



2015
Consolidated Annual Performance
and Evaluation Report
(CAPER)

Community Development
Block Grant Program
(CDBG)

City of Manhattan
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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.

The City of Manhattan was identified as an Entitlement community under the U.S. Department of Housing and Urban Development's (HUD) Community Development Block Grant (CDBG) Program in 2010. The City of Manhattan's 2015-2019 Consolidated Plan addresses the time period beginning July 1, 2015 through June 30, 2019, and July 1, 2015 through June 30, 2016 for the 2015 Annual Action Plan.

Through citizen participation, public hearings, and consultations with various organizations, groups, and agencies, the City determined that the five overall objectives for meeting the identified housing and community development needs for the years 2015 to 2019 are:

1. Sustain affordable housing opportunities by preserving the existing housing stock and supporting the creation of affordable permanent housing in standard condition.
2. Improve the livability and safety of neighborhoods through infrastructure improvements.
3. Support community facilities that improve the quality of life for low and moderate income residents.
4. Support public services that meet the needs of low and moderate income persons and families.
5. Support activities that create and sustain employment and quality jobs.

The City has identified 5 broad project categories that address these objectives and for the CDBG 2015 Program Year (PY), and allocated CDBG funds in the following ways:

- Project #1: Administration and Planning - \$126,000
- Project #2: Housing Rehabilitation Program - \$145,790 to complete rehabilitation of an estimated 10 single family homes.
- Project #3: Public Services - \$88,255 dispersed to 5 agencies serving LMI clients
- Project #4: Public Facilities - \$170,000
- Project #5: Neighborhood Infrastructure - \$102,489

These projects included activities for planning future projects, a Fair Housing seminar, street improvements including sidewalks and ADA improvements, housing rehabilitation, emergency and accessibility repairs to single family homes, improvements to public facilities and public services funding to non-profits that aided the nearly homeless, abused children, disabled individuals, and LMI consumers in need of budget and credit counseling. Some activities are still ongoing, but are expected to be completed by the end of the 2016 calendar year.

Through the application of its annual allocations, the City has achieved 4 of the 5 goals in the Strategic Plan. Unfortunately, no opportunity to support activities that create or sustain employment and jobs has presented itself, but this goal will be maintained in the throughout 2015-2019

Consolidated Plan years, should an opportunity present itself. The City has been diligent in meeting the requirements for compliance with National goals and objectives and the City's use of funds to date has served 99% of LMI persons.

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
Administration	Grant Administration, Planning, and Fair Housing	CDBG: \$	Other	Other	0	0				
Housing Rehabilitation	Affordable Housing Non-Homeless Special Needs Homeless Prevention	CDBG: \$	Homeowner Housing Rehabilitated	Household Housing Unit	10	14	140.00%	10	14	140.00%
Neighborhood Infrastructure Improvements	Non-Homeless Special Needs Non-Housing Community Development	CDBG: \$	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	2130	2895	135.92%	2130	2895	135.92%

Public Facilities	Homeless Non-Homeless Special Needs Non-Housing Community Development	CDBG: \$	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	2290	3265	142.58%	2290	3265	142.58%
Public Services	Homeless Non-Homeless Special Needs Presumed Benefit populations	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	155	223	143.87%	155	223	143.87%
Public Services	Homeless Non-Homeless Special Needs Presumed Benefit populations	CDBG: \$	Public service activities for Low/Moderate Income Housing Benefit	Households Assisted	100	80	80.00%	100	80	80.00%
Public Services	Homeless Non-Homeless Special Needs Presumed Benefit populations	CDBG: \$	Tenant-based rental assistance / Rapid Rehousing	Households Assisted	30	36	120.00%	30	36	120.00%
Public Services	Homeless Non-Homeless Special Needs Presumed Benefit populations	CDBG: \$	Homelessness Prevention	Persons Assisted	62	93	150.00%	60	93	155.00%

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 City of Manhattan identified 5 priorities that were addressed through the project categories in the 2015 Program Year.

Administration funds were used to conduct program administration and planning as well as a Fair Housing Seminar in April of 2016, which was attended by 31 people, and presenters discussed the Section 8 Program, the Service Member Civil Relief Act, the Kansas Residential Landlord and Tenant Act and the Fair Housing Act. Administration funds were also used to conduct a feasibility study for a new neighborhood recreation center to be located in an LMI neighborhood.

