



**LEE'S SUMMIT**  
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**Community Development Block Grant**  
**2017-2018**

# Action Plan

July 2017



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Annual Action Plan  
2017

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# Executive Summary

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

### 1. Introduction

This Action Plan covers the program year 2017-2018, the third year of the 2015-2019 Consolidated Plan period of the Community Development Block Grant Program. The 2015-2019 Consolidated Plan identified the following high priority needs:

- Mental Health/Substance Abuse Assistance
- Food Services for Persons of Special Needs
- Affordable Housing and Home Repairs
- Transitional Housing and Domestic Violence Shelters
- Rental Housing - Landlord Awareness/Education
- Sidewalk Improvement in Older Neighborhoods
- Public Transit/Transportation
- Public Facility Improvements for Non-profit Agencies
- Workforce Training Systems
- Commercial Property Improvement for Economic Development
- Expansion of Abuse Center Capacity
- Urgent Needs of LMI Persons and Families
- Assistance for First Time Homebuyers
- Daycare/Respite Care for Persons of Special Needs
- Foster Small Businesses and Startups
- Marketing Social Services
- Housing for the Developmentally Disabled
- Local Emergency Homeless Housing
- Sanitary and Storm Sewer Upgrade

The 2017-18 Action Plan reflects a local partnership between the City government and not-for-profit service and housing agencies to implement the goals and objectives as established in the Consolidated Plan by supporting services, programs and projects that will make a difference in serving the needy. The City followed the established public process that included public awareness campaign, solicitation of CDBG funding requests from local service and housing agencies, evaluation and prioritization of funding needs, a public hearing, a 30-day public review and comment period and the approval of the governing body.

Recommended funding allocation focuses on sustaining on-going programs that have proven to address the critical needs of the community as identified in the Consolidated Plan and to help achieve its goals and objectives. CDBG funds also help agencies to leverage other resources in support of their programs. Funded programs and projects on the non-public-service side focus on the upkeep of the community's affordable housing and home ownership. Public facility improvement funded addresses public housing maintenance needs.

A public hearing was held for public input on the Action Plan draft and funding recommendations (based on the 2016-17 funding amount before the 2017-18 funding level was announced by HUD) and the information was also distributed for public review and comment for no less than 30 days following the public hearing. No public comments were received by the City.

Due to limited funding from this program, not all the priority needs, as identified in the Consolidated Plan, will be addressed by the programs and projects to be funded this program year. Local agencies are urged to explore alternative resources to support and expand their programs.

## **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.

Through this plan and its commitment of financial support, the City strives to accomplish the following objectives:

- continue the level of support for agencies and programs that have received CDBG funding in prior years to maintain the level of service benefiting persons with special needs;
- continue to focus on critical services for the homeless, persons and families without the most basic necessities of living;
- continue to support services for victims of domestic violence and persons with mental health and substance abuse issues;
- continue to provide financial assistance to LMI homeowners for the upkeep of their homes and to the local public housing agency to implement its CIP; and
- provide assistance for local public service agencies for urgent facility maintenance

The outcomes of the above listed programs and projects will benefit a total of about 3,205 individuals and households, improve 90 affordable housing units and improve services.

### **3. Evaluation of past performance**

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

The majority of the programs and projects included in this Action Plan have been funded and in operation for some years and recent consolidated plan public participation process showed a strong indication that these services continue to meet the high priority needs of the community. Most of these agencies delivering these services have proven to be solid in terms of their performance. The City has established a system of monitoring and evaluation of subrecipient performances and the level of performance have been taken into account during the evaluation and prioritization of funding allocation.

### **4. Summary of Citizen Participation Process and consultation process**

Summary from citizen participation section of plan.

The consultation process and outreach for this Action Plan consists of a public awareness campaign via news releases, a solicitation of requests for funding, a public hearing and a 30-day public review and comment period.

A news release was posted on the City's website on December 19, 2016. The news release specifically stated:

- Applications for the 2017-18 CDBG program year would be available on January 13, 2017;
- Applications would be accepted from January 16 through February 13, 2017; and
- A public hearing would be held on March 8, 2017.

On February 17, 2017, a public notice was published in Lee's Summit Journal announcing the Community and Economic Development Committee public hearing scheduled for March 8, 2017 to hear funding request proposals from local agencies, staff evaluation and prioritization of the proposals, staff funding recommendations, public comments and committee discussions and recommendations for consideration by the full City Council.

On March 8, 2017, the City Council Community and Economic Development Committee held a public hearing on the draft 2017-18 Action Plan and funding allocation proposals based on the City's 2016-17 grant amount. The CEDC approved a recommendation for the City Council adoption of the Action Plan with funding levels based on the 2016-17 grant amount, with a recommendation that Staff adjust the allocation amounts to individual activities using a percentage increase or decrease across the board

based on the final grant amount as provided by HUD, so long as the adjustments do not go over the threshold of a substantial change.

The 30-day public review and comment period started on March 17 and ended on April 17. Hard copies were made available for public access at two local public libraries, Lee's Summit Social Services, and City Hall locations. The draft Action Plan was also made available on the City's website. No public comments were received by the City during the public comment period.

After HUD announced the 2017-18 grant amount, adjustments were applied to all activities based on a 3.9% reduction. These adjustments were minor and did not result in any substantial changes to any activity, therefore, no additional public hearing or public comment period was necessary. The final Action Plan with these adjustments were presented to the City Council on July 27, 2017 for adoption by ordinance.

## **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.

No public comments were received by the City during the public comment period.

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

No public comments were received.

