

City of Rapid City

2019 CDBG CAPER

PREPARED BY:

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CR-05 - Goals and Outcomes

Progress the jurisdiction has made in carrying out its strategic plan and its action plan. 91.520(a)

As an entitlement jurisdiction, Rapid City receives an annual allocation of Community Development Block Grant (CDBG) funds to address the community's housing, public facility and improvements, economic development, and public service needs. The City continues making progress in addressing high-priority needs as outlined in the 2018-2022 Consolidated Plan and FY19 Annual Action Plan. The FY19 CAPER reporting period covers April 1, 2019, to March 31, 2020. All data sets are from FY19 unless otherwise noted.

Programmatic highlights include:

Affordable Housing

Black Hills Area Habitat for Humanity transformed an underutilized city block featuring bare land and a vacant elementary school into affordable housing. A local builder renovated the school into market-rate apartments while Black Hills Area Habitat for Humanity added eight new owner-occupied single-family homes to the open space, one of which was completed in FY17, three in FY18, and the final four in FY19.

JB Holdings' development which includes 14 new HUD-certified mobile homes along with the rehabilitation of a tri-plex is underway. Several of the mobile homes are on-site with the remaining scheduled to arrive in FY20. The development improves an entire city block in a low-income census tract.

The City's Neighborhood Restoration Loan Program provides low- and no-interest loans to qualified low- and moderate-income households. The program is exclusive to owner-occupied homes in need of critical repairs or accessibility improvements in efforts to maintain Rapid City's current housing stock. During FY19 one household completed repairs and an additional household's repair work begun and is expected to finish in FY20. The current portfolio includes four 3% loans and fourteen 0% deferred loans.

Public Facilities and Improvements

The jurisdiction added a group home for individuals with traumatic brain injuries. Three low-income individuals with brain injuries reside in a new service-based housing facility owned and operated by Black Hills Works.

Feeding South Dakota finished security improvements to the food pantry and distribution center which included adding a maintenance room inside the building to store chemicals and equipment away from food and installing an exterior railing for improved safety among clients and staff.

Youth & Family Services replaced an aging H/VAC system. The existing unit was at the end of its life and without replacement, the building would

be unusable during most of the year.

The Environmental Review and public comment periods have been completed for Abbott House's therapeutic foster home which will provide foster care services for young adults ages 10-17. The home will contain six individual rooms for the young adults and will also feature a family suite for a foster couple to stay in. The home will include a common living area, dining area, and kitchen facilities. The home will also include two attached apartment units for individuals 16-23 who are aging out of the foster care system. The agency is currently working on a similar project with funding from sources other than CDBG. Combined, the jurisdiction will have six new units housing up to 18 youth.

Public Services

89 households at risk of homelessness and/or moving from transitional housing to permanent housing received temporary (not to exceed 3 months) security deposit and/or rental assistance through Pennington County's Economic Assistance program. In addition to immediate housing solutions, homeless prevention supportive services were provided.

\$54,955 in CDBG funding was leveraged to provide \$2,573,927 in free pharmaceutical medications for low-income people with mental health disorders through Behavior Management System's programming. Access to these medications helped individuals function in society, maintain stable living situations, and increase self-sufficiency. The program provided free medication to 223 individuals.

Direct Homeownership Assistance

Seven families applied and were qualified for Black Hills Community Loan Fund's Individual Development Account program. This newly-developed program will enable low-income families to save toward purchasing homes through matching contributions.

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)

Direct Homeownership Assistance

Progress has been made in recruiting and qualifying families for the Individual Development Account program. Over the next several months, participants will be saving up for the purchase of their homes with home purchase accomplishments likely to be recorded throughout FY20 and FY21.

Housing - Increase Affordable Housing Stock, Rental Units Rehabilitated

The rehabilitation of three rental units is currently underway and accomplishments will be reported in FY20.

Public Facilities & Improvements, Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit

35,490 persons have been assisted through public facility or infrastructure activities other than low moderate-income housing in FY18 and FY19

compared to the estimated number of 5,000.

Public Facilities & Improvements, Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit

Three households compared to the anticipated zero were assisted through Black Hills Works’ group home for individuals with traumatic brain injuries. See asterisk in Table 1.

Public Services

Pennington County’s Economic Assistance program assisted 89 households in FY19, reported in tenant-based rental assistance rapid re-housing rather than the public service activities for low moderate-income housing benefit where it was originally indicated as expected to serve 40 households.