The non-housing community development priorities include Public Facilities and Neighborhood Infrastructure Improvements Projects. Three of the Public Facilities and Infrastructure projects are underway and should be complete by the end of calendar year 2016. The Bus Loading Zone Improvements Project which was intended to make ADA improvements to bus stops in LMI areas, was cancelled when the local Area Transportation Agency (ATA) operator undertook a study of current routes with the possible end result being relocation of some stops. The project will be re-examined in a later grant year once the ATA has completed their study. The funds for this project were reallocated to other projects.

Affordable housing was addressed through the Housing Rehabilitation Project and included Comprehensive Rehabilitation, Emergency and Accessibility Rehabilitation, and Mobile Home Emergency and Accessibility Rehabilitation. In addition to CDBG funds, returned grant funds were incorporated into 2015 activities, as well as City resources from a Rehab fund to expand the effectiveness of the program. This project assisted 14 single family homeowners, of which included 7 Female Head of Household, 5 elderly households, and one household with disabilities.

Key Public Services are those agencies that collaborate within the community and with each other to offer services to the greatest extent possible. Four agencies performing 5 tasks were supported with CDBG funds, which leveraged additional funds from fundraising, state and local match, and from other non-profits in support of Public Service activities. Public Services addressed various needs and served 422 individuals in 211 households in the Manhattan area. Of those, 43 had a "female head of household", 31 households had a disabled person, 13 were headed by veterans, and 5 were elderly.

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	166
Black or African American	52
Asian	1
American Indian or American Native	1
Native Hawaiian or Other Pacific Islander	4
Total	224
Hispanic	20
Not Hispanic	204

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

Narrative

The City continually strives to address the greatest needs of the citizens of Manhattan. None of the groups or income levels experienced a disproportionately greater need for assistance, and the City allocated investments jurisdiction wide, concentrating projects in Census tracts with populations 51% or more LMI, or directly benefiting LMI persons. Two other races, "Black/African American and White", and "Other Multi Racial" are not accounted for in the above table but comprised an additional 16 households.

The U.S. Census Bureau 2014 estimates the population in Manhattan consisted of the following races:

- Minority Status: Number: Percent
- All Persons: 55,112: 100.00%
- White: 45,816: 83.10%
- Black or African American: 3,293: 5.98%
- Asian: 3,161: 5.73%
- American Indian and Alaska Native: 265: 0.48%
- Native Hawaiian and Other Pacific Islander: 140: 0.25%
- Two or More Races: 2,007: 3.64%
- All Other Races/Unspecified: 430: 0.78%
- Hispanci ethnicity - all races: 3,471: 6.30%

The percentage of racial and ethnic families assisted is consistent with the population. The percentages assisted are:

- White: 73.33%
- Black or African American: 17.78%
- Asian: 0.44%
- American Indian or American Native: 0.44%
- Native Hawaiian or Other Pacific Islanders: 0.89%
- Black/African American and White: 4.89%
- Other Multi-racial: 2.22%
- Hispanic of any race: 8.89%

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		2,530,136	337,810

Table 3 – Resources Made Available

Narrative

CDBG resources available to the City for PY 2015 included the \$632,534, and \$343,469.98 in prior year surplus funds. In 2015, the City completed one 2014 Infrastructure project that consumed \$200,550.27 of PY 2013 and PY 2014 CDBG funds which was matched by \$320,076.91 in City funds. Additionally, surplus funds from 2014 were combined with 2015 funds to complete a 2015 Public facility project.

The City does not require matching funds, however opportunities to leverage funds do occur and the City has procedures in place to manage external matching funds. Additionally, the City has procedures in place for individual homeowners who wish to contribute to the rehabilitation of their homes, as well as for public service agencies and non-profits to provide a match to funds for building rehab when the cost of improvements are greater than the CDBG funds budgeted. All of the Public Service agencies funded to date have identified a match in some amount.

Federal funds were used to help LMI single family home owners undertake home repairs designed to preserve the safety and livability of their homes and the City provided \$29,616.34 from a City fund dedicated to housing rehabilitation. In addition, returned CDBG Housing Rehabilitation Grant funds were reapplied adding an additional \$13,846.39 to the Housing Rehabilitation effort for the 2015 program year. Housing grant funds must be returned if the homeowner breaks the terms of the grant.

Federal funds were used by Public Service agencies in conjunction with donations from private, local and other agency fundraising to assist agencies meet the needs of as many “presumed benefit” and LMI populations as possible. In PY2015, Public Service agencies matched a total of \$135,251 from other private, non-profit, local, and other state funding for CDBG planned activities.

