CITY OF KENT

COMMUNITY DEVELOPMENT BLOCK GRANT
CONSOLIDATED ANNUAL PERFORMANCE AND EVALUATION REPORT

2019

Fifth Year CAPER
ASSOCIATED WITH THE
2015 – 2019
Consolidated Plan for Housing and Community Development
CR-05 - Goals and Outcomes

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

The purpose of this report, which is called the Consolidated Annual Performance and Evaluation Report (CAPER), is to inform the U.S. Department of Housing and Urban Development (HUD) and the community, of the activities and accomplishments derived from the investment of Community Development Block Grant (CDBG) and other resources for the 2019 program year, which covers the period January 1, 2019 to December 31, 2019.

In 2019, HUD allocated $1,111,021 in CDBG funds to the City. The City and its sub-recipients--organizations providing activities on behalf of the City--successfully executed the activities that were supported by CDBG funds.

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

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

<table>
<thead>
<tr>
<th>Goal</th>
<th>Category</th>
<th>Source/ Amount (2019)</th>
<th>Indicator</th>
<th>Unit of Measure</th>
<th>Expected – Strategic Plan</th>
<th>Actual – Strategic Plan</th>
<th>Percent Complete</th>
<th>Expected – Program Year</th>
<th>Actual – Program Year</th>
<th>Percent Complete</th>
</tr>
</thead>
<tbody>
<tr>
<td>Affordable Housing to homeless and those at risk</td>
<td>Affordable Housing Homeless</td>
<td>CDBG: $0</td>
<td>Public service activities for Low/Moderate Income Housing Benefit</td>
<td>Households Assisted</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Affordable Housing to homeless and those at risk</td>
<td>Affordable Housing Homeless</td>
<td>CDBG: $722,164</td>
<td>Homeowner Housing Rehabilitated</td>
<td>Household Housing Unit</td>
<td>450</td>
<td>565</td>
<td>125.55%</td>
<td>80</td>
<td>112</td>
<td>140%</td>
</tr>
</tbody>
</table>

OMB Control No: 2506-0117 (exp. 07/31/2015)
## Table 1 - Accomplishments – Program Year & Strategic Plan to Date

<table>
<thead>
<tr>
<th>Activity</th>
<th>CDBG: $</th>
<th>Description</th>
<th>Assisted</th>
<th>Persons</th>
<th>% Increase</th>
<th>Persons</th>
<th>% Increase</th>
<th>Persons</th>
<th>% Increase</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Affordable Housing to homeless and those at risk</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>1. Basic Needs</td>
<td></td>
<td>Homeless Non-Housing Community Development</td>
<td></td>
<td>200</td>
<td>456</td>
<td>228%</td>
<td>40</td>
<td>157</td>
<td>392.50%</td>
</tr>
<tr>
<td>2. Basic Needs</td>
<td></td>
<td>Public service activities other than Low/Moderate Income Housing Benefit</td>
<td></td>
<td>162(^1)</td>
<td>469</td>
<td>289.51%</td>
<td>74</td>
<td>188</td>
<td>254.05%</td>
</tr>
<tr>
<td>3. Increase Self Sufficiency</td>
<td></td>
<td>Tenant-based rental assistance / Rapid Rehousing</td>
<td></td>
<td>260</td>
<td>633</td>
<td>243.46%</td>
<td>60</td>
<td>72</td>
<td>120%</td>
</tr>
<tr>
<td>4. Planning and Administration</td>
<td></td>
<td>Other</td>
<td></td>
<td>130</td>
<td>164</td>
<td>126.15%</td>
<td>50(^2)</td>
<td>79</td>
<td>158%</td>
</tr>
</tbody>
</table>

**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.**

As explained in the preceding tables, the City successfully addressed the goals and objectives of meeting basic needs, affordable housing to

\(^1\) Expected number increased due to a change in organizations carrying out the activities during the Five-Year Strategic Plan period.

