

2013

Consolidated Annual Performance Evaluation Report



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Table of Contents

CR-05 - Goals and Outcomes	5
PROJECT FUNDING YEARS ACTIVE IN FY 2013	5
COMMUNITY DEVELOPMENT BLOCK GRANT (CDBG) FUNDED CATEGORIES	6
CR-15 - Resources and Investments 91.520(a)	17
CR-20 - Affordable Housing 91.520(b)	20
CR-25 - Homeless and Other Special Needs 91.220(d, e); 91.320(d, e); 91.520(c)	23
PREVENTING REPEAT HOMELESSNESS	26
EXPLAIN IMPLEMENTATION OF A HOMELESS DISCHARGE COORDINATION POLICY & HOW ESG FUNDS ARE BEING USED.	27
CR-30 - Public Housing 91.220(h); 91.320(j)	29
ACTIONS TAKEN TO ADDRESS THE NEEDS OF PUBLIC HOUSING	29
CR-35 - Other Actions 91.220(j)-(k); 91.320(i)-(j).....	30
CR-40 - Monitoring 91.220 and 91.230.....	36
MONITORING FINDINGS.....	37
MINORITY BUSINESS OUTREACH	41
PUBLIC INPUT AND COMPREHENSIVE PLANNING REQUIREMENTS.....	41
CR-45 - CDBG 91.520(c)	43

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.

Fiscal Year 2013 is the first year of our five-year Community Development Block Grant Consolidated Plan. Accomplishments reported in this report include projects and activities carried out in FY 2013.

Community Development Block Grant funds must be used to meet one of HUD's national objectives:

- serving Low-to-moderate income clientele;
- serving Low-to-moderate income census tract;
- serving a presumed low-to-moderate income group;
- eliminating blight, or
- address an urgent disaster, and

address a high priority need of the community, as described in the Consolidated Plan for fiscal years 2013-2017. At least 51% of those served by any activity must be low-to moderate income, with the total grant serving not less than 71% low-to-moderate income.

Rapid City focused its efforts on the following high priority goal areas in FY 2013:

- Affordable Housing
- Sustainable Housing Rehab
- Transitional Housing
- Homeless Prevention
- Housing and Utility Assistance
- Victims of Domestic Violence
- Mental Health Assistance
- Public Facilities & Improvements
- Senior Centers
- General Public Services
- Counseling and Intervention
- Case Management
- Life Skills Training
- Legal Service for Low Income People

The FY 2012 projects addressed the following specific national objective outcomes:

- ❖ DH – Decent Housing - Sustainability/Affordability/Availability/Accessibility
- ❖ SL – Suitable Living Environment - Availability/Accessibility/sustainability

Specifically, projects benefited low-to-moderate income persons and households by making services or housing available, accessible, and affordable. In addition, projects were undertaken to help people sustain their household or housing.

PROJECT FUNDING YEARS ACTIVE IN FY 2013

Projects undertaken in FY 2013 included projects carried forward from previous years' unspent funding. Funding for projects included the following program years:

CAPER Rapid City, SD

5

Program Administration

FY 2012
FY 2013

Public Services

FY 2011
FY 2012
FY 2013

Public Facilities and Improvements

FY 2012
FY 2013

Housing

FY 2011
FY 2012
FY 2013

COMMUNITY DEVELOPMENT BLOCK GRANT (CDBG) FUNDED CATEGORIES

Community Development Block Grant funds plus program income was allocated in the following categories for a total of \$468,565.08:

- \$93,697.00 Program Administration (*Entitlement and Program Income*)

(HUD caps the amount that may be spent on program administration at 20% of the Entitlement amount plus the program income earned during the program year.);

- \$ 73,636.00 Public Services (*Entitlement*)

(HUD puts a cap, 15% of the Entitlement amount plus program income from the previous completed year, on the amount of funds that may be used for Public Services); and

- \$ 40,000.00 Single Family Owner-Occupied Housing;
- \$ 67,628.44 Owner-Occupied Rehabilitation (*Entitlement + Revolving Loan funds*);
- \$ 35,000.00 Transitional Housing Homeless Youth
- \$110,427.00 Public Facilities and Improvements ;
- \$ 0.00 Economic Development.

Funding Sources	
Entitlement	\$466,188.00
Program Income (PI)	\$ 19,899.53
Revolving Loan Income (RL)	\$ 25,311.45
Available for Reprogramming	\$135,408.06
Total Funding Available:	\$646,807.04

Although HUD requirements state that at least 71% of persons assisted by the City with CDBG funds must be low-to-moderate income, the City strives to serve no less than ninety percent (90%) low-to-moderate income persons each year with the Community Development Block Grant (CDBG) funds. In

2013 ninety-five (95%) of FY 2013 expenditures assisted low- and moderate-income persons and households, either directly or on an area basis.

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.

Accomplishment of the goals set in the Consolidated Plan are dependent on the availability of funding, availability of affordable properties, eligible, qualified buyers, and agencies with adequate staffing and programming to take on new activities and projects.

We have been able to leverage our funds to accomplish many of our goals over the years, but the past two years have really put a strain on agencies, especially housing agencies, making it very difficult for them to complete projects and sell the properties.

See following table.

FY 2013 GOALS, INDICATORS AND ACCOMPLISHMENTS

Goal	Category	Source / Amount	Indicator	Unit of Measure	Expected – Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected – Program Year	Actual – Program Year	Percent Complete
Acquisition for Housing	Affordable Housing	CDBG: \$156559	Rental units constructed	Household Housing Unit	50	0	0.00%	0	0	0.00%
Acquisition for Housing	Affordable Housing	CDBG: \$156559	Rental units rehabilitated	Household Housing Unit	25	0	0.00%	0	0	0.00%
Acquisition for Housing	Affordable Housing	CDBG: \$156559	Homeowner Housing Added	Household Housing Unit	10	2	20.00%	2	2	100.00%
Acquisition for Housing	Affordable Housing	CDBG: \$156559	Homeowner Housing Rehabilitated	Household Housing Unit	25	0	0.00%	0	0	0.00%
Acquisition for Housing	Affordable Housing	CDBG: \$156559	Direct Financial Assistance to Homebuyers	Households Assisted	10	8	80.00%	10	8	80.00%
Acquisition for Housing	Affordable Housing	CDBG: \$156559	Homeless Person Overnight Shelter	Persons Assisted	20	0	0.00%	0	0	0.00%
Acquisition for Housing	Affordable Housing	CDBG: \$156559	Overnight/Emergency Shelter/Transitional Housing Beds added	Beds	20	0	0.00%	0	0	0.00%
Counseling Services	Non-Homeless Special Needs	CDBG: \$7000	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	2000	26	1.00%	72	26	36.11%

Counseling Services	Non-Homeless Special Needs	CDBG: \$7000	Public service activities for Low/Moderate Income Housing Benefit	Households Assisted	2000	0	0.00%	0	0	0.00%
Disabled Persons Services	Non-Homeless Special Needs	CDBG: \$0	Other	Other	150	0	0.00%	0	0	0.00%
Domestic Violence Services and Counseling	Victims of Domestic Violence	CDBG: \$25000	Other	Other	2500	2,744	0.00%	2500	2,744	110.0%
Early Childhood Education & Affordable Child Care	Non-Homeless Special Needs	CDBG: \$0	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	50	0	0.00%	0	0	0.00%
Economic Development	Non-Housing Community Development	CDBG: \$0	Direct Financial Assistance to Homebuyers	Households Assisted	5	0	0.00%	0	0	0.00%
Economic Development	Non-Housing Community Development	CDBG: \$0	Businesses assisted	Businesses Assisted	10	0	0.00%	0	0	0.00%
Economic Development	Non-Housing Community Development	CDBG: \$0	Other	Other	10	0	0.00%	0	0	0.00%
Efficiency and 1-Bedroom Apartments	Affordable Housing	CDBG: \$0	Rental units constructed	Household Housing Unit	20	0	0.00%	0	0	0.00%