## **7. Summary**

Through a comprehensive public process, the 2017-18 Action Plan was developed to address the priority needs of the community as identified in the 2015-19 Consolidated Plan and the 2017-18 Community Development Block Grant funds are allocated to support public service programs and non-public service projects/programs that help the community meet the goals and objectives of the Consolidated Plan. During this process, the City realizes that limited CDBG funding, made available to the community through the U.S. Department of Housing and Urban Development, will not address all of the priority needs of the community. Local agencies are working harder than ever to pool other resources so that more needs are met and the community responses have been very supportive of their efforts.

The funding provided through the CDBG program is making a difference for our community and we continue to use this valuable resource to support the most needed programs.

**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		Planning & Special Projects

**Table 1 – Responsible Agencies**

**Narrative (optional)**

**Consolidated Plan Public Contact Information**

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

### **1. Introduction**

The City of Lee's Summit Planning & Special Projects coordinates the consultation process for the Community Development Block Grant Program 2015-2019 Consolidated Plan and the subsequent Annual Action Plans. The consultation process for the Consolidated Plan included information gathering from variety of resources from the state level to the local level using a wide range of methods, analyses of information and data, community awareness campaign, public participation via open meetings, open houses, focus group discussions, public hearings, public review and comment.

The consultation process and outreach for this Action Plan consists of a public awareness campaign via news release, a solicitation of requests for funding, a public hearing and a 30-day public review and comment period.

### **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 Lee's Summit has actively worked to meet community needs and coordinate the efforts of those working to serve local residents and businesses. The City has worked closely in consultation, strategic planning as well as in financial support through its CDBG program to community housing, mental health, and service agencies. These agencies include: Lee's Summit Housing Authority, Hillcrest Transitional Housing of Eastern Jackson County, Hope House, Lee's Summit Social Services, ReDiscover, Developing Potential, Inc., Coldwater of Lee's Summit, Community Services League, and Center for Conflict Resolution.

### **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.**

Although Lee's Summit does not currently have an independent agency tasked with assessing the homeless population in and around the city, it has been working toward better coordination with the Homeless Services Coalition of Greater Kansas City (HSCGKC), the designated regional Continuum of Care (CoC) serving the Jackson County, Missouri and Wyandotte County, Kansas area. According to the HSCGKC Point in Time 2016 Survey, 1,452 individuals in the Kansas City metropolitan area were identified as homeless, which includes sheltered and unsheltered individuals and represents an

aggregated total of the counted individuals within the CoC's area. This includes Jackson County, Missouri, with the preponderance of services and counted individuals in Kansas City and Independence. This represents a reduction in the number of homeless individuals from 2+ years ago.

In evaluating the role of Lee's Summit in addressing homelessness, HSCGKC and their embrace of the Housing First approach were considered as a means of assessment. Effective attainment of this approach can be measured by the implementation of policy and provision of funding that ultimately leads to the creation of permanent and sustainable housing for all homeless individuals. Within Lee's Summit there are many services in the community that are supported by the City in their efforts to actively prevent and reduce homelessness. The following programs, offered through the City of Lee's Summit's CDBG program, help in the initial housing and home ownership of low- to moderate-income families and to make home repairs for low- and moderate-income families:

- First-Time Homebuyers Program, and
- Minor Home Repair Program.

Other contributors to the prevention of homelessness include:

- Hope House: An emergency shelter in Lee's Summit that serves victims of domestic violence, including children.
- ReDiscover Mental Health: Provides mental health services to individuals as well as families in different settings.
- Hillcrest Transitional Housing: Works to house homeless individuals, families, and youths in an environment that encourages working and the development of life skills.
- Lee's Summit Social Services: Provides emergency assistance to low-to moderate-income individuals and families.
- Lee's Summit Housing Authority: Local public housing agency.

**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**

Lee's Summit does not receive 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**



**Table 2 – Agencies, groups, organizations who participated**

1	<b>Agency/Group/Organization</b>	Coldwater of Lee's Summit
	<b>Agency/Group/Organization Type</b>	Services-Children
	<b>What section of the Plan was addressed by Consultation?</b>	Non-Homeless Special Needs
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The agency was notified of the funding application process, submitted funding requests to meet high priority special needs, and attended the public hearing. The agency's funding request is funded and the supported program will benefit persons in need of service.
2	<b>Agency/Group/Organization</b>	HOPE HOUSE, INC
	<b>Agency/Group/Organization Type</b>	Services-Victims of Domestic Violence
	<b>What section of the Plan was addressed by Consultation?</b>	Homeless Needs - Families with children Non-Homeless Special Needs
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The agency was notified of the funding application process, submitted funding requests to meet high priority special needs, and attended the public hearing. The agency's funding requests are funded and the supported program will benefit persons in need of service.
3	<b>Agency/Group/Organization</b>	LEE'S SUMMIT SOCIAL SERVICES
	<b>Agency/Group/Organization Type</b>	Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-homeless
	<b>What section of the Plan was addressed by Consultation?</b>	Food, clothing, school supplies, utility assistance, etc.

	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The agency was notified of the funding application process, submitted funding requests to meet high priority special needs, and attended the public hearing. The agency's funding request is funded and the supported program will benefit persons in need of service.
4	<b>Agency/Group/Organization</b>	REDISCOVER MENTAL HEALTH
	<b>Agency/Group/Organization Type</b>	Services-Health
	<b>What section of the Plan was addressed by Consultation?</b>	Non-Homeless Special Needs
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The agency was notified of the funding application process, submitted funding requests to meet high priority special needs, and attended the public hearing. The agency's funding requests are funded and the supported program will benefit persons in need of service.
5	<b>Agency/Group/Organization</b>	Center for Conflict Resolution
	<b>Agency/Group/Organization Type</b>	conflict mediation service
	<b>What section of the Plan was addressed by Consultation?</b>	Prevention of crime and conflict
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The agency was notified of the funding application process, submitted funding requests to meet high priority special needs, and attended the public hearing. The agency's funding request is funded and the supported program will benefit persons in need of service.
6	<b>Agency/Group/Organization</b>	LEE'S SUMMIT HOUSING AUTHORITY
	<b>Agency/Group/Organization Type</b>	PHA
	<b>What section of the Plan was addressed by Consultation?</b>	Public Housing Needs
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The agency was notified of the funding application process, submitted funding requests to meet high priority special needs, and attended the public hearing. The agency's funding request is funded and the supported program will benefit persons in need of service.