\(^2\) The expected number included in the Strategic Plan was incorrect—it should have been 120 (40 per year for a three-year period for one organization). In the final year of the Strategic Plan, a new organization was added, serving an additional 10 individuals.
homeless and at-risk persons, increasing self-sufficiency, and planning and administration by providing the following services:

- Case management services to youth with intellectual disabilities and their families
- Rent and utility assistance
- Home repair assistance
- Shelter
- Transitional housing
- Employment and training
- Legal Services to under-served populations
- Planning and administration activities
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)

<table>
<thead>
<tr>
<th></th>
<th>CDBG</th>
</tr>
</thead>
<tbody>
<tr>
<td>White</td>
<td>161</td>
</tr>
<tr>
<td>Black or African American</td>
<td>319</td>
</tr>
<tr>
<td>Asian</td>
<td>59</td>
</tr>
<tr>
<td>American Indian or American Native</td>
<td>2</td>
</tr>
<tr>
<td>Native Hawaiian or Other Pacific Islander</td>
<td>7</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>548</strong></td>
</tr>
<tr>
<td>Hispanic</td>
<td>33</td>
</tr>
<tr>
<td>Not Hispanic</td>
<td>515</td>
</tr>
</tbody>
</table>

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

Note: The racial categories listed above do not include all the racial categories that are tracked by sub-recipients in compliance with the racial categories that HUD requires programs to track. For example, programs track Other/Multi-racial, Black/African American AND White, etc.

Narrative

Demographic breakdown is listed below:

- **29%** of the population served was White
- **58%** of the population served was Black or African American
- **11%** of the population served was Asian
- **0.36%** of the population served was American Indian or American Native
- **1%** of the population served was Native Hawaiian or Other Pacific Islander
- **6%** of the population served was ethnic Hispanic
CR-15 - Resources and Investments 91.520(a)

Identify the resources made available

<table>
<thead>
<tr>
<th>Source of Funds</th>
<th>Source</th>
<th>Resources Made Available</th>
<th>Amount Expended During Program Year</th>
</tr>
</thead>
<tbody>
<tr>
<td>CDBG</td>
<td>$Amount will be added after the City completes year-end closing</td>
<td>$ Amount will be added after the City completes year-end closing</td>
<td></td>
</tr>
<tr>
<td>General Fund</td>
<td>$1,055,217</td>
<td>1,055,217</td>
<td></td>
</tr>
</tbody>
</table>

Table 3 – Resources Made Available

Narrative

The City invested the full allotment of its CDBG budget into public services, capital projects, and planning and administration in accordance with the strategies outlined in the Consolidated Plan for Housing and Community Development.

Identify the geographic distribution and location of investments

<table>
<thead>
<tr>
<th>Target Area</th>
<th>Planned Percentage of Allocation</th>
<th>Actual Percentage of Allocation</th>
<th>Narrative Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>City of Kent</td>
<td>100%</td>
<td>100%</td>
<td>See below</td>
</tr>
</tbody>
</table>

Table 4 – Identify the geographic distribution and location of investments

Narrative

The City distributed 100% CDBG funds to programs serving Kent residents throughout all geographic regions of the City. Funds were predominately invested in programs serving low/moderate-income individuals and families.

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3 The City’s 2019 Entitlement grant was 1,111,021.00; however, the amount available for the 2019 PY is the amount listed here.
4 Amount includes recaptured funds from previous years.
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.

In addition to allocating $1,111,021 in CDBG funds, the City leveraged $1,055,217 in resources from General Funds to fund additional human services programs.

Additional leveraging opportunities included the following:

The Kent Community Development Collaborative (KCDC), an equitable community development alliance, was created to improve community outcomes focused on housing, health and economic security. Community engagement and leadership development are overarching priorities in KCDC’s work. KCDC is led by the Community Network Council and includes the following organizations: Coalition for Refugees from Burma, Centro Rendu, Somali Youth and Family Club, Mother Africa, BEST, Iraqi Community Center and Communities in Schools -Kent. The City of Kent’s role is to offer support, help leverage addition resources, assist with data gathering, and to participate in workgroups. KCDC received a two-year grant of $500,000 from Communities of Opportunity.

The City does not allocate HOME funds; however, Kent staff participates on the Joint Recommendations Committee (JRC). The JRC is an inter-jurisdictional body that provides funding recommendations on a variety of capital funding sources for affordable housing, including HOME funds. JRC also provides advice on guidelines and procedures for King County, and its consortia city partners on a wide range of housing and community development issues.
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.