Efficiency and 1-Bedroom Apartments	Affordable Housing	CDBG: \$0	Rental units rehabilitated	Household Housing Unit	20	0	0.00%	0	0	0.00%
Emergency Shelter	Homeless	CDBG: \$5000	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	4600	2744	60.00%	100	2744	2744.0%
Emergency Shelter	Homeless	CDBG: \$5000	Homeless Person Overnight Shelter	Persons Assisted	4600	0	0.00%	100	0	2744.00%
Emergency Shelter Family Units	Homeless	CDBG: \$0	Overnight/Emergency Shelter/Transitional Housing Beds added	Beds	12	0	0.00%	0	0	0.00%
Emergency Shelter for Youth	Homeless	CDBG: \$0	Overnight/Emergency Shelter/Transitional Housing Beds added	Beds	10	0	0.00%	0	0	0.00%
Emergency Shelter for Youth	Homeless	CDBG: \$0	Homelessness Prevention	Persons Assisted	10	0	0.00%	0	0	0.00%
Handicap Services	Non-Homeless Special Needs	CDBG: \$0	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	100	0	0.00%	0	0	0.00%
Homeless Prevention	Homeless	CDBG: \$7400	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	60	0	0.00%	0	0	0.00%
Homeless Prevention	Homeless	CDBG: \$7400	Homelessness Prevention	Persons Assisted	250	62	25.00%	60	62	103.00%

Housing First - Rent/Utilities/Deposit Assistance	Affordable Housing Homeless	CDBG: \$7400	Tenant-based rental assistance / Rapid Rehousing	Households Assisted	125	62	50.00%	9	62	50.00%
Legal Assistance	Homeless Non-Homeless Special Needs	CDBG: \$5000	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	380	182	47.89%	15	182	1,213.33%
Mental Health Treatment and Services	Non-Homeless Special Needs	CDBG: \$39903	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	250	625	250.00%	230	625	271.74%
Mental Health Treatment and Services	Non-Homeless Special Needs	CDBG: \$39903	Other	Other	250	625	250.00%	230	625	271.74%

Planning and Administration of CDBG Grant	Affordable Housing Public Housing Homeless Non-Homeless Special Needs Non-Housing Community Development Economic Development	CDBG: \$429000	Other	Other	\$67000	\$93697	0.00%	\$93697	\$14,081.63 – 2012 \$4862.09 – 2013	5.00%
Public Facilities	Public Facilities	CDBG: \$110427	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	5000	1009	20.18%	3580	1009	28.18%
Public Facilities	Public Facilities	CDBG: \$110427	Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit	Households Assisted	50	0	0.00%	0	0	0.00%

Rehabilitation - Existing Housing	Affordable Housing	CDBG: \$85070	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Rental Units/Persons			0.00%			
Rehabilitation - Existing Housing	Affordable Housing	CDBG: \$85070	Rental units rehabilitated	Household Housing Unit	10	8	80.00%	10	8	80.00%
Rehabilitation - Existing Housing	Affordable Housing	CDBG: \$85070	Homeowner Housing Rehabilitated	Household Housing Unit	35	9	26.00%	11	9	82.00%
Rehabilitation - Existing Housing	Affordable Housing	CDBG: \$85070	Homeless Person Overnight Shelter	Persons Assisted		0	0.00%	0	0	0.00%
Rehabilitation - Existing Housing	Affordable Housing	CDBG: \$85070	Overnight/Emergency Shelter/Transitional Housing Beds added	Beds		0	0.00%	0	0	0.00%
Senior Citizens Facilities	Public Facility	CDBG: \$	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	5000	2689	75.00%	3580	2689	75.00%
Senior Citizens Services	Non-Homeless Special Needs	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	10000	0	0.00%	0	0	0.00%
Substance Abuse Treatment and Prevention	Non-Homeless Special Needs	CDBG: \$	Other	Other	150	0	0.00%	0	0	0.00%

Transportation	Non-Homeless Special Needs	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	400	0	0.00%	0	0	0.00%
Youth Activities	Non-Homeless Special Needs	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	400	0	0.00%	0	0	0.00%

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.

The highest priority needs identified for this planning year were affordable and sustainable housing, providing housing first and services to address homelessness, stabilizing families, and addressing mental health and substance abuse issues.

All funding allocations were required to meet a high priority need in the Consolidated Plan adopted by the City for FY 2013-2017. Emphasis is placed on projects that target persons in the lowest income levels and benefit the highest percentage of low income persons and minorities.

The 2013 program year was the first year covered by the 2013-2017 Consolidated Plan goals. Accomplishments of two of the projects have already exceeded the 5 year goals set for providing legal services and mental health treatment services.

Housing assistance was provided to 9 homeowners for rehabilitation of substandard conditions.

Eighteen households realized homeownership and twelve youth benefitted from improved safety in their transitional housing.

Behavior Management Systems utilized CDBG funding to assist 283 new clients apply for free medication assistance and 342 returning clients apply for free prescription refills. Clients were able to access over \$1.4 million dollars in free medications that allowed them to remain stable and productive. Only 6 clients out of 625 had a negative setback while in the program. Prior to the program being implemented there was an 87% negative setback rate. Negative setbacks may be arrest, detox, involuntary commitment, or an emergency room visit.

Emergency shelter was provided to 2,744 victims of domestic violence. Sixty-two (62%) of the victims were American Indian/Alaska Natives. WAVI also provides supportive services and education about domestic violence.

The Salvation Army provided utility assistance to 62 households to avoid possible homelessness from eviction. Ninety (90%) percent of the families were extremely –low income and 60% were minorities.

Dakota Plains Legal Services leveraged \$5,000 in CDBG funds to assist 182 low-income people with civil legal issues. Seventy –four (74) of the clients were assisted with housing issues to avoid homelessness.

Ninety-six (96%) of the people assisted make less than 80% of the Area Median Income with fifty-four percent (54%) of the expenditures assisting people making less than 30% of the Area Median Income.

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)

Rapid City is predominately white (80.4%) with a 19.6% minority population. The American Indian/Alaska Native population increased 2.3% between 2000 and 2010 to 12.4%, and is the largest minority group. The remainder of the City's population is another race (3.1%) or two or more races (4.1%). Hispanic or Latin origin (of all races) comprises approximately 4% of the population, a rise of 2.8% since 2000.

Native American/Alaska Natives are disproportionately represented in the homeless, low-income, unemployment, and alcohol and substance abuse populations, making up 40% or more of each group. Thirty (30%) percent of the FY 2013 funding provided service and assistance that benefitted American Indian/Alaska Native persons or households with 33% benefitting all minorities served.

