

# CITY OF COUNCIL BLUFFS, IOWA

Matthew J. Walsh, Mayor

DUNS# - 051955433

## FISCAL YEAR 2021 (FY21) CONSOLIDATED ANNUAL PERFORMANCE AND EVALUATION REPORT (CAPER)



COMMUNITY DEVELOPMENT PROGRAMS  
January 1 through December 31, 2021  
B-18-MC-19-0005

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CAPER

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## CR-05 - Goals and Outcomes

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

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

In an effort to prioritize needs and efficiently allocate resources, the City collaborated with citizens, elected officials, public/private agencies, and nonprofit organizations to determine community development needs for FY21 and the Five-Year Omaha/Council Bluffs ConPlan. The priority needs identified, goals addressed and their priority level for the Five-Year Omaha/Council Bluffs ConPlan were identified as follows:

1. Affordable Housing Development
2. Homelessness
3. Non-Homeless Persons with Special Needs
4. Housing Counseling Services
5. Slum and Blight Removal

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

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

Goal	Category	Source / Amount	Indicator	Unit of Measure	Expected – Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected – Program Year	Actual – Program Year	Percent Complete
Coronavirus Pandemic Support	COVID-19	CDBG-COVID-19 (CDBG-CV): \$	Public service activities for Low/Moderate Income Housing Benefit	Households Assisted	35	61				

Coronavirus Pandemic Support	COVID-19	CDBG-COVID-19 (CDBG-CV): \$	Businesses assisted	Businesses Assisted	11	18				
Housing Counseling	Housing Counseling	CDBG: \$ / Private: \$	Public service activities for Low/Moderate Income Housing Benefit	Households Assisted	2800	419		500	419	
Housing Development	Affordable Housing	CDBG: \$ / General Fund: \$ / HUD Lead Hazard Reduction and Healthy Homes: \$ / Private: \$	Rental units constructed	Household Housing Unit	36	0				
Housing Development	Affordable Housing	CDBG: \$ / General Fund: \$ / HUD Lead Hazard Reduction and Healthy Homes: \$ / Private: \$	Rental units rehabilitated	Household Housing Unit	10	0		10	0	

Housing Development	Affordable Housing	CDBG: \$ / General Fund: \$ / HUD Lead Hazard Reduction and Healthy Homes: \$ / Private: \$	Homeowner Housing Added	Household Housing Unit	21	0		21	0	
Housing Development	Affordable Housing	CDBG: \$ / General Fund: \$ / HUD Lead Hazard Reduction and Healthy Homes: \$ / Private: \$	Homeowner Housing Rehabilitated	Household Housing Unit	125	3		125	3	
Housing Development	Affordable Housing	CDBG: \$ / General Fund: \$ / HUD Lead Hazard Reduction and Healthy Homes: \$ / Private: \$	Direct Financial Assistance to Homebuyers	Households Assisted	5	0		1	0	0.00%

Meal Center Support	Homeless Non-Housing Community Development	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	0	0		5000	0	0.00%
Meal Center Support	Homeless Non-Housing Community Development	CDBG: \$	Public service activities for Low/Moderate Income Housing Benefit	Households Assisted	0	0				
Neighborhood Development	Affordable Housing	CDBG: \$ / General Fund: \$100000	Rental units constructed	Household Housing Unit	12	0		7	0	
Neighborhood Development	Affordable Housing	CDBG: \$ / General Fund: \$100000	Homeowner Housing Added	Household Housing Unit	12	4		5	4	
Neighborhood Development	Affordable Housing	CDBG: \$ / General Fund: \$100000	Buildings Demolished	Buildings	0	0		1	0	
Public Facilities and Improvements	Homeless Non-Homeless Special Needs	CDBG: \$ / Private: \$	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	0	424		900	0	

Public Facilities and Improvements	Homeless Non-Homeless Special Needs	CDBG: \$ / Private: \$	Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit	Households Assisted	75	19				
Slum and Blight Removal	Non-Housing Community Development	CDBG: \$ / General Fund: \$	Buildings Demolished	Buildings	1	0		1	0	
Supportive Services for the Homeless	Homeless	CDBG: \$ / Private: \$	Homeless Person Overnight Shelter	Persons Assisted	9000	2463		9000	0	

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

**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.**

In FY21, the City’s anticipated CDBG entitlement amount was \$975,000. In addition to the annual CDBG entitlement; \$766,666 in HUD Lead Hazard Remediation funds; anticipated \$2,263,333 in CDBG program income. Actual expenditures during FY21 were \$1,113,866.37 in CDBG funds, \$46,106.59 in direct program income to the City and \$4,439,064 was leveraged by sub-recipient’s.