<table>
<thead>
<tr>
<th></th>
<th>One-Year Goal</th>
<th>Actual</th>
</tr>
</thead>
<tbody>
<tr>
<td>Number of homeless households to be provided affordable housing units</td>
<td>40</td>
<td>157</td>
</tr>
<tr>
<td>Number of non-homeless households to be provided affordable housing units</td>
<td>80</td>
<td>112</td>
</tr>
<tr>
<td>Number of special-needs households to be provided affordable housing units</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>120</strong></td>
<td><strong>269</strong></td>
</tr>
</tbody>
</table>

Table 5 – Number of Households

<table>
<thead>
<tr>
<th></th>
<th>One-Year Goal</th>
<th>Actual</th>
</tr>
</thead>
<tbody>
<tr>
<td>Number of households supported through rental assistance</td>
<td>60</td>
<td>72</td>
</tr>
<tr>
<td>Number of households supported through the production of new units</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Number of households supported through the rehab of existing units</td>
<td>80</td>
<td>112</td>
</tr>
<tr>
<td>Number of households supported through the acquisition of existing units</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>140</strong></td>
<td><strong>184</strong></td>
</tr>
</tbody>
</table>

Table 6 – Number of Households Supported

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

Outcomes exceeded goals; and overall, the City was pleased with the performance of its Home Repair Program and sub-recipient organizations that provided and sustained affordable housing. The City’s investments kept individuals from being unsheltered and allowed families to remain in their homes.

Discuss how these outcomes will impact future annual action plans.

Although the City is projecting that it will receive level funding in 2020; this is extremely speculative given political uncertainties. The City recently discovered that the federal government categorizes the East Hill of Kent as a Racially or Ethnically Concentrated Area of Poverty or R/ECAPA. (A R/ECAP is defined as a census tract that is majority non-White and has a poverty rate greater than 40%).
Consequently, the City is preparing to shift a modest amount of funding to the East Hill in 2021. The City will start a collaborative process now to find solutions to the underlying issues.

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.

<table>
<thead>
<tr>
<th>Number of Persons Served</th>
<th>CDBG Actual</th>
<th>HOME Actual</th>
</tr>
</thead>
<tbody>
<tr>
<td>Extremely Low-income</td>
<td>181</td>
<td>0</td>
</tr>
<tr>
<td>Low-income</td>
<td>46</td>
<td>0</td>
</tr>
<tr>
<td>Moderate-income</td>
<td>42</td>
<td>0</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>269</strong></td>
<td><strong>0</strong></td>
</tr>
</tbody>
</table>

Table 7 – Number of Persons Served

**Narrative Information**

The City met the national objective of activities benefitting low/moderate-income persons; these totals are only for Affordable Housing projects pursuant to CR-20. The projects are: City of Kent-Home Repair Program, Catholic Community Services-Katherine’s House, St. Stephen Housing Association, and the YWCA-Anita Vista Transitional Housing.
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 invested in outreach to the homeless through General Fund-supported projects, including street outreach by mental health professionals and a community engagement day center. In addition, the City's police officers’ bike unit outreaches to unsheltered street homeless individuals by connecting them to Housing and Human Services staff and providing information on organizations that provide homeless assistance. The City provides information on its cold weather shelter through organizations that work with the homeless and in locations where homeless individuals assemble; e.g., the library, hot meal programs, etc.

Finally, several homeless individuals received telephone assistance and visited the City’s Housing and Human Services Office to request food, housing and other services. City staff assessed their needs and provided referrals to nonprofits in the area.

Addressing the emergency shelter and transitional housing needs of homeless persons

Three programs funded by the City addressed emergency shelter and transitional housing needs of homeless persons: YWCA: Anita Vista Transitional Housing Program (housing for domestic violence survivors and their families); St. Stephen Housing Association Transitional Housing Program (housing for families); and Catholic Community Services-Katherine's House (shelter and case management services to single women in recovery).

Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: likely to become homeless after being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); and, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs

The YWCA (CDBG-funded) provided case management services and helped homeless individuals find permanent housing.

