



# **CITY OF KENT**

## **COMMUNITY DEVELOPMENT BLOCK GRANT CONSOLIDATED ANNUAL PERFORMANCE AND EVALUATION REPORT**

**2021**

Second Year CAPER  
ASSOCIATED WITH THE  
2020 – 2024

Consolidated Plan for Housing and Community Development

## **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 purpose of this report, which is called the Consolidated Annual Performance and Evaluation Report (CAPER), is to inform the U.S. Department of Housing and Urban Development (HUD) and the community, of the activities and accomplishments derived from the investment of Community Development Block Grant (CDBG) and other resources for the 2019 program year, which covers the period January 1, 2021 to December 31, 2021.

In 2021, HUD allocated \$1,159,798 in CDBG funds to the City. The City and its sub-recipients--organizations providing activities on behalf of the City--successfully executed the activities that were supported by CDBG funds.

### **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
Affordable Housing to homeless and those at risk	Affordable Housing Homeless	CDBG: \$693,868	Homeowner Housing Rehabilitated	Household Housing Unit	425	192	45.176%	100	97	97%
Affordable Housing to homeless and those at risk	Affordable Housing Homeless	CDBG: \$49,000	Homeless Person Overnight Shelter	Persons Assisted	200	296	148%	40	172	430%
Basic Needs	Homeless Non-Housing Community Development	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	375 <sup>1</sup>	860	229.33%	75	684	912%
Basic Needs	Homeless Non-Housing Community Development	CDBG: \$290,990.93 <sup>2</sup>	Tenant-based rental assistance / Rapid Rehousing	Households Assisted	185 <sup>3</sup>	265	143.24%	60	197	328.33%

<sup>1</sup> Update with CV units expected to serve in 2021.

<sup>2</sup> Amount of CDBG-CV expended for rental assistance in 2021; no CDBG entitlement funds were expended for rental assistance in 2021. Because the City provided rental assistance through its CDBG-CV funds, strategic plan goals were amended and increased for the Five-Year Strategic Plan.

<sup>3</sup> Update with CV units expected to serve in 2021.

Increase Self Sufficiency	Non-Housing Community Development	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	250	68	27.2%	79 <sup>4</sup>	120	158.00%
Increase Self Sufficiency	Non-Housing Community Development	CDBG: \$	Other	Other	25	129	516%	79	120	151.89%
Planning and Administration	Planning and Administration	CDBG: \$	Other	Other	N/A	N/A	N/A	N/A	N/A	N/A

**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.**

As explained in the preceding tables, the City successfully addressed the goals and objectives of meeting basic needs, affordable housing to

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<sup>4</sup> Includes Highline CV supported project.

homeless and at-risk persons, increasing self-sufficiency, and planning and administration by providing the following services<sup>5</sup>:

- Case management services to youth with intellectual disabilities and their families
- Rent and utility assistance
- Home repair assistance
- Shelter
- Transitional housing
- Employment and training
- Rental Assistance
- Food Assistance
- Community garden to increase food security
- Micro-enterprise assistance
- Legal Services to under-served populations
- Healthcare resources and testing for individuals in the sex industry
- Education services for youth
- Planning and administration activities

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<sup>5</sup> Services include coronavirus support with CDBG-CV funds.

## 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	334	
Black or African American	439	
Asian	266	
American Indian or American Native	26	
Native Hawaiian or Other Pacific Islander	35	
<b>Total</b>	<b>1100*</b>	
Hispanic	92	
<b>Not Hispanic</b>	<b>1008</b>	

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

Demographic breakdown is listed below:

- **30%** of the population served was White
- **40%** of the population served was Black or African American
- **24%** of the population served was Asian
- **2%** of the population served was American Indian or American Native
- **3%** of the population served was Native Hawaiian or Other Pacific Islander
- **8%** of the population served was ethnic Hispanic

**\*Note:** The racial categories listed above do not include all the racial categories that are tracked by sub-recipients in compliance with the racial categories that HUD requires programs to track. For example, programs track Other/Multi-racial, Black/African American AND White, etc. If all the racial categories are added, the total is 1314. Total number of Hispanics reported as ethnically Hispanic within all racial categories is 208.