CDBG funds were used in LMI areas to improve neighborhood facilities and infrastructure, improve sub-standard facilities, and make ADA and safety improvements. These public facilities directly served LMI populations or areas, required ADA improvements, and historic preservation

The City of Manhattan does not receive ESG, HOME or HOPWA funds.

Identify the geographic distribution and location of investments

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description
City of Manhattan	100	100	

Table 4 – Identify the geographic distribution and location of investments

Narrative

The City of Manhattan does not have specifically named target areas, but uses funds for eligible purposes, direct benefit to LMI clients, and LMI areas as defined by Census Tracts within the city limits of Manhattan. The target area for the allocation of CDBG funds is any LMI person or area within the city limits of Manhattan.

Leveraging

Explain how federal funds leveraged additional resources (private, state and local funds), including a description of how matching requirements were satisfied, as well as how any publicly owned land or property located within the jurisdiction that were used to address the needs identified in the plan.

The City of Manhattan does not receive Entitlement ESG funds, but does monitor State operated ESG funds which are “passed through” to the Manhattan Emergency Shelter, Inc. (MESI) and The Crisis Center, Inc., a domestic violence shelter.

MESI operates the Caroline Peine Shelter which provides Emergency Shelter, Rapid Re-housing, and Homeless Prevention Services. These services are funded through a variety of sources including ESG, Community Services Block Grant (CSBG), Emergency Food Shelter Program (EFSP), local City and County funds, United Way and other local non-profits, and private fundraising. Through the Kansas Balance of State Continuum of Care funding, MESI operates the “*Transition in Place Program*” (TIPP) and the “*Opportunities Program*”, which is matched with a 25% grant from the Caroline Peine Foundation to support services and operational costs. The “*Transition in Place Program*” provides support to homeless families with dependent children who have extreme housing barriers, such as a pregnant mother with young children or a family that owes rental arrears preventing them from qualifying for Public Housing. The “*Opportunities Program*” provides shelter to individuals with Severe and Persistent Mental Illness who are homeless.

In 2015, MESI used \$203,375.10 in ESG funds provided by the Kansas Housing Resources Corporation (KHRC) to provide emergency shelter to individuals and families. CDBG PY 2015 funds were used to expand the Housing Rental Assistance Program (HRAP) which provided rapid re-housing and homelessness prevention services. EFSP funds also supported emergency shelter services.

The Crisis Center matched \$30,195.00 in ESG funds with a state general fund grant to provide emergency shelter and case management services for victims of domestic violence and their children who cannot remain safely in their homes.

The Manhattan Housing Authority (MHA) operated 202 1-4 bedroom units in five public housing communities and managed an additional 108 units (30 of which are also considered public housing) in two tax credit housing communities. In 2014, MHA was designated as a “Standard Performer” in the Section 8 Housing Choice Voucher Program. The MHA received HUD Operating Subsidy and Capital funds directly from the Federal Government and funds passed through the State of Kansas HOME Program. The MHA administers a Tenant Based Rental Assistance Program (TBRA) which provides Security and Utility Deposit assistance, provides Section 8 vouchers to eligible Manhattan residents and collaborates with the Veterans Administration (VA), to administer HUD-VASH (Veterans Affairs Supportive Housing) vouchers tagged for homeless veterans who have VA case management.

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	30	0
Number of Non-Homeless households to be provided affordable housing units	80	0
Number of Special-Needs households to be provided affordable housing units	145	0
Total	255	0

Table 5 – Number of Households

	One-Year Goal	Actual
Number of households supported through Rental Assistance	30	36
Number of households supported through The Production of New Units	0	0
Number of households supported through Rehab of Existing Units	10	14
Number of households supported through Acquisition of Existing Units	0	0
Total	40	50

Table 6 – Number of Households Supported

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

The City of Manhattan does not own, plan to acquire, or operate public housing units or homeless shelters.

The City supports the Manhattan Housing Authority (MHA), the Manhattan Area Housing Partnership, Inc. (MAHP Inc.), the Manhattan Emergency Shelter, Inc. (MESI), Housing and Credit Counseling, Inc. (HCCI), Pawnee Mental Health Services, Inc. (PMHS) and the Crisis Center in their efforts to maintain affordable housing, provide financial counseling, and provide housing and shelter to low income households, homeless populations and special needs individuals.

