

NOTICE OF AVAILABILITY FOR REVIEW AND COMMENT ON THE CITY OF OVERLAND PARK'S COMMUNITY DEVELOPMENT BLOCK GRANT 2018 CONSOLIDATED ANNUAL PERFORMANCE AND EVALUATION REPORT

Date of Publication: February 26, 2019

City of Overland Park
8500 Antioch Road
Overland Park, Kansas 66212
(913) 895-6192

Notice is hereby given to all interested agencies, groups and residents of Overland Park that the City's CDBG 2018 Consolidated Annual Performance and Evaluation Report (CAPER) is available for review and comment. The CAPER evaluates the City's use of federal Community Development Block Grant funds (CDBG) received from the U.S. Department of Housing and Urban Development (HUD) during the 2018 program year.

The CAPER identifies activities undertaken and/or completed during the period of January 1 to December 31, 2018. The report assesses the City's activities and accomplishments in relation to the 2015-2019 Consolidated Plan and the 2018 Annual Action Plan. The CAPER will be submitted to HUD on or before March 31, 2019.

A copy of the CAPER will be available for review or comment for 16 days beginning on February 26, 2019 through March 13, 2019. The public is welcome to review the 2018 CAPER at any of the locations listed below:

- City of Overland Park, City Clerk's Office: City Hall, 8500 Santa Fe Drive
- City of Overland Park, Community Services Office: Myron Scafe Building, 8500 Antioch Road
- Johnson County Central Resource Library: 9875 West 87th Street
- City of Overland Park's website: www.opkansas.org

The Governing Body of Overland Park will conduct a public hearing on the matter at its regularly scheduled meeting to be held at 7:30 p.m. on Monday, March 18, 2019 in Council Chambers, City Hall, 8500 Santa Fe Drive, Overland Park, KS 66212. The public is welcome to attend the meeting and to comment regarding the 2018 CAPER.

For questions regarding the 2018 CAPER, please contact:
Julie Smith, Grants Program Coordinator – 8500 Antioch Road – 913/895-6192

Written comments can be submitted to:
Julie Smith: julie.smith@opkansas.org
OR
City of Overland Park - Neighborhood Services
8500 Antioch Road
Overland Park, KS 66212



ABOVE AND BEYOND. BY DESIGN.

City of Overland Park

**2018 Community Development Block Grant
Consolidated Annual Performance and Evaluation Report (CAPER)**

Submitted to:
U.S. Department of Housing and Urban Development

Prepared By:
City of Overland Park Planning and Development Department

CR-05 - Goals and Outcomes

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

During the 2018 Program Year, covering the period of January 1, 2018 through December 31, 2018, a total of \$542,602.92 in CDBG funds was disbursed. The funds utilized during the 2018 Program Year were remaining funds from the City's 2017 allocation.

Public Facilities and Infrastructure	\$334,963.95	(2016 & 2017 funds)
Single-Unit Housing Rehabilitation	\$63,845.45	(2016 & 2017 funds)
Public Service Projects	\$98,413.41	(2017 funds)
Planning & Administration	\$45,380.11	(2017 funds)

The Public Facilities and Infrastructure Project approved in the 2016 Annual Action Plan was a Street Reconstruction Project that was awarded funding from multiple annual allocations, including Pre-2015, 2016, and 2017. This project was completed during the 2017 Program Year and the final funds were drawn during the 2018 Program Year.

Projects approved within the 2017 Annual Action Plan did not receive funding awards until the fourth quarter of 2017, which resulted in a delay of the disbursement of funds from the 2017 allocation within the 2017 Program Year; therefore the majority of the funds expended during the 2018 Program Year were from 2017 projects. In addition, the projects approved in the 2018 Annual Action Plan did not receive their awards until the fourth quarter of 2018; therefore minimal 2018 funds were disbursed during the 2018 Program Year.