Through its homeless continuum; which was funded by General Funds and CDBG, Multi-service Center (MSC) provided responsive services to target the needs of homeless individuals. Services provided along the continuum consisted of shelter with supportive services, hotel vouchers, rental assistance, and referrals to permanent housing.
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.

Rental assistance to prevent homelessness was provided by MSC.

Most of the women that received shelter through CCS were women who were released from the King County Regional Justice Center.

General Fund dollars support The Watson Manor Transitional Living Program, which provides up to 18 months of transitional housing and support services to single, homeless, and extremely low-income teenage and young adult mothers and their children. Each young mother is parenting one to two children or at least six months pregnant. Program participants receive a furnished apartment in Watson Manor, a small apartment complex. Services include case management, parent education, life skills training, counseling, substance abuse services, and referral to childcare and educational/vocational programs. The overall program goal is to increase self-sufficiency among homeless young mothers and equip them with the skills necessary to obtain and retain permanent housing.
CR-30 - Public Housing 91.220(h); 91.320(j)

Actions taken to address the needs of public housing

The City worked collaboratively to address the needs of public housing by advocating for and investing in affordable housing stock, providing supportive services to prevent homelessness (keeping additional people off the King County Housing Authority waitlist), and staffing a number of committees and application review teams that directed funds to organizations managing affordable housing stock.

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

The King County Housing Authority (KCHA) increased resident involvement through several mechanisms; e.g., the Resident Advisory Council was created as a forum for residents to provide feedback to assist KCHA with the development of policies and procedures that impact Housing Authority residents, etc. The City was rarely able to have direct impact on resident involvement.

Actions taken to provide assistance to troubled PHAs

The KCHA is not considered a troubled PHA.
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)

Several years ago, the City capped school impact fees; and although it was not previously reported in the CAPER, these fees would have seriously impacted potential housing development. One of the school districts in the Kent area benefitted from this policy in 2019.

The City received $100,000 in funding from the Washington State Department of Commerce to do a housing supply study. Code changes will flow out of that in 2021 that will affect housing supply and therefore, impact affordability.

The City will introduce a new targeted housing growth tax incentive program in the next few months, which will include an affordable housing requirement in the Midway area. Further details on this program will be included in the 2020 CAPER.

Finally, the City’s Rental Housing Inspection Program has been instrumental in finding and addressing hundreds of health/safety code violations. This preserves affordable housing and impacts the return on residential investment.

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

The City staffs and facilitates the Kent Cultural Diversity Initiative Group (KC-DIG). KC-DIG consists of provider agencies, public sector organizations, businesses, and community members that specialize in providing services and resources to refugee communities residing in Kent. It is an opportunity for continuing education, networking, collaboration, and understanding and sharing across cultures.

- Staff worked with the King County Department of Natural Resources to provide free training opportunities to Kent residents, KC-DIG participants, and Kent Cultural Communities Board members on climate change and how it impacts the community
- Staff participated on the King County Refugee Housing Task Force http://www.kingcounty.gov/council/issues/archive/immigrantrefugee.aspx
- Staff served as the South King County representative on the King County Mobility Coalition http://metro.kingcounty.gov/advisory-groups/mobility-coalition/index.html
- Staff participated on the Black Education Strategy Roundtable; this group works to improve education outcomes for African American students in WA State
- Staff participated on the Governing for Racial Equity and Inclusion (GREI), a regional equity and inclusion coalition

Actions taken to reduce lead-based paint hazards. 91.220(k); 91.320(j)
None

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

The City of Kent is committed to maintaining the affordable housing stock in our community. Using CDBG funds for the Home Repair Program enabled home owners to maintain their homes and preserve housing stock by assisting with critical repairs that they otherwise could not afford.

The City also:

- Allocated CDBG funds to Puget Sound Training Center to provide job training and employment assistance to under-served populations; and
- Allocated CDBG funds to Partner in Employment to provide culturally responsive case management & job readiness skills to prepare under-served/new Americans for employment.

The City continues to look for opportunities to partner with nonprofits and other community organizations to apply for planning and implementation grants to increase economic opportunity for its residents.