CDBG PY 2015 funds were provided to MESI for rental assistance services that prevented 36 households (93 individuals) from becoming homeless. This exceeded the number of households served and financing will continue for PY 2016.

Surplus funds from the 2014 grant year were combined with the 2015 Housing Rehabilitation funds to rehabilitate 14 family owned housing units. This project included comprehensive rehabilitation of single-family housing units occupied by Low to Moderate Income home owners; and emergency repairs or accessibility modifications to single-family housing units and mobile homes.

The MAHP, Inc. was provided funds to expand services for the Financial Assurance Program, which helped 9 disabled adults maintain their independence. The City also supported the MAHP, Inc., in its efforts to develop additional affordable housing in the Manhattan area.

Discuss how these outcomes will impact future annual action plans.

The demand for housing to serve students, soldiers and low income households will continue to place pressure on the supply of affordable housing in the City of Manhattan. The City’s Housing Rehabilitation Program strives to enhance accessibility, and improve and preserve existing decent, safe and sanitary housing stock for low and moderate income persons. Any remaining undedicated surplus 2015 Comprehensive Housing Rehabilitation funds will be invested in PY 2016 Comprehensive Housing Rehabilitation activities. The City will also continues to collaborate with the MHA and MAHP. Inc., on issues related to affordable housing; and with MESI, PMHS, The Crisis Center and HCCI to prevent individuals and LMI households from becoming homeless.

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

Number of Persons Served	CDBG Actual	HOME Actual
Extremely Low-income	269	0
Low-income	95	0
Moderate-income	85	0
Total	449	0

Table 7 – Number of Persons Served

Narrative Information

The number of persons and households served with CDBG funds has remained somewhat consistent through the first 6 years that Manhattan has been an Entitlement Community. However, the population is continuing to trend upward and needs may change along with the demographics. The City does not receive HOME funds.

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

Providers within the City of Manhattan who specialize in providing outreach to homeless individuals and families include MESI specifically, faith based organizations, the HUD-VASH representative, and agencies that participate in the annual "Everybody Counts" event. MESI in particular leads the Point-In-Time counts to canvas the City and Riley County, as mandated by HUD every January, to provide the Kansas BoS CoC agencies with numbers. Pawnee Mental Health PATH providers are trained specifically to conduct outreach to homeless individuals within the City and County. All of these providers have capacity to assess the needs of the homeless, especially those who are unsheltered.

The Caroline Peine Transitional Shelter offers 47 beds of emergency shelter for homeless men, women, and families. A total of 494 persons received emergency shelter in calendar year 2015. MESI also offered placement in transitional and permanent supportive housing, and homeless rental assistance to either decrease the current length of homelessness or to prevent a family from becoming homeless and entering shelter. Through its two Continuum of Care (CoC) Programs, MESI also housed another 54 individuals in calendar year 2015. MESI prioritizes chronically homeless individuals and had 1 bed dedicated to the chronically homeless through the Opportunities Program.

Addressing the emergency shelter and transitional housing needs of homeless persons

Since its inception, MESI's Homeless Rental Assistance Program (HRAP) has assisted with housing stabilization by integrating the program into shelter services to prevent and divert clients from entering shelter, and connect them to the most applicable services to resolve their immediate crisis situation. One piece of MESI's HRAP offers homelessness prevention services to households in imminent risk of homelessness. This program prevents and diverts clients from entering emergency shelter by allowing them to stay in their current, permanent residence. An important element in HRAP prevention services is housing stability case management, which aims to prevent future evictions or homeless episodes; this includes financial assistance with utilities and rent when necessary. HRAP is unique in its ability to assist with large portions of arrears and its intensive case management. For PY 2015 this program was funded through the CDBG program.

MESI collaborates with other local agencies and non-profits to provide housing options, and supports the expansion of the homeless service system to include homeless prevention and re-housing programs and supportive housing programs for the disabled and families. MESI advocates for collaboration among service providers, including public housing agencies, to improve access to affordable housing and expansion of supportive services. MESI encourages agencies to look not just at homelessness but other issues of poverty.

The Manhattan Housing Authority (MHA) administers a Tenant Based Rental Assistance Program (TBRA) which provides Security and Utility Deposit assistance. In addition to regular Section 8 Vouchers, MHA also administers 55 HUD-VASH (Veterans Affairs Supportive Housing) vouchers that help homeless veterans. These vouchers are Section 8 Vouchers that must have VA case management and are tagged for veterans only. The VASH vouchers are administered in collaboration with the VA.