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)

Goal	Category	Source / Amount	Indicator	Unit of Measure	Expected – Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected – Program Year	Actual – Program Year	Percent Complete
Administrative Services	Admin Cost Only	CDBG: \$500,000.00	Other	Other	1	1	100%	1	1	100%
City Funded Public Service Projects	Emergency and Utility assistance	City General Funds Budget: \$424,000.00	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	300	10,905	3635%			
HOME Projects	Affordable Housing Homeless	HOME: \$524,000.00	Homeowner Housing Rehabilitated	Household Housing Unit	15	7	46.67%			
Minor Home Repair	Affordable Housing	CDBG: \$540,000.00	Homeowner Housing Rehabilitated	Household Housing Unit	20	14	70.00%	20	14	70.00%
Public Facilities and Infrastructure Improvements	Homeless Non-Housing Community Development	CDBG: \$2,368,000.00	Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit	Households Assisted	250	538	215.20%	3000	538	17.93%
Public Services	Affordable Housing Homeless Non-	CDBG: \$92,000.00	Public service activities other than Low/Moderate	Persons Assisted	250	253	101.20%			

	Homeless Special Needs		Income Housing Benefit							
Public Services	Affordable Housing Homeless Non- Homeless Special Needs	CDBG: \$92,000.00	Public service activities for Low/Moderate Income Housing Benefit	Households Assisted				100	253	253%

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

DRAFT

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

The City of Overland Park's 2015-2019 Consolidated Plan identified the following as highest priority needs:

Non-housing Community Development, including public facilities, public improvements, and infrastructure:

The City of Overland Park completed a street reconstruction project on Grant Street between 87th and 79th Street during the 2017 Program Year, with final financial disbursements during the 2018 Program Year. A total of \$905,340.00 of CDBG funds was expended on this project, including \$300,000 from Pre-2015 funds, \$305,340 from a substantial amendment of the 2015 Annual Action Plan for FY2015 funds, and \$300,000 from the FY2016 Allocation. This project included upgrading the street to City standards for width, storm water management, lighting and walkability and replacement of the parking lot of the adjacent Sapling Grove Park. The area served by this project has a low and moderate income percentage of 55.67%.

In addition, SAFEHOME, Inc., a domestic violence shelter, completed a project with \$14,120.50 for improvements to their emergency shelter, including the installation of a bus shelter on their property for the use of their residents.

Single-Unit Housing Rehabilitation:

The City of Overland Park provides funding for the Minor Home Repair Program through a contract with Johnson County Housing Services. The remaining \$31,016.24 of the FY2016 funds allocated to the Minor Home Repair Program was spent on rehabilitation projects completed in 2018. \$32,829.20 of FY2017 funds allocated to this project was disbursed during the 2018 Program Year, with \$67,170.80 remaining of FY2017 funds to be disbursed to completed and future projects.

In addition, Friends of JCDS completed interior and exterior accessibility updates for a single family home utilized as a group home for individuals with disabilities with \$11,486.00 of FY2017 CDBG funds.

Public Services:

The City of Overland Park disbursed \$98,413.41 of FY2017 funds to five public service agencies that provided supportive services and financial assistance to low and moderate income households. The public service agencies included Catholic Charities of Northeast Kansas, Hillcrest Transitional Housing, Johnson County Park and Recreation District and The Salvation Army.

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	445
Black or African American	287
Asian	12
American Indian or American Native	17
Native Hawaiian or Other Pacific Islander	2
Total	763
Hispanic	92
Not Hispanic	671

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

Narrative

The table above shows the persons served through the Minor Home Repair Program, child care services, emergency shelter services, and emergency assistance during the 2018 Program Year, which utilized both FY2016 and FY2017 funds.

As of the 2015 American Community Survey, the following demographics apply to the City of Overland Park:

White	84.2%
Black or African American	5.0%
Asian	7.2%
American Indian or American Native	0.2%
Native Hawaiian or Other Pacific Islander	0.0%
Other	3.4%
Hispanic	6.3%
Not Hispanic	93.7%

The racial and ethnic composition of families assisted is similar to the overall demographics of Overland Park, with the exception of a comparatively greater ratio of Black or African American persons served.

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		751,427.00	542,602.92
Other	City General Funds Budget	130,200	130,200
Other	HOME	125,085.25	16,250.97

Table 3 – Resources Made Available

Narrative

The City of Overland Park's FY2018 CDBG award was \$751,427.00, of which \$608,791.31 was allocated to 2018 projects. The City received its FY2018 formula allocation in the third quarter of the program year, which left a limited time period for subrecipients to perform funded activities and seek reimbursement within 2018. In order to ensure subrecipients were able to maximize the impact of their grant funds, the performance period for FY2018 grant agreements between the City and subrecipients was lengthened to January 1, 2018 through June 30, 2019. The majority of expenditures covered by these agreements will be reported in the 2019 CAPER.