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

N/A.

**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	The Strategic Plan supports the overall goals of the plan of the CoC.

**Table 3 – Other local / regional / federal planning efforts**

**Narrative (optional)**

**AP-12 Participation – 91.105, 91.200(c)**

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

A press release was posted on December 19, 2016. The press release specifically stated:

- Applications for the 2017-18 CDBG program year would be available online on January 13, 2017;
- Applications would be accepted from January 16 through February 17, 2017; and
- A public hearing would be held by the City Council Community and Economic Development Committee on March 8, 2017.

A legal public notice was published in Lee's Summit Journal for the public hearing. The public hearing provided an opportunity for public participation and the 30-day public comment period from March 17 through April 17 before the City Council approval of the final plan gave the public another opportunity to review the information and submit input.

**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	Non-targeted/broad community	Public awareness/informational campaign only.	No comments received. Public information only.	No comments received. Public information only.	<a href="http://cityofls.net/City-of-Lees-Summit/articleType/ArticleView/articleId/3895/CDBG-Application-Forms-Available-Online-Beginning-Jan-13-for-Program-Year">http://cityofls.net/City-of-Lees-Summit/articleType/ArticleView/articleId/3895/CDBG-Application-Forms-Available-Online-Beginning-Jan-13-for-Program-Year</a>

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 Hearing	Non-targeted/broad community	All funding applicants presented their programs and funding requests during the public hearing. Staff presented application review and prioritization results and funding allocation recommendations.	No public comments were received during the hearing.	No public comments were received during the hearing.	
4	Public review and comment	Non-targeted/broad community	Draft Action Plan with Funding Allocation Recommendations were made available at various public places/locations.	No public comments were received during the public comment period.	No public comments were received during the public comment period.	<a href="http://cityofls.net/Development/Development-News/articleType/ArticleView/articleId/180/Community-Development-Block-Grant-Highlights">http://cityofls.net/Development/Development-News/articleType/ArticleView/articleId/180/Community-Development-Block-Grant-Highlights</a>

**Table 4 – Citizen Participation Outreach**



## Expected Resources

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

#### Introduction

The Community Development Block Grant is the only known resource to be available to the City of Lee's Summit from various federal resources to address the identified community needs. Local agencies will have opportunities to apply for the ESG grant through the State of Missouri. Public housing needs may also be met with other HUD grants to be awarded to the Lee's Summit Housing Authority. Local agencies will continue to make efforts and explore new funding sources for their programs to meet client needs.

#### 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	354,769	0	12,856	367,625	0	CDBG allocation expected for program year 2017-18. Surplus funds unexpended from prior years will also be available for redistribution.

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: \$		
General Fund	public - local	Admin and Planning	0	0	0	0	0	
Public Housing Capital Fund	public - federal	Housing	0	0	0	0	0	
Other	private	Housing	0	0	0	0	0	
Other	private	Public Services	0	0	0	0	0	

**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**

The CDBG funding is leveraged with other resources for most of our programs. For CDBG, the City will continue to cover a lot of the administrative cost with its general fund. Lee's Summit Housing Authority leverages other federal funds for capital expenses. Other subrecipients combine CDBG allocations with a variety of other funding sources, including in-kind donations, local grants, local churches, local charities, private foundations, private fundraising, State funding resources, etc. The City will not require funding match for any of the CDBG funded programs and projects.



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

N/A.

**Discussion**

No further discussion.

## 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	CDBG Program Planning/Administration	2015	2019	Planning and Administration	Communitywide	CDBG Administration and Planning	CDBG: \$29,000	Other: 1 Other
2	Food Services for Persons with Special Needs	2017	2019	Non-Homeless Special Needs	Communitywide	Food Services for Persons of Special Needs	CDBG: \$5,500	Public service activities other than Low/Moderate Income Housing Benefit: 23 Persons Assisted
3	Services for Victims of Domestic Violence	2015	2019	Homeless Non-Homeless Special Needs	Communitywide	Mental Health/Substance Abuse Assistance Transitional Housing & Domestic Violence Shelters Expansion of Abuse Center Capacity	CDBG: \$17,200	Public service activities other than Low/Moderate Income Housing Benefit: 54 Persons Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
4	Emergency Needs of LMI Persons/Families	2015	2019	Non-Homeless Special Needs	Old Town Area Communitywide	Urgent Needs of LMI Persons and Families	CDBG: \$24,000	Public service activities other than Low/Moderate Income Housing Benefit: 2897 Persons Assisted
5	Services for Mental Health and Substance Abuse	2015	2019	Non-Homeless Special Needs	Old Town Area Communitywide	Mental Health/Substance Abuse Assistance	CDBG: \$4,575	Public service activities other than Low/Moderate Income Housing Benefit: 128 Persons Assisted
6	Public Housing	2015	2019	Affordable Housing Public Housing	Old Town Area Communitywide	Affordable Housing and Home Repairs	CDBG: \$142,500	Rental units rehabilitated: 76 Household Housing Unit
7	Home Repairs	2015	2019	Affordable Housing	Communitywide	Affordable Housing and Home Repairs	CDBG: \$142,910	Homeowner Housing Rehabilitated: 15 Household Housing Unit

**Table 6 – Goals Summary**

### Goal Descriptions

1	<b>Goal Name</b>	CDBG Program Planning/Administration
	<b>Goal Description</b>	Various activities and associated expenses for the general administration of the CDBG program, including planning activities as allowed by HUD regulations.