Goal	Category	Source / Amount	Indicator	Unit of Measure	Expected – Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected – Program Year	Actual – Program Year	Percent Complete
Economic Development	Non-Housing Community Development	CDBG: \$48,600	Other	Other	30	0	0.00%	0	0	0.00%
Housing - Direct Homeownership Assistance	Affordable Housing	CDBG: \$25,000	Direct Financial Assistance to Homebuyers	Households Assisted	5	0	0.00%	0	0	0.00%
Housing - Increase Affordable Housing Stock	Affordable Housing	CDBG: \$966,288	Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit	Households Assisted	5	0	0.00%	0	0	0.00%
Housing - Increase Affordable Housing Stock	Affordable Housing		Rental units constructed	Household Housing Unit	20	0	0.00%	0	0	0.00%
Housing - Increase Affordable Housing Stock	Affordable Housing		Rental units rehabilitated	Household Housing Unit	0	0		0	0	
Housing - Increase Affordable Housing Stock	Affordable Housing		Homeowner Housing Added	Household Housing Unit	10	7	70.00%	2	4	200.00%
Housing - Increase Affordable Housing Stock	Affordable Housing		Buildings Demolished	Buildings	3	2	66.67%	0	0	0.00%

Housing - Preserve Existing Housing Stock	Affordable Housing	CDBG: \$200,00	Rental units rehabilitated	Household Housing Unit	10	16	160.00%	0	0	0.00%
Housing - Preserve Existing Housing Stock	Affordable Housing		Homeowner Housing Rehabilitated	Household Housing Unit	15	1	6.67%	1	1	100.00%
Public Facilities & Improvements	Homeless Public Facility Rehabilitation	CDBG: \$300,00	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	5000	35490	709.80%	600	25465	4,244.17%
Public Facilities & Improvements	Homeless Public Facility Rehabilitation		Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit	Households Assisted	100	3	3.00%	0	0*	0.00%
Public Facilities & Improvements	Homeless Public Facility Rehabilitation		Overnight/Emergency Shelter/Transitional Housing Beds added	Beds	24	0	0.00%	0	0	0.00%
Public Facilities & Improvements	Homeless Public Facility Rehabilitation		Housing for Homeless added	Household Housing Unit	3	0	0.00%	0	0	0.00%
Public Services	Affordable Housing Homeless Non-Homeless Special Needs Non-Housing Community Development	CDBG: \$273,000	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	1500	912	60.80%	150	223	148.67%
Public Services	Affordable Housing Homeless Non-Homeless Special Needs Non-Housing Community Development		Public service activities for Low/Moderate Income Housing Benefit	Households Assisted	200	0	0.00%	40	0	0.00%
Public Services	Affordable Housing Homeless Non-Homeless Special Needs Non-Housing Community Development		Direct Financial Assistance to Homebuyers	Households Assisted	0	0		0	0	

Public Services	Affordable Housing Homeless Non-Homeless Special Needs Non-Housing Community Development		Tenant-based rental assistance / Rapid Rehousing	Households Assisted	0	89		0	89	
Public Services	Affordable Housing Homeless Non-Homeless Special Needs Non-Housing Community Development		Homeless Person Overnight Shelter	Persons Assisted	0	0		0	0	

Table 1 - Accomplishments – Program Year & Strategic Plan to Date

* 3 additional households were assisted through Black Hills Works’ activity #502 which is not reported in Table 1

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 provided over \$379,000 in general funds to homeless and domestic violence shelters, senior centers, and youth substance abuse programs throughout the calendar year 2019.

Lutheran Social Services Youth Case Management (activity 505) expended \$5,000 in CDBG funds to provide case management services for youth and their families.

BMS meds program (activities 501 and 519) expended almost \$55,000 in CDBG funds, assisting individuals with mental illnesses in accessing free pharmaceutical medications.

Pennington County Health and Human Services’ (activities 506 and 520) security deposit/rent assistance program expended just over \$49,000 in CDBG funds for efforts related to homeless and homeless prevention services.

Feeding South Dakota Building Improvements (activity 504) expended \$25,000 in CDBG funds. The agency provides food security through its food distribution center, food bank, and mobile food banks.

Black Hills Works - Bathroom Renovation (activity 522) expended just over \$122,000 in CDBG funds for facility accessibility improvements.

Community Health Center of the Black Hills Security Improvements (activity 503) expended over \$12,000 to increase security for staff and clients. The health center’s target population includes those persons whose household income is at or below 200% of the Federal Poverty Guidelines.