During FY21, the City provided affordable housing, increased housing education and outreach, expanded services for homeless populations, and contributed to economic and community revitalization. The City assisted 31 single-family owner-occupants to remain in their homes by providing loans and grants for emergency housing repairs. Four new single family homes were completed and sold to a low-moderate income households. Over the past year, the City provided housing counseling to 419, existing homeowners and new homeowners to increase access to housing and stable home ownership. CDBG funds provided shelter for 2,463 homeless men, women and children. Even due to the Covid-19 pandemic, the city and it’s partners were able continue assisting individuals or pivot programs to assist individuals online. The city also used CDBG-CV funding and administered Direct Financial Assistance to approximately 61 households and also distribute Business Assistnace Grants to local, small businesses for approximately 18 businesses. The City provided Food Security grants with CDBG-CV funding to one of our local

shelters and to a new local food pantry. The City also used CDBG-CV funding to help install free internet to LMI areas of town.

## 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	7847
Black or African American	828
Asian	87
American Indian or American Native	120
Native Hawaiian or Other Pacific Islander	8
<b>Total</b>	<b>12881</b>
Hispanic	2556
Not Hispanic	10325

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

### Narrative

During FY21, the City assisted 12,881 units/households/persons. Of the 12,881 units/households/persons 11 households assisted with Emergency Housing Repairs, 4 household provided access to a new single family home. Approximately 28% of the persons/households assisted were non-White. Of those non-White persons/households 6% were Black or African American. Also, 20% of the persons/households assisted were of Hispanic ethnicity. According to the US Census Bureau, in 2021 approximately 76.3% of the population in Council Bluffs is White, followed by 13.4% Black, 5.9% Asian, and 18.5% Hispanic. However only 61% of the persons/households assisted with CDBG funds are White. This tells us that the programs are reaching minority populations.



## CR-15 - Resources and Investments 91.520(a)

### Identify the resources made available

Source of Funds	Source	Resources Made Available	Amount Expended During Program Year
CDBG	public - federal	2,484,225	
General Fund	public - local	100,000	
Other	public - federal	766,667	

**Table 3 - Resources Made Available**

### Narrative

### Identify the geographic distribution and location of investments

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description
Mid-City Railroad Corridor Urban Renewal Area	0		
NEIGHBORHOOD REVITALIZATION STRATEGY AREA (NRSA)	35		

**Table 4 – Identify the geographic distribution and location of investments**

### Narrative

In FY21, the City spent 55% of its funds in the NRSA. This includes \$374,972.71 of regular CDBG funds.

## 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 total expenditures during FY21 were \$1,162,116.61 of which \$1,113,866.37 was CDBG entitlement funds. Therefore, \$46,106.59 in direct program income to the City and an additional \$4,439,061 was leveraged by the City's sub-recipients. This means that for every \$1.00 in CDBG funds received by the City, approximately another \$4.02 in direct program income and other private and public resources were leveraged to assist in addressing the needs identified in the FY19-23 ConPlan and FY21 Annual Action Plan.

Often times CDBG funds are utilized to satisfy matching requirements for other private and public resources. It is not always known if the City sub-recipients utilized CDBG funds to satisfy a match requirement for other private and public resources they leveraged. The programs/projects that did utilize CDBG funds to satisfy matching requirements of other private and public resources leveraged were Heartland Family Services' Heartland Homes and Pottawattamie County Homeless Link Programs; and New Visions' homeless programs.

No publicly owned land or property located within the jurisdiction was used to address the needs identified in this plan

## CR-20 - Affordable Housing 91.520(b)

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

	One-Year Goal	Actual
Number of homeless households to be provided affordable housing units	0	0
Number of non-homeless households to be provided affordable housing units	34	34
Number of special-needs households to be provided affordable housing units	0	0
<b>Total</b>	<b>34</b>	<b>34</b>

Table 11 – Number of Households

	One-Year Goal	Actual
Number of households supported through rental assistance	120	61
Number of households supported through the production of new units	8	4
Number of households supported through the rehab of existing units	53	31
Number of households supported through the acquisition of existing units	0	0
<b>Total</b>	<b>181</b>	<b>96</b>

Table 12 – Number of Households Supported

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

In 2017, the City launched its Affected Properties Program with the assistance of Southwest Iowa Planning Council to provide rehabilitation supervision. This project is similar to the previous Single Family Housing Rehabilitation Program with a focus on houses adjacent to City-funded development projects. The City expected this program to rehabilitate 15-20 units per year; however, staff has struggled to get interest from the public. In 2019, the City opened the program city-wide to gain interest in the program but it is still taking time to familiarize residents with the program. In 2021, the city rehabilitate 17 units under the Affected Properties program. So that makes 2021 the first year the City reached it's goal to rehabilitate between 15-20 units per year.