2	<b>Goal Name</b>	Food Services for Persons with Special Needs
	<b>Goal Description</b>	Coldwater of Lee's Summit partners with Harvesters and the Lee's Summit School District to provide weekend backpacks of food to chronically hungry children within the Lee's Summit School District who are part of the free and reduced lunch population.
3	<b>Goal Name</b>	Services for Victims of Domestic Violence
	<b>Goal Description</b>	Hope House provides emergency shelter and services for moms and children running away from domestic violence. The agency expressed a continuing need financially to support its Children's Therapy services.
4	<b>Goal Name</b>	Emergency Needs of LMI Persons/Families
	<b>Goal Description</b>	Lee's Summit Social Services provides food, clothing, supplies, rental assistance, medical assistance to LMI persons with emergency needs. The Agency needs financial support for its operation by filling the budget gap in its operating cost. Center for Conflict Resolution supports individuals and families of LMI in resolving conflicts.
5	<b>Goal Name</b>	Services for Mental Health and Substance Abuse
	<b>Goal Description</b>	Agencies providing services for persons with mental health issues and substance abuse problems expressed a need for financial support to its programs to meet an unmet community need.
6	<b>Goal Name</b>	Public Housing
	<b>Goal Description</b>	Provide assistance to Lee's Summit Housing Authority for its interior unit rehab project at its Lea Haven and Duncan Estates public housing complexes.
7	<b>Goal Name</b>	Home Repairs
	<b>Goal Description</b>	Continue to fund the minor home repair program to provide financial assistance to LMI homeowners who need critical repairs to their homes. This also implements the community's strategy for the upkeep of the affordable housing stock.

# Projects

## AP-35 Projects – 91.220(d)

### Introduction

This program year, Lee's Summit continues to support existing on-going programs by providing same level of CDBG funding to public service agencies as in previous years. Due to the 15% cap for public service activities, the allocated funding for these programs is lower than the level of support the public service agencies requested. On the non-public-service side, the City maintains the level of funding for its minor home repair program. The City continues to work with Lee's Summit Housing Authority to make needed updates of its residential units for sustainability and energy efficiency.

### Projects

#	Project Name
1	CDBG Planning & Administration
2	Coldwater of Lee's Summit BackSnack Program
3	Children's Therapy Services
4	Lee's Summit Social Services Operating Expenses
5	Parenting with Love and Logic
6	Case Management for At-Risk Elementary Children
7	Community Mediation
8	Lee's Summit Housing Authority Residential Interior Rehab
9	Minor Home Repair Program

Table 7 - Project Information

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

**AP-38 Project Summary**  
**Project Summary Information**

1	<b>Project Name</b>	CDBG Planning & Administration
	<b>Target Area</b>	Communitywide
	<b>Goals Supported</b>	CDBG Program Planning/Administration
	<b>Needs Addressed</b>	CDBG Administration and Planning
	<b>Funding</b>	CDBG: \$29,000
	<b>Description</b>	Various activities and associated expenses for the general administration of the CDBG program, including planning related activities as allowed by HUD regulations.
	<b>Target Date</b>	6/30/2018
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	N/A
	<b>Location Description</b>	N/A
	<b>Planned Activities</b>	Various expenses associated with the city's general administration of the CDBG program.
2	<b>Project Name</b>	Coldwater of Lee's Summit BackSnack Program
	<b>Target Area</b>	Communitywide
	<b>Goals Supported</b>	Emergency Needs of LMI Persons/Families
	<b>Needs Addressed</b>	Food Services for Persons of Special Needs
	<b>Funding</b>	CDBG: \$5,500
	<b>Description</b>	Provide free bagged lunches through the BackSnack program of Harvesters for chronically hungry school children.
	<b>Target Date</b>	6/30/2018
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	23 students.
	<b>Location Description</b>	Food will be distributed to the schools.
	<b>Planned Activities</b>	Provide backpacks of free lunches to school children for weekends.
3	<b>Project Name</b>	Children's Therapy Services
	<b>Target Area</b>	Communitywide
	<b>Goals Supported</b>	Services for Victims of Domestic Violence

	<b>Needs Addressed</b>	Transitional Housing & Domestic Violence Shelters
	<b>Funding</b>	CDBG: \$17,200
	<b>Description</b>	Provide services focusing on issues relevant to children who have been exposed to violence, such as self-esteem, safety planning, conflict resolution skills and healthy ways of managing emotions.
	<b>Target Date</b>	6/30/2018
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	60.
	<b>Location Description</b>	Confidential due to the nature of the service.
	<b>Planned Activities</b>	Sessions providing therapy for children exposed to violence.
<b>4</b>	<b>Project Name</b>	Lee's Summit Social Services Operating Expenses
	<b>Target Area</b>	Communitywide
	<b>Goals Supported</b>	Emergency Needs of LMI Persons/Families
	<b>Needs Addressed</b>	Urgent Needs of LMI Persons and Families
	<b>Funding</b>	CDBG: \$24,000
	<b>Description</b>	Provide CDBG funding to assist with the agency's operating cost, including utilities, communication services and vehicle usage and maintenance.
	<b>Target Date</b>	6/30/2018
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	It is estimated that approximately 2,857 unduplicated individuals will benefit from services rendered by this agency and this program. This number is based upon the recommended funding allocation and the agency's past performance. All individuals and families served will be low- to moderate-income.
	<b>Location Description</b>	The agency is located at 108 SE 4th St, Lee's Summit, MO 64063.
	<b>Planned Activities</b>	Providing emergency assistance to persons and families who need food, clothing, utility assistance, medical assistance, school supplies, etc.
<b>5</b>	<b>Project Name</b>	Parenting with Love and Logic
	<b>Target Area</b>	Communitywide
	<b>Goals Supported</b>	Services for Mental Health and Substance Abuse
	<b>Needs Addressed</b>	Mental Health/Substance Abuse Assistance