Black Hills Works Construction for Housing for Persons with Traumatic Brain Damage (activity 502) expended over \$44,000 and added a group home to accommodate three individuals with traumatic brain injuries.

JB Holdings Infrastructure and Triplex Renovation (activity 524) expended just over \$199,000 for public facility upgrades and improvements to a city block that will feature new HUD-certified mobile homes and renovations to a triplex.

Youth and Family Services Replace H/VAC System (activity 525) expended nearly \$67,000 for improvements to a building that serves low-income youth.

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	14,528
Black or African American	446
Asian	148
American Indian or American Native	13,917
Native Hawaiian or Other Pacific Islander	164
Total	29,203
Hispanic	1,144
Not Hispanic	28,059

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

Narrative

Each year Rapid City’s Long Range Planning Division prepares a population estimate for Rapid City using a methodology approved by the United States Census Bureau. These estimates are based on approved building permits, housing demolitions, the Census 2010 occupancy rate, and the Census 2010 persons per household rate for Rapid City and Pennington County. The 2019 year-end Rapid City population estimate is 77,185, up .85% from the 2018 population estimate of 76,532. The 2018 year-end Rapid City population estimate was up 1.38% from the 2017 population estimate of 75,488.

According to the Census population estimates, White alone makes up 79.4% of the population. American Indians are the largest minority group at 11.3% of the population. 2.5% of the population is Asian and .2% is Native Hawaiian or Other Pacific Islanders. Hispanics account for 5.3% of the population.

49.7% of families assisted was White, 1.5% was Black or African American, one half of one percent was Asian, 47.7% was American Indian or American Native, and .6% was Native Hawaiian or Other Pacific Islander. 3.9% was Hispanic.

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	533,479.25	662,635.22

Table 3 - Resources Made Available

Identify the geographic distribution and location of investments

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description
Rapid City Corporate Limits	100	100	

Table 4 – Identify the geographic distribution and location of investments

Narrative

All funded activities benefitted persons living within the corporate limits of the City of Rapid City. Projects funded and people assisted with CDBG dollars could be located anywhere throughout the corporate limits of Rapid City. Housing for low-income people throughout the City is encouraged to provide equal opportunities to all income level households.

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.

Agencies leveraged over \$1,580,660 which equated to \$2.38 for every expended CDBG dollar. Matching funds are not currently a requirement for receiving CDBG funds; however, funding decisions do take into consideration the use of leveraged funds.

Through the Neighborhood Lift program, two Subrecipients were awarded the use and ownership of two City-owned lots to develop a single-family home and a residential public facility for individuals with disabilities.

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	20	8
Number of Non-Homeless households to be provided affordable housing units	23	86
Number of Special-Needs households to be provided affordable housing units	0	3
Total	43	97

Table 5 – Number of Households

	One-Year Goal	Actual
Number of households supported through Rental Assistance	40	89
Number of households supported through The Production of New Units	2	7
Number of households supported through Rehab of Existing Units	1	1
Number of households supported through Acquisition of Existing Units	0	0
Total	43	97

Table 6 – Number of Households Supported

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

Four households were provided affordable housing units through the completion of Black Hills Area Habitat for Humanity’s Garfield Green project. Compared to the goal of 40, 89 households were provided access to or continued availability of housing through rent/security deposit

assistance. Of those households assisted, eight were previously homeless rather than 20 as expected. The expectation of one household supported through rehab of an existing unit was met through the City's Neighborhood Restoration Loan program.

Discuss how these outcomes will impact future annual action plans.

The City will continue focusing on funding affordable housing projects, especially for the lowest-income households, through a variety of approaches including rent assistance, new construction, acquisition, and rehabilitation of the current housing stock.

CommonBond Communities, a non-profit developer and manager of affordable housing with onsite services, announced it will expand services to Rapid City. CommonBond is based in the Twin Cities and currently operates more than 50 affordable housing properties in the Midwest.

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	64	0
Low-income	27	0
Moderate-income	1	0
Total	92	0

Table 7 – Number of Households Served

Narrative Information

Table 7 outlines actual achievements compared to the FY19 goal of providing affordable housing to 40 extremely low-, 3 low-, and 5 moderate-income households. Five additional non-low/moderate-income households were provided affordable housing for a total of 97 households served through affordable housing programs and projects.