Narrative

RACE	HOUSING		NON-HOUSING		
	HOUSEHOLDS	HISPANIC	PERSONS	HISPANIC	
White	21		4887	26	4908
Black or African American			104	3	104
Asian			78	1	78
American Indian/Alaska Native	10	1	2174	23	2184
Native Hawaiian or Other Pacific Islander			3		3
American Indian/Alaska Native & White			40		40
Asian & White			2		2
Black/African American & White			5		5
American Indian/ Alaskan Native & Black/African			1		1
Other Multi-Racial	1	1	43		44
TOTAL HOUSING	32*	2	7337	53	7369

*Same person worked with 3 agencies and was counted by each.

Actual count (- 2) for housing

INCOME	OWNER	RENTER	PERSON	Totals
Extremely Low	9	12	3987	4008
Low-Mod	8		772	780
Moderate	3		2257	2260
Non Low-Moderate			321	321
TOTAL	20*	12	7337	7369

CR-15 - Resources and Investments 91.520(a)

IDENTIFY THE RESOURCES MADE AVAILABLE

Source of Funds	Source	Expected Amount Available	Actual Amount Expended Program Year 2013
CDBG	Public -Federal	2,145,000	121,942.58

Table 2 – Resources Made Available

Narrative

In addition to the Community Development Block Grant funds the City allocated \$204,000 from the Community Investment Fund for the Fine Arts and Health and Human Services, providing \$102,000 for each. The Community Investment Fund is not represented in the dollars showing in this report as this department does not manage them. However this report will include information about projects conducted with Investment Funds that address high priority needs of the community.

IDENTIFY THE GEOGRAPHIC DISTRIBUTION AND LOCATION OF INVESTMENTS

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description
Rapid City Corporate Limits	100%	100%	Balance of 62% were public services and/or housing projects for clients living city-wide
Census Tract 102 – City Center		20%	Housing acquisition and rehab projects
Census Tract 103 – Silver St. & N. Haines		8%	Housing acquisition and rehab projects
Census Tract 104 – Knollwood Area			
Census Tract 105 – E. North St. to St. Patrick St.			
Census Tract 106 – Elm to Cambell & St. Pat to Fairmont			
Census Tract 107 – Old Robbinsdale			
Census Tract 111 – Sioux Park/Old Canyon Lake			
Census Tract 114 – North of I-90		10%	Housing acquisition projects

Table 3 – Identify the geographic distribution and location of investments

Narrative

The City seeks to utilize CDBG funding to benefit our low-income census tracts, CT 102, 103, 104, and 105, to the greatest extent possible. However, our goal is also to provide mixed housing throughout the city and provide assistance to all low-income people.

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.

Matching funds are not currently required for projects receiving Community Development Block Grant (CDBG) funds. However funding decisions do take into consideration the use of leveraged funds for projects. The City and local agencies are aggressive in pursuing funding sources for needed services.

In 2013, agencies leveraged a total of \$677,056; that equaled \$1.45 from other funding sources for every \$1 of CDBG funds used for CDBG funded activities. The amount of leveraged funds dropped significantly from the previous year's \$2,419,517 due to budget cuts and reduced private donations. State and local funds increased slightly over 2012, lessening the impact of declining federal and private dollars. The activities and funding shown do not include program administration for the grant. Agencies had projected receiving \$1,113,643 in other grants and private funding. The severe reduction in leverage funds will adversely affect the number of projects we can complete and the number of low-income people we can serve.

In response to the continued reductions in all funding sources ,local funding sources, agencies and government services have come together to form a very strong collaboration for addressing high priority issues and pursuing grants to address them. The community seeks partnerships for projects rather than duplications of services, and as a result problems are being addressed, goals are being achieved and funds are being leveraged to go even farther.

The total Federal, State, local, and private dollars leveraged for CDBG funded projects in 2013:

TABLE 5 TOTAL FUNDS LEVERAGED - FY 2013	
Source of Funds	Dollar Amount
CDBG	\$ 466,188
Federal Funds (Other)	\$ 89,680
State & Local Funds	\$ 394,942
Private Donations	\$ 192,434
Fees & Interest Income	\$ 0.00
In-Kind	\$ 0.00
United Way	\$ 0.00
Mortgages	\$ 0.00
Total Leveraged Funds	\$ 677,056

Table 5 – Total Funds leveraged – FY 2013

There are no match requirements for Community Development Block Grant funds at this time.

Match Contribution for the Federal Fiscal Year								
Project No. or Other ID	Date of Contribution	Cash (non-Federal sources)	Foregone Taxes, Fees, Charges	Appraised Land/Real Property	Required Infrastructure	Site Preparation, Construction Materials, Donated labor	Bond Financing	Total Match
N/A								

Table 4 – Match Contribution for the Federal Fiscal Year

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	219 9	0
Number of non-homeless households to be provided affordable housing units	2047 20	18
Number of special-needs households to be provided affordable housing units	1850 5	0
Total	4116 34	18

Table 5- Number of Households

	One-Year Goal	Actual
Number of households supported through rental assistance	69 *should have been 9	0 * late release of funds, program not started by time of reporting.
Number of households supported through the production of new units	1	5
Number of households supported through the rehab of existing units	13	9
Number of households supported through the acquisition of existing units	6	4* 5 loans provided to 4 buyers - 2 agencies provided DP assistance to same buyer
Total	89 29	18

Table 6 - Number of Households Supported

DISCUSS THE DIFFERENCE BETWEEN GOALS AND OUTCOMES AND PROBLEMS ENCOUNTERED IN MEETING THESE GOALS.

The goals for the 2013 Annual Action Plan in Table 11 were input incorrectly and do not reflect a realistic one year goal for accomplishments for housing with the funding amounts we typically receive. The Consolidated Plan and FY 2013 Annual Action Plan will be corrected to reflect the correct annual goal. In Table 12 the one-year goal for the "Number of households supported through rental assistance" was also incorrectly entered as 69 instead of 9. Corrections to both tables 11 and 12 are shown next to the lined-out incorrect numbers.

Salvation Army made a decision to change their program policy to no longer provide rental assistance, concentrating only on utility assistance for homeless prevention. This eliminated one of our programs to provide Housing First assistance, thereby reducing the number of people who could be assisted.

The City also allocated funding to Volunteers of America for rent and utility assistance but they had a large turnover in staff, including the Director, just prior to the release of funds, so the City cancelled the grant due to instability of the agency and lack of knowledgeable staff to carry out the program. The City

then approached The HOPE Center about taking over the Housing First program since they have been providing housing assistance for two reentry programs and they agreed. However they were not able to get their program started prior to the end of the program year due to the lateness of the offering and need to get board approval for the program, execute contracts, and get policies and procedures in place. The program will be operational shortly and it is expected the funding will be expended within a few months.

The low-income housing market continues to be very slow, with few people able to qualify for loans and accumulate the minimum required borrower investment, making it difficult for the housing agencies to sell and close on properties purchased with CDBG funds. Agencies continue to aggressively market the properties.

Housing projects for those with special needs have also been difficult to address, as agencies are already short staffed, have seen significant reductions in funding, and lack the expertise to put together complicated financing packages and projects.

DISCUSS HOW THESE OUTCOMES WILL IMPACT FUTURE ANNUAL ACTION PLANS.

Housing Agencies have struggled to expend their funds for the last three years and still haven't closed on properties they currently have. Therefore the City will not fund homeownership projects unless there is a proven need with qualified, ready-to-go buyers and funding already identified for construction.

The City is working with the United Way and the John T. Vucurevich Foundation to encourage the formation of an Affordable Housing Collaborative to focus on the highest need housing types and identify a project management plan for leadership of projects in partnership with agencies and the collaborative.

