

Executive Summary

AP-05 Executive Summary - 24 CFR 91.200(c), 91.220(b)

1. Introduction

The Program Year (PY) 2021 marks the second year of the City of Kent's 2020-2024 Five Year Consolidated Plan period. The PY2021 Annual Action Plan identifies the specific programs and projects the City plans to implement with its PY2021 Community Development Block Grant Program (CDBG) funding in the second year of its five-year Consolidated Plan period. The selected projects will assist the City in its efforts to address the five year goals the City established for addressing identified needs in the community, including housing needs, homeless issues, and community development initiatives. The PY2021 Action Plan also includes the commitment of available revolving loan funds (RLF) to provide the City with additional resources to assist with addressing identified housing needs.

The City of Kent received notification from the U.S. Department of Housing and Urban Development (HUD) of its PY2021 CDBG funding allocation amount, which is \$302,337. In response to a publically issued RFP a total of six (6) project proposals were received this year seeking CDBG funding assistance and the total amount of funding requested was \$299,000. The City has committed a portion of its CDBG funding to all six (6) of the project proposals it received and also committed funds to program administration.

2. Summarize the objectives and outcomes identified in the Plan

This could be a restatement of items or a table listed elsewhere in the plan or a reference to another location. It may also contain any essential items from the housing and homeless needs assessment, the housing market analysis or the strategic plan.

The City of Kent identified the following specific funding objectives in its 2020 - 2024 Five Year Consolidated Plan:

OBJECTIVE #1: Targeted Infrastructure Improvements in Low- to Moderate-Income Residential Areas: Promote a suitable living environment by allocating CDBG resources to support infrastructure and public facility improvement activities that will assist with addressing the problem of aging and insufficient infrastructure in residential areas that have high concentrations of low- to moderate-income households.

OBJECTIVE #2: Offer Housing Programs to Provide Safe and Decent Housing for Low- to Moderate-Income Households: Promote safe and decent housing for low- to-moderate-income households throughout the City by providing owner-occupied housing rehabilitation and an energy efficiency repair program that ensures basic housing needs are met. Citywide, the percentage of households that are classified as

low- to moderate-income is 61.6%. The City's housing stock is older, with 52.4% of the owner-occupied units constructed prior to 1969. Many of these older residential units have structural deficiencies which need to be corrected in order to ensure safe and decent housing.

OBJECTIVE #3: Provide Appropriate Supportive Services for Low- to Moderate-Income Persons: Provide assistance to nonprofit organizations that provide needed programs, public facilities, and supportive services for low- to moderate-income persons living in the community. The City maintains a strong working relationship with the nonprofit organizations operating in the Kent community and has used CDBG funds to support many needed programs.

3. Evaluation of past performance

This is an evaluation of past performance that helped lead the grantee to choose its goals or projects.

The City's most recent Consolidated Annual Performance and Evaluation Report (CAPER) for PY2019 was completed and submitted to HUD in October 2020. PY2020 was year one (1) of the five-year Consolidated Planning period that spans from 2020 through 2024. The PY2019 CAPER reported on performance for the program year August 1 2019 through July 30, 2020.

During the 2015 – 2019 Five Year Consolidated Strategic Plan, the City completed energy efficiency improvements to twenty-nine (29) low- to moderate-income owner occupied housing units in the City of Kent; provided rehabilitation assistance for seven (7) low- to moderate-income owner-occupied City of Kent Residents; provided homeless shelter services to four hundred eighty (480) homeless individuals; provided micro-enterprise assistance to sixteen (16) businesses; provided rehabilitation services to sixteen (16) rental housing units for low- to moderate-income City of Kent residents; reconstructed three (3) City residential streets, and completed façade improvements for two (2) local businesses.

4. Summary of Citizen Participation Process and consultation process

Summary from citizen participation section of plan.

The City conducted two public hearings while preparing its PY2021 Annual Action Plan. Announcements for the two public hearings were posted as display advertisements that appeared in the local general circulation newspaper fifteen (15) days prior to the scheduled public hearings. Notices of the two public hearings were also posted on the City bulletin board fifteen (15) days prior to the scheduled meetings. The first public hearing was held on February 17th, 2021. This session occurred early in the planning process and was held before a scheduled City Council session. Due to COVID-19 restrictions, the hearing occurred in an open, virtual forum and was promoted as an opportunity to present information about the CDBG program and to gather information and comments from interested persons concerning needs in the community or specific activities the City should consider funding during PY2021. The second public hearing was held on May 19th, 2021 at 7:25 pm in the same format as the first.