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:

Funding housing-first activities and public services targeted at those experiencing homelessness or at risk of homelessness is one strategy for reducing homelessness. 89 households moved from homelessness or at risk of becoming homeless into permanent housing through temporary rent and/or security deposit assistance compared to the anticipated 40 households.

167 persons with mental illness were assisted in accessing free pharmaceutical medication. Most of the individuals who received services were living below the poverty line and some were homeless. Even those who worked and lived independently found it difficult to pay for necessities such as rent, utilities, and food. This program helped individuals stabilize and move towards self-sufficiency by reducing the length of time individuals were homeless or the likelihood of them becoming homeless.

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

Every June, the Black Hills Homeless Coalition conducts a Homeless Connect Day, providing a “one-stop” center where veterans and homeless can access information, services, medical check-ups, eye exams, haircuts, employment assistance, clothing vouchers for interview apparel, personal care items, and a meal at one convenient location. Agencies providing funding assistance for housing are also present. Mini-Connects are hosted the first Sunday of each month at a skate park as a way to connect with individuals experiencing homelessness and to address immediate needs as they arise.

In collaboration with several area non-profits, the Police Department's Quality of Life Unit has made hundreds of connections and at least 60 individuals have gone through a “transformational change.” The unit mobilizes into the community to build connections with individuals experiencing homelessness and provides resources and referrals for services. They conduct outreach in street clothes and non-marked vehicles to encourage engagement. The unit is based in the Care Campus where many vital services are housed.

The Department of Veterans Affairs (VA) conducts outreach at the Cornerstone Rescue Mission, connecting eligible veterans to needed services and VASH vouchers. The agency currently has a sufficient amount of VASH vouchers and has seen the number of veteran referrals, both internal and external, to the VA homeless programming drop significantly. There was roughly a 48% drop in veteran homelessness from 2018-2019 in Rapid City. Despite the progress, finding landlords willing to rent to the ‘hard to house’ veteran population (i.e. those with felony convictions, bad rental history, poor credit, etc.) continues to be a challenge. Many of the veterans who are still considered homeless or at risk of homelessness fall into this category. To continue working with these populations, the VA provides case management and wrap-around support services. The Supportive Services for Veteran Families Program has been integral in assisting with rent and/or security deposit assistance. The VA also utilizes local programs like the Sgt. Colton Levi Derr Foundation, Grow SD, and Western Resources for Independent Living.

Behavior Management Systems and the Community Health Center of the Black Hills utilize offices at Cornerstone Rescue Mission as an outreach method as well.

Addressing the emergency shelter and transitional housing needs of homeless persons

The HOPE Center, a homeless day drop-in center, assists both the sheltered and unsheltered by providing a safe, comfortable place during the day. The Center also provides laundry service, a phone messaging service, a mailbox, and storage for a small number of personal goods.

The Cornerstone Rescue Mission provides three meals daily, at no cost, to anyone in the community experiencing food insecurity. Cornerstone's main facility houses up to 160 individuals nightly. Throughout the calendar year 2019, 3,606 individuals were sheltered a total of 42,270 bed nights and 166,033 free meals were provided. Cornerstone's Women and Children's Home provides transitional housing to homeless women and children. It provides shelter and assistance to an average of 350-400 women and children annually. The home allows a place for stability as families work toward self-sufficiency. Cornerstone's apartments offer the next level of self-sufficiency with permanent supportive housing.

Working Against Violence, Inc. (WAVI) provides emergency shelter, counseling, and case management to homeless individuals and victims of domestic violence.

From the opening date on September 26, 2018, through September 26, 2019, the Care Campus supported 24,137 admissions, of which 64% were self-admitted. Sixteen percent of law enforcement referrals resulted in alternatives to incarceration. The campus is now a model for combating addiction and reducing the number of homeless individuals jailed statewide.

Owens Apartments provides housing for individuals receiving services from Behavior Management Systems or Pennington County Health and Human Services. The apartments are part of a continuum of care and are available to anyone seeking the services. The application process often begins in the Pennington County jail from kiosks in cell blocks.

The McKinney-Vento Act ensures homeless youth have access to free public education and the McKinney-Vento Coordinator connects families experiencing homelessness to vital housing and supportive services.

Recipients of state Continuum of Care funds follow a coordinated entry plan and participate in regular case conferencing meetings across the state that are managed regionally and implemented locally.

