

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 following is a description of annual goals and progress:

1. Improve public facilities that serve LMI households or persons with disabilities (605 goal, 10,115 actual). Four projects were funded with the 2019 allotment, but none were completed. Three of the projects are underway, and the fifth is nearing completion of the environmental review. Youthworks, a 2018 project, was completed in 2019, as well as the Kiwanis Park Fit-Trail project and Burleigh County Senior Center improvements. Additionally, Youthworks' 2017 project and the 23rd Street Park project were completed in 2019.
2. Assist with development or renovation of rental housing: Renovate existing units (72 unit goal, 4 actual): A rental project from prior year is underway (Washington Court, 2016) and a 2017 project was completed (Row Houses, BCHA).
3. Promote Special Needs Housing: (16 goal, none complete) One special needs housing project was funded, the PATH program, which is underway.
4. Homeless housing & services:
 - Support renovation of facilities serving homeless: (1050 goal, 906 actual) 2019 funds were allocated to the United Way Emergency Shelter and the Abused Adult Resource Center's shelter for victims of domestic violence, although no progress was made on these projects. Additionally, funds were awarded to facilities serving youth and those with disabilities who may also be homeless. One 2018 activity for the renovation transitional housing for those recovering from addiction.
 - Fund efforts to prevent homelessness: (141 goal, 107 actual) Three projects providing emergency housing and homelessness prevention are underway, and two projects from 2017 and 2018 were completed.
 - Support for homeless service providers: (96 goal, 87 actual) Two projects are underway, and a project from 2017 was completed.
5. Improve access to public services (80 goal, no progress): Fair Housing was funded in 2018 and is just starting, and 3 prior years' projects that were completed are Legal Services, Fair Housing, and Youth at Risk (126 actual). Homeless services reported in that category.

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
Allocate funds to prevent homelessness	Homeless	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	0	5		0	5	
Allocate funds to prevent homelessness	Homeless	CDBG: \$	Homeless Person Overnight Shelter	Persons Assisted	0	0		0	0	
Allocate funds to prevent homelessness	Homeless	CDBG: \$	Homelessness Prevention	Persons Assisted	500	5	1.00%	141	5	3.55%
Assist development of additional homeless housing	Homeless	CDBG: \$	Homeless Person Overnight Shelter	Persons Assisted	0	0		800	0	0.00%
Assist development of additional homeless housing	Homeless	CDBG: \$	Overnight/Emergency Shelter/Transitional Housing Beds added	Beds	10	0	0.00%			

Assist with development or renovation of rental	Affordable Housing	CDBG: \$	Rental units constructed	Household Housing Unit	6	0	0.00%			
Assist with development or renovation of rental	Affordable Housing	CDBG: \$	Rental units rehabilitated	Household Housing Unit	20	0	0.00%	72	0	0.00%
Assist with development or renovation of rental	Affordable Housing	CDBG: \$	Homeowner Housing Rehabilitated	Household Housing Unit	0	79		0	79	
Improve the quality of public facilities	Non-Housing Community Development	CDBG: \$	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	1850	390	21.08%	605	390	64.46%
Promote special needs housing	Affordable Housing Non-Homeless Special Needs	CDBG: \$	Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit	Households Assisted	200	0	0.00%			
Promote special needs housing	Affordable Housing Non-Homeless Special Needs	CDBG: \$	Rental units constructed	Household Housing Unit	5	0	0.00%			

Promote special needs housing	Affordable Housing Non-Homeless Special Needs	CDBG: \$	Rental units rehabilitated	Household Housing Unit	72	0	0.00%			
Promote special needs housing	Affordable Housing Non-Homeless Special Needs	CDBG: \$	Homeowner Housing Rehabilitated	Household Housing Unit	0	2		0	2	
Promote special needs housing	Affordable Housing Non-Homeless Special Needs	CDBG: \$	Homelessness Prevention	Persons Assisted	0	0		16	0	0.00%
Provide for homeless service providers	Homeless	CDBG: \$	Homelessness Prevention	Persons Assisted	800	0	0.00%	96	0	0.00%
Support efforts to increase homeownership for LMI	Affordable Housing	CDBG: \$	Homeowner Housing Rehabilitated	Household Housing Unit	135	0	0.00%			
Support public service activities	Non-Homeless Special Needs Non-Housing Community Development	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	925	0	0.00%	110	0	0.00%