	<b>Funding</b>	CDBG: \$775
	<b>Description</b>	Provide scholarship for parents taking classes on becoming empowered in their interactions with their children at risk.
	<b>Target Date</b>	6/30/2018
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	The entire program is estimated by ReDiscover to serve 255 adults and 505 children, part of which will be funded with CDBG grant.
	<b>Location Description</b>	ReDiscover has two locations in Lee's Summit: 901 NE Independence Ave and 1555 NE Rice Rd serving client throughout the community.
	<b>Planned Activities</b>	Classes by certified instructors.
<b>6</b>	<b>Project Name</b>	Case Management for At-Risk Elementary Children
	<b>Target Area</b>	Old Town Area
	<b>Goals Supported</b>	Services for Mental Health and Substance Abuse
	<b>Needs Addressed</b>	Mental Health/Substance Abuse Assistance
	<b>Funding</b>	CDBG: \$3,800
	<b>Description</b>	A school-based program to provide needed counseling for elementary students identified to be at-risk.
	<b>Target Date</b>	6/30/2018
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	ReDiscover estimated that the entire program will serve 205 elementary students.
	<b>Location Description</b>	ReDiscover is providing case management at Lee's Summit Elementary School, located at 110 SE Green St., Lee's Summit, MO 64063
	<b>Planned Activities</b>	Case management at elementary school.
<b>7</b>	<b>Project Name</b>	Community Mediation
	<b>Target Area</b>	Communitywide
	<b>Goals Supported</b>	Emergency Needs of LMI Persons/Families
	<b>Needs Addressed</b>	Urgent Needs of LMI Persons and Families
	<b>Funding</b>	CDBG: \$1,940
	<b>Description</b>	Financial assistance to individuals of Lee's Summit residence for mediation services provided by Center for Conflict Resolution.

	<b>Target Date</b>	6/30/2018
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Center for Conflict Resolution estimates that the entire program could serve 60 clients.
	<b>Location Description</b>	The Center for Conflict Resolution is located at 1734 E 63rd St, Kansas City, Mo 64110.
	<b>Planned Activities</b>	Professional facilitators and trained community volunteers help parties solve conflict in just and peaceful ways.
<b>8</b>	<b>Project Name</b>	Lee's Summit Housing Authority Residential Interior Rehab
	<b>Target Area</b>	Old Town Area Communitywide
	<b>Goals Supported</b>	Public Housing
	<b>Needs Addressed</b>	Affordable Housing and Home Repairs
	<b>Funding</b>	CDBG: \$142,500
	<b>Description</b>	Interior rehabilitation of 76 units in Lea Haven and Duncan Estates to include: ADA improvements in bathrooms; water conserving plumbing upgrades; and the replacement of interior doors, toilets, showers/tubs, lavatories, and flooring.
	<b>Target Date</b>	12/31/2018
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Renovations are planned for 76 units and will affect 90 residents. All residents are low- to moderate-income.
	<b>Location Description</b>	The units to be rehabilitated are within the Lea Haven and Duncan Estates complexes.
	<b>Planned Activities</b>	Interior rehabilitation of 76 units in Lea Haven and Duncan Estates to include: ADA improvements in bathrooms; water conserving plumbing upgrades; and the replacement of interior doors, toilets, showers/tubs, lavatories, and flooring.
<b>9</b>	<b>Project Name</b>	Minor Home Repair Program
	<b>Target Area</b>	Communitywide
	<b>Goals Supported</b>	Home Repairs

<b>Needs Addressed</b>	Affordable Housing and Home Repairs CDBG Administration and Planning
<b>Funding</b>	CDBG: \$14,290,996
<b>Description</b>	Provide minor exterior repairs and minor private sanitary sewer repairs to eligible homeowners.
<b>Target Date</b>	12/31/2018
<b>Estimate the number and type of families that will benefit from the proposed activities</b>	15 single family owner occupied homes of low income families will benefit with needed exterior repairs to their homes and/or private sanitary sewer system.
<b>Location Description</b>	The program is open to all qualified home owners regardless of location within Lee's Summit city limits.
<b>Planned Activities</b>	Provide grants up to \$10,000 for minor exterior home repairs and up to \$3,000 for minor private sanitary sewer repairs for LMI households in Lee's Summit.

## **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 programs to be funded target LMI persons and families and persons with special needs regardless of their location in Lee's Summit. The majority of the agencies to receive CDBG funding are located within or immediately adjacent to the old town area of the community.

### **Geographic Distribution**

<b>Target Area</b>	<b>Percentage of Funds</b>
Old Town Area	
Communitywide	100

**Table 8 - Geographic Distribution**

### **Rationale for the priorities for allocating investments geographically**

Generally, there is no priority given based on geographic location. The programs/projects are funded to serve the needs of targeted clients regardless of geographic locations, so long as the clients are Lee's Summit residents. Some services go beyond the city limits.

### **Discussion**

The City identified three different Geographic Distribution Target Areas for the purpose of the Consolidated Plan: Downtown, Old Town Area and Communitywide. However, the programs and services to be supported through the CDBG program target the populations that the CDBG program is designed for, without an obvious emphasis on the geographic locations of the clients. As shown above, the City intends to allocate funding for programs and services that do not specifically have a geographic focus. However, most of these programs and services benefit the population located in the Downtown and Old Town Area.

## Affordable Housing

### AP-55 Affordable Housing – 91.220(g)

#### Introduction

For the 2017-18 Action Plan, the City anticipates supporting the LSHA and Minor Home Repair Programs at levels specified in the projects section of the plan. This means that the City expects to benefit approximately 76 households through the LSHA interior rehab program and 15 households through the Minor Home Repair Program.

