to make progress on this goal in current and prior years no activities were fulfilled throughout this program year.

The City partnered with a local housing group that consists of non-profit housing organizations, for-profit-developers, relators, and homeless service providers in order to form an unofficial housing continuum this group is known as the Housing Improvement Partnership (HIP), the HIP group requested an allocation of funds from the 2019 AAP to partner with a local non-profit to meet rehab needs to LMI residents in Grand Island. Funds from the 2019 AAP in the amount of \$128,557, were then sub-granted to Habitat for Humanity to partner with the HIP group to implement a Owner Occupied Rehab Program. HIP/ Habitat for Humanity encountered challenges in starting the program due to COVID-19, as doors were closed to outside public and converting programming to virtual means of communication to accommodate the restrictions placed to ensure the health and safety of both staff and clients. Habitat has been able to receive applications for units that need Rehabilitation although work had not been completed within the 2019 program year and is currently on going.

The Housing Development Corporation was awarded \$26,500 in funds from the 2018 Annual Action Plan to use as matching funds in an owner Occupied rehab program. 2 houses were to be completed from the program and all units rehabilitated were to be occupied by Low to moderate income persons. Two Household were approved for the rehab process and began work on May 5, 2020 although work had not been completed by the end of the program year, Housing Development Corporation and the City directly feel that supplies for rehabilitation was greatly hindered by the Covid-19 pandemic and extended the process once the applicants were approved and rehabilitation activities began.

Goal 2: Cultivate Small and Emerging Business

No funds were allocated from the 2019 AAP to directly impact this goal, although in 2016 a significant allocation was made to a local non profit known as Railside Downtown Business Improvement District. Railside has continued to use CDBG funds to help small businesses start up or relocate to the downtown area by offering aid in the form of Rental Assistance. This has both prompted owners of buildings downtown to renovate and aided small locally owned business to occupy recently rehabbed store fronts, while expanded their businesses. Through out the 2019 program year this program was able to provide Rental assistance to one new business.

CAPER

1

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

Due to the COVID-19 pandemic the City was able to restructure an Revolving loan fund which still met the same economic development project needs but the amounts requested were lowered to stretch the funding farther than originally intended. The Revolving loan fund offered small business loans to locally owned business for job creation and retention purposes to aid in economic challenges that local small businesses were facing.

Goal 3: Support public Services and vulnerable populations.

The Literacy Council of Grand Island was able to use City CDBG funds to leverage dollars from private donors to acquire a building that had been vacant and deteriorating, restoration of a building was donated by local developer. By moving to a new location the Literacy Council estimated that it would be able to double the number of clients they served although due to COVID-19 their doors had to be shut to the public for multiple months, after reopening the the Literacy Council was able to continue serving 106 previous clients and 54 new clients.

Hope Harbor a local Women's Homeless shelter was the lead agency on for the Project Connect event. This program had over 52 service providers present to provide referrals, set appointments, and provide same day services to the homeless and near homeless population within our Community. 202 households were served which resulted in 514 individuals receiving services.

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: \$	Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit	Households Assisted	0	0		10	0	0.00%

CAPER

2

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

Increase and Preserve Affordable Housing	Affordable Housing Public Housing Homeless	CDBG: \$	Homeowner Housing Rehabilitated	Household Housing Unit	100	0	0.00%	2	0	0.00%
Increase and Preserve Affordable Housing	Affordable Housing Public Housing Homeless	CDBG: \$	Direct Financial Assistance to Homebuyers	Households Assisted	25	1	4.00%	0	0	0.00%
Increase and Preserve Affordable Housing	Affordable Housing Public Housing Homeless	CDBG: \$	Buildings Demolished	Buildings	15	0	0.00%	0	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%	0	0	0.00%
Cultivate small and Emerging businesses	Non-Housing Community Development	CDBG: \$	Facade treatment/business building rehabilitation	Business	2	3	150.00%	3	1	33.33%
Cultivate small and emerging businesses	Non-Housing Community Development	CDBG: \$	Jobs created/retained	Jobs	5	19	380.00%%	0	19	100.00%
Cultivate small and Emerging businesses	Non-Housing Community Development	CDBG: \$	Businesses assisted	Businesses Assisted	15	12	20.00%	0	8	100%