## 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	\$1,159,798 <sup>6</sup>	1,573,469.48
General Fund	public - federal	0	
Other	public - federal	0	

**Table 3 - Resources Made Available**

### Narrative

The City invested the full allotment of its CDBG budget into public services, capital projects, and planning and administration in accordance with the strategies outlined in the Consolidated Plan for Housing and Community Development. The City also primarily used its CDBG-CV funds for public services.

### Identify the geographic distribution and location of investments

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description
City of Kent	100%	100%	Public service & capital projects

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

### Narrative

The City distributed 100% CDBG funds to programs serving Kent residents throughout all geographic regions of the City. Funds were primarily invested in programs serving low/moderate-income individuals and families.

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<sup>6</sup> This amount only includes the CDBG-EN (entitlement) funds available for the PY; however, the amount expended during the PY includes CDBG-CV funds.

## Leveraging

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

In addition to allocating \$1,159,798 in CDBG funds, the City leveraged \$1,069,920 in resources from General Funds to fund additional human services programs (includes funds to organizations and administrative costs).

Additional leveraging opportunities included the following:

The City allocated \$200,000 in General Funds for a Request for Proposals (RFP) to promote youth mental and emotional well-being. The goal of funded projects is to prevent mental health challenges from becoming chronic or disabling. These one-time grants will range from \$25,000 - \$75,000.

The City allocated \$22,000 in General Funds to support a youth internship pilot with three BIPOC led organizations. The Pilot funded 12 paid internships for youth to gain skills in facilitating community meetings, co-designing youth activities, and creating community services projects.

The City allocated \$25,000 in criminal justice funds, aligned with the youth mental health project, to a BIPOC led organization to implement a youth violence prevention program that includes utilizing a HOPE scale to guide positive outlook for future. Youth also co-designed youth support groups and workshops to gain skills in positive peer and family relationships.

Discussion and planning in 2020 initiated a RFP in 2021 that allocated \$200,000 received from House Bill (HB) 1590 for programs that promote youth mental and emotional well-being. The one-time grants were allocated to six programs and ranged from \$25,000 - \$75,000. The goal of funded projects is to prevent mental health challenges from becoming chronic or disabling.

The City of Kent received a grant from the Washington State Department of Commerce through House Bill (HB) 1923 to develop the Kent Housing Options Plan (KHOP) to increase residential building capacity. Goals for KHOP include building more housing, diversifying housing options, increasing overall affordability, and reducing displacement. The focus on “options” reflects the community’s need for a variety of housing types to meet the diverse needs of residents. The project started with Kent leading the way to form a collaborative with other South King County cities for a housing needs assessment that cut across jurisdictional boundaries. This approach ensured consistency and a shared understanding of housing needs for the subregion, as well as providing a framework for developing strategies appropriate for the South King County submarket. Kent City Council adopted the plan in June 2021.

The City does not allocate HOME funds; however, Kent staff participates on the Joint Recommendations Committee (JRC) on a rotating basis. The JRC is an inter-jurisdictional body that provides funding recommendations on a variety of capital funding sources for affordable housing, including HOME funds.



JRC also provides advice on guidelines and procedures for King County, and its consortia city partners on a wide range of housing and community development issues.

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## 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	40	172
Number of Non-Homeless households to be provided affordable housing units	100	97
Number of Special-Needs households to be provided affordable housing units	0	0
<b>Total</b>	<b>140</b>	<b>269</b>

Table 5 – Number of Households

	One-Year Goal	Actual
Number of households supported through Rental Assistance	256	197
Number of households supported through The Production of New Units	0	0
Number of households supported through Rehab of Existing Units	100	97
Number of households supported through Acquisition of Existing Units	0	0
<b>Total</b>	<b>356</b>	<b>294</b>

Table 6 – Number of Households Supported

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

Outcomes were less than one-year goals for two reasons:

- CDBG-CV contracts were from 2021-2022; therefore, goals were split between those PYs
- Increased home repair material costs, along with large rent arrearages per family, meant that the City and sub-recipients did not always meet one-year goals and were compelled to serve fewer residents

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

Although the City is projecting that it will receive level funding in 2022; future funding predictions are extremely speculative given the strain on the federal budget associated with the pandemic. The pandemic has also led to under-employment, unemployment, and income reduction. This will continue to impact the ability of Kent residents to pay rent and remain housed, which will increase the number of individuals and families experiencing homelessness. The City allocated a large percentage of its CDBG-CV funds to rental assistance.

