



City of Bismarck, North Dakota

2020 CAPER

(Consolidated Annual Performance Evaluation Report)

Draft for Public Review

December 30, 2021

Community Development Department

221 North 5th Street

Bismarck, ND 58501

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.

There was a significant delay in the allocation of 2020 CDBG funding. This was partly because of the pandemic and an unexpected change of the CDBG grant administrator. This delayed the submission of both the 2020-2024 Consolidated Plan and CAPER, and consequentially, 2020 and 2021 funding to subrecipients. Projects carried out during the 2020 program year used funds carried over from the previous year and/or CARES Act's CDBG-CV.

1. Promote special needs housing; Community Action Program (CAP) completed project for one household with disabled members to resolve accessibility concerns in their home.
2. Support facilities serving homeless persons; An amendment to allocate funds to Missouri Slope Areawide United Way (UW) was done in 2021. Once complete, the proposed UW CDBG funded project will offer a coordinated entry process and be well-positioned to serve more homeless people within the City. This project will also offer job training skills to help its clientele transition into self-sufficiency. Bridging the Dental Gap, an agency that helps low-income, uninsured, and under-insured access dental care, reported 1188 beneficiaries. West Central Human Service Center, an agency that serves people with behavioral health and other health issues completed their 2019 project reporting 7 beneficiaries.
3. Homelessness prevention: The Salvation Army assisted 87 individuals with their 2019 funding to stay housed by either paying their rental arrears, utilities or both. The Salvation Army was also a recipient of CDBG-CV and playing a crucial role in eviction prevention through 2020. AID, Inc, an agency that provides temporary emergency assistance to help families and individuals stay in their homes, served 13 individuals
4. Support public service activities; High Plains Fair Housing advocacy on fair housing and tenant landlord mediation when needed. They assisted two households during the 2020 program year using 2018 funding.
5. Improve the quality of public facilities; Youthworks completed their 2019 renovation project and reported 390 beneficiaries. Youthworks shelters youth in need of emergency care, homeless/runaway and juvenile offenders by offering counseling, meals, job training, and medical services as needed. Charles Hall Youth & Family Services, an organization that assists at-risk youth make a successful transition from troubled adolescence to mature adulthood, completed their 2019 project and reported 17 beneficiaries.

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: \$200,000	Homelessness Prevention	Persons Assisted	500	0	0.00%	50	0	0.00%
Assist development of additional homeless housing	Homeless	CDBG: \$50,000	Overnight/Emergency Shelter/Transitional Housing Beds added	Beds	10	0	0.00%			
Development or renovation of affordable rentals	Affordable Housing	CDBG: \$200,000	Rental units rehabilitated Buildings Demolished	Household Housing Unit Buildings	20 3	0 0	0.00%			
Improve connectivity and access	Non-Housing Community Development	CDBG: \$100,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	500	0	0.00%			

Improve the quality of public facilities	Non-Housing Community Development	CDBG: \$425,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	20,000	0	0.00%	790	0	0.00%
Promote special needs housing	Affordable Housing Non-Homeless Special Needs	CDBG: \$200,000	Homeowner Housing Rehabilitated	Household Housing Unit	50	0	0.00%	10	0	0.00%
Provide for homeless service providers	Homeless	CDBG: \$50,000	Homelessness Prevention	Persons Assisted	100	0	0.00%			
Support facilities serving homeless persons	Homeless	CDBG: \$200,000	Homeless Person Overnight Shelter	Persons Assisted	1,500	0	0.00%	625	0	0.00%
Support homeownership for LMI households	Affordable Housing	CDBG: \$100,000	Homeowner Housing Rehabilitated	Household Housing Unit	20	0	0.00%	4	0	0.00%
Support public service activities	Non-Housing Community Development	CDBG: \$100,500	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	1,000	0	0.00%	460	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.

All CDBG funds were used to assist low- and moderate-income residents and for the high priority goals identified in the Consolidated Plan: (1) special needs housing; (2) support facilities serving homeless; (3) Homeless prevention; (4) public service activities; and (5) improvement of public facilities. Overall, the City of Bismarck was effective in meeting these needs given that 2020 was a challenging year.