At the same time, we are also forming a *Poverty to Prosperity* collaboration to address the root issues of poverty, in order to provide persons living in poverty with the tools needed to move ahead with education, job training, skills improvement and other asset building programs.

The Black Hills Human Services Collaborative is now well established and an inspiring model of the power of a community effort with the establishment of a Rapid City Crisis Care Center, the new Intensive Family Services Team, Arise, a new Youth Systems program, the expansion of the Juvenile Diversion Alternatives Initiative, and the Rapid City Community Paramedic Program.

Future funding allocations will be directed to fewer activities, so funding amounts will be sufficient to make significant progress on an issue.

Funding will be directed to collaborative efforts to address our highest priority needs.

Requests for Funding applications will be specific to activities to fill gaps in services and housing types, rather than general for any type of project.

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
Extremely Low-income	9
Low-income	5
Moderate-income	2
Total	16

Table 7 – Number of Persons Served

Narrative Information

Housing projects continue to struggle to find homebuyers who qualify for a mortgage loan and have their required buyer investment, even with down payment assistance programs available. There are three homebuyer education programs available in the community to help prospective buyers understand the process, credit and financial requirements, and assistance programs available.

Thirteen (13) households were able to realize homeownership with down payment and closing cost or land acquisition assistance. In addition, nine (9) low-income homeowners received home rehabilitation assistance to remove substandard conditions to ensure long term sustainability and affordability of their home.

Transitional apartments for youth were renovated to improve safety with the installation of a fire suppressant system. Twelve youth received the benefit of the improved safety.

Housing

Housing	Income Levels	Owner Occupied	Renter Occupied	Persons
	Extremely Low (<=30%)	10	12	0
	Low (>30% and <=50%)	4	0	0
	Mod (>50% and <=80%)	2	0	0
	Total Low-Mod	16	12	0
	Non Low-Mod (>80%)	0	0	0
	Total Beneficiaries	16	12	0

Non-Housing Activities

Non-Housing	Income Levels	Owner Occupied	Renter Occupied	Persons
	Extremely Low (<=30%)	0	0	3,987
	Low (>30% and <=50%)	3	0	772
	Mod (>50% and <=80%)	2	0	1,284
	Total Low-Mod	5	0	6,043
	Non Low-Mod (>80%)	0	0	285
	Total Beneficiaries	5	0	6,328

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

There is not currently a formal, coordinated outreach effort to unsheltered persons for the purpose of assessing their individual needs. There are homeless outreach professionals from the VA and Behavior Management Systems, a mental health and substance abuse program, who work with Cornerstone Rescue Mission to coordinate access to needed services of persons staying at the Mission or who eat meals at the Mission, which many of the chronic homeless do.

The HOPE Center, a homeless day drop-in center assists both the sheltered and unsheltered by providing a safe, warm place for them to go during the day where they can get information about services and assistance available in the community. The Center also provides a phone message service, a mailbox and storage area for a small amount of personal goods.

The City will be implementing the 100,000 Homes Outreach Initiative for chronic homeless in 2014 to provide access to permanent housing. The 100,000 Homes Initiative makes contact with all homeless living on the street, or in other not-meant-for-habitation conditions to gather information on their needs, readiness for help, and then prioritize them for housing. The City will be working with the Black Hills Homeless Coalition to develop and implement the plan for moving chronic homeless into permanent housing and connecting them to needed supportive services.

Every June, the Black Hills Homeless Coalition conducts a Homeless Connect Day, providing a "one-stop" center where veterans and the homeless are able to access information, services, medical check-ups, eye exams, haircuts, employment assistance, clothing vouchers for interview clothing, personal care items and a meal at one convenient location. Agencies providing funding assistance for housing are also present to link people to programs they might be eligible for.

ADDRESSING THE EMERGENCY SHELTER AND TRANSITIONAL HOUSING NEEDS OF HOMELESS PERSONS

Cornerstone Rescue Mission, Cornerstone Women & Children's Home, and Working Against Violence, Inc. (WAVI) provide emergency shelter, counseling and case management to the homeless and victims of domestic violence. Cornerstone Rescue Mission provides 3 meals daily to the homeless and anyone else in the community with food insecurity.

Cornerstone Rescue Mission is actively seeking a property for a new women's shelter that will allow them to expand to meet the growing numbers of homeless women with children.

There is still a need for separate quarters to house families, so that the males do not have to be separated from the female family members and an emergency shelter for homeless youth. These are a

little more difficult to address, in that supportive services must be provided on site and funding is very limited, but they are two of the highest priorities in the consolidated plan.

HELPING HOMELESS PERSONS TRANSITION TO PERMANENT HOUSING AND INDEPENDENT LIVING

Funds were provided to WAVI to provide emergency shelter services and counseling support of homeless women and children who are victims of domestic violence. WAVI assists battered women by providing emergency shelter, counseling, and assistance with transitioning to their own apartment, if needed, through use of other assistance funds or referrals to other agencies.

Dakota Plains Legal Services provided legal advice and representation to the homeless, victims of domestic violence, low-income people and the elderly to resolve civil matters.

Salvation Army received funding to provide assistance for accessing housing through utility deposits or paying off delinquent utility bills.

Lutheran Social Services received funding for renovations to improve fire safety and the livability of transitional apartments for homeless youth exiting the foster care or juvenile detention systems with the installation of an alarm and sprinkler system. The apartments provide youth with safe affordable housing, supportive services and life skills training for a successful transition to their independence.

The HOPE Center received funding to provide housing assistance to homeless families in the form of short-term housing assistance, up to 3 months, and/or rent deposits to help move the homeless into housing and provide the short-term “safety net” so they could get established and stable, more successfully achieving self-sufficiency.

The Rapid City Offender Re-Entry Program received funding from the Department of Justice Second Chance Act to provide assistance for temporary, transitional, and permanent housing for homeless offenders as well as supportive services needed for their mental health, substance abuse and living skills stabilization. Services are provided as collaborative effort of city, county, and state agencies, non-profit service providers, medical and mental health facilities, housing providers, family support agencies, the Department of Corrections, and faith-based organizations. The collaboration has developed a program to assist offenders with their reintegration into the community and reduce recidivism. The program receives referrals from the State Department of Corrections and self-referrals of returnees in the community who need assistance. The City transferred the administration of the program to The HOPE Center on February 6, 2014.

Behavior Management Systems received funding to assist persons with severe persistent mental illness and/or substance abuse access prescription medications needed to stabilize their conditions so they can maintain employment and permanent housing.

SHORTENING PERIOD OF HOMELESSNESS AND PREVENTING REPEAT HOMELESSNESS

Rapid City has adopted a Plan to End Chronic Involuntary Homelessness that includes a “housing first” focus. The CDBG funding provided to Salvation Army and The HOPE Center were used to move people quickly into housing and/or pay delinquent rent or utilities to avoid eviction and repeat homelessness.

Pennington County Health and Human Services and Western SD Community Action also made funds available for the homeless to acquire housing with short-term assistance for rent and utilities.

The Rapid City Reentry Program provides transitional and permanent housing assistance to move quickly into housing for those meeting the Second Chance Act eligibility requirements.

Assistance provided requires case management services to try to anticipate and deal with difficulties that may affect their ability to maintain and remain in housing.