Similarly, projects approved within the 2017 Annual Action Plan did not receive funding awards until the fourth quarter of 2017, which resulted in a delay of the disbursement of 2017 funds within the 2018 Program Year; therefore the majority of the funds expended during the 2018 Program Year were from 2017 projects.

The City's General Fund provided funding in the amount of \$130,200 for 2018 Public Services grants, which include Johnson County Emergency and Utility Assistance programs and the Johnson County Human Services Fund.

Identify the geographic distribution and location of investments

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description

Table 4 – Identify the geographic distribution and location of investments

Narrative

Overland Park does not target funding to a specific geographic area. Agencies receiving CDBG Public Services funds through the City of Overland Park provide assistance to Overland Park residents based on the applicant's low to moderate income eligibility.

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.

The City's CDBG Public Services allocation is leveraged with multiple awards from the City's General Fund. In 2018, \$130,200 was provided to support local non-profit agencies that deliver services to meet the various needs of low and moderate income households. In addition, some of these funds were matched \$1:\$1 by Johnson County and various other public and private entities. This partnership allows a wider range of agencies access to resources than is possible through CDBG funding alone.

The City of Overland Park does not receive Emergency Solutions Grant (ESG) funds.

The HOME Program is administered by Johnson County Housing Services. The City of Overland Park provided \$38,632.95 in 2016, \$39,057.93 in 2017, and \$53,894.62 in 2018 as the 25% cash match requirement for HOME.

The HOME funds expended during the 2017 Program Year were from the 2015 and 2016 awards. This is due, in part, to delays related to finding eligible projects with scopes of work compatible with the program. A large number of projects have multiple issues to address and thus are leveraged with Minor Home Repair Program funds, as well as the City's HOME matching funds. MHR project limits were increased under the most recent MHR program agreement to allow more projects, overall, to advance more quickly. The City remains committed to furnish HOME Program match funds.

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		
Number of non-homeless households to be provided affordable housing units		
Number of special-needs households to be provided affordable housing units		
Total		

Table 5- Number of Households

	One-Year Goal	Actual
Number of households supported through rental assistance		
Number of households supported through the production of new units		
Number of households supported through the rehab of existing units		14
Number of households supported through the acquisition of existing units		
Total		

Table 6 - Number of Households Supported

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

The City of Overland Park does not provide on-going rental assistance and does not construct or manage affordable housing units through CDBG. Funding for emergency assistance is provided through CDBG subrecipient awards to public service agencies funded with CDBG and awards from the City's General Fund.

The Minor Home Repair Program completed 14 projects with FY2016 and FY2017 CDBG funds, but no FY2018 funds were utilized during the 2018 Program Year.

Friends of JCDS completed their project of accessibility upgrades to one group home with FY2017 CDBG funds.

Discuss how these outcomes will impact future annual action plans.

Johnson County is monitoring factors effecting project completion to determine if outcome goals should be adjusted in future years. During the 2018 Program Year, City staff and Johnson County Housing Services staff discussed ways to more directly impact the needs of the applicants requesting assistance, as the cost of repairs has consistently increased over time. Per-project spending limits for CDBG-funded homeowner rehabilitation activities was reviewed and adjusted to reflect the monetary impact of regulatory compliance and any inflationary pressure on costs related to labor and materials.

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 Persons Served	CDBG Actual	HOME Actual
Extremely Low-income	630	N/A
Low-income	105	N/A
Moderate-income	70	N/A
Total	805	N/A

Table 7 – Number of Persons Served

Narrative Information

While the number of households served by CDBG and HOME programs remains reasonably consistent over time, Johnson County Minor Home Repair Program does not have capacity to carry out all the projects for which funds are available. Discussions are ongoing between City and County staff about ways to increase capacity and how to market the availability of the programs. We anticipate an increased demand in the coming years for accessibility modifications and minor home repairs, due to an aging population and housing stock.