2020 projects were implemented with the use of CDBG-CV except for a few subrecipients that had funding from the previous years. The pandemic impacted the progress of most of the CDBG projects and their initial projected outcome. Renovation projects had significant delays due to shortage of labor aggravated by the pandemic. Subrecipients responded to the pandemic needs of the community by changing the way they operate to curb the spread of the virus. Shelters utilized hotel vouchers to allow social distancing. CDBG-CV funds were helpful in addressing immediate basic needs of our community that had been heightened by the pandemic such as food. Salvation Army and Ministry on the Margins played a key role in stabilizing LMI households by assisting them to catch up with their rent and other critical bills, thus, preventing homelessness.

The highest priority addressed in 2020 was homelessness prevention. The pandemic had an impact on health emergencies and associated expenses, job loss and income reductions that put many LMI households at risk of becoming homeless. While the eviction moratoria and other interventions played a part in keeping the LMI population housed, CDBG-CV funding was especially helpful for those in need of legal assistance to remain housed. Legal Services of North Dakota and High Plains Fair housing played a key role in raising awareness, and when needed, mediation between landlord and tenant. The enactment of temporary relief of evictions through the moratoria meant that fewer households were accessing CDBG homeless prevention funds through our subrecipients. Both Legal Services of North Dakota and High Plains Fair Housing anticipate that more LMI households will need assistance once the moratoria expire. Ministry on the Margins played a key role as a low barrier shelter for homeless people struggling with addiction, emergency shelter for those released from prison or treatment centers and other social issues that made it challenging for them to access other shelter facilities. AID Inc used their CDBG funds towards food provision and other household items through their thrift store.

In addition to the utilization of CDBG-CV funding, subrecipients that had residual funds from previous years used their funds towards their goals.

Priorities addressed include improvements on quality of public facilities, public service, and special needs housing. See attached table.

Goal		Source / Amount	Indicator	Unit of Measure	Expected – Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected – Program Year	Actual – Program Year	Percent Complete
CDBG-CV	Category									
	Homeless	CDBG:	Homeless Person Overnight Shelter	Persons Assisted	0	0		625	0	0.00%
1) Homelessness prevention										
Salvation Army				87			100%			
Legal Services of North Dakota				0			0%			
AID incorporated				6			100%			
Washington Court				68			100%			
TOTAL				155						
2) Special Needs Housing										
Community Action Program (CAP)				1						
3) Public Service Activities										
High Plains Fair Housing				2						
TOTAL										
4) Improve Public Facilities										
Youthworks				390						

CR-05 Table

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	671
Black or African American	104
Asian	8
American Indian or American Native	233
Native Hawaiian or Other Pacific Islander	5
Total	1,021
Hispanic	0
Not Hispanic	0

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

Narrative

There were a total of 1780 subrecipients (see attached CR-10 Chart - Race Distribution of Beneficiaries and CR-10 Table 1 - Beneficiaries). The majority of the recipients (**759**) opted not to identify with any race category, there were **233** American Indian/Alaska Native, **8** Asian, **104** Black/African American, **0** Native Hawaii/other Pacific Islander, **671** White, **0** American Indian/Alaska Native White, **5** Indian/Alaska Native and Black African (see distribution by % attached). The CDBG beneficiary numbers resonate with the current census population breakdown in Bismarck, North Dakota.