FACILITATING ACCESS FOR HOMELESS INDIVIDUALS AND FAMILIES TO AFFORDABLE HOUSING UNITS

Affordable housing for homeless individuals or couples without children is extremely difficult to find. Many of the homeless have no income, only disability or social security income, or minimum wage jobs that do not provide a livable wage with current housing costs. While there is assistance money to help place people in apartments, there is no additional gap assistance money for long term maintenance, and people are unable to maintain housing for more than a month or two beyond the initial assistance. Section 8 waiting lists are over 2 years and preferences are given to Veterans and families with children, so it is very difficult for single individuals and couples without children to access a voucher. Subsidized housing also has long waiting lists and most efficiency and one bedroom apartments are located in senior housing projects.

Single resident and couples without children occupancy housing is the top housing priority for the City. The City is working with the Affordable Housing Collaborative to plan and implement housing projects with public/private partnerships that develop apartments with rents in the \$350-\$500 range that would be affordable to people on limited and minimum wage incomes.

The City’s new Comprehensive Plan, *Plan Rapid City* has made affordable housing a high priority. A recent review and rewrite of the building codes and ordinances allows for consideration of smaller lot sizes and square footages that would help bring unit costs down to a more affordable range.

Assistance programs are available to help the homeless with initial deposits for rent and utilities, and up to 3 months of rent through The HOPE Center, The Second Chance Act Offender Reentry Program, and Pennington County Health & Human Services’ Rebound and New Start programs. Lutheran Social Services provides transitional housing assistance to homeless youth exiting the Foster Care system or Juvenile Detention System.

PREVENTING REPEAT HOMELESSNESS

Helping Low-Income People Avoid Homelessness

Discharged from mental, health care, foster and corrections facilities

The City had no CDBG funded projects specifically for homeless being discharged from mental, health care, foster and corrections facilities, publicly funded institutions and systems of care for FY 2012 however, local agencies address homeless issues with other funding sources for:

- **State Department of Corrections Funding**

Second Chance Act Grant (SCA) Funds: The Offender reentry program receives funding from the SD Department of Corrections SCA Grant to provide assistance to offenders from state prisons to secure transitional and permanent housing.

- **County/Private Funding**

Pennington County Health and Human Services has two programs providing assistance to help homeless people discharged from jail and other institutions:

Rebound Program, provides assistance for housing, utilities and other needed services for persons discharged from the jail.

New Start Program provides housing and supportive services for the homeless, including those discharged from publicly funded institutions.

- **State Departments of Health & Human Services, and Social Services & Other Federal Funding Sources**

Funding is provided through local agencies and offices for mental health and substance abuse clients' case management upon release from institutions and for help in accessing housing when funding is available.

Lutheran Social Services provides transitional housing for homeless youth exiting the foster care system or juvenile detention.

Passages provides transitional housing to women returning from prison.

ELI and families

Non-profit agencies were provided funding for public services to assist the extremely low-, low- and moderate income households and families secure services they need. Funding was provided to the following agencies to serve this population:

- Dakota Plains Legal Services provided legal advice and representation to the homeless, victims of domestic violence, low-income people and the elderly to resolve civil matters.

- Salvation Army received funding to provide assistance for accessing housing through utility deposits or paying off delinquent utility bills.
- The HOPE Center received funding to provide housing assistance to homeless families in the form of short-term housing assistance, up to 3 months, and/or rent deposits to help move the homeless into housing and provide the short-term “safety net” so they could get established and stable, more successfully achieving self-sufficiency. The HOPE Center program was late getting started due to funds being transferred from another program and the initial set-up time to get policies and contracts in place. The program did not get started prior to this report, but will be reported in the 2014 CAPER.
- Behavior Management Systems received funding to provide application assistance and case management services to persons with mental illness who are in need of accessing medications to stabilize so they can maintain housing.
- Youth and Family Services provided counseling services to youth and families in order to stabilize and improve their interactions and family life.
- Neighborhood Restoration Loan Program received funding for rehabilitation of substandard homes and/or handicap modifications for low-income homeowners. The program makes it possible for the extremely low- and low-income household to make repairs that improve access, safety, health, and energy efficiency issues so they can remain in their own home.

HELPING PEOPLE RECEIVING ASSISTANCE FROM PUBLIC OR PRIVATE AGENCIES AVOID BECOMING HOMELESS.

See all of the above. People who receive public and private assistance may fall into any of the same categories described above and may utilize any of the services available.

The City works closely with County and State agencies as well as private agencies and funders such as the United Way and John T. Vucurevich Foundation through our many collaborative initiatives and groups to ensure that we are all leveraging our efforts and dollars in the best way possible to address our high priority needs.

EXPLAIN IMPLEMENTATION OF A HOMELESS DISCHARGE COORDINATION POLICY & HOW ESG FUNDS ARE BEING USED.

The City does not receive Emergency Solutions Grant (ESG) funds as an entitlement; they are managed by South Dakota Housing Development Authority for the state. Therefore the city does not develop performance standards, evaluate outcomes or develop funding, policies or procedures for the

administration of HMIS. However, as an active member of the South Dakota Homeless Consortium and Policy Advisory Board, we are able to provide input on such things to the group.

In 2013, Cornerstone Rescue Mission, the Cornerstone Women & Children's Home and Working Against Violence, Inc. were recipients of Emergency Solutions Grants. Both agencies participate in and lead collaborative groups centered on serving the needs of homeless people.

The City Community Development Manager is very active with the local continuum of care agencies as a funder, an advisor to boards, and through providing technical assistance for program development and implementation. All agencies were invited to participate in listening sessions and public comment sessions for this plan. In addition, the manager attends many agency and community meetings in order to hear public and agencies' concerns, discussions and plans for addressing emergency shelter issues. Funding recommendations based on the information collected locally is shared with the Homeless Consortium for the annual application process.

The HMIS data system is used by the state and local agencies participating in the Emergency Solutions Grant to gather information and evaluate outcomes.

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

The City of Rapid City does not fund public housing improvements or resident initiatives. Pennington County Housing and Redevelopment Commission (PCHRC) receives Public Housing Capital Program funds, Section 8 Tenant Based Assistance Funds, and Shelter Plus Care funds to maintain its properties in safe and sanitary conditions for the residents and fund assistance programs for low-income tenants.

ACTIONS TAKEN TO ADDRESS THE NEEDS OF PUBLIC HOUSING

Rapid City has a joint cooperation agreement with PCHRC that provides for collaboration on the development of affordable housing units. The Executive Director of PCHRC works closely with Rapid City's Community Development Specialist in reviewing needs for housing development, public housing tenant needs within the community and jointly working to further additional affordable housing locally. PCHRC's Agency Plan is on file with Rapid City and the City reviews projects and provides Certifications of Consistency with the Consolidated Plan. PCHRC's Agency Plan is on file with Rapid City. Rapid City will consider requests by PCHRC for Certifications of Consistency with the Consolidated Plan.

At this time, the Authority's inventory includes a sufficient number of units to meet current requirements.

ACTIONS TAKEN TO ENCOURAGE PUBLIC HOUSING RESIDENTS TO BECOME MORE INVOLVED IN MANAGEMENT AND PARTICIPATE IN HOMEOWNERSHIP

The PCHRC implements and coordinates various programs and services to benefit families, including the elderly. To encourage public housing residents to become more involved in management PCHRC has established an authority-wide Resident Advisory Board made up of residents from the various programs and developments. Appointments are made by the PCHRC Board of Commissioners. The Panel meets with the Executive Director and staff on a monthly basis to provide input on issues with their respective housing areas. Input is sought on all aspects of PCHRC operations. A representative of the Panel attends PCHRC Board meetings. The Resident Advisory Board assists and makes recommendations to the PCHRC in both long range strategic planning and implementation of many policies and procedures specified in the Agency Plan. Additionally, a public housing resident is a member of the public housing authority governing board, which further provides resident input into management. The PCHRC works closely with local law enforcement agencies to provide crime prevention activities at the public housing developments in Rapid City.