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

The City of Overland Park provides funding to non-profit agencies that work with households experiencing homelessness or those at risk of homelessness, such as Catholic Charities of Northeast Kansas, Hillcrest Transitional Housing, Johnson County Interfaith Hospitality Network, The Salvation Army, and SAFEHOME, Inc. These agencies provide direct services to qualified Overland Park applicants.

Addressing the emergency shelter and transitional housing needs of homeless persons

Organizations within Johnson County continue to seek out ways to expand and strengthen housing options for households experiencing homelessness. Current options are primarily for households with dependent children and are often not available for immediate housing. Immediate shelter is often arranged by diversion to a doubled-up situation or through a system of one night hotel vouchers until shelter beds are available or the household is accepted into a rapid re-housing program. In addition, a portion of transitional housing beds within the county are being converted to rapid re-housing beds in order to be more responsive to a range of needs for assistance and support among persons experiencing homelessness. Currently, steps are being taken in conjunction with adjoining counties to build a unified system that brings together prevention, diversion, and emergency permanent housing resources, incorporates service prioritization and offers individualized supports to stabilize homeless households.

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

In 2018, the City of Overland Park allocated funds to assist low and moderate income households and households experiencing homelessness by funding public service agencies. Specific projects included:

1. Catholic Charities of Northeast Kansas: assists low and moderate income households with emergency assistance, such as rental and utility assistance
2. Hillcrest Transitional Housing: provides housing assistance to households transitioning from homelessness into permanent housing from their transitional housing program
3. Johnson County Emergency Assistance Program: assists low and moderate income households with emergency assistance, such as rental and mortgage assistance
4. Johnson County Interfaith Hospitality Network: provides case management services for

households experiencing homelessness

5. Johnson County Parks and Recreation: provides assistance for day camp programs to allow working parents the opportunity to send their children to summer camp
6. Johnson County Utility Assistance Program: assists low and moderate income households with utility assistance
7. The Salvation Army: assists low and moderate income households with emergency assistance, such as rental and utility assistance

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

While participating with the Johnson County Continuum of Care, Overland Park will continue funding homeless services such as:

Rapid re-housing programs;

Building relationships between organizations serving the homeless and local landlords to improve housing opportunities and stability;

Provide funding for case management services beyond short term rental assistance in order to build the capacity of households to prevent a series of events that could result in households' losing their housing.

The City of Overland Park does not provide housing, but provides funding to public service agencies in order to direct emergency assistance to households within Overland Park that are at risk of homelessness or are currently experiencing homelessness.

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

Actions taken to address the needs of public housing

The Johnson County Housing Authority provides public housing vouchers for residents of the City of Overland Park. JCHA provides resources and services to meet the housing needs of residents across Johnson County, including Overland Park residents. The City of Overland Park has allocated funding through CDBG funds and City general fund to local agencies that provide services to support the housing needs of local residents.

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

The Johnson County Housing Authority provides resources to participants of the Housing Choice Voucher program that support homeownership opportunities, such as the Family Self Sufficient Program and the Homebuyer Assistance Program.

Actions taken to provide assistance to troubled PHAs

The Johnson County Housing Authority is not a troubled agency and the City of Overland Park has established communication with the County to ensure that if any issues are identified, they would be addressed adequately and in a timely manner.

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)

In 2016, Overland Park's City Council approved the implementation a new Rental Licensing Program. This program was developed as a response to declining neighborhood conditions, problem properties and the condition of housing stock in the city, especially among single family dwellings and duplex/townhome rental units.

The Rental Licensing Program began inspections in July of 2017. This program addresses the pattern of property maintenance neglect that often goes unchecked when a vulnerable population of rental tenants do not know or are afraid to advocate with their landlord for property improvements. Social service agencies have reported anecdotal connects between incidence and severity of property neglect and whether or not there is a local regulation to curb irresponsible rental property management. In addition to improving housing conditions, other aims of the program are to promote family stability by reducing unnecessary tenant relocations due to poor housing conditions, and to prevent financial and other losses to persons of low and moderate income due to frequent moves, which are known barriers to affordable housing and increase the risk of homelessness.