The Minor Home Repair Program has been an on-going activity of the City, providing support to LMI homeowners for needed exterior repairs and and emergency repairs to private sewer system.

One Year Goals for the Number of Households to be Supported	
Homeless	0
Non-Homeless	91
Special-Needs	0
Total	91

**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	0
Rehab of Existing Units	91
Acquisition of Existing Units	0
Total	91

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

#### Discussion

The Minor Home Repair program is a multi-year program and it is anticipated that during the program year of 2017-18, additional homeowners will be assisted utilizing prior year funds as they come in the process. The anticipated goals referenced above do not reflect these beneficiaries.

## **AP-60 Public Housing – 91.220(h)**

### **Introduction**

The vision of the Lee's Summit Housing is to "Create new communities where children, families, seniors, individuals with disabilities and veterans can increase their opportunity for a better life". The mission of the Lee's Summit Housing Authority is to fulfill the need for decent, safe and affordable housing for low to moderate income seniors and families residing in Lee's Summit; to provide quality living environments; to create partnerships for affordable housing opportunities; to promote a people-oriented organization that encourages and supports the families we serve.

### **Strategic Goals:**

- Develop a reputation of effective leadership as an advocate for affordable housing.
- Collaborate with community organizations to expand the supply of affordable housing opportunities.
- Continue to improve operations necessary to remain a high-performing and financially strong organization.
- Protect and improve existing housing stock in the community.
- Foster the growth of our employees to promote an organization recognized for our integrity, accountability and customer service.

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

The Lee's Summit Housing Authority (LSHA) has adopted the following action strategies to address the needs of Public Housing:

#### **9.1 Strategy for Addressing Housing Needs**

- Apply for additional rental vouchers (as they may become available through HUD) and actively administrate the Section 8 Housing Choice Voucher Program.
- Reduce public housing vacancies (vacancy rate of less than >2%) to ensure all units are being utilized
- Explore leveraging public and private funds to create additional housing opportunities
- Collaborate with the City of Lee's Summit, Jackson County, other for-profit and non-profit organizations in the development of affordable housing
- Participate in Housing Affordability Market Studies
- Collaborate with the Lee's Summit Economic Development Council
- Acquire or build units or developments (and explore management of other housing programs)
- Undertake measures to ensure access to affordable housing among families assisted by the PHA, regardless of unit size required

- Develop strategies and carry out necessary physical improvements to improve energy efficiencies in public housing units.
- Affirmatively market to races/ethnicities shown to have disproportionate housing needs (Consolidated Plan)
- Explore designation of public housing units for the elderly
- Explore admissions preferences aimed at working families
- Conduct physical needs assessments, energy audits and other applicable reviews as necessary for proper planning
- Renovate and modernize existing public housing units; maintaining safe, decent and affordable housing
- Employ effective management and maintenance policies

### **Reasons for Selecting Strategies**

- Housing needs identified in the CDBG Consolidated Plan for the City of Lee's Summit 2015 – 2019
- Local housing markets / resources / current affordable housing stock
- CHAS Data
- Census Data
- Collaboration with the City of Lee's Summit
- Housing Needs Identified in 2014 Lee's Summit Housing Affordability Analysis
- Consultation with residents and advisory board

### **Needs Identified:**

Physical Needs: LSHA has identified needed physical improvements and modernization activities that will improve the quality of life for residents through improved living environments, increased energy efficiency and ensuring long-term viability of the existing public housing stock. These activities are detailed in the 5-Year Plan covering the period of 2015-2019 as follows:

- Renovate Bathrooms 18-units;
- Repair structural Issues 4-buildings;
- Replace Appliances Utilizing Energy Star 91-units;
- Replace Exterior Primary Doors with energy efficient 50-units;
- Interior Rehab (occupied units) 50-units;
- Exterior Rehab 33-buildings;
- Replace Water Lines (Lee Haven) 50-units;
- Site Improvements PHA-wide;

Operational Needs: LSHA has identified needed operational improvements necessary to maintain a high performing agency. These include costs associated with housing operations and computer/software/IT

services.

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

The Lee's Summit Housing Authority has a Resident Housing Commissioner appointed to serve on the Board of Housing Commissioners. Lee's Summit Mayor, Randy Rhodes appointed Ms. Kathern Kelsey to serve as a Commissioner of the Housing Authority. Ms. Kelsey, a Resident of Duncan Estates, was appointed on June 18, 2015, for a term ending May 4, 2017. Ms. Kelsey is a welcomed addition to the Housing Authority Board of Commissioners and she will bring a unique perspective and insight to the Board. The Lee's Summit Housing Authority keeps open communications with the residents through a monthly news-letter and twice monthly pot-luck dinners. Residents are also engaged by LSHA management and Board Members. The Lee's Summit Housing Authority maintains an "open door" policy for residents to voice their concerns.

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

The Lee's Summit Housing Authority is designated a High Performing Agency by HUD through its Public Housing Management Assessment and Section Eight Management Assessment Programs. LSHA is not designated as "Troubled".

### **Discussion**

Many of the strategies and goals for long-term viability and objectives for addressing the needs of the Lee's Summit Housing Authority and the greater Community are taken directly from the information, strategies and objectives identified in the City of Lee's Summit Consolidated Plan and as may also be identified in additional "Studies" such as the Old Lee's Summit Development Master Plan and Housing Affordability Analysis 2014 and previous and subsequent studies (Census, CHAS, etc.)

Many of the physical and operational improvements identified in LSHAs 5-Year Plan are contingent upon current and future funding through the CDBG Program, HUD Funding (CFP & OPFND) and, PILOT waiver by the City.

Many of the strategies to address the need for developing affordable housing opportunities and solutions for the growing Senior population, Veterans and low to moderate income families is dependent upon cooperation by the City of Lee's Summit, the Business Community, Private and Public Investment and the greater Community support.