After writing the PY2021 Draft Annual Action Plan, the city provided a thirty (30) day public comment period that spanned the time-period of April 20th, 2021 to May 19th, 2021. Various community-oriented agencies and service providers were invited to review the draft and submit comments during the 30-day period. A notice was published in the local newspaper of general circulation announcing the 30-day comment period and availability of the draft for review and comment. Paper copies of the draft were made available for review upon request. The draft was published online at the City of Kent's Website, www.kentohio.org, under the Spotlights section. Each advertisement indicated that persons with special needs and non-English speaking residents are encouraged to participate and that they should contact the City so that any needed accommodations can be arranged.

5. Summary of public comments

This could be a brief narrative summary or reference an attached document from the Citizen Participation section of the Con Plan.

No comments were received.

6. Summary of comments or views not accepted and the reasons for not accepting them

N/A

7. Summary

PR-05 Lead & Responsible Agencies – 91.200(b)

1. Agency/entity responsible for preparing/administering the Consolidated Plan

Describe the agency/entity responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

Agency Role	Name	Department/Agency
Kent, Ohio		
CDBG Administrator	KENT	Department of Community Development

Table 1 – Responsible Agencies

Narrative (optional)

The City of Kent Community Development Department is the lead entity responsible for overseeing the development of the 2020-2024 Consolidated Plan and each annual Action Plan, and is responsible for administering programs and activities covered by the 5-Year Plan. The City's Community Development Department staff has been responsible for addressing all administrative aspects of the CDBG program since the City became an entitlement community in 1984. Department personnel were responsible for developing and administering the City's last five (5) 5-Year Consolidated Plans (PY1995-1999, PY2000-2004, PY2005-2009, PY2010-2014, and 2015-2019) and addressing all regulatory requirements associated with the CDBG program. The City implements specific CDBG activities on its own or through the use of subrecipients and contractors.

Consolidated Plan Public Contact Information

AP-10 Consultation – 91.100, 91.200(b), 91.215(I)

1. Introduction

The City of Kent’s 2020-2024 Consolidated Plan process incorporated several different methodologies for gathering comments and input in order to identify needs and priorities the City should consider during the development of its 2020-2024 Consolidated Plan. The City of Kent distributed an electronic survey to numerous nonprofit organizations requesting information on current affordable housing inventory, the needs of the homeless, supportive services, special needs, community development needs and other proposed services that would benefit low-to-moderate income persons. The City also held discussions with City personnel from various departments to identify needs and to collect insights on possible priority needs that should be considered for inclusion into the 2020-2024 Consolidated Plan.

Provide a concise summary of the jurisdiction’s activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies (91.215(I))

Coordination among different service providers is an integral component in providing quality affordable housing opportunities and needed supportive services. The City has funded and collaborated on numerous housing and supportive service activities through the years with Community Development Block Grant (CDBG) funding, Community Housing Impact and Preservation (CHIP) program funding and local social service funding. The City sought input from numerous agencies in the community that provide a variety of housing and social service programs for specific beneficiaries. The Portage County Housing Services Council is an organization that meets on a quarterly basis and that provides an excellent forum for housing and service providers to discuss needs facing the community and to coordinate the provision of services to meet those needs.

Describe coordination with the Continuum of Care and efforts to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans, and unaccompanied youth) and persons at risk of homelessness.

The City of Kent is part of Region 5 of the State of Ohio’s Continuum of Care (CoC) Balance of State program. Each year the City verifies and provides certification that the projects undertaken with CoC funding are consistent with the goals of the City’s Consolidated Plan. The City also often funds activities undertaken by both Family & Community Services (F&CS) and the Region 5 lead agency, Coleman Professional Services, on efforts to address the needs of the homeless within the City and in Portage County. The City currently provides funding to Family & Community Services for operation of the only emergency homeless shelter in Portage County which is located in the City of Kent. The City also provides support for F&CS’s Safer Futures, a domestic violence shelter and F&CS’s Housing and Emergency Support Services program which provides homelessness prevention for those facing eviction and

homelessness. The City has also recently provided funding to Coleman Professional Services for an emergency rental assistance program and the construction of new permanent supportive housing for youth transitioning out of foster care. Many of the non-housing supportive services that the City supports aim to address some of the conditions that often eventually lead to homelessness.