The City of Overland Park has a "Resource Guide" listed on its website for residents seeking assistance or resources. We also often refer callers to Johnson County's extensive website "My Resource Connection" to assist individuals to locate relevant resources across the Kansas City metro. The site allows searches by zip code for affordable rental housing, food pantries, transportation, health and medicine, counseling, employment, as well as many other services.

The "My Resource Connection" is maintained and hosted by Johnson County. A significant contribution of the data compiled comes from United Way 211 of Greater Kansas City, various departments within Johnson County government, and the Unified Government of Wyandotte County and Kansas City, KS.

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

In addition to funding public services projects in 2018, Overland Park provided funding to the following agencies to help meet underserved needs:

Johnson County Interfaith Hospitality Network: case management, (homelessness)

SAFEHOME, Inc.: shelter improvements, (domestic violence)

The City continues to support and participate in initiatives of the Johnson County Continuum of Care to help meet underserved needs.

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

According to City of Overland Park development records, 45.3% of single-family housing units within the City's boundaries were built prior to 1980, which includes the construction time period of greatest likelihood for lead-based paint hazards. Overland Park agreement with Johnson County Housing Services for the Minor Home Repair Program includes terms and conditions that require lead based paint safe work practices and remediation activities when necessary. Johnson County Housing Services has staff trained in Lead Safe Work Practices as lead-based paint inspectors and risk assessors, along with several contractors certified as lead-based abatement supervisors and certified lead based-workers.

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

The City of Overland Park's 2015-2019 Consolidated Plan recognizes the City lacks enough resources and capacity to effectively target the issue of poverty by itself. The City does not provide services directly to individuals, but provides grant funding to various agencies in order to assist households with incomes at or below the poverty level threshold.

Related to reducing poverty, the highest priority Plan objective is to support neighborhood revitalization strategies to improve conditions where people live. The City has undertaken a systematic and broad analysis of factors to identify and monitor neighborhoods, then provide concentrated resources to those most at risk of decline. The data set uses diverse factors, such as participation in the elementary school free and reduced-rate lunch program, rate of homeowner-occupied housing, property maintenance violations, part-one crime rate, age of housing stock, property values, etc., to spot trends and identify areas where resources need to be concentrated to reverse or prevent further decline. (See attached maps, "Neighborhood Indicators")

The City tracks the rate of enrollment in the free and reduced rate lunch program at neighborhood elementary schools as a means of helping to identify pockets of poverty. In one elementary school, approximately 85% of its enrollees are qualified for this food assistance. Four CDBG-eligible neighborhoods surround the school site. It has been an easy decision for the City to take steps to make extra resources available to this area.

The extent of need and the declining resources available for publically funded assistance programs also require community partnerships whenever possible. Through partnership with Johnson County, City residents have access to one of six Community Outreach Centers, with a variety of resources, including a Self-Reliance program. The City assists by providing funds to help qualified individuals or families with financial assistance and services. Through CDBG awards, the City funds activities specifically designed to move people out of poverty, such as child care for parents who are working or seeking an education, self-sufficiency programs that move participants toward financial goals or transition from homelessness to permanent housing. The City continues to provide grants to United Community Services to assist families living with incomes below the poverty line.

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

The City of Overland Park actively seeks to hire or appoint persons who represent the diversity of the community to both staff and volunteer positions. The CDBG Citizens' Advisory Committee is drawn from throughout the community and includes persons living or working in areas that are either CDBG eligible or adjacent to areas that are low and moderate income qualified.

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

The City of Overland Park has several public-private cooperation agreements, including, but not limited to: United Community Services, to deliver social services to Overland Park residents on the City's behalf and Johnson County Human Services, to provide homeowner housing rehabilitation services. City staff actively participates in the Johnson County Continuum of Care.

The City invited a broad representation of persons from the real estate and rental housing industry to participate with neighborhood leaders and others in discussions regarding the development of the Rental Licensing Program. City staff and elected officials take leadership roles in a variety of initiatives sponsored by the Mid-America Regional Council (MARC). That group has distinguished itself on a national level by its success at cultivating public/private partnerships to identify and solve key regional issues, most of which are related to housing, transportation and employment.