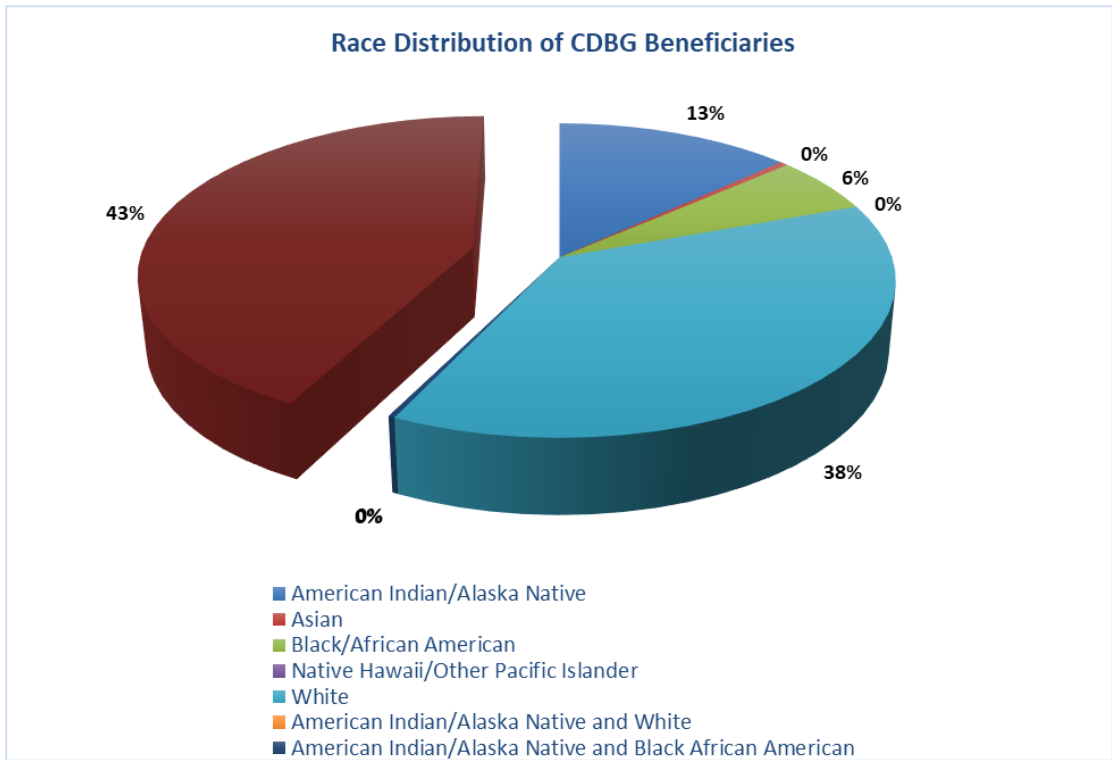
According to the recent census, the City of Bismarck had the following race distribution:

- 89.8% White
- 2.7% Black/African American
- 4.3% American Indian and Alaska Native
- 0.9% Asian
- 0.1% Native Hawaiian and other Pacific Islander
- 1.8% two or more races

- 2.5% Hispanic/Latino
- 88.1% white alone, not Hispanic or Latino


Approximately 89.9% of the Bismarck population identify as White individuals. The largest minority category is American Indian at 4.3%. Other minority groups include Asian at 0.9% and Black/African American at 2.7%. 38% of CDBG funding was spent on White population, 13% on American Indian/Alaska Natives and 6% on Black/African American group (see *Chart and Table on Race Distribution of CDBG recipients*) The City of Bismarck's CDBG program works in close collaboration with a coalition of non-profits know as Missouri Valley Coalition for Homeless People (MVCHP). The coalition's common mission is to help alleviate homelessness. Through this coalition, the city has been able to reach out to a wide demographic cross-section of the LMI households with diverse needs. Notable coalition members include the Native American Development Center (NADC), an organization that serves Native Americans living on or off the reservation through affordable lending services and general financial education. NADC also offers HUD housing and homeownership counseling and addresses other social issues that affect Native American's living in Bismarck area. During the pandemic, NADC launched a North Dakota Urban Indian Covid-10 Emergency Response Fund to assist Native Americans in need of housing or temporary shelter due to the coronavirus pandemic. The City of Bismarck continues to reach out to all racial and ethnic compositions by engaging with subrecipients that are racially inclusive.

The families assisted were either already experiencing homelessness prior to the pandemic or at the brink of becoming homeless. For many, the pandemic escalated an existing delicate situation, which was made worse as many experienced losses in income, a health emergency or both. Families required assistance to keep up with their rental and utility payments to ensure they did not end up homeless. Other issues addressed during this period included legal and administrative support to avoid eviction, food, low barrier shelter and emergency shelter.