Support public service activities	Non-Homeless Special Needs Non-Housing Community Development	CDBG: \$	Homelessness Prevention	Persons Assisted	0	0		141	0	0.00%
Support renovation of facilities serving homeless	Homeless	CDBG: \$	Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit	Households Assisted	400	0	0.00%			
Support renovation of facilities serving homeless	Homeless	CDBG: \$	Homeless Person Overnight Shelter	Persons Assisted	0	0		800	0	0.00%
Support renovation of facilities serving homeless	Homeless	CDBG: \$	Homelessness Prevention	Persons Assisted	0	0		250	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 City made reasonable progress in meeting goals in the fifth and final year of the Consolidated Plan. In 2019 the City funded 12 CDBG activities. None of these activities were completed during the 2019 program year, although all but 2 are under underway. In addition, 12 projects funded in prior years were completed. The City listed 9 primary priorities and goals in its Plan and most of the activities funded in 2019 addressed those priorities. The City continued to prioritize public service activities which addressed prevention of homelessness or provided emergency assistance for persons who were homeless. About 66% of the project funding was awarded to activities addressing homelessness concerns. 10%

of of the 2019 project funds were allocated to housing activities. Improvements to public facilities also followed priorities with funding going to improving facilities serving the disabled, the elderly, mentally ill persons, and youth at risk. However, the City fell behind in meeting goals for creating affordable housing, units for persons who are homeless, and special needs housing. While we didn't create any special needs housing, CDBG funds went towards rehab of such housing. Funding and local agency capacity are major concerns, so most of the CDBG funds are allocated for prevention of homelessness or emergency shelter. The overall goal for improvement of public facilities was exceeded. Homelessness will continue to be a priority for the City due to local need. The City will continue to focus on affordable housing, but lack of resources and the high costs continue to be the major obstacles.

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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	2,877
Black or African American	48
Asian	15
American Indian or American Native	299
Native Hawaiian or Other Pacific Islander	12
Total	3,251
Hispanic	0
Not Hispanic	351

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

Narrative

IDIS data on the actual number of beneficiaries does not match the above CAPER table since racial categories are different. For instance, IDIS requires that we report beneficiaries that identify themselves as more than one race (e.g., Asian & White), but this table does not include such classifications. Also, the CAPER Goals & Outcomes table does not include activities that were funded prior to approval of the current Consolidated Plan, but were completed in Program Year 2019. A table that presents the IDIS statistics, 2019 Census data for comparison, and additional information on the income has been attached.

CR-15 - Resources and Investments 91.520(a)

Identify the resources made available

Source of Funds	Source	Resources Made Available	Amount Expended During Program Year
CDBG	public - federal	376,992	

Table 3 - Resources Made Available

Narrative

The City of Bismarck received \$376,992.00 in CDBG funds for program year 2019, and had no funds in prior year resources. No funds were spent during the program year.

Identify the geographic distribution and location of investments

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description
Citywide			Funds are not targeted geographically, but are available citywide

Table 4 – Identify the geographic distribution and location of investments

Narrative

Funds are not targeted geographically, but are available citywide. Programs are based on an individual applicant meeting eligibility criteria rather than geographic area. No target area was selected in the Consolidated Plan.

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 does not generally require a set amount of match for the subrecipients that it funds under the CDBG program. However, match is taken into consideration when proposals for CDBG funding are reviewed. Match sources include in-kind labor, private donations, United Way funds, foundation support, state funds and federal funds. No publicly owned land or property was used to address needs in the Plan. Previously funded HOME projects generate an annual state supportive service match of up to \$3 million that can be used when the City applies for HOME funding from the State of North Dakota.

In the case of projects undertaken by public entities, the City does require an in-kind match on the part of the sub-recipient. Bismarck Parks and Recreation District used CDBG funds to complete the Kiwanis Fit-Trail, a 2018 project, and supplied a match of \$18,000.

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	800	10
Number of Non-Homeless households to be provided affordable housing units	0	75
Number of Special-Needs households to be provided affordable housing units	0	2
Total	800	87

Table 5 – Number of Households

	One-Year Goal	Actual
Number of households supported through Rental Assistance	0	10
Number of households supported through The Production of New Units	0	0
Number of households supported through Rehab of Existing Units	72	77
Number of households supported through Acquisition of Existing Units	0	0
Total	72	87

Table 6 – Number of Households Supported

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

Lack of resources and organizational capacity are both concerns in meeting housing goals. CDBG funding for rental assistance is used for security deposits, 1st month's rent, or back-rent in order to prevent homelessness. A CDBG housing project from a prior year to rehab 4 units of Section 8 rental housing was completed.

Discuss how these outcomes will impact future annual action plans.