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 Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	0	0	0	0 0	0	0
Support Public Services and Vulnerable populations	Homeless Non-Homeless Special Needs	CDBG: \$	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	30	0	0.00%	0	0	0.00%
Support Public Services and Vulnerable populations	Homeless Non-Homeless Special Needs	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	20	521	2,605.00%	300	202	67.33%%
Support Public Services and Vulnerable populations	Homeless Non-Homeless Special Needs	CDBG: \$	Homeless Person Overnight Shelter	Persons Assisted	10	0	0.00%	0	0	0.00%
Support Public Services and Vulnerable populations	Homeless Non-Homeless Special Needs	CDBG: \$	Homelessness Prevention	Persons Assisted	20	0	0.00%	300	514	100%

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

CAPER

4

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.

All funds provided under the CDBG program address priorities identified within the 2019-2023 Consolidated Plan. No activity was denoted to be a priority than any other activity as all activities aim to assist low-income residents of our community.

CAPER

5

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	174
Black or African American	11
Asian	2
American Indian or American Native	6
Native Hawaiian or Other Pacific Islander	1
Other	10
Total	204
Hispanic	59
Not Hispanic	87

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

Narrative

CDBG funds were utilized to benefit a variety of races and ethnicities. No one race was given priority over others, all programs were operated as a first come first serve basis.

The Current table represents the number of households served at the Project connect even and housing rehabilitation programs .

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	public - federal		

Table 3 - Resources Made Available

Narrative

Throughout the program year, the City of Grand Island received an allocation amount of \$413,557 of CDBG and \$332,374.15 of Revolving Loan funding was available. As shown in the table above \$348,000.00 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			
City of Grand Island	100		
LMI Census Tracts			

Table 4 – Identify the geographic distribution and location of investments

Narrative

The Table above represents funding that has been expended to date from the 2019 allocations and the Revolving loan fund program- the owner occupied Rehabilitation program through Habitat for Humanity, building acquisition for The Literacy Council and the Small business loans through the Revolving loan fund were services that are available to no distinct area of Grand Island.

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.

At this time the City of Grand Island does not require a local match from sub grantees although the City plans on using funds, whenever possible, to assist community groups and organizations in leveraging resources. This means the City will consider projects a priority if the CDBG funds will be used as a leverage to further secure additional funding to conduct a project on a scale much larger than would have been possible with CDBG funds alone. The Literacy council was able to use CDBG funds to buy a building that was appraised at \$425,000.00, although Literacy did not have the funds to purchase the building outright from the private owner who offered the building at a significantly reduced price, a local developer purchased the building on behalf of the Literacy Council and renovated the inside of the building to meet the needs of the literacy Council's growing clientele. The Literacy council was able to use funds to purchase the Building at the original asking price of \$225,000 which resulted in over \$200,000 of donation funds from the cost of the building, and labor for renovations which was donated.

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	0	0
Number of Non-Homeless households to be provided affordable housing units	0	0
Number of Special-Needs households to be provided affordable housing units	0	0
Total	0	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	5	1
Number of households supported through Acquisition of Existing Units	0	0
Total	5	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 2019-2023 consolidated Plan. This year the had to manage the expectations because of COVID-19 pandemic. The sub-recipients worked hard to ensure the safety of the homeowners and contractors to accomplish work, but ultimately due to the demand in building supplies and and time to process applicants now projects were

completed through this Program year. Both the HIP/Habitat for Humanity and Housing development Corporation's owner occupied rehab program continue and plan to make progress in throughout the next program year.