**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.**

<b>Number of Households Served</b>	<b>CDBG Actual</b>	<b>HOME Actual</b>
Extremely Low-income	202	0
Low-income	38	0
Moderate-income	29	0
<b>Total</b>	<b>269</b>	<b>0</b>

**Table 7 – Number of Households Served**

**Narrative Information**

The City met the national objective of activities benefitting low/moderate-income persons; these totals are only for Affordable Housing projects pursuant to CR-20. The projects are: City of Kent-Home Repair Program, Catholic Community Services-Katherine’s House, St. Stephen Housing Association, and the YWCA-Anita Vista Transitional 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 invested in outreach to the homeless through General Fund-supported projects, including street outreach by mental health professionals and a community engagement day center. In addition, the City's police officers' bike unit outreaches to unsheltered street homeless individuals by connecting them to Housing and Human Services staff and providing information on organizations that provide homeless assistance. The City provides information on its cold weather shelter through organizations that work with the homeless and in locations where homeless individuals assemble; e.g, the library, hot meal programs, etc.

Residents who telephone the Human Services Division receive referrals to rental assistance, shelter, and other requests. The City also works with providers to coordinate basic service needs such as food, transportation, and healthcare.

Finally, the City set up cooling shelters and provided support to residents and organizations during the extremely hot weather experienced during the summer.

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

Three programs funded by the City addressed emergency shelter and transitional housing needs of homeless persons: YWCA: Anita Vista Transitional Housing Program (housing for domestic violence survivors and their families); St. Stephen Housing Association Transitional Housing Program (housing for families); and Catholic Community Services-Katherine's House (shelter and case management services to single women in recovery).

### **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 YWCA (CDBG-funded) provided case management services and helped homeless individuals find permanent housing.

Through its homeless continuum; which was funded by General Funds and CDBG, Multi-service Center

(MSC) provided responsive services to target the needs of homeless individuals. Services provided along the continuum consisted of shelter with supportive services, hotel vouchers, rental assistance, case management, and referrals to permanent housing.

**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**

Rental assistance to prevent homelessness was provided by MSC, YWCA, World Relief-Seattle, Neighborhood House, East African Community Services, Open Doors for Multi-cultural Families.

Most of the women that received shelter through CCS were women who were released from the King County Regional Justice Center.

General Fund dollars support the Watson Manor Transitional Living Program, which provides up to 18 months of transitional housing and support services to single, homeless, and extremely low-income teenage and young adult mothers and their children. Each young mother is parenting one to two children or at least six months pregnant. Program participants receive a furnished apartment in Watson Manor, a small apartment complex. Services include case management, parent education, life skills training, counseling, substance abuse services, and referral to childcare and educational/vocational programs. The overall program goal is to increase self-sufficiency among homeless young mothers and equip them with the skills necessary to obtain and retain permanent housing.

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

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

The City worked collaboratively to address the needs of public housing by advocating for and investing in affordable housing stock, providing supportive services to prevent homelessness (keeping additional people off the King County Housing Authority waitlist), and staffing a number of committees and application review teams that directed funds to organizations managing affordable housing stock.

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

The King County Housing Authority (KCHA) increased resident involvement through several mechanisms; e.g., the Resident Advisory Council was created as a forum for residents to provide feedback to assist KCHA with the development of policies and procedures that impact Housing Authority residents, etc. The City was rarely able to have direct impact on resident involvement.

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

The KCHA is not considered 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)**

Several years ago , the City capped school impact fees--these fees left unchecked deleteriously impact housing development.

The City will introduce a new targeted housing growth tax incentive program, which included an affordable housing requirement in the Midway area.

Finally, the City's Rental Housing Inspection Program has been instrumental in finding and addressing hundreds of health/safety code violations. This preserves affordable housing and impacts the return on residential investment.