ACTIONS TAKEN TO PROVIDE ASSISTANCE TO TROUBLED PHAS

This jurisdiction has no troubled Public Housing Agencies.

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)

Existing barriers to housing diversity and affordability are:

- Accessory dwelling units not allowed in Urban Residential Neighborhood;
- Minimum lot size requirements for medium and high-density residential districts of 6,500 sq. ft. that are exclusionary of affordable housing for low-income housing development by not allowing smaller homes on separate lots;
- While exceptions exist for buildings on lots smaller than the zone district minimum lot size, they are inconsistent and should be clarified or updated. The “Dwellings on small lots” exceptions (17.50.250) and “Existing small lots” section (17.52.065) in the Nonconforming Buildings and Uses chapter allow single-family homes to be constructed on lots that do not meet the minimum lot size. However, the two are inconsistent as the former requires a side yard of 4 feet and sum of side yards of 12 feet, and the latter does not have setback requirements and prohibits duplexes or multi-family housing;
- Single family detached units are not allowed in the High Density Residential district;
- Townhouses are listed as both a permitted use and a conditional use in the MDR and HDR districts and not allowed as a permitted use in zone districts themselves;
- There is no accepted definition for affordable and workforce housing for targeted income levels and specific housing needs for each group;
- There are no regulatory incentives and/or requirements to support construction of affordable and workforce housing;
- Older housing stock deteriorating to sub-standard conditions resulting in loss of affordable housing;
- Shortage of single level housing with handicap accessibility for elderly and persons with disabilities with very low-, low- and moderate incomes;
- Lack of efficiency and 1 bedroom apartments with rents between \$350 and \$500;
- New developments, retail, commercial and housing, are occurring on the outer boundaries in areas not currently part of the Rapid Transit System;
- Social Barriers from the “Not in My Back Yard” syndrome (NIMBY’ism)
- Increased land costs
- Occupancy limitations

The City conducted studies in 2010 -2013 pertaining to Planning and Development and Transportation

- Lehe Development Review Team (DRT) Processes: 2010
- *Plan Rapid City Comprehensive Plan*: 2014
- Long Range Transportation Study

Recommendations from the studies have already been implemented or are in the implementation stage. Some of the changes that are designed to remove the aforementioned barriers include:

- Streamline the application process for building and development projects,
- Completed a rewrite of the Subdivision Ordinance;
- Revised the Planned Development Overlay District;
- Created a new Planned Unit Development District;
- Created a new Administrative Exceptions Ordinance;
- Consolidated the City Future Land Use Plan Districts;
- Reviewed changes to the Infrastructure Design Criteria manual;
- Revised various application procedures.
- Adopted the 2009 International Building Codes with amendments
- Outcome Based Budgeting
- Establish a series of mixed-use zoning districts and design standards
- Promote a variety of housing types, lot sizes, densities, housing prices and styles
- Remove Existing Barriers to Housing Diversity (as stated above)

The Comprehensive Plan includes an Implementation Plan which divides the goals and action steps into three priority time frames and assigns accountability to Lead departments for each of the action steps. The action steps time frames are identified as:

- Immediate - are done concurrently and ongoing with adoption of the plan
- Near-term - over the next two years after adoption of the plan (adopted 04/2014)
- Longer-term – two to five years following the plan adoption.

Many of the issues listed are already underway or will be addressed within the 5 year period.

ACTIONS TAKEN TO ADDRESS OBSTACLES TO MEETING UNDERSERVED NEEDS. 91.220(K); 91.320(J)

The main obstacles to meeting underserved needs remain the same, only intensified with continuing funding cuts:

- 1) Lack of funding;
- 2) Lack of adequate staffing and funding for overhead costs to take on any new activities;
- 3) Lack of expertise on the part of agencies to carry out the activities;
- 4) Onerous regulations, restrictions and paperwork involved with federal grant programs.

Many agencies are struggling with the continuing reduction in funds, donations and staffing shortages. They have had to cut back on services and eliminate any extra involvement in projects in order to just keep up with their existing obligations.

The City is also experiencing the same struggles of staffing shortages that necessitate dealing with existing obligations and not being able to spend as much time working with the agencies to build capacity or put together new programs.

Again this year, several agencies have returned funding or said they would not apply again because of the man hours necessary to provide the required reporting and documentation would cost the agency more than the funding amount they would receive.

Several housing projects that had a lot of support could not move forward because there was no agency in a financial position to take on the time and development costs for pursuing it. Minimum square footage requirements and the absence of gap financing for homeless people without jobs or on very limited income prevents the project from being able to show a cash flow.

The Affordable Housing Collaborative is exploring the possibility of hiring a Housing Coordinator to lead the needed projects, do the fund raising, and community outreach.

The Collaboration is also working on more outreach to businesses, churches and the general public for volunteers and involvement in the various initiatives we are hoping to undertake.

The community will seek more private funds donations and funding sources in order to overcome some of the government restrictions placed on use of funds.

ACTIONS TAKEN TO REDUCE LEAD-BASED PAINT HAZARDS. 91.220(K); 91.320(J)

No homes were made lead free. Due to the limited amount of funding available and the high cost of lead abatement, we are unable to fund projects that require lead abatement at this time. Lead safe practices and certification are required for all projects carried out on homes built prior to 1978.

Educational materials about lead and lead paint hazards are provided to all applicants for home rehabilitation assistance along with information on how to conduct self-help home repair projects to protect themselves and their families.

ACTIONS TAKEN TO REDUCE THE NUMBER OF POVERTY-LEVEL FAMILIES. 91.220(k); 91.320(j)

At this point, there is no way for us to estimate the number of families removed from poverty, as it would require tracking employment and income for an extended period of time and no agency is providing services that tracks that kind of information.

There were no projects brought forward in FY 2013 that provided job skills training, education, or job placement. Although other community programs do provide those services they have not tracked information to show that people have kept jobs and increased income beyond the poverty rate.

At the close of the fiscal year, community leaders, agencies and the public have come together in planning meetings to form a collaborative group, Poverty to Prosperity, to develop a plan to start

addressing the root issues of poverty: lack of education, lack of job skills and training, and livable wage.

The Community will consider becoming an Opportunity Community, where community members will serve as Navigators for people living in poverty, guiding them, much in the way of a mentor, helping them understand the language and actions of “middle class”, personally helping them connect to services needed to improve their stability, earning abilities and business relationships for success.

ACTIONS TAKEN TO DEVELOP INSTITUTIONAL STRUCTURE. 91.220(K); 91.320(J)

The Community has a very well developed institutional structure with strong collaborative groups formed under the guidance of the John T. Vucurevich Foundation to address the highest priority issues identified by the community:

- Affordable Housing Collaborative (early stage)
- Poverty to Prosperity Collaborative (early stage)
- Human Services Collaborative (well established)

We will continue to encourage all groups within the community to become a part of the collaboratives and efforts to address issues of homelessness, poverty, housing and mental health and substance abuse.