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 2019-2023 Consolidated Plan. Although the Owner Occupied REhabilitation programs have had slow progress this program year, they generally are effective to meeting the the housing quality needs in our community, the City believes the lack of progress can be directly related to COVID-19 and there fore would fund programs similar in the future, Other direction the City has gone in the past is impletmenting a Purchase, Rehab, and Resell program. 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.

They has yet to do so but may in the future look at neighbor hoods who have worst case houses and target areas of LMI to do specific target area rehabilitation. With the creation of the Housing Improvement partnership(HIP) group the City hopes to build and maintain affordable housing options within Grand Island by creating partnerships between for-profit developers and non-profit housing service providers. The City does recognize that there is a need for affordable housing and hopes that the HIP group can foster growth in this area.

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	173	0
Low-income	29	0
Moderate-income		0
Total	202	0

Table 7 – Number of Households Served

Narrative Information

The numbers represented on this table are from the Project Connect Event, which is an activity from 2018 although funds were not utilized until the event that took place in the 2019 program year. Also numbers that contributed were the clients received services from the Literacy Council throughout the 2019 program year. The City anticipates that the Owner Occupied Rehabilitation programs will have accomplishments that take place in the 2020 program year.

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. The Local CoC works as a collective group to meet and conduct case coordination to better help individuals find the services best suited for them.

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 throughout the 2019 AAP. The City of Grand Island continues does have multiple agencies such as Hope Harbor, Crossroads Mission, and Crisis Center, who provide transitional shelter while participating in programs that promote self sufficiency.

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 allocated funds to Hope Harbor who partnered with other services providers to implement a Project Connect Event, this acted as a one day event where homeless and near homeless were able to locate services in one location. The City of Grand Island works with the Local Continuum of Care and other Local non-profits to continue seeking financial help from other State and Federal Entities. Majority of the providers who participate in the local CoC follow the "Housing First Policy", the group is equipped to discuss what services are needed and which agencies can help individuals after discharge from instituions.

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 direct regards to homeless persons. Although the City does not experience a high number of chronic homelessness compared to near homeless. The City does participate in discussion of homelessness needs through both the regional CoC and the local CoC group.

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 continues to work with other non-profit agencies and the Hall County Housing Authority in order to create the Housing Improvement Partnership (HIP). HIP will act as a hub for housing needs and has a goal to become its own non-profit organization.

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.

The Hall County Housing Authority is a separte public body from the City and provides all of the services to citizens for any housing choice vouchers, Section 8 programs, and public housing. The HCHA does have a full time social worker who offers free confidential social work services to the HCHA residents, the social worker assists residents by diagnosing problems, advocating for and providing referral services to individuals and families dealing with various challenges.

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 continues to seek opportunities for public input in restrictive policies and procedures. The City of Grand Island has taken actions in the past to remove negative effects of public policies in regard to the development of affordable housing including the change of subdivision regulations to allow for narrower streets and small lots sizes, thereby reducing the cost to the developer, which could in turn foster a reduction in cost to the potential homeowners.

In regard to the CDBG funds and future plans to remove or ameliorate barriers, the City of Grand Island has partnered with other local housing agencies to form the Housing Improvement Partnership, this group works within the community to aid in the goal of obtaining affordable housing.

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

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 organization within the community as well as organizations that are receiving CDBG funds. As the City continues to work with other organizations and the Housing Improvement Partnership begins to grow, the city will have an organization 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 of 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 Lead 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 City continues to offer CDBG grants for Public Services to Non-profit Service providers within 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 have various programs that support poverty-level families. It is the intent of the City to continue to support these programs 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 as each agency offers different expertise. 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 of 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 2019-2023 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.

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 May 26, 2020 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 2019 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 2019-2023 Consolidated plan and 2019 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 2021-70

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, 2019 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, March 23, 2021.

Roger G. Steele, Mayor

Attest:

RaNae Edwards, City Clerk

Approved as to Form	☐ _____
March 19, 2021	☐ City Attorney