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

Lutheran Social Services' New Alternatives' transitional housing program provides a safe housing experience for homeless youth, youth living with severe mental illness, or those who have resided in out-of-home placements through hospitalization, foster care, psychiatric residential treatment, chemical dependency treatment facilities, or who are transitioning into adulthood with limited support systems. The supportive housing program teaches the life skills necessary for living independently. 37 individuals received transitional housing with an average length of stay of 108.38 days.

Lutheran Social Services' Arise Youth Center Evening Reporting Center served 67 individuals a total of 74 times. Of those clients, 31% were unsuccessful, 50% were successful, 9.5% were still enrolled at the time of this report, and 9.5% never began programming. The Arise Youth Center Shelter Care served 229 individuals a total of 346 times in the Shelter Care program. Of those clients, 74% were successful, 23.7% were unsuccessful, and 2.3% were still enrolled. The Arise Youth Center Reception Center served 453 individuals a total of 848 times; 87.5% were successfully discharged.

Behavior Management Systems assists people with persistent mental illness to complete applications for free medications from pharmaceutical companies. Clients are often discharged from institutions with a limited supply of medications needed to maintain stability. Most clients can't afford the necessary medications and end up homeless, incarcerated, or admitted to the hospital or mental health facility again. The assistance allows clients to access free medication that makes it possible for them to be productive members of the community.

Passages provides a faith-based residential re-entry program for women transitioning from incarceration or homelessness into positive sustainable life patterns.

Pennington County Health and Human Services (PCHHS) provides temporary rent, security deposits, and utility assistance to the homeless to access housing or persons in danger of eviction to prevent homelessness. PCHHS works with many people exiting correctional facilities, mental health facilities, and other institutional care.

The Department of Social Services Economic Assistance office also provides numerous programs with assistance for acquiring housing, food, transportation, and other needed services.

The City works closely with county and state agencies, as well as private agencies and funders, such as United Way of the Black Hills, Black Hills Area Community Foundation, and the John T. Vucurevich Foundation, to ensure a unified approach is implemented in addressing community 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

Cornerstone Rescue Mission works with individuals and families staying at its facility to transition to permanent housing. Nightly fees paid by residents are used to help provide rent deposits when residents move out of the Mission.

Pennington County Health and Human Services received CDBG funds from the City, and New Start funds from the John T. Vucurevich Foundation to provide temporary rent and deposit assistance to people experiencing homelessness. The program prevents homelessness, reduces the amount of time individuals experience homelessness, and reduces the number of times individuals experience homelessness.

Volunteers of America Northern Rockies provides a variety of homeless services and referrals to services outside of the organization, including

health, critical supplies, and veteran services.

Youth & Family Services, Community Health Center of the Black Hills, Behavior Management Systems, Black Hills Special Services Cooperative/Career Learning Center of the Black Hills, Catholic Social Services, Dress for Success Black Hills, National Alliance on Mental Illness South Dakota, Rapid City Area School’s McKinney-Vento Program, Western Dakota Tech, Working Against Violence, Inc., the Rapid City YMCA, and others have committed to residing inside the OneHeart campus. OneHeart will provide transitional housing and is natural next step after individuals receive Care Campus services. OneHeart will provide a variety of services and housing in the same location. Residents are required to have a plan in which to move from OneHeart into independence.

While Rapid City’s population continues to grow, child homelessness continues to decline. Rapid City’s population increased by 2.20% from 2017 to 2019 while the number of households with at least one adult and one child decreased by 38.71%.

	2017	2018	2019
Households with at least one adult and one child	124	105	76
Households with only children	16	3	2
Persons in households with at least one adult and one child	332	323	270
Persons in households with only children	26	8	2

Source: HUD Point in Time Homeless Count

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

Actions taken to address the needs of public housing

Pennington County Housing and Redevelopment Commission approved a Memorandum of Understanding to apply for and administer vouchers under HUD's new Foster Youth to Independence Program. The initiative will offer housing vouchers to local public housing authorities to prevent or end homelessness among young adults under the age of 25 who are, or have recently left, the foster care system. HUD further describes the challenges and needs as, "The U.S. Department of Health and Human Services (HHS) estimates that more than 20,000 young people age out of foster care each year. The National Center for Housing and Child Welfare (NCHCW) estimates that approximately 25 percent of these young people experience homelessness within four years of leaving foster care and an even higher share are precariously housed."

The PHA's staff participated in Fair Housing training throughout the year as ongoing professional development.

Upgrades to the PHA's structures included converting fluorescent lighting to LED, replacing boilers with high-efficiency units at River Ridge high-rise, and window replacement on single-family units.