Describe consultation with the Continuum(s) of Care that serves the jurisdiction's area in determining how to allocate ESG funds, develop performance standards for and evaluate outcomes of projects and activities assisted by ESG funds, and develop funding, policies and procedures for the operation and administration of HMIS

The City of Kent is part of Region 5 of the State of Ohio's CoC Balance of State program which does not receive ESG funding.

2. Describe Agencies, groups, organizations and others who participated in the process and describe the jurisdiction's consultations with housing, social service agencies and other entities

Table 2 – Agencies, groups, organizations who participated

1	Agency/Group/Organization	Portage Metropolitan Housing Authority
	Agency/Group/Organization Type	PHA
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs Market Analysis Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	This agency was included in the process for developing the overall goals and objectives of the City's 5-year Consolidated Plan. The agency was invited to submit any comments about the PY2021 Action Plan during the 30-day public comment period.

2	Agency/Group/Organization	Family & Community Services
	Agency/Group/Organization Type	Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-Victims of Domestic Violence Services-homeless Services-Health Services-Education Services - Victims Health Agency
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs Market Analysis Economic Development Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	This agency was included in the process for developing the overall goals and objectives of the City's 5-year Consolidated Plan. The agency was invited to submit any comments about the PY2021 Action Plan during the 30-day public comment period.

3	Agency/Group/Organization	Coleman Professional Services
	Agency/Group/Organization Type	Housing Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-homeless Services-Health Services-Employment Health Agency
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs Market Analysis Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	This agency was included in the process for developing the overall goals and objectives of the City's 5-year Consolidated Plan. The agency was invited to submit any comments about the PY2021 Action Plan during the 30-day public comment period.
4	Agency/Group/Organization	TOWNHALL II
	Agency/Group/Organization Type	Services-Health Health Agency
	What section of the Plan was addressed by Consultation?	Mental Health and Addiction Services

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	This agency was included in the process for developing the overall goals and objectives of the City's 5-year Consolidated Plan. The agency was invited to submit any comments about the PY2021 Action Plan during the 30-day public comment period.
5	Agency/Group/Organization	Community Action Council of Portage County
	Agency/Group/Organization Type	Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-Victims of Domestic Violence Services-homeless Services-Health Services-Education Services-Employment
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	This agency was included in the process for developing the overall goals and objectives of the City's 5-year Consolidated Plan. The agency was invited to submit any comments about the PY2021 Action Plan during the 30-day public comment period.

6	Agency/Group/Organization	Summit Medina Business Alliance (SBDC)
	Agency/Group/Organization Type	Services-Education Services-Employment
	What section of the Plan was addressed by Consultation?	Economic Development
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	This agency was included in the process for developing the overall goals and objectives of the City's 5-year Consolidated Plan. The agency was invited to submit any comments about the PY2021 Action Plan during the 30-day public comment period.
7	Agency/Group/Organization	Habitat for Humanity of Portage County
	Agency/Group/Organization Type	Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Market Analysis Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	This agency was included in the process for developing the overall goals and objectives of the City's 5-year Consolidated Plan. The agency was invited to submit any comments about the PY2021 Action Plan during the 30-day public comment period.
8	Agency/Group/Organization	NEIGHBORHOOD DEVELOPMENT SERVICES INC.
	Agency/Group/Organization Type	Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Market Analysis Anti-poverty Strategy

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	This agency was included in the process for developing the overall goals and objectives of the City's 5-year Consolidated Plan. The agency was invited to submit any comments about the PY2021 Action Plan during the 30-day public comment period.
9	Agency/Group/Organization	AxessPointe Community Health Center
	Agency/Group/Organization Type	Services-Health Health Agency
	What section of the Plan was addressed by Consultation?	Community Development Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	This agency was included in the process for developing the overall goals and objectives of the City's 5-year Consolidated Plan. The agency was invited to submit any comments about the PY2021 Action Plan during the 30-day public comment period.
10	Agency/Group/Organization	City of Kent
	Agency/Group/Organization Type	Other government - Local
	What section of the Plan was addressed by Consultation?	Community Development Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	City Departments were included in the process for developing the overall goals and objectives of the City's 5-year Consolidated Plan. Departments were invited to submit any comments about the PY2021 Action Plan during the 30-day public comment period.