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

- The City staffs and facilitates the Kent Cultural Diversity Initiative Group (KC-DIG). KC-DIG consists of provider agencies, public sector organizations, businesses, and community members that specialize in providing services and resources to refugee communities residing in Kent. It is an opportunity for continuing education, networking, collaboration, and understanding and sharing across cultures.
- Staff worked with the King County Department of Natural Resources to provide free training opportunities to Kent residents, KC-DIG participants, and Kent Cultural Communities Board members on climate change and how it impacts the community
- Staff participated on the King County Refugee Housing Task Force (<http://www.kingcounty.gov/council/issues/archive/immigrantrefugee.asp>)
- Staff participated on the King County Climate Equity Community Task Force, which drafted the Sustainable and Resilient Frontline Communities section of the King County Strategic Climate Action Plan and won the 2021 King County Department of Natural Resources and Parks Green Globe Environmental Catalyst Award
- Staff participated on the Magic Cabinet Advisory Committee, which helped select three Kent-based organizations to serve on a five-year cohort to share a \$2.5 million capacity building grant; staff will also serve as a cohort advisor for these organizations
- Staff participated on the Governing for Racial Equity and Inclusion (GREI), a regional coalition to improve the lives of residents and combat disproportional outcomes for populations that have been historically marginalized

Staff served on the Seattle site core team of the 3C Initiative, a three-year national initiative of the Center for Community Investment(CCI) that targets racial inequities at the core of the housing ecosystem-Civic Commons, an initiative of Seattle Foundation, is the convening organization for the 3C's

Seattle site, which will focus on increasing homeownership in the Black community where the highest wealth gap exists

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

None.

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

CDBG funds for the Home Repair Program enabled homeowners to maintain their homes and preserve housing stock by assisting with critical repairs that they otherwise could not afford.

The City also:

- Allocated CDBG funds to Puget Sound Training Center to provide job training and employment assistance to under-served populations
- Allocated CDBG funds to Partner in Employment to provide culturally responsive case management & job readiness skills to prepare under-served/new Americans for employment
- Allocated CDBG funds to Highline College to provide technical assistance to micro-enterprise businesses impacted by the pandemic
- Allocated funds to South Sound Outreach Services to provide financial counseling and emergency assistance grants to prevent COVID-related financial crises and help individuals and families create financial sustainability; services for this project will be provided in 2022

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

- City staff chaired a regional committee (included the City of Federal Way) that continued a two-year process for the 2019-2020 funding cycle process; the City awarded small General Fund grants to four ECBOs totaling \$30,000 (grants were between \$2,500 to \$9,000).
- The City hired a contractor to help guide its 2021-2022 human services funding process and increase racial equity and justice in its funding decisions
- In previous years, the City hired contractors to evaluate its Parallel Human Services application and 2021-2022 human services funding processes to determine what barriers community-based organizations face in seeking funding from Kent and how to eliminate or minimize those barriers; the City is implementing recommendations from these evaluations

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

The City funds or funded several organizations providing housing and rental assistance: MSC, CCS, Neighborhood House, East African Community Services, Open Doors for Multi-cultural Families, St.



Stephen Housing Association, World Relief-Seattle, YWCA, Solid Ground, and DAWN (General Fund budget). The City coordinates housing services through its investment, communication, and networking with these organizations. Additionally, the City sits on several committees that coordinate services to homeless individuals. Homeless coordination is led by All Home, formerly known as the King County Committee to End Homelessness.

### **South King Housing and Homelessness Partnership**

SKHHP is a joint board formed by an interlocal agreement between the jurisdictions of Auburn, Burien, Covington, Des Moines, Federal Way, Kent, Normandy Park, Renton, Tukwila, and King County. SKHHP's mission is to work together and share resources to increase available options for South King County residents to access affordable housing and preserve existing affordable housing stock. An Executive Manager and Program Coordinator were hired in 2020. Kent has contributed funds to SKHHP from the Human Services General Fund budget since 2016 and plans to continue into the future. Kent's Mayor served as the Vice-Chair in 2021, and Kent's Human Services Manager served as an alternate on the Executive Board.

Objectives include:

- Sharing technical information and resources to promote sound housing policy
- Coordinating public resources to attract greater private and public investment
- Providing unified voice for South King County

### **SKHHP Advisory Board**

As part of SKHHP's commitment to amplifying and ensuring community voices lead the work, an Advisory Board was created in 2021 which will inform and influence SKHHP Executive Board decisions by providing recommendations that advance the broader interests of the communities they represent. All Advisory Board members live or work in South King County and possess a personal and/or professional commitment to understanding and working to undo the impacts of institutionalized racism and disparities experienced by Black, Indigenous, and people of color (BIPOC) communities.