While the subrecipients who administer the emergency rehab and housing accessibility programs did not apply for 2020 funding, but have been encouraged to apply for the 2021 cycle as these are programs that are much needed within the City. The City will increase efforts to support affordable housing projects through such means as LIHTC, applying for HOME funds, and exploring ways to reduce development costs. The City's main partner in this effort will continue to be the local housing authority, but will also encompass nonprofit and for profit developers. However, high local development costs will likely mean that the City will continue to focus on preservation of existing affordable housing.

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

Number of Households Served	CDBG Actual	HOME Actual
Extremely Low-income	830	0
Low-income	1,832	0
Moderate-income	628	0
Total	3,290	0

Table 7 – Number of Households Served

Narrative Information

25% of all program beneficiaries in 2019 were extremely low income, 80% were low income, and 19% were moderate income. The majority of low income beneficiaries were benefited by homelessness prevention, emergency housing rehab and special needs housing activities.

Worst-case needs: City representatives make an ongoing effort to meet with local organizations to plan for future needs. For instance, the City has been involved in planning for a new homeless shelter to replace the one that closed. The City met with agencies serving persons who are homeless to address potential concerns such as emergency housing needs during the winter. A number of City departments are actively involved in long term planning with the local United way to develop an improved homeless shelter. Over the past year, the City has been working with a low income housing developer to develop a Section 8 housing project in City that is much needed, and is now under construction. The City continues to award CDBG funds to prevent homelessness to several local organizations. City staff have met with housing owners/developers to try to come up with ways to preserve existing affordable housing rather than to lose it. The City works closely with the local housing authority in order to gain knowledge of the current rental market and to plan joint activities to try to foster affordable housing. The Police, Fire and Public Health Departments actively meet throughout the year to jointly plan for unexpected emergencies.

CR-25 - Homeless and Other Special Needs 91.220(d, e); 91.320(d, e); 91.520(c)

Evaluate the jurisdiction's progress in meeting its specific objectives for reducing and ending homelessness through:

Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs

The City continues to maintain active membership in the Missouri Coalition for Homeless Persons. This organization is responsible for conducting the point-in-time homeless surveys and for education, outreach, and coordination of regional participation in the Continuum of Care process. The local police department supplements their efforts.

Addressing the emergency shelter and transitional housing needs of homeless persons

CDBG funds are also being used for rehab of facilities that provide housing and shelter to persons with mental illness, and another which supports at-risk youth and their families. 2019 funds were awarded to Charles Hall Youth Services for renovations to their youth housing facility. 2019 funds were awarded to AARC for renovations to a shelter for victims of domestic violence and to United Way for renovations to their emergency homeless shelter; however, neither project was completed during the 2019 program year.

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

The City awarded CDBG funding to three local nonprofit agencies in order to prevent homelessness. Funds are used for security deposits, first month rent, and unpaid rent or utilities. In the 2019 program year, 96 households received this assistance. Six local agencies continue to receive ESG and State Homeless Grants for a variety of program needs.

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

Local agencies work with the HUD-VASH Program to provide rental assistance and support services. Several agencies provide transitional housing (or housing support) with case management services through their own staff or through referrals. CDBG funds were awarded to West Central Human Service Center to be used for subsistence payments (e.g., rent, security deposits). This agency in turn provides case management to help persons with mental illness avoid homelessness. Other agencies receiving CDBG assistance also provide case management services depending upon household needs. Such services will continue be needed in our community.

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

Actions taken to address the needs of public housing

The Burleigh County Housing Authority manages 282 units of Public Housing. This includes both elderly and family housing. None of these units were designated as troubled or problematic. Most of this housing was built 25-35 years ago and needs improvements for code compliance, energy efficiency, accessibility, and modernization. The Housing Authority has used both public and private funds to implement major improvements, and the City has supported this effort with CDBG and HOME funding. Demolition of antiquated units allowed the construction of new special needs housing (non-Public Housing). The Housing Authority also manages approximately 1,100 vouchers, 48 units of special needs housing, 40 Shelter Plus Care Vouchers, 40 basic care units for the frail elderly, and 96 units of Section 236 housing for families. The City continues to consult with the Housing Authority on its needs for renovation/preservation of existing units and the need for the development of new housing. It provides technical support such as the provision of environmental review. A Burleigh County Housing Authority project received funding in 2019, to replace flooring and install stoves required for fire safety.

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

Tenants in both elderly and family housing have advisory councils. Each council holds monthly meetings, and the Housing Authority board meets with the councils a minimum of once per year. The councils have their own activity budgets and use the funds for tenant activities throughout the year. The Housing Authority administers a non-HUD sponsored self-sufficiency program that is open to any of its tenants. Approximately 20 households a year participate. The services are coordinated with other local agencies. Several tenants each year participate in a program that provides training and counseling to promote homeownership in order to purchase the unit of Public Housing that they are renting (e.g., single-family dwellings). Escalating property values in the past several years have made it more difficult for households to qualify.