The Crisis Center shelters only those who must flee violence in their homes and must certify those seeking shelter as homeless. The Crisis Center uses “Protection from Abuse Orders” which can in some instances, make it possible for spouse abuse victims to remain in their homes, as can criminal prosecutions. Whenever possible, the Crisis Center seeks to help victims of domestic violence stay in their homes through legal means. When that is not possible, they provide emergency shelter for those who are in danger. The Crisis Center also works with many agencies and organizations, including the Manhattan Housing Authority, to provide shelter for their clients. Domestic violence victims are never sent to MESI for shelter.

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

Local providers work with Housing and Credit Counseling, Inc. (HCCI) to provide financial counseling to individuals at risk of becoming homeless. HCCI receives referral from numerous agencies in Manhattan and provides other services including first time homebuyer training. MESI operates a Homelessness prevention program which provides counseling and rent and utility arrears or rapid re-housing services to individuals and families in need of shelter. The Crisis Center specifically provides housing for abused spouses and their children who are in need of a safe place to stay. Pawnee Mental Health Services (PMHS) coordinates with MESI, MHA, and MAHP, Inc. to secure housing for individuals with mental illness. Agencies in Manhattan are very effective in communicating with each other in regards to the needs of their clients.

MAHP’s Financial Assurance Program assists Social Security and Veteran’s Administration benefit recipients who cannot adequately manage their monthly disability benefit payments, and whose benefits depend on a third party payee. MAHP staff work directly with LMI disabled individuals to help them budget and pay for their housing, food, medical, and other needs required to maintain independence. This is the only Social Security Administration approved program in the Manhattan area.

Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again

The City falls within the North East Region of the Kansas BoS CoC operated by the Kansas Statewide Homeless Coalition, and MESI receives funds through this program. MESI is very involved in the CoC and regularly attends meeting and provides input to other agencies within the balance of the state. MESI’s two programs are designed to help chronically homeless individuals transition to permanent housing and maintain independent living.

Big Lakes Developmental Center, Inc., provides training specifically with intellectually disadvantaged individuals to help them become self-sufficient.

The HUD VASH representative works solely with veterans and their families through the “Housing First”

principle to access the services needed transition to permanent housing. A HUD-VASH representative provides services to the local population of homeless veterans which are incorporated into services for homeless populations of all kinds and are part of the services for the LMI population at large.

The Crisis Center shelters abused spouses and families who must flee violence in the homes and certifies those seeking shelter as homeless. They provide emergency shelter only for those who are in danger and cannot remain in their own homes. The Crisis Center works with many agencies and organizations, including the Manhattan Housing Authority, to provide permanent shelter for their clients.

Homeless persons are identified through a number of sources including the local hospital, school district, law enforcement, Pawnee Mental Health, the Flint Hills Breadbasket, and other agencies. MESI directly conducts a Homeless Street Outreach effort, or homeless clients may self-identify by presenting themselves at the MESI shelter. The Riley County Health Department and the Flint Hill Community Clinic address the health needs for homeless and uninsured. The Flint Hills ATA Bus provides transportation to individuals needing transportation to the wide range of agencies that provide assistance to the homeless.

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

Actions taken to address the needs of public housing

In terms of Compliance, MHA does not need to increase accessible units. In terms of Applicants, MHA occasionally has need for more accessible units, but not consistent demand. Additional demand for accessible units is accommodated through unit modification as necessary.

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

MHA provided several opportunities to improve resident involvements such as Resident Appreciation Day, and the Resident Holiday Social. In addition, MHA partnered with the Kansas State University (KSU) Mortar Board Society to provide resident activities and residents were invited to participate in local parades. MHA also encourages residents to participate in Neighborhood Watches.

Actions taken to provide assistance to troubled PHAs

The Manhattan Housing Authority is not designated as troubled.

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)

There are no known negative effects of City policy in regards to affordable housing and residential investment.

The City implements its planning and zoning authority through the Manhattan Urban Area Comprehensive Plan, the Manhattan Urban Area Subdivision Regulations and the Manhattan Zoning Regulations. The Manhattan Urban Area Planning Board and Manhattan City Commission develop, adopt and update the comprehensive plan and other policy documents for the Board's jurisdictional area, and complete formulation of Subdivision and Zoning Regulations for the City.