CR-10 Chart

Subrecipient	American Indian /Alaska Native	Asian	Black /African American	Native Hawaii /Other Pacific Islander	White	American Indian /Alaska Native and White	American Indian /Alaska Native and Black African American	Other	TOTAL	Very Low Income	LMI	Not Low & Moderate	TOTAL	# in permanent Housing after assistance	Female headed households
Youthworks	113	8	70		195			4	390	23	367		390		
Charles Hall Youth Services	8		1		8				17		17		17		
AID Incorporated	8				5				13	5	8		13	6	
West Central Human Service Center			1		6				7	6	1		7	7	3
Salvation Army	34		12		41				87	35	22	30	87	23	38
Highlands Fair Housing	1				1				2		2		2		
Dacotah Foundation					5		2		7		7		7		
Dental Gap	35		18		380			755	1188		1188		1188		
CAP					1				1		1		1		
Washington Court	34		2		29		3		68	66	2	0	68		
TOTAL	233	8	104	0	671	0	5	759	1780	135	1615	30	1780	36	41
Percent of Total Beneficiaries	13.09%	0.45%	5.84%		37.70%		0.28%	42.64%	100.00%						

 CDBG-CV rental assistance

CR-10 Table

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	406,397	0

Table 3 - Resources Made Available

Narrative

The City of Bismarck received CDBG entitlement allocation of \$406,397, but no amount was spent during the 2020 program year. There was a significant delay in the allocation of 2020 funding partly because of the pandemic and a change of the CDBG grant administrator. This delayed the submission of both the 5-year Consolidated Plan and CAPER, and consequentially, 2020 and 2021 funding. Projects conducted in 2020 utilized funds carried over from previous years and CARES Act (CDBG-CV).

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 made available to eligible beneficiaries city-wide. The City does not have any targeted areas of CDBG investments.

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 generated 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 subrecipient.

CR-20 - Affordable Housing 91.520(b)

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

	One-Year Goal	Actual
Number of Homeless households to be provided affordable housing units	0	0
Number of Non-Homeless households to be provided affordable housing units	0	0
Number of Special-Needs households to be provided affordable housing units	0	0
Total	0	0

Table 5 – Number of Households

	One-Year Goal	Actual
Number of households supported through Rental Assistance	50	102
Number of households supported through The Production of New Units	0	0
Number of households supported through Rehab of Existing Units	4	0
Number of households supported through Acquisition of Existing Units	0	0
Total	54	102

Table 6 – Number of Households Supported

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

The projected one-year goal for rental assistance was 50 and the actual 102 because of the pandemic’s undue hardship on LMI households that them at risk of becoming homeless. LMI workers were in a shaky financial position before the pandemic and tend to work in industries that were

most affected by the pandemic. Subrecipients that previously had projects to prevent homelessness such as Salvation Army, saw an increase in the number of people requesting assistance compared to the previous years. In addition, majority of the subrecipients who received CDBG-CV used their fund to help keep LMI households housed through assistance in rent, utilities, or legal mediation. The city did not meet the one-year goal of support through 4 Rehab units because subrecipients did not receive their allocated funding for the year.

Discuss how these outcomes will impact future annual action plans.

The City expects to continue supporting households stay housed through the pandemic to prevent homelessness. There are several housing stability programs such as ND Rent Help, under the North Dakota Department of Human Services (NDDH), which in addition to rental assistance has expanded in scope to also cover utilities. NDDH is working together with local private sector partners to help those experiencing housing crisis. The City will increase efforts to support affordable housing projects through a series of consultations with developers and other stakeholders as it prepares its Together 2045 Comprehensive Plan. Burleigh County Housing Authority (BCHA) continues to be a key partner in providing affordable housing. The City expects to have a greater to meet its CDBG projected goals with the release of 2020 and 2021 funding to its subrecipients.

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	135	0
Low-income	1,615	0
Moderate-income	30	0
Total	1,780	0

Table 7 – Number of Households Served

Narrative Information

There were a total of 1780 beneficiaries. 90.7% low-income, 7.5% extremely low-income and 1.6% from moderate-income households. 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. Several City departments are actively involved in long term planning with Missouri Slope Areawide United Way (UW) to develop an improved homeless shelter. The City continues to award CDBG funds to prevent homelessness to several local organizations. The City works closely with the local housing authority to gain knowledge of the current rental market and to plan joint activities to try to foster affordable housing.