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

The City has undertaken a systematic and broad analysis of factors to identify and monitor neighborhoods at risk of decline. The data set uses diverse factors, such as participation in the elementary school free and reduced-rate lunch program, rate of homeowner-occupied housing, property maintenance violations, Part One Crime rate, age of housing stock, property values, etc., to spot trends and identify areas where resources need to be concentrated to reverse or prevent further decline.

Overland Park market rental rates are the highest in the Kansas City Metro area. Conditions in some individual units are not necessarily superior to other areas. While the City has not been able to attract development of new low- to moderate income housing, it is making a strong effort to improve the quality of existing housing, especially of rental housing, via a proposal to require a license to operate rental units. Persons with disabilities, families with mixed immigration status and others caught in the cycle of poverty and homelessness often must cope with substandard housing or accept discriminatory practices by operators who are not subject to local regulation.

Revitalization of the City's Fair Housing Committee is also a step in the right direction to empower citizens to help identify and participate in overcoming impediments to fair housing choice.

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 Overland Park maintains all project files, rules and procedures applicable to CDBG projects. CDBG sub-grantees must sign a grant agreement that details their obligations to the City. The majority of subgrantees also receive CDBG funds annually from Johnson County, which requires them to attend training each year on CDBG rules and regulations, records to be maintained, purchasing policies, minority and women business procedures, Davis-Bacon and related Acts, if applicable to the activity.

The Overland Park grant agreement includes rules and regulations, files and records to be maintained, purchasing policies, income verification procedures, non-discrimination policy, Age and ADA discrimination prevention. Recipients receiving over \$750,000 in Federal dollars within the agency are asked to submit a Single Audit report with their grant documents.

Staff maintains contact with subgrantees throughout the term of the grant, including quarterly reviews. Formal and informal site visits and file reviews are completed periodically to identify potential problem areas and to assure compliance with the program. Documentation and on-site monitoring visits are done at the close-out of the grant and results are placed in the grant file.

The County administers the HOME and Minor Home Repair Program and monitoring is performed on an annual basis. The monitoring is structured to review the following areas: overall administrative program documentation and compliance, eligibility determination, and general program policies and fiscal transactions.

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.

On February 6, 2019, the City Council's Community Development Committee reviewed the draft 2017 Consolidated Annual Performance Evaluation Report (CAPER). Additionally, a public notice was submitted to City committees and boards, news outlets and neighborhood leaders, as well as published in the Legal Record. Beginning on February 26, 2019, the 2018 CAPER was posted on the City's website for public review and comment, as well as paper copies were available at City Hall, the Community Services Office and at the Johnson County Central Resource Library.

On March 18, 2019, the City Council conducted a public hearing to review the 2018 CAPER. After the public hearing, the City Council approved for the submission of the 2018 CAPER to Housing and Urban Development (HUD).

*Enter Public Comments Received Here

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 Overland Park continues to provide effective public services to low and moderate income residents of the City. It partners with other entities to coordinate efforts and use resources wisely.

The City is currently working with Johnson County Housing Services to identify ways in which capacity issues can be addressed in order to increase the impact of the Minor Home Rehabilitation Program for the 2018 program year.

During the 2018 Program Year, the City worked to meet timely expenditures of funds, especially due to the availability of funds from multiple allocations. Spending delays of FY2015 and FY2016 funds were remedied through substantial amendments to the 2015 and 2016 Annual Action Plans and projects within these plans have been completed. Projects funded through the 2017 Annual Action Plan are nearly fully expended. All projects funded through the 2018 Annual Action Plan have been provided with notice to proceed and are on track to fully expend funding in a timely manner within their grant term.

Any program subject to complex regulations requires staff and administrators to constantly stay in step with program changes and advances in technology. As more reporting functions transition to the online IDIS system, it is evident to staff and administrators that effort spent in mastering the systems HUD offers will translate into direct benefit for us. Overland Park is in on-going process of cross-training staff and increasing overall depth of knowledge to support program changes on both the local and Federal level.

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

No

ATTACHMENTS

1. PR-26 CDBG Financial Summary Report
2. Public Notice
3. Neighborhood Indicator Maps
 - a. CDBG Eligible Areas
 - b. Measure of Need
 - c. Median Appraised Value
 - d. Part One Crimes
 - e. Property Maintenance
 - f. Single-Family Absentee Ownership

DRAFT