In 2019, the City kicked off its Lead Hazard Reduction program with funding from the Office of Lead Hazards and Healthy Homes. The City expects to complete 100 units through this program and is working to gain interest in the program. Still in year 2020 the program has continues to work on gaining interest by working with the local schools to try and identify families that may be eligible for the program. In 2021, the Lead program continues to struggle to get participants as only 3 units were completed in 2021. The City has participated in Lead specific outreach at events including school fairs, Movie Night in the Park, National Night Out, and trick or treating in City Hall. There were also social media posts specific to the Lead Program and flyers distributed to school. However, the Lead Program still struggles to get participants.

In 2019 NeighborWorks Home Solutions and Habitat for Humanity completed the construction on four houses funded through CDBG in the Walnut Grove neighborhood. The City also participated in downpayment assistance with three single family homes sold to LMI families.

In 2020 NeighborWorks Home Solutions completed construction on one house funded through CDBG and Habitat for Humanity acquired two lots and began construction on those lots.

In 2021 NeighborWorks Home Solutions completed construction on two houses funded through CDBG and Habitat for Humanity acquired two lots and began construction on those lots.

**Discuss how these outcomes will impact future annual action plans.**

In all, it is anticipated that there will be 14 new single family homes built for LMI persons at Hillside Estates. Also, the site at 110 South 28th Street is anticipated to create 84 affordable housing units with a mix of conventional apartment-style and townhouses to serve families which will begin construction in late 2022. The City is also expecting construction to start on Spin Lofts in 2022, which will utilize HOME funds. The total units expected for this project at 50 with 40 being built for LMI persons and five designated for families near homeless and five at market rate.

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

Number of Households Served	CDBG Actual	HOME Actual
Extremely Low-income	2	0
Low-income	19	0
Moderate-income	2	0
<b>Total</b>	<b>23</b>	<b>0</b>

Table 13 – Number of Households Served

**Narrative Information**

During 2021, two extremely low households, 21 low income households and four moderately low income households were assisted. Six of the low-income households were part of the City's Emergency Repair Program. One of the moderate-income household was down payment assistance through the Infill Program and another one was through Habitat for Humanity.

## **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 develops and initiate strategies to identify and engage persons with extensive or frequent episodes of homelessness.

One such initiative, now implemented, is the Homeless Review Team (HRT). The HRT involves 16 participating agencies and focuses on the most vulnerable of those among the homeless, assessing their needs (using the Vulnerability Index) and then coordinating the meeting of their needs (from medical, mental health, HIV and veterans needs to the need for housing and mainstream resources).

In addition to the HRT, several agencies provide outreach to special populations employing what is essentially the CoC's strategy for reaching out to homeless persons, i.e., 1) seek out homeless persons on the street or wherever else they are staying/congregating, 2) approach them with respect, 3) develop trust, 4) encourage and provide support for the use of supportive services and existing housing. The agency providing outreach include the following:

- Heartland Family Service (through its Pottawattamie County Homeless Link Project and through its various housing programs) also provides mobile outreach teams that do street outreach/street canvassing. Outreach workers have fixed days to be at area shelters to assess the housing needs of shelter guests. **Connecting homeless to services and housing:** For safety reasons, outreach workers go out in teams of at least two persons. When contact is made with homeless individuals on the street, the outreach workers attempt to complete a "vulnerability index". **Once an assessment is completed (to whatever extent is possible), the outreach workers provide referrals (a variety of materials for referral purposes as well as materials to meet basic needs are carried with outreach staff).**