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

- City staff chaired a regional committee (included the City of Federal Way) that continued a two-year Parallel Human Services application process for the 2019-2020 funding cycle process; the City awarded small General Fund grants to four ECBOs totaling $30,000 (grants were between $2,500 to $9,000).
- The City hired a contractor to evaluate the 2017-2018--and portions of the 2019--Parallel Human Services application process. Lessons learned and recommendations are being reviewed by the Kent Human Services Commission to determine its influence on the 2021-2022 Human Services application (larger grants).

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

The City funds several organizations providing housing and rental assistance: MSC, CCS, DAWN (General Fund budget), Open Doors for Multicultural Families, and St. Stephen Housing Association. The City coordinates housing services through its investment, communication, and networking with these organizations. Additionally, the City sits on several committees that coordinate services to homeless individuals. Homeless coordination is led by All Home, formerly known as the King County Committee to End Homelessness.

**South King Housing and Homelessness Partnership**

Staff worked extensively in 2018 to develop an Interlocal Agreement as the continuation and expansion
of three years of piloting formal collaboration on housing and homelessness issues between six cities in South King County, including Kent. South King Housing and Homelessness Partners (SKHHP) is a coalition formed by an interlocal agreement between the jurisdictions of Auburn, Burien, Covington, Des Moines, Federal Way, Kent, Normandy Park, Renton, Tukwila, and King County. The agreement facilitates collaboration and resource sharing among South King County jurisdictions to engender a comprehensive response to affordable housing and homelessness, which allows the jurisdictions to meet the goals of increasing access to affordable housing options and preserving affordable housing stock. This collaborative model is based on similar approaches used in Snohomish County, East King County, and other areas of the country. Kent has contributed funds to SKHHP from the Human Services General Fund budget since 2016 and plans to continue allocating from this budget source into the future.

Additionally, Kent staff and other South King County stakeholders continue to meet to deepen cross-jurisdictional coordination, create a common understanding for housing and homelessness needs and strategies for South King County, and move forward strategies in the South King County Response to Homelessness. Two separate groups currently meet – the South King County Homeless Action Committee and the South King County Joint Planners.

**South King County Joint Planners Convening**

Human services, land use, and other staff members met every other month with Housing Development Consortium (HDC) staff to promote regional dialogue and collaboration and provide support and technical assistance on comprehensive plan policies and assessments. This group, the SKC Joint Planners, continued to meet bimonthly to address regional needs related to housing and the suburbanization of poverty in general. Planners also discussed Regional Affordable Housing Task Force Recommendations and served as a starting part for a joint effort in South King County to apply for Housing Action Plan funds from the State. That work will commence in 2020.

**South King County Homeless Action Committee**

The Homeless Action Committee met monthly, with an emphasis on keeping stakeholders updated on regional work, such as the All Home Strategic Plan update, One Night Count facilitation, and the transition to regional governance discussion. HDC staff facilitated the regular meetings in 2019, and the primary focus over the year was providing a venue for homeless and housing providers and City staff to be kept apprised and provide feedback on the work to begin the transition to a Regional Homelessness Authority. Also, in 2019, a subcommittee formed to work towards developing a 24-hour enhanced shelter plan in South King County. The group worked on developing service principles and general shelter design (capacity, target population, service package, etc.) to begin with a unified vision. Work will continue in 2020.

**Identify actions taken to overcome the effects of any impediments identified in the jurisdiction’s analysis of impediments to fair housing choice. 91.520(a)**
Recommendations from the City’s Analysis of Impediments to Fair Housing Choice included:

Recommendation I: Expand current education and outreach efforts

The City continued to work on this recommendation by: (1) Posting fair housing materials on its website; (2) Providing fair housing articles/information/notices in electronic communications to the Kent Cultural Diversity Initiative Group; and (3) Providing fair housing materials to apartment complexes through its police department.

Recommendation II: Continue ongoing enforcement activities

In January 2017, the Kent City Council unanimously passed a Source of Income Discrimination Ordinance. This tenant protection ensures that people already facing high barriers to housing are not discriminated against solely based on use of a Section 8 voucher or other form of public assistance.