Actions taken to provide assistance to troubled PHAs

Burleigh County Housing Authority is not a troubled PHA.

CR-35 - Other Actions 91.220(j)-(k); 91.320(i)-(j)

Actions taken to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment. 91.220 (j); 91.320 (i)

The City continues to seek ways to reduce barriers to affordable housing. The City reduced required right-of-way and roadway widths for local streets to reduce development costs in residential subdivisions. The City also allows accessory dwelling units to single-family homes and adopted an In-fill and Redevelopment Plan to encourage infill development with increased densities in areas already served by municipal utilities. The implementation of a Quiet Rail Zone, which eliminated the blowing of train whistles at downtown crossings except in an emergency, has had the desired result of increasing the amount of residential development in the City's downtown area, with five multi-family rental housing projects either completed or under construction in the past five years. In addition, the City continues to provide letters of support for LIHTC projects within the community and further supports housing in the core of the community with state-enabled Renaissance Zone. The City also awarded CDBG, HOME and/or NSP funds to several other local housing projects, including a 40-unit permanent supportive housing project using the housing first approach and a housing project that is preserving 85 units of affordable housing and adding another 35 units to the project in a converted nursing home. The City is currently undertaking a comprehensive planning effort that will help define other actions that can be taken to further eliminate barriers to affordable housing within the community.

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

The City worked with the local homeless coalition, United Way, and service providers to improve emergency homeless facilities. The City staff and Commissioners are active participants in local efforts to find means to address homelessness concerns. The City continues to prioritize its CDBG and HOME funding for activities that address homelessness or prevent homelessness. CDBG funds were awarded to the United Way in 2019 to help with construction costs for a new emergency shelter.

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

Bismarck has not historically had a large number of lead-based paint poisoning in children, but this could be because of lack of awareness and training. The local Public Health Department administers the Health Tracks Program which provides testing for young children whose parents are eligible for Medicaid. Any CDBG assisted residential property (non-elderly) or facility in which young people are normally present is tested for lead based paint prior to work being done on the property if it was constructed prior to 1978. The City provides information on training and property construction procedures to contractors and maintenance workers. It also provides referrals for LBP training if needed. The City consults with the North Dakota Department of Environmental Quality on technical concerns and for assistance in working with new contractors.

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

The primary activities undertaken to alleviate poverty include economic development, family self-sufficiency programs, and assistance to human service agencies that provide support services or training and employment activities for disadvantaged persons. The City continues to support the local development corporation with local sales tax revenue. The two entities work cooperatively to expand local economic opportunities. Downtown groups also work together to encourage improvements and employment through such means as the Renaissance Zone. No CDBG funds were used for economic development, commercial development, or downtown improvements since other resources appear to be meeting local needs. It should be noted that the Renaissance Zone was approved through July 31, 2022.

The Housing Authority's self-sufficiency program uses a variety of resources to work with tenants to help them develop a strategy to escape poverty, including assistance with homeownership. CDBG has been used to fund public services and renovate public facilities serving persons who are homeless, disabled, or disadvantaged. For instance, the City provides CDBG funds to 3 agencies to prevent homelessness. In turn, each agency provides supportive services or case management to help their clients. The City also continues to support the development or preservation of special needs housing with both CDBG and HOME funds. This housing is linked to supportive services for residents.

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

The City continues to collaborate with local agencies. This effort has included consultation with the Housing Authority, social service agencies, Regional Development Council, Community Action, homeless coalition, health care agencies, advocacy organizations, and other local groups. The City uses outreach to local housing agencies in order to promote joint efforts to develop affordable housing and special needs housing.

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

The Consolidated Plan recognized the Burleigh County Housing Authority as the primary housing agency for affordable housing in Bismarck. Accordingly, the City continues to work with the Housing Authority to develop and preserve affordable rental housing. This type of collaboration is evident in the use of CDBG and HOME funds for housing projects that preserve existing housing or create new housing, primarily for persons with special needs. The City membership in the local homeless coalition promotes awareness and cooperation. The City maintains contact with the Region VII Supportive Housing Development Collaborative to assess local need and resources. This affiliation has resulted in a joint effort to develop 40 units of supportive housing for homeless persons which opened in the fall of 2019. The Housing Authority, Beyond Shelter (nonprofit), and the City worked together to realize this much needed housing. The local coalition for the homeless meetings provides a wonderful opportunity for

local service providers and government to share concerns and knowledge.