### **SKHHP Staff Work Group**

The SKHHP staff work group represents SKHHP partner jurisdictions in the areas of economic development, housing programs, human services, and land use planning. The SKHHP staff work group informs SKHHP staff and the SKHHP Executive Board on work plan and program priorities, and provides technical expertise and guidance to implement annual work plans and achieve SKHHP's goals and priorities. Kent staff participates in the SKHHP staff work group, which meets monthly and forms sub-work groups as necessary to advance SKHHP priorities. Additionally, Kent staff and other South King County stakeholders continue to meet to deepen cross-jurisdictional coordination, create a common understanding for housing and homelessness needs and strategies for South King County, and move forward strategies in the South King County Response to Homelessness. Two separate groups currently meet – the South King County Homeless Action Committee and the South King County Joint Planners.

### **South King County Joint Planners Convening**

Human services, land use, and other staff members met every other month (now led by staff from SKHHP) to promote regional dialogue and collaboration and provide support and technical assistance on comprehensive plan policies and assessments. This group, the SKC Joint Planners, continued to meet bimonthly to address regional needs related to housing and the suburbanization of poverty in general. Planners also discussed Regional Affordable Housing Task Force Recommendations and served as a starting part for a joint effort in South King County to apply for Housing Action Plan funds from the State and the work continued into 2021. Cities seeking to develop a housing action plan were made eligible to apply for planning grants through the Department of Commerce, for up to \$100,000. Ultimately the Kent Housing Options Plan (KHOP) was adopted by City Council in June 2021, and serves as the housing action plan for the City of Kent in accordance with HB 1923.

The four strategic policy objectives identified in KHOP are: 1. Preserve the affordable housing options in Kent while minimizing and mitigating displacement. 2. Make it easier to grow Kent's housing stock while increasing housing variety and choice. 3. Leverage and expand partnerships to further housing-related goals. 4. Share Kent's housing story, in close collaboration with the South King County subregion.

### **South King County Homeless Action Committee**

The Homeless Action Committee met monthly, with an emphasis on keeping stakeholders updated on regional work, such as the All Home Strategic Plan update, One Night Count facilitation, the regional impact of the pandemic, and the transition to regional governance discussion. Staffing shifted in 2021 to a co-lead model led by the King County Regional Homelessness Authority subregional staff member assigned to South King County and staff from a local nonprofit (Multi Service Center) and the primary focus over the year was providing a venue for homeless and housing providers and City staff to be kept apprised and provide feedback on the transition of work to the Regional Homelessness Authority. Also, in 2019, a subcommittee formed to work towards developing a 24-hour enhanced shelter plan in South King County. The group worked on developing service principles and general shelter design (capacity, target population, service package, etc.) to begin with a unified vision. Work continued in 2020 and with funding provided largely through King County, a 24/7 subregional shelter will be opening in Federal Way in 2022.

### **Other Countywide Meetings**

Staff has attended additional meetings established over the course of the pandemic to further partnerships between public and private housing and social service agencies including the Countywide Subregional Human Services Collaboration meeting facilitated by King County. A large focus of the meetings in 2021 focused on the County's Eviction Prevention and Rental Assistance Program. EPRAP helped residents behind in rent and utility payments due to COVID-19 hardships during 2021 and will continue into early 2022. Eligible households throughout King County who had past due rent due to unemployment, lost wages, or health crises as a result of the COVID-19 pandemic were able to apply for assistance.

Staff also attends meetings focused on Health Through Housing (also facilitated by King County). By the end of 2022, King County will have partnered with local jurisdictions to create up to 1,600 emergency

housing and permanent supportive housing units for people experiencing chronic homelessness. Onsite 24/7 staffing will include:

- Case management
- Employment counseling
- Access to health and behavioral health services

By acquiring existing facilities, such as former hotels, nursing homes, and other similar properties, HTH immediately creates housing units that are dignified, protective, and service-enriched. King County is committed to working with local cities and communities to identify suitable properties, and then participate in planning and community engagement together.

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

Recommendations from the City's Analysis of Impediments to Fair Housing Choice included:

Recommendation I: Expand current education and outreach efforts

The City continued to work on this recommendation by: (1) Posting fair housing materials on its website; (2) Providing fair housing articles/information/notices in electronic communications to the Kent Cultural Diversity Initiative Group; and (3) Providing fair housing materials to apartment complexes through its police department.