Identify any Agency Types not consulted and provide rationale for not consulting

N/A

Other local/regional/state/federal planning efforts considered when preparing the Plan

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	Region 5 - Coleman Professional Services	Both plans aim to address the needs of the homeless including efforts to provide stable housing opportunities, as well as needed supportive services.
Analysis of Impediments to Fair Housing Choice	City of Kent	Both plans share to goal of Affirmatively Furthering Fair Housing.

Table 3 – Other local / regional / federal planning efforts

Narrative (optional)

AP-12 Participation – 91.105, 91.200(c)

1. Summary of citizen participation process/Efforts made to broaden citizen participation Summarize citizen participation process and how it impacted goal-setting

The City conducted two public hearings while preparing its PY2021 Annual Action Plan. Announcements for the two public hearings were posted as display advertisements that appeared in the local general circulation newspaper fifteen (15) days prior to the scheduled public hearings. Notices of the two public hearings are also posted on the City bulletin board fifteen (15) days prior to the scheduled meetings. The first public hearing was held on February 17th, 2021. This session occurred early in the planning process and was held before a scheduled City Council session. The hearing occurred in an open forum and was promoted as an opportunity to present information about the CDBG program and to gather information and comments from interested persons concerning needs in the community or specific activities the City should consider funding during PY2021. The second public hearing was held on May 19th, 2021 at 7:25 pm in the same format as the first.

After writing a draft of the PY2021 Draft Annual Action Plan the city provided a thirty (30) day public comment period that spanned the time-period of April 20th, 2021 to May 19, 2021. Various community-oriented agencies and service providers were invited to review the draft and submit comments during the 30-day period. A notice was published in the local newspaper of general circulation announcing the 30-day comment period and availability of the draft for review and comment. Paper copies of the draft were made available for review at the City of Kent Clerk of Council office and the City of Kent Community Development Department. Each advertisement indicated that persons with special needs and non-English speaking residents are encouraged to participate and that they should contact the City so that any needed accommodations can be arranged.

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Newspaper Ad	Non-targeted/broad community	Notice of 2/17/2021 Public Hearing published in the Kent-Ravenna Record Courier on 2/3/2021	N/A	N/A	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
2	Public Hearing	Non-targeted/broad community	Virtual Public Hearing held 4/17/2021			
3	Newspaper Ad	Non-targeted/broad community	Notice of 5/19/2021 Public Hearing published in the Kent-Ravenna Record Courier on 5/5/2021			
4	Newspaper Ad	Non-targeted/broad community	Public Notice of availability of DRAFT PY2021 CDBG Action Plan for Review, published in the Kent-Ravenna Record Courier on 4/20/2021			

Table 4 – Citizen Participation Outreach

Expected Resources

AP-15 Expected Resources – 91.220(c)(1,2)

Introduction

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	302,337	25,000	0	327,337	982,011	Estimated 327,337 available for 3 years remaining after 2021 Action Plan.
Other	public - state	Housing	0	0	0	0	0	

Table 5 - Expected Resources – Priority Table

Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied

Leveraging other resources is an important part of the CDBG program and will be vital for meeting the needs and goals of the City's 5-year Consolidated Plan, including activities undertaken during PY2021, because it increases the impact of CDBG funding above and beyond what would be feasible through the City's yearly CDBG allocation on its own. The importance of leveraged funds is seen in the projects that the City funds and significant weight is given to leveraged funds as part of the City's project evaluation process. Most of the projects and activities undertaken provide some sort of leverage whether it be local agency funds into a project, funding through the State of Ohio, or through other sources. Projects that will leverage funding during PY2021 include the Community Action Council of Portage County's Energy Efficiency Program, which anticipates leverage of over \$49,166 of other federal, state and local sources. Phases I and II of the Walnut Street Reconstruction project, which is partially being funded with CDBG funds, will leverage an estimated \$647,000 in local capital funds and \$401,165 in federal funds.

The City is not a Participating Jurisdiction under the HOME Investment Partnerships Program (HOME), so there are no match requirements related to HOME.