The PHA has received resident support for the increased police patrols and it will continue these going forward. No additional land or rental units were acquired, constructed, or rehabilitated. There has not been a significant change in the number of Section 8 landlords despite outreach efforts.

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

Pennington County Housing and Redevelopment Commission's Resident Advisory Board (RAB) provided comments that will be submitted by the PHA as an attachment to the PHA Plan along with a narrative describing their analysis of the RAB recommendations and decisions made on those recommendations.

For example, residents voiced the desire for security cameras which resulted in cameras scheduled to be installed in elevators. Based on resident comments and support, the feasibility of providing Wi-Fi at properties will be evaluated.

Actions taken to provide assistance to troubled PHAs

The jurisdiction does not have 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)

Rapid City recently adopted an affordable housing policy that aims to expand housing varieties to meet the community's changing needs and establishes a comprehensive housing strategy. It establishes a local definition of 'affordable housing' while allowing flexibility in ways specific projects can qualify. As part of the Rapid City Affordable Housing Policy, the City will prepare and follow a comprehensive Affordable Housing Strategic Plan which will set forth several objectives including targeted strategies for a variety of household types, planning opportunities for the development of housing that aligns with needs of target groups, expanding the City's purview and approach to housing beyond programs currently in place, supporting collaboration, and promoting the development of affordable housing close to public transit and other essential services.

Through an ordinance amendment and by recommendation of Rapid City's Comprehensive Plan, the City now allows legal, permitted, accessory dwelling units in residential neighborhoods to provide supplementary living accommodations in the community and encourage unique affordable and workforce housing options. A review of zoning ordinances will continue into FY20 and will assess the effects of regulatory barriers, both intended and unintended, especially on protected classes to further Fair Housing choice for all.

Pennington County recently passed a tax break over five years for housing projects with four or more units that have rental rates set for households under 60% AMI for 10 years. Rapid City is also exploring the possibility of providing incentives and cost reductions for qualified affordable housing projects. The culmination of these incremental tools will reduce costs for developers and incentivize affordable housing projects.

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

The CDBG Program is administered in compliance with the Fair Housing Act (42 USC 3601) and compliance is required among Subrecipients.

South Dakota's Governor, in partnership with the State Legislature, launched a broadband development program, Connect South Dakota, which includes \$5 million in grant money. Program goals include increasing the availability of high-speed broadband to every South Dakota citizen, business, and community institution, and to do so with the standards set by the FCC at download speeds of 25 Megabits per second and upload speeds at 3 Megabits per second. The most pressing broadband need is in rural areas. In Pennington County, 9.4% of the population lacks access.

Neighboring rural counties such as Custer (84.4% no access rate), Meade (18.6% no access rate), Oglala Lakota (77.6% no access rate), Jackson (85.9% no access rate), and Haakon (60.4% no access rate) have a disproportionately greater need. Rapid City is served by at least 2 large providers, Midco and Vast Broadband. According to census.gov, 80.5% of Rapid City households had a broadband internet subscription from 2014-2018. The goal of the program is to ensure all residents have access to broadband services.

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

Exposure to lead-based paint can cause a range of health problems including damage to the brain and vital organs. Lead-based testing and safe lead practices in required of all CDBG-funded projects.

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

Elevate Rapid City is a joint venture of the Rapid City Chamber of Commerce, Ellsworth Development Authority, Rapid City Economic Development Partnership, and the Economic Development Foundation to elevate the quality of life and employment opportunities for Rapid City residents. It has been working toward strategies including increasing per capita income by 15%. Work is also focused on mitigating barriers for low-income households such as childcare and transportation and working toward a scaled reduction of benefits approach to reduce the cliff effect for subsidies.

One objective is to provide unemployed and under-employed individuals the basic workforce skills and soft skills necessary to become gainfully employed and increase the number of employers accepting National Career Readiness Certificates. Over 36,000 certificates were earned over three years and over 1,200 additional businesses joined in recognizing the certificate in the same period.

	2017	2018	2019	Total
Certificates Earned	4519	5000	7643	36,131
Additional Businesses Recognizing the Certificate	306	520	292	1,237

Source: South Dakota Department of Labor and Regulation

The grade-level reading initiative reported in the calendar year 2018, 48.8% of Black Hills 3rd graders were able to read at grade level, compared

to 46.1% in 2017. Work continues to ensure children are ready for school, less likely to drop out, and have better chances of earning livable wages.