The City adopted the 2015 International Building Code Series, and the 2014 National Electrical Code in June of 2016. The City prefers to use the Federal Fair Housing guidelines for accessibility compliance in covered multifamily dwellings, which references the American National Standards Institute (ANSI) requirements for accessibility. The Code Services Division ensures through the permitting and enforcement process that new multifamily housing containing four or more dwelling units complies with all federal regulations of the Fair Housing Act.

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

The City allocates CDBG funds each year with the goal of maintaining the existing affordable housing stock, promoting quality of life and providing stability, especially in older neighborhoods. The housing and community development activities that will be undertaken each year will be based on areas of need suggested during the consultation and data collection process.

Recognizing that limited dollars should be focused where the need is greatest, preference will be given to projects that directly affect low and moderate income residents and serve low and moderate income neighborhoods. The City will continue to fund specific programs and partnerships with agencies to alleviate poverty conditions and will monitor poverty statistics to ensure that scarce resources are directed to those who have the greatest need.

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

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

The CDBG Housing Rehabilitation program followed lead safe practices at qualified sites. All units constructed prior to 1978 were required to have a lead based paint assessment. The City proactively tested for lead, even though the homeowner may not have asked for it as part of the rehabilitation request. Based on the results of the assessment, hazards were identified and control options were reported. Contractors were required to follow lead-safe work practices and were monitored by a certified lead based paint inspector. Additionally, all general contractors who successfully bid projects were required to be State authorized as lead activity firms employing certified lead safe workers. A maximum of \$5,000 per site was allowed for lead-based paint activities for any given rehabilitation. In PY 2015, the City temporarily relocated 2 families while lead issues were addressed in their homes.

The City of Manhattan will continue to use lead safe work practices in all rehabilitation activities

pursuant to 40 CFR 745.80 subpart E.

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

The City of Manhattan does not directly provide grants to individuals; however the City provides financial support to agencies that have programs and policies that are directed toward reducing the number of poverty level families. The City also allocates funding from the general fund on an annual basis to local social service agencies that work directly with poverty-level families.

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

The Public Service agencies serving Manhattan have a strong institutional delivery system through the collaboration that serves the needs of LMI populations and special needs groups. Agencies are members of the Riley County Council of Social Service Agencies (RCCSSA) and meet on a monthly basis to collaborate and coordinate.

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

The City dedicates annual funds for social service agencies and has created the Social Services Advisory Board (SSAB), a volunteer group of citizens who advise the City on the award of funds collected by the City through taxes. For 2016, eleven agencies were awarded \$398,797 for programs addressing abused children and spouses, homelessness, frail elderly and terminally ill, day care services and after school programs.

MESI, the Crisis Center, the Manhattan Housing Authority, Shepherd's Crossing, Housing and Credit Counseling, Inc.(HCCI), Kansas Legal Services among other agencies and non-profits all work together to prevent homelessness when possible, or re-house homeless populations as quickly as possible, and HCCI specifically educates first time homebuyers and provide financial management counseling to LMI households.

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

Cost burden was the most severe housing problem for all races and ethnicities while overcrowding is increasing in the Manhattan community. Only 2.4% of units were identified as overcrowded (greater than 1 person per room) in the 2000 Census while 10.1% were identified as overcrowded in 2009-2013 American Community Survey. The City has enacted ordinances and developed zoning districts in an effort to control overcrowding in areas of the City where it is likely to occur, such as near the KSU campus.

Over the past several years, the City has encouraged the development of new multi-family housing units in various ways, which has resulted in an increased supply of rental housing, and a healthier vacancy rate. Since 2002, the Manhattan Area Housing Partnership, Inc. (MAHP, Inc.), a Community Housing Development Organization (CHDO), and other private partners have developed affordable multi-family housing units through the application of tax. In May of 2015, the MAHP, Inc. was awarded additional tax credits credits from the Kansas Housing Resources Corporation for the development of another 42 affordable housing units. The City has acted positively on resolutions of support for these projects and in some cases, waived building permit fees and utility hookup fees.

The Manhattan Area Housing Partnership (MAHP), Inc. is dedicated to bringing quality affordable

housing to the Manhattan community as well as dedicated specialized services to low/moderate income persons (LMI) through their Financial Assurance Program.