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

Emergency shelters are using overflow accommodations on a consistent basis, i.e., guests sleeping on temporary mats or other places not designed as a permanent place for sleeping. Dependency on overflow beds is a signal that the emergency response system is stretched thin. Shelters report record numbers of single women, women experiencing domestic violence, and persons in families with young children. Add to this the single men who are parents and the families with teenage boys and the provision of emergency shelter accommodations becomes more difficult still. Further, it's frequently the case that TH programs have long waiting lists. This requires individuals and families—ready for their next step toward self-sufficiency—to remain in emergency shelters until TH units are available. It is a goal of

the CoC to alleviate overcrowding in emergency shelters and to ensure that all homeless persons have a safe and appropriate place to sleep and eventually a long-term place to live. The CoC does not consider floor mats an appropriate way to accommodate homeless persons and families. The CoC will monitor the ongoing need for temporary beds each year to ensure that current resources are going to meet the current need. This will include analysis of how different populations move through the ES, TH, and PSH homeless response systems in order to identify where we collectively could become more efficient. An inventory of housing beds by homeless sub-population is conducted annually on a formal basis at the time of the Metro Area CoC application for SHP funds (the annual NOFA published by HUD). This information is maintained in the CoC's HMIS and is updated as changes occur. Bed count is conducted by each housing facility and reported to the executive director of the CoC.

**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**

Persons at risk of homelessness are served in a variety of ways in an effort to help them avoid homelessness. Contact with persons in need of services in order to avoid homelessness can come by various sources. United Way of the Midlands, for example, has a "211" emergency assistance line; local churches are a source of referrals; and so, too, hospitals, nursing homes and public schools. These groups refer persons at risk of homelessness to food pantries—there are several in the jurisdiction—for food assistance and to the local utilities (Omaha Public Power District and Metropolitan Utilities District) for assistance with utility payments. There also are agencies—the Salvation Army is one—that provides rental and utility assistance on a limited basis. Finally, representatives from the CoC meet with representatives from institutions (hospitals and prisons, for example) in an effort to find suitable housing for individuals soon to be released from those institutions.

As indicated earlier in this document, the CoC will work to address the needs of those populations who have 1) severe medical or mental health conditions, 2) significant developmental disabilities, and/or 3) severe housing barriers due to prior convictions, addictions, citizenship problems, or elderly and hard to employ. These special needs populations represent many of the long term residents of shelters and pose significant challenges for transitional housing programs trying to identify permanent housing solutions for them. In more specific terms, the CoC will identify how many persons are released into shelters from publicly funded institutions or hospitals and expand/implement programs that provide those individuals with more appropriate housing solutions. Careful assessment of individual needs, collaboration with community partners so as to ensure successful referrals, the regular collection and reporting of relevant data to funders and others, all are steps the CoC will take as a part of its strategy to address the housing and service needs of persons released from institutions with no housing options.

**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**

Chronically homeless individuals and families are identified through the outreach efforts of several agencies (Community Alliance, Heartland Family Service, the Nebraska Aids Project, Stephen Center, Siena/Francis House, the VA and Youth Emergency Services). Once identified, they are assessed by those same agencies and referred to what is currently the most appropriate of available housing options. Once housed, case managers work with the individuals and/or families to stabilize their situation and connect them to needed services. Housing subsidies often are needed as are the financial and other supports available through mainstream resources. The City is the jurisdiction's grantee for rental assistance for the chronically homeless with mental illness, a 22 bed program run in partnership with the Omaha PHA and Community Alliance. Other housing programs serving the chronically homeless are Heartland Family Service's Samaritan Program and the Veterans Administration Supportive Housing (VASH) program. Emergency shelters and other programs, including transitional housing facilities and the rapid re-housing program, also provide and/or work to secure housing for the chronically homeless en route to ending their homelessness.

Families with children are contacted initially—or often so—by emergency shelters and/or by the many groups (listed in the previous paragraph) engaged in street outreach. They also are identified by homeless liaison workers employed by the public school system for the specific purpose of identifying homeless children (and families). Once identified, their situation is assessed and they are referred to the best of available housing options. This could mean referral to area shelters if they are living on the street or, if already in a shelter, to Heartland Family Service's rapid re-housing program or to area transitional housing and permanent housing options.

Homeless veterans and their families are contacted/identified by the CoC's outreach teams (listed above) but also through Family Housing Advisory Service's "Outreach to Veterans" program. Assessed and referred, they are housed variously at emergency shelters and transitional housing programs until they can be permanently housed. A grant per diem program, "Transitional Housing for Homeless Veterans" is available through the Siena/Francis House, through the Lutheran Home, and through the newly established "New Visions" program. The City was a partner in the development and expansion of Siena/Francis House and provided the land and site development for the construction of the New Visions program. The Nebraska Veterans' Aid Fund (NVA) offers temporary emergency aid, a fund that assists veterans, their spouses, and dependents when unforeseen emergencies occur and other resources are not available.