## **AP-65 Homeless and Other Special Needs Activities – 91.220(i)**

### **Introduction**

For the 2017-18 Action Plan, the City anticipates supporting the homeless and special needs populations by the continued support to local public services and domestic violence shelters such as Hope House, ReDiscover, Lee's Summit Social Services, and other local agencies that offer food and nutrition to persons with special needs.

Coldwater of Lee's Summit has requested funds to continue the support of the "BackSnack Program". This program provides nutritional needs of hungry children. Hope House is continuing its "Children's Therapy Services Program". Lee's Summit Social Services requests continued financial support for their agency by covering a portion of their general operating expenses. ReDiscover has requested funds for its "Parenting with Love and Logic" Program and "Case Management for At-risk School Children". Center for Conflict Resolution provides consultation services for its clients tangled in disputes and conflicts to move to resolution. CDBG funds will help the agency to offer such service to individuals who do not have the financial means to receive such service.

### **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**

Will coordinate and work with CoC for its outreach and assessment efforts.

#### **Addressing the emergency shelter and transitional housing needs of homeless persons**

The City's strategy for addressing the emergency and transitional housing needs of people who are homeless or at risk of homelessness includes sustained funding that maintains existing shelters and services, through the allocation of Community Development Block Grant resources to local entities that leverage further resources for that purpose. Coordination among different agencies and service providers to assist the homeless and prevent homelessness will be led by the Homeless Services Coalition of Greater Kansas City (HSCGKC). The Jackson County Continuum of Care (CoC) will engage and coordinate resources to improve current programs and funding strategies.

- **Emergency Shelters & Services**—Currently, Lee's Summit does not provide permanent shelters for chronic homeless. Shelters and services in the network of the CoC provide coverage for the region including Lee's Summit. However, emergency shelters are available for domestic violence victims and their children and transitional housing is available for short-term homeless.
- Hope House is a domestic violence shelter providing outreach counseling and emergency shelter for victims of domestic violence (women and their children). It also provides group and

individual therapy to victims in Lee's Summit. The City will continue to support its service needs with CDBG funds in 2017-18.

- ReDiscover Mental Health, Inc. provides temporary shelter for homeless persons in two apartments within Lee's Summit. This program operates two respite apartment services for mentally ill adults who have a housing crisis and need temporary shelter. The City will continue to support the agency's service needs in the 2017-18 program year with CDBG allocations.

**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's strategy for helping people who are homeless, particularly the chronically homeless, transition to stable housing and independent living focuses on better coordination with the Jackson County CoC while maintaining the level of appropriate supportive services and the number of units of permanent supportive housing provided by local agencies. Needs associated with this stage of the process are largely addressed by non-profit organizations like Hillcrest Transitional Housing and local churches. Local churches often provide similar services without any assistance from the CDBG Program, but nonetheless play an important role in helping homeless individuals and families make the transition to permanent housing.

**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.**

Prevention initiatives play a central role in short term and long term strategies to help low-income individuals and families avoid becoming homeless. Local agencies providing housing assistance and emergency shelters have already built into their programs homeless prevention counseling for the people and families they serve. In the 2017-18 program year, the City will direct CDBG funds to several of these programs to alleviate budget shortage. In the meantime, CDBG support will also benefit local agencies and programs that provide services targeting LMI persons and persons with special needs for housing, health, and other social services.

## **Discussion**



## **AP-75 Barriers to affordable housing – 91.220(j)**

### **Introduction:**

The City of Lee's Summit's adopted public policies and standards pertaining to development as well as housing development and residential investment in the community are designed and updated to promote and protect community values, to ensure quality, to improve sustainability, to protect property values and investments, and to provide equal opportunities for all. The City does not and will not endorse and put in place any public policies that will prevent investment and development of affordable housing.

### **Actions it planned to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment**

During the 2017-18 Program Year, the City of Lee's Summit plans to continue the support of the largely successful activity that is known as the City's Minor Home Repair Program. The City will also continue to evaluate and update the zoning ordinance, Unified Development Ordinance (UDO), and Comprehensive Plan as needed.

### **Discussion:**

## **AP-85 Other Actions – 91.220(k)**

### **Introduction:**

Coordination of services is extremely important to ensure services are provided efficiently and effectively, especially when resources are scarce.

### **Actions planned to address obstacles to meeting underserved needs**

The major obstacle to meeting underserved needs is limited funding. The City will continue to encourage public service agencies to actively explore and pursue new funding opportunities. The City will also continue to explore and participate in regional solutions to some of the underserved needs.

### **Actions planned to foster and maintain affordable housing**

Funded programs and projects through the CDBG program for housing related repairs and rehabilitation meet the goal of sustaining the community's affordable housing stock and improving the conditions. In addition, the City will continue to foster and maintain affordable housing through implementation of the Comprehensive Plan that promotes housing varieties and sustainable development.

### **Actions planned to reduce lead-based paint hazards**

- Continue to educate the public regarding the danger of lead-based paint hazards.
- Continue to enforce the requirement for residential rehabilitation contractors to be properly licensed when taking on residential rehabilitation projects.
- Continue to perform lead-based paint hazard inspections when appropriate for CDBG funding Minor Home Repair and First-Time Homebuyer programs.

### **Actions planned to reduce the number of poverty-level families**

The City will focus on economic development by:

- Increase business activities.
- Expand employment opportunities.
- Foster small business and startups.
- Invest in needed public infrastructure improvement for economic development.
- Encourage and incentivize business expansion and new business activities.
- Continued to support private agencies for services to help poverty-level population to get on their feet.

### **Actions planned to develop institutional structure**

The City will continue to improve the institutional structure to better serve the needs of the community. Inter-agency coordination will continue to be the focus in order to improve efficiency and avoid duplication of efforts.