MAHP owns and operates low income housing developed with HUD HOME funds and low income housing tax credits received from the Kansas Housing Resources Corporation. The MAHP owns 159 affordable units in seven developments and manages 53 units in five of them. MHA manages the other 106 units in 2 developments for the MAHP. The MAHP also collaborated with the MHA in the first joint venture in Kansas with the development of the Flint Hills Apartments, a public housing and tax credit venture. The MAHP accepts Section 8 vouchers from the MHA and the North Central Flint Hills Area Agency on Aging and Disabilities.

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 Manhattan acted as the lead agency to oversee all aspects of the CDBG program, which included regulatory compliance, citizen participation, fair housing activities and project management. The Community Development Department is responsible for administration of the CDBG program and manages all CDBG undertakings, facilitates public involvement in the CDBG program and conducts all reporting of CDBG activities to HUD. All CDBG projects were conducted by City of Manhattan and directly monitored by Community Development staff. The City continues to refine administrative practices in order to effectively manage CDBG projects and activities, and ensure compliance with all CDBG and applicable HUD requirements.

For the 2015 Program Year, three projects were subject to Davis Bacon prevailing wage requirements. Of those, one was subject to Section 3. These obligations were included in the terms of the contract and were monitored for compliance. All 3 Projects' Notice to Bidders were e-mailed to Minority Business Owned, Women Business Owned, and Disadvantaged Business Owned Companies identified on the Kansas Department of Commerce website. All general contractors were checked for an active registration in the federal System for Award Management (SAM.gov) and all contractors provided the appropriate certifications of wages paid and hiring. No compliance actions were needed to be taken by the City. The City also published a notice of Opportunity for Work in the Manhattan Mercury to alert eligible Section 3 persons of HUD funded construction projects in the community on September 27, 2015 and March 27, 2016.

The public services projects provided monthly reports of progress and demographic data for households and persons served. Additionally, Public Service agencies received monitoring visits in January of 2016, in which files were reviewed for compliance with HUD guidelines including income verification, consistency with project objectives and other documentation of services delivered. Agencies were found to be in compliance with agreements for services and CDBG national objectives and program goals.

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.

Manhattan's citizen participation process involves citizens in decisions that directly affect their lives. The Citizen Participation Plan (CPP) encouraged full and proper citizen participation at all stages of the planning process and designates the structure, procedures, roles and policies to be followed by program participants and are consistent with federal requirements for the Community Development Block Grant Program and the Section 108 Loan Guarantee Program.

Citizen participation activities in 2015 encompassed the Section 3 opportunities advertised in September and March, as well as preparation for the 2016 Annual Action Plan and the 2014 CAPER.

Consultations were held throughout the fall with local agencies and service groups that serve the City and an electronic suggestion box for input from citizens for the 2016 Annual Plan was open from

October 23 to December 4, 2015. Eighteen citizens attended the Public Input meeting for the 2016 Annual Action Plan that was held on November 9, 2015 as an opportunity for the public to provide further input and discussion of suggested 2016 Annual Plan projects. Twenty-two electronic suggestions were received and 18 additional suggestions were received at the Public meeting.

City staff combined the agency consultations with the recommendations of the citizens to develop broad descriptions of projects that the City could address. City Departments were then consulted in early winter to identify projects that addressed public concerns.

A "Request for Proposals" process was advertised in the local paper and e-mailed to local public services agencies at the end of October. Nine submissions were received and reviewed by the Social Services Advisory Board in January. The City of Manhattan held a public review and comment period for the proposed 2016 Annual Action Plan from March 22, 2016, through April 21, 2016. The Public Comment period and public hearing was advertised on April 20, 2016 in the Manhattan Mercury, posted on the City of Manhattan Website and a notice was sent via email to subscribers of the City of Manhattan's "InTouch" system.

The City of Manhattan holds a public review and comment period for the proposed Consolidated Annual Performance Evaluation Report (CAPER) each year. The PY 2015 CAPER comment period ran from September 15, 2016 through September 29, 2016. In addition to the public review and comment period, a CAPER Public Hearing was held on September 22, 2016 at 5:30 PM in the City of Manhattan Commission Room.

This public comment period was advertised on September 14, 2016 in the Manhattan Mercury and the 2015 CAPER was made available for review and comment at Manhattan City Hall, the Manhattan Public Library, and on the City of Manhattan Website.

During the CAPER public comment period and at the public hearing, the City received the following public comments regarding the 2015 CAPER for the CDBG program: No comments were received.

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.

There were no changes in the City's 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.