This can have a significant impact on communities like Kent whose low-income residents disproportionately need to rely on housing subsidies to make ends meet, including households of color, seniors, veterans, people with disabilities, and single parent households with young children.

The City Council took great strides in 2016 by including funding in the 2017-2018 budget to enact a Proactive Rental Inspection program in the City of Kent. This program has benefitted residents in many ways, including helping protect tenants who fear speaking up about substandard housing conditions and ensuring that rental properties are adequately maintained.

The City does not have enforcement authority; the Washington State Human Rights Commission and the King County Office of Civil Rights investigates complaints.

Recommendation III: Target home ownership and lending marketing to African Americans and Hispanics households

When the City received stimulus funds through the Neighborhood Stabilization Program (NSP), the funds were used to purchase and rehabilitate three foreclosed homes, which were then sold to income-eligible homebuyers. The homebuyers were families of African descent that had been on the Habitat for Humanity waitlist for an extended period; the families received zero-interest loans. A fifteen-year covenant of affordability was signed by each homebuyer. Mortgage payments received from the homebuyers were entered a fund that will allow Habitat for Humanity to purchase, rehabilitate, and sell additional houses. (Habitat for Humanity provides an annual accounting to the City on the amount of these funds.) The mortgage payments will allow the City and Habitat for Humanity to target additional home ownership to African American and Hispanic households that are on the waitlist. The City provides an annual report to the State on its NSP project.

Recently, Habitat asked if it could use mortgage payments to complete repairs on homes owned by low/moderate-income residents. The City is evaluating this request.
The City will update its Analysis of Impediments to Fair Housing Choice in 2020.
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 monitored its CDBG projects throughout the year. In 2019, three new projects were funded: Mother Africa (MA), Partner in Employment (PIE), and West African Community Council (WACC). All three projects prioritize under-served populations and reach demographic categories that comprise residents who are economically disadvantaged and seek integration into the Kent community. CDBG staff provided extensive technical assistance to these projects and met on-site with staff of two of the newly funded projects in 2019 and 2020. Staff is also planning to meet with another new Project Manager in 2020. The City completes a Sub-recipient Risk Analysis to prioritize project reviews. Staff will conduct a minimum of two (2) formal on-site reviews in 2020, at least one of which will be a new project. New projects are higher risk, and it is important to make sure they have procedures in place to ensure long-term CDBG compliance.

The following standards and procedures were used to monitor CDBG-funded agencies:

- Programs funded by the City must maintain high standards. Organizations are informed via the CDBG Agreement that the failure to comply with contractual requirements and regulations could result in remedial actions and/or the termination of funding
- Backup reports to support costs are required; and if adequate documentation is not submitted, payment is reduced or denied
- Projects received quarterly monitoring. Programs that needed guidance in achieving performance measures or adhering to contractual requirements received technical assistance, were required to attend a meeting with City staff, and/or received an on-site monitoring visit; Quarterly performance reports were reviewed by the Human Services Commission
- Monitoring concerns/finding were reviewed with agency staff and documented in writing. When applicable, timely corrective action was required

Agencies were required to provide supporting documentation or written communication verifying that deficiencies were corrected.

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.

- A Public Notice was posted on two City website locations on Friday, February 14, 2020: City of Kent website and Housing & Human Services Division website.
• A link to the website was provided to non-profits, South King County Planners, and stakeholders in the Kent area. In addition, a link to the electronic notice was provided to participants of the Kent Cultural Diversity Initiative Group and other organizations that have contacts with ethnic/racial minorities, non-English speaking persons, and people with disabilities.

• The Kent community and stakeholders were also invited to provide comments at a public hearing before the Kent Human Services Commission on March 19, 2020.

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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.

There were no changes in the City’s program objectives. The City does not anticipate major changes in programs; however, we may slightly diversify how capital funds are invested and consider investing in more public service prevention and integration projects for new Americans.

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

No
Submitted to:

US DEPARTMENT OF HOUSING & URBAN DEVELOPMENT
Office of Community Planning and Development
Seattle Federal Office Building
909 First Avenue, Suite 300
Seattle, WA 98104-1000

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Report Due: March 2020