**Actions planned to enhance coordination between public and private housing and social service agencies**

- Continue to provide training for agencies receiving CDBG funding.
- Continue to encourage agencies, private or public, to communicate and coordinate.
- Continue to monitor CDBG subrecipients on performance and provide technical support as needed.

**Discussion:**

## Program Specific Requirements

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

#### Introduction:

The City's CDBG funded programs and projects are not intended to generate any program income up to today. Funds returned to the line of credit have been normally a result of programs and projects completed or cancelled with a balance of unused funds.

#### 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
<b>Total Program Income:</b>	<b>0</b>

#### 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.	80.00%

**Emergency Solutions Grant (ESG)**  
**Reference 91.220(I)(4)**

1. Include written standards for providing ESG assistance (may include as attachment)
2. If the Continuum of Care has established centralized or coordinated assessment system that meets HUD requirements, describe that centralized or coordinated assessment system.
3. Identify the process for making sub-awards and describe how the ESG allocation available to private nonprofit organizations (including community and faith-based organizations).
4. If the jurisdiction is unable to meet the homeless participation requirement in 24 CFR 576.405(a), the jurisdiction must specify its plan for reaching out to and consulting with homeless or formerly homeless individuals in considering policies and funding decisions regarding facilities and services funded under ESG.
5. Describe performance standards for evaluating ESG.

**Housing Trust Fund (HTF)**  
**Reference 24 CFR 91.220(I)(5)**

1. Distribution of Funds
  - a. Describe the eligibility requirements for recipients of HTF funds (as defined in 24 CFR § 93.2).
  - b. Describe the jurisdiction's application requirements for eligible recipients to apply for HTF funds.
  - c. Describe the selection criteria that the jurisdiction will use to select applications submitted by eligible recipients.



- d. Describe the jurisdiction's required priority for funding based on geographic distribution, which is a description of the geographic areas of the State (including areas of low-income and minority concentration) in which it will direct assistance during the ensuing program year.
- e. Describe the jurisdiction's required priority for funding based on the applicant's ability to obligate HTF funds and undertake eligible activities in a timely manner.
- f. Describe the jurisdiction's required priority for funding based on the extent to which rents for units in the rental project are affordable to extremely low-income families.
- g. Describe the jurisdiction's required priority for funding based on the financial feasibility of the project beyond the required 30-year period.
- h. Describe the jurisdiction's required priority for funding based on the merits of the application in meeting the priority housing needs of the jurisdiction (such as housing that is accessible to transit or employment centers, housing that includes green building and sustainable development features, or housing that serves special needs populations).
- i. Describe the jurisdiction's required priority for funding based on the location of existing affordable housing.
- j. Describe the jurisdiction's required priority for funding based on the extent to which the application makes use of non-federal funding sources.

2. Does the jurisdiction's application require the applicant to include a description of the eligible activities to be conducted with HTF funds?

3. Does the jurisdiction's application require that each eligible recipient certify that housing units assisted with HTF funds will comply with HTF requirements?

4. **Performance Goals and Benchmarks.** The jurisdiction has met the requirement to provide for performance goals, consistent with the jurisdiction's goals established under 24 CFR 91.215(b)(2), by including HTF in its housing goals in the housing table on the SP-45 Goals and AP-20 Annual Goals and Objectives screens.

5. **Rehabilitation Standards.** The jurisdiction must establish rehabilitation standards for all HTF-assisted

housing rehabilitation activities that set forth the requirements that the housing must meet upon project completion. The jurisdiction's description of its standards must be in sufficient detail to determine the required rehabilitation work including methods and materials. The standards may refer to applicable codes or they may establish requirements that exceed the minimum requirements of the codes. The jurisdiction must attach its rehabilitation standards below. If the jurisdiction will not use HTF funds for the rehabilitation of housing, enter "N/A".

In addition, the rehabilitation standards must address each of the following: health and safety; major systems; lead-based paint; accessibility; disaster mitigation (where relevant); state and local codes, ordinances, and zoning requirements; Uniform Physical Condition Standards; and Capital Needs Assessments (if applicable).

**6. Resale or Recapture Guidelines.** Below, the jurisdiction must enter (or attach) a description of the guidelines that will be used for resale or recapture of HTF funds when used to assist first-time homebuyers. If the jurisdiction will not use HTF funds to assist first-time homebuyers, enter "N/A".

**7. HTF Affordable Homeownership Limits.** If the jurisdiction intends to use HTF funds for homebuyer assistance and does not use the HTF affordable homeownership limits for the area provided by HUD, it must determine 95 percent of the median area purchase price and set forth the information in accordance with §93.305. If the jurisdiction will not use HTF funds to assist first-time homebuyers, enter "N/A".

**8. Limited Beneficiaries or Preferences.** Describe how the jurisdiction will limit the beneficiaries or give preferences to a particular segment of the extremely low- or very low-income population to serve unmet needs identified in its consolidated plan or annual action plan. If the jurisdiction will not limit the beneficiaries or give preferences to a particular segment of the extremely low- or very low-income population, enter "N/A."

Any limitation or preference must not violate nondiscrimination requirements in § 93.350, and the jurisdiction must not limit or give preferences to students. The jurisdiction may permit rental housing owners to limit tenants or give a preference in accordance with § 93.303 only if such limitation or preference is described in the action plan.

**9. Refinancing of Existing Debt.** Enter or attach the jurisdiction's refinancing guidelines below. The guidelines describe the conditions under which the jurisdiction will refinance existing rental housing project debt. The jurisdiction's refinancing guidelines must, at minimum, demonstrate that rehabilitation is the primary eligible activity and ensure that this requirement is met by establishing a minimum level of rehabilitation per unit or a required ratio between rehabilitation and refinancing. If

the jurisdiction will not refinance existing debt, enter "N/A."

**Discussion:**