Unaccompanied youth are contacted most often through the outreach efforts of Youth Emergency



Services (YES). Youths are contacted on the street or at the drop-in center provided by YES. Unaccompanied homeless youth also are contacted by law enforcement officers on patrol and through Child Saving Institute, an organization (like the State of Nebraska's Child Protective Services) that works to reunify children with their families. In addition, the CoC's Youth Task Force provides advocacy for homeless youth and works to increase community awareness concerning the problem of youth homelessness. Youth Emergency Services does provide transitional housing beds for unaccompanied youth as do emergency shelters on a limited basis. Finally, Project Everlast works with youth in foster care to help them make the connections that will allow them to avoid homelessness once they leave the foster care system.

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

### **Actions taken to address the needs of public housing**

The Municipal Housing Agency was created in 1968 to serve as the public housing authority within the city limits of Council Bluffs. MHA currently assists families and individuals who are disabled, near-elderly, elderly or low income. Regal Towers and Dudley Court provide 295 units of public housing which includes 146 efficiency units and 64 one bedroom units . The Section 8 Housing Choice Voucher Program provides 697 vouchers which includes twenty Veteran Affairs Supportive Housing vouchers (VASH). The Agency's Family Self Sufficiency program currently has twenty participants.

The Mission of MHA includes, but is not limited, to the following

- Provide affordable, safe, decent and sanitary housing to low-income families that will promote economic mobility and a suitable living environment free from discrimination.
- To provide safe and sanitary living conditions for very low income families while maintaining their rent payments at an affordable level.
- To minimize public housing vacancies and continue to improve turnaround days to maintain MHA's High Performer Status in HUD's PHAS Accreditation
- Housing for elderly and disabled low income families in or Public Housing units.

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

Currently the MHA owns and manages two multi-family facilities with the first preference of housing the elderly and disabled. MHA has a five member Board of Commissioners appointed by the Mayor of Council Bluffs and approved by the City Council. MHA has a Resident Advisory Board which meets a minimum of once time per year to express their ideas as well as assist MHA in prioritizing future improvements to the public housing and Section 8 programs.

Municipal Housing Agency continues outreach and marketing efforts which is done mainly by attending various meetings with area non-profits. The MHA distributes various pamphlets including "Respect Your Tenants" and "Respect your Rental Unit" as well several informational brochures.

There were no activities reported for activities that encourage public housing residents to participate in homeownership.

### **Actions taken to provide assistance to troubled PHAs**

Not applicable. The Municipal Housing Agency is not 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)**

In conjunction with the Cities of Omaha and Bellevue and each city's respective Public Housing Authority, the City completed its Affirmative Fair Housing Assessment in 2018. This document identified deficiencies in Council Bluffs with regards to affordable and fair housing and set goals for improving these deficiencies. From this, the City has evaluated its land use, zoning ordinances, building codes and fees to reduce barriers for affordable development.

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

1. Expanded outreach efforts to inform the public of available programs including housing rehabilitation, emergency housing repairs, lead remediation and available services through partner agencies.
2. Expanded the Affected Properties Program to city-wide.
3. Worked with NeighborWorks Home Solutions to revise new construction single-family house plans to create a new, more affordable unit for purchase.
4. Continued partnerships with the Human Services Advisory Council (HSAC) and the FEMA Emergency Food and Pantry (EFSP).

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

In December 2018, the City was awarded a Lead Based Paint Hazard Control Grant (LBPHC) for \$2,000,000 to remediate lead in low-to-moderate income households with children 6 years and under. The City is currently working on this program with a goal to assess 110 units and remediate lead in 110 units approximately. The City worked to increase outreach efforts and completed three remediations in 2020. In 2021, three units were completed.

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

The City supported efforts of non-profit and public agencies working to reduce the number of poverty-level families.

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

During the 2019-2023 Consolidated Plan period, the City plans to work on the following actions to develop institutional structure:

- Eliminate language barriers for persons with LEP to enhance their accessibility to City programs and services by providing language services as needed, if a Language Access Plan is not warranted. The City provides language interpretation services for those requesting such.
- Solicit applications and increase the percentage of members of the protected classes serving on appointed boards and commissions dealing with housing issues until comparable to City-wide rates. In addition, as vacancies on appointed boards and commissions dealing with housing issues came available, applicants from protected classes were sought.
- Completed the Consortia Affirmatively Furthering Fair Housing Assessment identifying contributing factors to barriers and goals for furthering fair housing. Plans to continue these efforts and reaching goals.