ACTIONS TAKEN TO ENHANCE COORDINATION BETWEEN PUBLIC AND PRIVATE HOUSING AND SOCIAL SERVICE AGENCIES. 91.220(K); 91.320(J)

The Collaborations discussed above are bringing coordination to individual efforts and expanding them beyond an agency level to a community wide effort. The City, United Way, County and State Agencies are also working with the non-profit and community members to take a full “360 degree” approach to the issues.

The John T. Vucurevich Foundation brought Dr. Donna Beegle to Rapid City to speak to over 1,300 people on poverty and the possibility of Rapid City becoming an Opportunity Community to help people move up and out of poverty. In conjunction with that poverty summit, the City Community Development Division will put on two Poverty Simulations for the general public to help raise awareness and understanding about the issues of homelessness and poverty.

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 Analysis of impediments to fair housing is being finalized now that the City has adopted the Comprehensive Plan which identified issues affecting housing diversity, zoning, etc.

Many of the issues are stated above in the affordable housing.

In addition, the City has recently approved a Resolution that expands the authority of the Human Relations Committee to do investigations with subpoena power of local discrimination cases.

Inquiries to the following agencies regarding the occurrence of fair housing complaints were made and

the response letters are attached in the appendix. Responses were:

- S.D. Department of Labor Regulation
 - For period April 1, 2013 to March 31, 2014
 - No complaints regarding fair housing issues made within the City of Rapid City.
- U.S. Department of Housing and Urban Development (Regional Office)
 - For period April 1, 2013 to March 31, 2014

Fair Housing Complaint Codes:

Issues

- 302 Discrimination Refusal to sell or negotiate for sale
- 320 Discrimination Advertising statements and notices
- 354 Discrimination in selling residence or real property
- 380 Equal Employment Opportunity Contract Clause
- 430 Otherwise deny or make housing unavailable
- 460 Using ordinances to discriminated in zoning and land use
- 510 Failure to make reasonable accommodation

Closure Reason

- 16 Conciliation/settlement successful
- 18 Complaint withdrawn by complainant after resolution
- 25 No cause determination

FAIR HOUSING COMPLAINTS – RAPID CITY, SD									
Date Complaint	Physical Disability	Mental Disability	Native American	Retaliation	Issue	Sec. 504 Housing	Sec. 202-811 Housing	Date Closed	Why Closed
04/05/13	X			X	380	X	X	7/11/13	16
04/05/13	X			X	450	X	X	7/11/13	16
04/05/13	X			X	510	X	x	7/11/13	16
05/06/13		X			380			09/16/13	25
05/06/13		X			510			09/16/13	25
07/09/13	X				380			11/13/13	16
07/09/13	X				510			11/13/13	16
08/23/13			X		302			03/07/14	18
08/23/13			X		320			03/07/14	18
08/23/13			X		354			03/07/14	18
08/23/13			X		380			03/07/14	18
08/23/13			X		430			03/07/14	18
01/16/14		X		X	430				
01/16/14		X		X	450				
01/16/14		X		X	510				

Table - Fair Housing Complaints

CR-40 - Monitoring 91.220 and 91.230

Description of 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 Community Development Division (CDD) monitors activities funded under the Consolidated Plan and Annual Action Plan in a number of ways to ensure long-term compliance with program requirements.

- Contractual agreements are executed between the City of Rapid City and Sub-grantees that include the applicable HUD regulations and best practice oversights to ensure compliance with all regulations. Agreements spell out
 - requirements for reporting;
 - documentation;
 - access for site reviews of records;
 - Sub-grantee obligations to meet all applicable HUD, local, state, and federal regulations applicable to CDBG and the project.
- Training sessions are also held prior to the application deadline and release of funds in order to make all parties aware of the HUD regulations and compliance requirements.
- Files are audited monthly upon receipt of the monthly activity report for project progress and for numbers of people being assisted. Numbers are compared to the previous month to verify that totals are sequential and make sense.
- Files are reviewed every time a draw request is received to verify
 - balance remaining;
 - proper documentation of activities performed;
 - activity eligibility; and
 - numbers assisted match monthly report;
- Accounting sheets are maintained in the City CDBG Department file as well as the Finance Department. The purchase order draw request is reviewed and entered by the administrative secretary, then undergoes review and approval by four other people prior to being processed, to ensure accuracy.
- Site visits are conducted with new applicants at the beginning of the program year for the purpose of meeting the staff that will be involved with administering the funded program, discussing any questions or concerns on how they will handle the program and supporting documentation and files, and to review procedures. Staff provides technical assistance for maintaining files and tracking information.
- Site visits and audits are to be performed, ideally, on all agencies on a rotating basis. However, with the number of agencies funded ranging up to 21 per year and a staff of only two people, this is not always feasible. At a minimum each year an audit will be done on one file from each of the funding categories with projects, with more being accomplished as staffing and time allows. The categories are:
 - Public Service
 - Public Facility or Improvements
 - Housing
 - Economic Development

Agencies to be audited will be chosen with priority placed on agencies:

- receiving funding for the first time;
- who experienced key program staff turnover;
- experiencing financial instability;
- who are involved in complicated or high volume projects; or
- who have received funding for several years and not been audited within 3 years.

On site audits were performed on the following three (3) Sub-grantees in FY 2013:

- Teton Coalition – Housing Agency; Only housing grant.
 - Dakota Plains Legal Services – Public service; New Executive Director.
 - Youth and Family Services – Public Facility rehabilitation project; Agency’s first Public Facility project in more than 3 years.
- A final review of each file is accomplished upon close out of funding and completion of the activity. The final audit reviews the accounting sheets and reporting documentation for accomplishments.

Projects that trigger Davis Bacon guidelines have additional oversight requirements that include a contractor training session to review payroll and draw documentation, work site requirements and minimum pay rates for workers.

Internal controls have been designed to ensure adequate segregation of duties. The City’s Finance Department establishes accounts and issues checks for draw requests after review processes are completed, in cooperation with the Community Development Division. The Community Development Division monitors invoices for compliance with the contractual agreement, approved spending plan and federal regulations. The Finance Department does a secondary review of the draw based on purpose of draw, amount requested, and supporting documentation. The Community Development Division is responsible for setting up and administering project activities on the Integrated Disbursement and Information System (IDIS).

Monitoring Findings

In 2013 all accounts were reviewed monthly upon receipt of draw requests for proper documentation, balances and accomplishment reporting.

Remediation Plans

A new HUD monitoring program was implemented in 2012 for projects failing to spend their funds in the program year and/or drawing all of their funds without showing completion of the activity and/or falling behind schedule. Activities meeting the criteria are required to submit a remediation plan to the City and HUD, with a benchmarks timeline for completion.

Two agencies were required to submit remediation plans to HUD in 2012: Black Hills Area Habitat for Humanity and Rapid City Community Development Corporation.

The Rapid City Community Health Center was required to submit a remediation plan in 2013.

Current Status

- Black Hills Area Habitat for Humanity

Habitat for Humanity experienced difficulties completing grant funded projects due to increased difficulty in acquiring funding for the construction materials for the homes and buyers ready to close for the 5 CDBG lots. Weather conditions from October through May made construction difficult and delays in families completing sweat equity caused additional delay past original 2013 closing dates.