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

Rapid City Collective Impact's Food Security Oversight Committee (FSOC) members collaboratively developed innovative ideas to address food insecurity gaps. Black Hills Area Community Foundation awarded more than \$81K in grants to partnering organizations to address these gaps. The FSOC partnered with Fork Real Community Cafe' to provide access to food nutrition education and meals. The FSOC also partnered with Bethel Assembly of God, Volunteers of America Northern Rockies, Black Hills Farmer Market, Meals on Wheels, Rapid City Area Schools, YMCA, Youth and Family Services, and over 20 additional organizations which have resulted in expanding food pantry access and increased youth participation in the summer feeding program. Participation in accessing mobile food pantries increased by nearly 400 percent.

Rapid City Collective Impact received a \$200,000 grant from the Bush Foundation to support work addressing the lack of affordable housing in Rapid City. Goals that have been worked on include creating a non-profit development corporation or partner with an existing organization to build and manage affordable housing properties.

Elevate Rapid City's mission to achieve shared economic and community development goals are part of a shared vision adopted by over 100 community leaders.

Along with several community members, including bankers and non-profit leaders, the directors of the John T. Vucurevich Foundation, United Way of the Black Hills, and Black Hills Area Community Foundation serve on the Community Investment Committee. All members bring a range of expertise and knowledge allowing informed and holistic funding decisions for the City's CDBG program.

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

OneHeart's funding is provided by both public and private sources and will allow housing and services to be co-located.

The City selected a developer to convert a parking lot into a structure more suitable for a prime downtown location. The awarded developer has planned a multi-use building featuring businesses, hospitality, and housing.

Pennington County Housing and Redevelopment Commission continues to educate private landlords on the partnership available with the PHA.

Identify actions taken to overcome the effects of any impediments identified in the jurisdictions analysis of impediments to fair

housing choice. 91.520(a)

Impediments to Fair Housing choice may disparately impact persons in protected class groups based on race, color, national origin, sex, age, religion, familial status, gender, or disability.

Title VIII of the Civil Rights Act of 1968 (Fair Housing Act), as amended, prohibits discrimination in the sale, rental, and financing of dwellings, and in other housing-related transactions based on race, national origin, religion, gender, familial status (including children under the age of 18 living with parents or legal custodians, pregnant women, and people securing custody of children under the age of 18), and disability. Additionally, South Dakota offers legal protections based on creed and ancestry.

The Fair Housing Act covers most types of housing including rentals, sales, home mortgages, and improvements, as well as land use and zoning. Excluded from the Act are owner-occupied buildings having up to four units, single-family housing rented or sold without the use of a real estate agent, and housing for senior citizens.

HUD has the primary authority for enforcing the Fair Housing Act by investigating complaints and determining if there is reasonable cause to show that discrimination has occurred. If the complaint is determined to be valid, HUD brings the complaint to the Administrative Law Judge or parties can elect to have the trial held in federal court.

Locally, Rapid City's attorney's office is tasked with receiving and settling or forwarding complaints of discrimination within Rapid City. The State Division of Human Rights handles discrimination cases that fall outside of the jurisdiction or that involve public entities.

The State Department of Labor Regulation Division of Human Rights handles discrimination cases involving employment and housing.

Neither the City of Rapid City nor the South Dakota Department of Labor and Regulation received fair housing complaints. The U.S. Department of Housing and Urban Development (HUD) received five complaints; two cases were closed via conciliation or successful settlement, one was dismissed for lack of jurisdiction, and two remained open.

Fair Housing Posters are publically displayed at the CDBG Program Division office and Community Development staff continues to stay informed of new laws, regulations, and trends. Along with recently adopted an affordable housing policy, the Community Development Department continues to evaluate and amend zoning ordinances to respond to changing community needs.

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 CDBG Program Division monitors activities to ensure compliance with program requirements. Training sessions are held before the annual application deadline to ensure all parties are aware of regulations and compliance requirements. This year's training session was held on August 23, 2018.

Contractual agreements are executed between the City of Rapid City and Subrecipient that include requirements related to meeting a National Objective, program delivery, levels of performance and accomplishments, monitoring, project schedule and milestones, compensation and method of payment, accounting standards, record keeping and retention, client data, disclosure, reporting, procurement, relocation, real property acquisition, one-for-one housing replacement, personnel and participant conditions, affirmative action, minority business outreach, conflict of interest, lobbying policies, environmental conditions, and more.