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

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

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

The City continues to maintain an active membership with the Missouri Valley Coalition for Homeless People (MVCHP). 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. In addition, the City engages CDBG subrecipients such as Missouri Slope Areawide United Way (UW) which offers emergency shelter and a linkage to other services. The shelter is open 7 days a week and is in the process of expanding services to include an opportunity center where homeless people can access job training, financial counseling, and broadly support transition from homelessness. The City also collaborates with the Department of Health and Human Services' West Central Human Services to reach out to homeless population with mental health issues.

Addressing the emergency shelter and transitional housing needs of homeless persons

During program year 2020, it was particularly challenging and important to provide safe and stable housing with services for homeless persons. Ministry on the Margins ran a low barrier emergency shelter for homeless people struggling with addiction. Adult Abused Resource Center (AARC) ran a shelter for victims of domestic violence. Homeless shelter programs modified the way in which emergency shelter was provided in response to COVID-19 by offering hotel vouchers to prevent overcrowding.

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

UW and MVCHP offer a coordinated entry process designed to ensure that people who need assistance the most can receive it in a timely manner. Ministry on the Margins offers a low barrier shelter for those discharged from publicly funded institutions or struggling with addiction. Youthworks shelters youth in need of emergency care, homeless/runaway and juvenile offenders by offering counseling and job training. In

addition to shelter, Youthworks provides meals, alcohol/substance abuse treatment and medical services as needed. Missouri Slope Areawide United Way (UW) has CDBG-CV and 2020 funding available for renovation and expansion of its homeless shelter to include a dining area and an opportunity center. Youthworks also has funds allocated for renovation of its windows and an ADA compliant grounds and parking lot. Ministry on the Margins utilized CDGB CARES Act funds to help homeless access shelter. The City expects to see a greater positive impact as 2020 and 2021 funds are made available to these agencies.

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 agencies named above assist individuals and families in making a transition to permanent housing. They serve chronically homeless individuals and families, families with children, and their families, and unaccompanied youth. West Central Human Services Center assists with rent, security deposits and provides case management for those with mental illness to prevent them from being homeless. We anticipate a greater impact with the release of 2020 and 2021 CDBG funds.

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

Actions taken to address the needs of public housing

The City of Bismarck continues to work closely with Burleigh County Housing Authority (BCHA). BCHA manages 281 units of Public Housing which are made available to a cross-section of vulnerable individuals. Most of housing needs improvements for code compliance, energy efficiency, accessibility, and general modernization. The Housing Authority uses both public and private funds to implement major improvements. The City has supported these efforts through CDBG and HOME funding. 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 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. BCHA has 2020 funding for demolition of antiquated units to allow for construction of new public housing units.

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

The Housing Authority hosts monthly advisory council meetings. These 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 participate in a program that provides training and counseling to promote homeownership to purchase the public housing unit that they are renting. An increase in property values 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. Some barriers to affordable housing in the City of Bismarck are out of the reach of the City, including the cost of land, labor and materials. The City can, however, continue to make it feasible for developers to develop affordable housing units within the City. The City will continue its partnership with local nonprofits, and private developers to promote 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 City is currently undertaking a new comprehensive plan, Together 2045, to explore actions that can 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 collaborates with the local homeless coalition group, Missouri Valley Coalition for Homeless People (MVCHP), to actively identify and address obstacles to meeting underserved needs. The Coalition holds monthly meetings to explore present homeless conditions, resources available and channels of assistance distribution. The City's CDBG program administrator and other City staff regularly sit in on these meetings. MVCHP regularly hosts advocacy events to raise awareness on the plight of the homeless. The city continues to prioritize its CDBG funding activities to agencies that address homelessness.

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

Historically, Bismarck has not had a significant amount of lead-based paint poisoning in children. 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 build prior to 1978 or facility in which young people are present is tested for lead-based paint prior to work being funded. The City provides information on training and property construction procedures to contractors and maintenance workers. The City's CDBG Program Administrator and the Planning Manager are both certified lead renovators and can help agencies dealing with lead-based paint in renovation, repair and painting projects on proper procedures. The city also 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)

In 2020, families living below the poverty level may have encountered great setbacks because of the pandemic. The primary activities undertaken to alleviate poverty include support services, training and employment activities undertaken by CDBG funded agencies. Youthworks actively trains its troubled and homeless youth on skills that help them become employable in the future. UW is currently in the process of setting up an opportunity center which will train and guide participating homeless people through the process of becoming self-sufficient. The Housing Authority's self-sufficiency program uses a variety of resources to collaborate with tenants to help them develop a strategy towards self-sufficiency such as its home ownership program. The city continues to work with agencies that provide services to homeless families and families at risk of homelessness provide these families with housing, housing counseling, budget counseling, and assistance with finding employment or better employment.