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

- The City adopted an Analysis of Impediments in 2015. It identified the following concerns: discrimination on the basis of disability and familial status; failure to make reasonable accommodation; discriminatory advertising; higher loan denial rates for Native Americans and Hispanic households; discrimination against recipients of assistance; lack of understanding of FH laws; shortage of accessible housing; and location of public assisted housing in areas of LMI & minority concentration. Since then, the City was monitored by HUD's Office of FHEO and received training on future requirements. New concerns include identification of 4 areas or racially and ethnically concentrated areas; lack of accessible, affordable housing; lack of affordable housing for persons based on race and ethnicity; and people with disabilities living in segregated settings such as nursing homes. The following are actions taken to address these concerns:
- The City allocated CDBG funds for a housing accessibility program which makes improvements in private sector housing. 5 low income households received assistance from the 2019 program year.
- The City worked with 2 agencies on outreach and education. Funding was from prior years, but activities cont'd into 2019. Legal Services provided assistance to 18 LMI persons in order to prevent homelessness or to help obtain affordable housing. High Plains Fair Housing did fair housing education and outreach within the City of Bismarck. The City provided in-kind assistance with meeting rooms, publicity and outreach, and referrals to agencies.
- The Mayors' Committee on Human Relations sponsored Diversity University, an Intercultural Festival, & an essay contest for children.
- CDBG funds were allocated for the rehab of a facility for persons with disabilities (mental illness). 2019 CDBG funds were awarded to another such project, to improve accessibility at a transitional housing facility for persons recovering from substance abuse, in which there were 390 beneficiaries.
- The City conducted outreach (mailings) to agencies serving LMI households, persons with disabilities, minorities, housing agencies, etc. to encourage their participation in the CDBG process. CDBG notices include TDD, Voice, and Spanish relay information.
- Public hearings are conducted in the City/County Building which is ADA accessible and located in the downtown, LMI area.
- The City Commission approved an anti-discrimination resolution discouraging biased employment, rental/housing, and service practices based on sexual orientation or gender identity.
- The City worked to improve access to its CDBG program and improve recordkeeping. This included year end analysis of beneficiary data. The analysis indicated that minorities benefitted at a slightly higher percentage rate than the 2010 Census. About 14% of the beneficiaries were

persons with disabilities. The fewest minority beneficiaries were in housing, but these activities had high percentages of beneficiaries with disabilities.

- The City made progress with Section 504 requirements. The planner that administers HUD grants will become the 504 coordinator.
- Staff is has updated the Citizen Participation plan to include information on the City's Limited English Proficiency Access Plan, Section 504 Plan & to improve the description of outreach efforts.
- The City increased subrecipient reporting requirements on beneficiaries (new forms)

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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 uses a variety of methods to monitor compliance and progress. Requests for CDBG funding are carefully reviewed to identify any potential issues before a project is funded. This effort will include a review by the City's Fiscal Department, checking the SAM.gov system, and a review of prior experience with federal grants (in particular CDBG). The City Finance Department, Fiscal Division will also review audit reports from sub-recipients annually. Technical assistance and project guidance is given to the sub-recipients at the beginning of the project year, and throughout as necessary. All sub-recipients must submit a performance report annually and upon project completion. In addition, the sub-recipients must submit a report and support documentation with each request for payment. On-site visits are made when possible to ensure compliance and to provide technical assistance. Additional materials or on-site training are provided upon request or when conditions warrant it. The City also used consultants and training for sub-recipients to increase knowledge (e.g., LBP). City staff use informal means to check compliance, such as phone calls or emails to discern progress or problems. Staff, A/E consultants, or rehab specialists verify project progress and completion when requests for payment are made for construction activities. The Annual Performance Report also gives the City an opportunity to assess overall progress and to address concerns. Delays in project implementation and major changes in staff at several agencies indicate that monitoring efforts and technical assistance are likely needed.

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

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

A noticed was place in the Bismarck Tribune on March 16, 2021 to request comments on the City's performance in the administration of the CDBG program and Consolidated Plan. Sub-recipients could also comment when they submitted their annual reports. See Appendix 1. 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.

No changes in program objectives were made. An evaluation of the program indicates that few changes are needed in the program except that increased technical assistance and activity monitoring will be useful in the future to increase sub-recipient success. It will also be increasingly important to evaluate sub-recipient capability and activity effectiveness as competitiveness for CDBG dollars increases. Consideration should also continue to be given to funding fewer, but more effective, activities, since the CDBG program will still be managed by a single part-time employee. Consideration also needs to be given to how to deal effectively with new entities applying for funding and the importance of funding innovation.

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

No

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

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CR-45 - CDBG 91.520(c)

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