Section 3 requires that recipients of certain HUD financial assistance, to the greatest extent feasible, provide job training, employment, and contracting opportunities for low- or very low-income residents in connection with projects and activities in their neighborhoods. The CDBG Program Division reports accomplishments concerning employment and other economic opportunities provided to low- and very low-income persons from CDBG-funding activities.

Environmental Reviews are conducted on all activities and must be completed prior to the commitment of funds. The CDBG Program Division maintains compliance with environmental regulatory requirements on all activities and ensures compliance when additional factors become mandatory such as Finding of No Significant Impact (FONSI) Statements and Request for Release of Funds (RRF) for more complex or unique circumstances.

Projects subject to Davis-Bacon and Related Acts require additional oversight including pre-construction meetings and training on Wage Decisions, certified payroll processing, and worksite requirements. Certified Payroll reports are reviewed to ensure complete and accurate time records are kept and compliance with minimum pay rates, signature authority standards, wage deductions, and work classifications are met. Discrepancies in pay rates or work classifications are communicated, documented, reported, and are required to be rectified.

Housing discrimination includes both differential treatment regarding availability or terms and conditions in the advertisement, sale or rental,

financing, or insurance of housing, and disparate impact of apparently neutral practices or policies in restricting housing choice and opportunity according to any basis prohibited by law. The CDBG Program Division reviews Subrecipient policies, practices, documents, and advertisements for compliance with the Fair Housing Act and monitors programs and projects so to ensure they are not conducted in a manner in which may cause discrimination

One-on-one meetings are held with Subrecipients and the CDBG staff provides ongoing technical assistance to Subrecipients. The meetings can be at the request of the CDBD Program Division or the Subrecipient.

On-site audits are conducted on a rotating annual basis. At a minimum, each year an audit is completed from each of the four funding categories which include public services, public facility and improvements, housing, and economic development.

Evaluations to agencies that are audited include a variety of factors with priority placed on agencies receiving funding for the first time, experiencing key program staff turnover, demonstrating financial instability, conducting complex or high-volume projects, or receiving funding for several consecutive years without a CDBG audit within the previous 3 years.

Internal controls have been designed to ensure adequate segregation of duties. The City's Finance Department establishes accounts and issues checks for draw requests after review processes are completed by and requested from the CDBG Program Division. The City's Finance Department conducts a secondary review of draws and ensures funding availability. The CDBG Program Division is responsible for setting up and administering project activities on the Integrated Disbursement and Information System (IDIS). The Finance department is responsible for processing draw requests and returning earned interest to HUD.

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.

See Grantee Unique Appendices for Resident Participation Plan and Public Notice Publications

The City provides for and encourages the submission of citizens' views and proposals regarding the CDBG Program Division. Reports are published on the City web site at <https://www.rcgov.org/departments/community-planning-development/cdbg-program-division.html> and hard copies are displayed in the CDBG Program office, the Public Library's main office, General Beadle School satellite library, and the lobby of the Pennington County Housing and Redevelopment Commission. Display ads and public notices are run in the Rapid City Journal and the Native Sun Times, both local papers with large distributions. The City provides for and encourages the submission of citizen's comments through assessments and surveys, public notices and comment periods, public information meetings, public hearings, and listening sessions.

The City held a public review and comment period for proposed FY19 allocations that ran from January 9, 2019, through February 11, 2019. Preliminary approval of FY19 allocations was brought before the Legal and Finance committee on January 2, 2019, and City Council on January 7, 2019. Final approval of FY19 allocations was brought before the Legal and Finance committee on April 10, 2019, and City Council on April 15, 2019. The City held a public review and comment period for the proposed FY19 Annual Action Plan from May 29, 2019, through July 27, 2019; final approval was authorized by the Legal and Finance committee on June 26, 2019, and City Council on July 1, 2019. The FY19 Annual Action Plan was made available at the distribution sites listed above and in accordance with the Resident Participation Plan. Three public comments were received (see Grantee Unique Appendices.)

Rapid City encourages minority-owned business participation in CDBG assisted activities. Contracts executed with agencies include their obligation to conduct outreach to minority and women-owned businesses when requesting proposals for activities funded with CDBG funds. Requests for Proposals include non-discrimination and Americans with Disabilities Act clauses stating that successful bidders shall provide services in compliance with Title VI of the Civil Rights Act of 1964 and the Americans with Disabilities Act of 1990.

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.

The City has not changed any objectives and does not anticipate a program change.

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

The Rapid City jurisdiction has no identified Brownfield grants.

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

N/A