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

The City continues to collaborate and consult with local agencies. These agencies include Housing Authority, MVCHP, healthcare agencies and other groups. The City's involvement with the homeless coalition group, MVCHP, gives it perspective and an in-depth knowledge on challenges experienced by local agencies, which better informs the City's CDBG priorities.

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

The City maintains communication with social service agencies in the community through its CDBG program. The City continues to work with the Housing Authority to develop and preserve affordable rental housing.

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 collaborates with CDBG-funded agencies that advocate fair housing choice such as Legal Services of North Dakota and High Plains Fair Housing. These agencies advocate, educate the community on fair housing regulation and provide legal assistance to LMI households. In accordance with the applicable statutes and regulations governing the Consolidated Plan, the City of Bismarck certifies that they will

affirmatively further fair housing. The City of Bismarck adopted an Analysis of Impediments to Fair Housing Choice in 2015 and will be conducting an update to this document in the future. The City of Bismarck will take appropriate actions to overcome the effects of any impediments identified through that analysis and maintain records reflecting that analysis and actions in this regard.

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 monitors compliance with requirements of the program through a number of ways. Requests for CDBG funding are carefully reviewed to identify any potential issues before the funding is made available.

- **Fiscal Monitoring:** The City's Finance Department reviews audit reports at the beginning of the project year, and throughout the program as deemed necessary. The Finance Department has preventative internal control systems that ensure timely and accurate expenditures of CDBG resources. Additionally, the City is audited on an annual basis, and CDBG funds are included in that audit.
- **Performance Reporting:** The City utilizes HUD's Integrated Disbursement and Information System (IDIS) to manage all financial and programmatic information that is generated through its CDBG program each fiscal year. The Consolidated Annual Performance and Evaluations Report (CAPER) is used to analyze the City's annual activities and compare them to the annual and 5-year goals. Subrecipients are required to submit a performance report upon the completion of their CDBG funded projects.
- **MBE/WBE:** The City is required to report on Minority Business Enterprise and Women Owned Enterprise participation in its federally funded activities. The City's CDBG office compiles data from the City's CDBG funded construction projects and submits the Contract and Subcontract Activity Reports, Labor Standards and Enforcement Reports, and Section 3 Report. The City is in the process of refining its delivery of information to subrecipients; the 2020 and 2021 subrecipients will receive information packets on federal labor standards and MBE/WBE provisions and other pertinent information on reporting requirements.
- **Monitoring of Subrecipients:** The Community Development Department creates subrecipient contracts that ensure that subrecipients are informed of the requirements for the use of CDBG and CDBG-CV funds. The subrecipients are required to submit invoices with supporting documentation and beneficiary reporting forms. These documents are used to monitor the subrecipients' progress toward meeting their goals throughout the program year. The City's CDBG office provides technical assistance with regard to regulatory requirements or if subrecipients are not on track with meeting their goals. For program year 2020, desk monitoring was done of all subrecipients due to the COVID19 pandemic. The City hopes to resume some on-site monitoring visits in the upcoming year.

Going forward, all subrecipients will be receiving welcome packets clearly outlining their reporting requirements. The City also plans to hold an onboarding session with subrecipients to ensure they understand the standards and requirements and CDBG reporting requirements.

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

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

(Narrative pending based on notice placed in the Bismarck Tribune and comments 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. Program priority goals were aligned in 2021 to mirror Bismarck’s community needs. The City’s CDBG program now has a full-time employee hopes to resume some on-site monitoring visits, while also streamlining reporting process of its subrecipients. The City’s CDBG website portal will be updated to provide the community and local agencies with more information on available resources and progress of on-going CDBG funded projects.

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

No

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