Recommendation II: Continue ongoing enforcement activities

In January 2017, the Kent City Council unanimously passed a Source of Income Discrimination Ordinance. This tenant protection ensures that people already facing high barriers to housing are not discriminated against solely based on use of a Section 8 voucher or other form of public assistance. This can have a significant impact on communities like Kent whose low-income residents disproportionately need to rely on housing subsidies to make ends meet, including households of color, seniors, veterans, people with disabilities, and single parent households with young children.

Since 2017, Kent has allocated funds in its budget for a Rental Inspection program. This program has benefitted residents in many ways, including helping protect tenants who fear speaking up about substandard housing conditions and ensuring that rental properties are adequately maintained.

The City does not have enforcement authority; the Washington State Human Rights Commission and the King County Office of Civil Rights investigates complaints.

Recommendation III: Target home ownership and lending marketing to African Americans and Hispanics households

When the City received stimulus funds through the Neighborhood Stabilization Program (NSP), the funds

were used to purchase and rehabilitate three foreclosed homes, which were then sold to income-eligible homebuyers. The homebuyers were families of African descent that had been on the Habitat for Humanity waitlist for an extended period; the families received zero-interest loans. A fifteen-year covenant of affordability was signed by each homebuyer. Mortgage payments received from the homebuyers were entered a fund that will allow Habitat for Humanity to purchase, rehabilitate, and sell additional houses. (Habitat for Humanity provides an annual accounting to the City on the amount of these funds.) The mortgage payments will allow the City and Habitat for Humanity to target additional home ownership to African American and Hispanic households that are on the waitlist. The City provides an annual report to the State on its NSP project.

In 2021, one of the homeowners who purchased a home from Habitat moved to another property and re-sold the home to Habitat, which will in turn resell it to a low/moderate-income buyer.

The City will update its Analysis of Impediments to Fair Housing Choice in 2022 or 2023.

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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 monitored its CDBG projects throughout the year and provided a significant amount of technical assistance to ensure compliance. Because the City used a portion of its funds to respond to COVID-19, two (2) new projects were funded in 2021: World Relief-Seattle (community garden to increase food security) and Utopia (healthcare resources and testing for individuals in the sex industry). The City provided a technical assistance workshop to World Relief in 2020 (this workshop also covered general CDBG compliance issue), and closely worked with Utopia on this grant and a CDBG-CV grant partnership between Utopia and Multi-service Center in 2021. The City also met with several entitlement and CDBG-CV supported organizations to review scopes of work, provide TA on reporting, and review compliance. The City also connected organizations that had not collaborated previously. For example, St. Stephen Housing Association (SSHA) was connected with South Sound Outreach Services so that SSHA clients could receive financial counseling, and Multi-Service Center and Utopia were connected to collaborate on a rental assistance project.

The City completes a Sub-recipient Risk Analysis to prioritize project reviews. Due to the pandemic, the City decided not to conduct on-site reviews in 2021, but plans monitoring reviews in 2022. The City met

The following standards and procedures were used to monitor CDBG-funded agencies:

- Programs funded by the City must maintain high standards. Organizations are informed via the CDBG Agreement that the failure to comply with contractual requirements and regulations could result in remedial actions and/or the termination of funding
- Backup reports to support costs are required; and if adequate documentation is not submitted, payment is reduced or denied
- Projects received quarterly monitoring. Programs that needed guidance in achieving performance measures or adhering to contractual requirements received technical assistance, were required to attend a meeting with City staff, and/or received an on-site monitoring visit; Quarterly performance reports were reviewed by the Human Services Commission
- Monitoring concerns/finding were reviewed with agency staff and documented in writing. When applicable, timely corrective action was required
- Agencies were required to provide supporting documentation or written communication verifying that deficiencies were corrected.

## **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 Public Notice was posted on two City website locations on Wednesday, February 9, 2022: City of Kent website and Housing & Human Services Division website.
- A link to the website was provided to non-profits, South King County Planners, and stakeholders in the Kent area. In addition, a link to the electronic notice was provided to participants of the Kent Cultural Diversity Initiative Group and other organizations that have contacts with ethnic/racial minorities, non-English speaking persons, and people with disabilities.
- The Kent community and stakeholders were also invited to provide comments at a public hearing on February 17, 2022.

**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. The City does not anticipate major changes in programs; however, we may slightly diversify how capital funds are invested and consider investing in more public service prevention and integration projects for new Americans.

**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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