Utilizing an award for a Lead Based Paint Hazard Control Grant that will be used for low-to-moderate income households to remediate lead based paint and soil in households with children six years old and under.

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

The City continues its partnership with the Human Services Advisory Council (HSAC) and its Housing Committee (Committee). HSAC is comprised of 50 plus agencies that serve in the social service environment. The mission of HSAC is to foster collaboration between human services agencies. They identify community needs, and then encourage the optimal utilization of resources to cultivate change and public awareness.

The Committee is comprised of agencies that specifically focus on housing for low-to-moderate income individuals. Their goals and objectives are:

- Build capacity of the committee and continued recruitment of new members.
- Survey HSAC member agencies on a regular basis to assess the needs of their clients and to determine how the Housing Committee can better address needs.
- Continue maintaining and updating HSAC Housing List. This list will include apartment complexes and smaller rental units, including individual landlords, and will include additional information about the units pertinent to low-income individuals. The list will be made available to the general membership and will be posted on the HSAC webpage.
- Develop and implement 2 client information sessions during the year. Sessions will focus on providing tools and information to assist low-income residents with housing issues (a tenant's legal rights and responsibilities, etc.). Sessions will be incorporated into existing local events that target lower income and at-risk populations.
- Review and update the informational flyers made by the committee.
- Organize and conduct one items drive to support a housing-based agency or program to assist participants with furniture and household items.
- Keep the general HSAC membership apprised of housing updates, news, and legislation

- through sharing of information in general meetings and via the listserve.
- Maintain a relationship with the City of Council Bluffs Housing Department.

**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 is working to implement its goals and objectives outlined in the AFFH Assessment completed in 2019. The City is actively seeking to create additional low-to-moderate income housing through its partner agencies. Additionally, the City continues to provide funding to promote stable, permanent housing for the homeless. The City is working to identify ways to increase its Section 3 compliance through partnerships with MHA and other local low-to-moderate income housing agencies.

## **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 Council Bluffs' project monitoring efforts begin with the negotiation of individual contracts. Contracts must be drafted in such a way as to provide measurable performance criteria and administrative standards, all consistent with HUD or other regulatory guidelines and requirements. Progress towards attainment of specific goals will be monitored throughout the contract term and any longer period specified. This is particularly important for Sub-recipients who are working under a long-term contract for services. Monitoring of Sub-recipients by City staff will include the combined use of tracking of compliance key terms of the contract, contract specified inventory of required monitoring area, on-site reviews and audits, annual performance reports, and periodic status reports, as necessary. Violations, deficiencies or problems identified during routine monitoring procedures will be addressed and corrected by providing the Sub-recipient with the necessary information and technical assistance. If the problem persists, sanctions will be imposed appropriate to the scale of the problem.

In addition to monitoring the performance of Sub-recipients, the City of Council Bluffs has a monitoring system in place for projects and programs conducted by Community Development Department staff. This includes a competitive bidding, job site inspection, eligibility determinations and underwriting criteria and monthly activity reports. Monthly reports allow staff to analyze goal related performance in a number of areas. These include number of clients benefiting, client composition and geographic areas served. By analyzing at this level, staff can determine when and where needs are being met, area and population being underserved and compliance with regulatory requirements. The City of Council Bluffs will continue to invest significant staff time and effort to an ongoing and thorough monitoring process to insure that all funds are put to their best and most efficient use according to the priorities and goals identified and within the guidelines of the appropriate state and federal program.

In FY20 the Community Development Department staff conducted desk reviews of all the City's projects/programs funded with CDBG funds. In general, all projects/programs were found in compliance with HUD and other regulatory guidelines. Staff continued to monitor these programs in 2020 for compliance.

Utilizing minority-women owned businesses are encouraged. For all requests for proposals and/or services, the City requests information from the proposed contractor regarding their minority business status.

Additionally, the City's Community Development Department verifies all programs and projects assisted are in compliance with the City's Comprehensive planning requirements.

**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.**

Section 91.105(d)(2) of the consolidated plan regulations requires that grantees consider any comments or views of citizens, received in writing or orally at public hearings, in preparing the CAPER. No citizen comments have been received in preparing the FY21 CAPER. Notice of the availability of the CAPER was posted on the City of Council Bluffs' website and were available for printing upon request. Copies of the proof of posting / certifications of availability are attached and found in Appendix A.

**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.**

During the FY21 program year, the City made no changes in program objectives.

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

No

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

**CR-45 - CDBG 91.520(c)**

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

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