- FY 2008 funding
 - Funding expended on two (2) properties
 - Property 1- 910 Blaine sold to buyer 2/22/13
 - Property 2 – 126 Anamosa home constructed; buyer identified; Sweat equity not yet completed
 - New projected completion date June, 2014
- FY 2011 funding
 - Funding expended to purchase three (3) properties
 - Property 1- 238 Patton construction funding identified; buyer identified; Sweat equity started
 - Construction completed 12/18/13; Cert of Occupancy Issued
 - Buyer equity not yet completed;
 - New projected completion date June, 2014
 - Property 2 – 230 Patton construction funding identified; buyer identified; Sweat equity started
 - Sweat equity not completed yet
 - New projected completion date May 31, 2014
 - Property 3 – 225 Lindbergh construction funding identified; buyer identified; Sweat equity started
 - Construction underway
 - Projected closing date June 30, 2014

- Rapid City Community Development Corporation

Rapid City Community Development Corporation continues to experience difficulties in finding qualified buyers for the properties due to tightened mortgage guidelines and higher buyer investment requirements. The longer, wetter winter has also made construction progress difficult. In addition, two loans were repaid and program income received must be spent prior to additional draws against grant fund, which is why FY 2011 funding remains. However, the remaining funds will be used to provide additional down payment and closing cost assistance to buyers of the remaining properties, if needed.

- FY 2009 and FY 2010 Funding
 - Funding expended with two remaining lots for construction to be completed
 - Property 1 – 29 Melano sold to buyer and closed 7/19/13.
 - Property 2 - 4907 Ambrose Dr. Construction started. No buyer identified.
 - Property 3 - 35 Melano St. Construction started. No buyer identified. FY 2010 Funding used on this property purchase in addition to FY 2009 Funds.
- FY 2012 Funding
 - Balance remaining of \$12,537 will be used for down payment and/or closing cost assistance for purchase of the remaining properties.

RCCDC has had interest in the two homes, but no qualified buyers to date. They continue to aggressively market the properties. One of the homes is projected to be complete by July 2014.

- Dakota Land Trust

Dakota Land Trust was put on a remediation program in 2013 because funded projects for FY 2011 and FY 2012 remain incomplete.

- FY 2011 Funding
 - Funding expended to purchase two (2) properties
 - Property 1 – 907 Haakon purchased partial payment plus FY 2012 funding; no buyer identified; construction not started.
 - Property 2 – 911 Haakon purchased; buyer identified; construction begun 1/31/13 with projected closing June 2013
 - Buyer changed mind
 - Actively marketing for a new buyer.
- FY 2012 Funding
 - Balance remaining \$4,227.25
 - Funding expended to purchase 2 lots
 - Property 1 – 907 Haakon – partial payment
 - Property 2 - 716 Willsie
 - Construction completed and closed July 31, 2013 to buyer.

Dakota Land Trust continues to aggressively market the properties.

- Community Health Center of the Black Hills

The Community Health Center utilized CDBG funding to help purchase property for the construction of a new clinic. The project was delayed while getting County approval for partnership in the project and City approval of development plans.

- FY 2011 Funding
 - Funding was expended for purchase of the land on 4/20/12 and finalized 6/03/13.
 - Building plans were approved and ground breaking was estimated to start in May 2014 with completion of the project in fall of 2015.

On-Site Monitoring

The Community Development Division performed three (3) on-site audits of sub-grantees at the end of the program year: Dakota Plains Legal Services, Teton Coalition, and Youth and Family Services – Kitchen Remodel Project.

- Dakota Plains Legal Services – Public service; New Executive Director.
 - Audit April 11, 2014
 - No Findings or Concerns

- Teton Coalition – Housing Agency; Housing grant..
 - Audit April 15, 2014
 - No Findings or Concerns

- Youth and Family Services – Public Facility rehabilitation project; Agency’s first Public Facility project in more than 3 years.
 - Audit April 29, 2014
 - No Findings or Concerns

Citizen Participation Plan 91.105(d); 91.115(d)

See Appendix for a copy of the Citizen Participation Plan

Description of the efforts to provide citizens with reasonable notice and an opportunity to comment on performance reports.

The Citizen Participation plan for the Community Development Block Grant program endeavors to provide the citizens of Rapid City every opportunity to comment on the Annual Action Plans, Consolidated Plans and Consolidated Annual Performance and Evaluation Reports. Reports are published on the City web site at www.rcgov.org/communityresources/communitydevelopment and hard copies are displayed in the City administration building, the Community Development Division’s office, the Public Library’s main office, General Beadle School satellite library, and the lobby of the Pennington County Housing and Redevelopment Commission’s office building. Display ads and public notices are run in the Rapid City Journal and the Native Sun Times, both local papers with large distributions locally as well as statewide. A fifteen-day (15) comment period plus public comment periods at the City Legal & Finance Meeting and City Council meets were held to collect public input on the Consolidated Plan Annual Performance Evaluation Report (CAPER). Citizens have the opportunity to offer their comments regarding the CDBG program in writing to the Rapid City Community Development Division, or in person at public hearings or City Council meetings.

The City provides for and encourages the submission of citizen's views and proposals regarding the Community Development Program, the Consolidated Plan, Annual Action Plan and the Community Annual Performance and Evaluation Report through:

- assessments and surveys;
- public notices;
- public information meetings;
- public hearings; and
- listening sessions.

Additionally, staff attends community meetings, board meetings and other organization meetings to hear what issues they are bringing up and actions needed or to be taken towards addressing them. Those issues are also taken into account in preparing the Consolidated Plan and Annual Action Plans.

Materials will be provided in other languages and accommodations will be made for hearing and sight impaired, as requested.

MINORITY BUSINESS OUTREACH

Rapid City encourages minority-owned business participation in CDBG assisted activities.

Contracts executed with Agencies included their obligation to do outreach to minority and women-owned businesses when requesting proposals for activities funded with Community Development Block Grant funds. A training class was provided in August 2013 to potential CDBG grant sub-recipients in which ways to do outreach to minority and women owned businesses was discussed. Additionally, those agencies selected for funding in FY 2013 were required to attend a training session that goes over the contract in detail, highlighting all requirements, including minority business outreach and fair housing. All City Requests for Proposals include a non-discrimination and Americans with Disabilities Act clause stating that successful bidders shall provide services in compliance with Title VI of the Civil Rights Act of 1964 and the Americans with Disabilities Act of 1990.

There is an additional discussion with general contractors on projects about the requirement to meet these guidelines when hiring subcontractors for projects at the time of the Davis Bacon briefing.

Notices of bid opportunities and grant proposal requests were published in the Rapid City Journal, a local paper and the Native Sun News, a Native American focused paper, both also having state-wide circulation. In addition, offerings were posted on the City web site, www.rcgov.org and emailed out to data bases of related interests.

PUBLIC INPUT AND COMPREHENSIVE PLANNING REQUIREMENTS

The City endeavors to gather as much community input on all plans governing programs administered by the City, including the Community Development Block Grant program. Outreach to the public for input is done in an on-going basis throughout the year. Outreach methods utilized for the Annual Action Plan and CAPER included, public notice ads in the Rapid City Journal and Native Sun News newspapers,

public meetings, broadcast emails to the entire Community Development data base, interviews with news and TV reporters, presentations to the North Rapid Civic Association and the Roosevelt Park Neighborhood Watch groups, and non-profit agencies. The Comprehensive Planning Process is outlined in the **Error! Reference source not found.**, which is included in the Appendix.

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.

This is the first year in our new five year plan and we will not be changing any of our objectives.

We will continue to focus in on the highest priorities of ending homelessness, helping people move from poverty to prosperity, developing affordable housing for our lowest income households and single persons, and addressing issues of mental health and substance abuse.

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

The Jurisdiction has No Brownfield grants.

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

N/A