If appropriate, describe publically owned land or property located within the jurisdiction that may be used to address the needs identified in the plan

N/A

Discussion

Annual Goals and Objectives

AP-20 Annual Goals and Objectives

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Walnut Street Reconstruction	2020	2021	Non-Housing Community Development		Public Infrastructure Improvements	CDBG: \$160,000 public - state: \$1,058,200	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 685 Persons Assisted
2	Neighborhood Policing Program	2020	2024	Non-Housing Community Development		Crime Prevention	CDBG: \$18,000	Public service activities other than Low/Moderate Income Housing Benefit: 8097 Persons Assisted
3	Energy Efficiency Housing Rehabilitation	2020	2024	Affordable Housing		Owner-Occupied Housing Rehabilitation	CDBG: \$35,000 public - state: \$49,166	Homeowner Housing Rehabilitated: 8 Household Housing Unit

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
4	Nonprofit Public Facilities	2020	2020	Non-Housing Community Development		Non-Profit Rental Rehabilitation	CDBG: \$45,000 public - state: \$10,001	Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit: 14 Households Assisted
5	Micro-Enterprise Assistance	2020	2024	Non-Housing Community Development		Micro-Enterprise Assistance	CDBG: \$5,000 public - state: \$222,700	Businesses assisted: 3 Businesses Assisted
6	Homeless Shelter Services	2020	2024	Homeless			CDBG: \$15,000 public - state: \$185,700	Homeless Person Overnight Shelter: 37 Persons Assisted

Table 6 – Goals Summary

Goal Descriptions

1	Goal Name	Walnut Street Reconstruction
	Goal Description	CDBG funds will be used to assist with the design and full depth reconstruction of Walnut Street from Harris Street to Dodge Street. The work involves new sidewalks, concrete curbs and gutters, a waterline replacement and storm sewers to improve drainage along the roadway.

2	Goal Name	Neighborhood Policing Program
	Goal Description	CDBG funds will be used for the Neighborhood Policing Program which provides additional patrols and police visibility primarily in low- to moderate-income neighborhoods and in assisted housing complexes. The program has a goal of improving communication, trust and understanding between residents and the Police Department. Funding for this activity is counted toward the Public Service 15% funding cap.
3	Goal Name	Energy Efficiency Housing Rehabilitation
	Goal Description	During PY2021, the Targeted Furnace Inspection/Replacement Program aims to improve energy efficiency and affordability by inspection and replacement of failing or inefficient furnaces and/or hot water tanks for eight (8) low-to moderate-income owner-occupied households.
4	Goal Name	Nonprofit Public Facilities
	Goal Description	Family & Community Services is requesting CDBG funds to replace fourteen (14) aging heating and cooling units at two of their housing locations: Safe Path, a transitional housing facility for individuals and families experiencing domestic violence, and Currie Hall, a transitional housing facility for individuals experiencing homelessness.
5	Goal Name	Micro-Enterprise Assistance
	Goal Description	Funds will be used to provide one-to-one business counseling, as well as business workshops/training, to low- to moderate-income residents of the City of Kent.
6	Goal Name	Homeless Shelter Services
	Goal Description	The Homeless Shelter Services program provides services at Miller Community House an emergency homeless shelter. Funding helps pay for shelter nights spent by Kent residents including needed case management, counseling and housing placement. Funding for this activity is counted toward the Public Service 15% funding limitation.

Projects

AP-35 Projects – 91.220(d)

Introduction

The City is proposing to undertake the projects listed in Table 7 during PY2021, the second year of the 2020-2024 Five-Year Consolidated Planning period. The proposed projects are a result of an open request for proposal process and a thorough staff review which takes into account the proposed objectives and priority needs outlined in this plan, as well as all regulatory requirements of the CDBG program.

Projects

#	Project Name
1	2021 Walnut Street Reconstruction
2	2020 Neighborhood Policing Program
3	2021 CAC Targeted Furnace Inspection/Replacement Program
4	2021 F&CS Miller House Homeless Services
5	2021 Small Business Development/Counseling
6	2021 CDBG Admin
7	2021 Fair Housing Services

Table 7 - Project Information

Describe the reasons for allocation priorities and any obstacles to addressing underserved needs

The allocation priorities are driven by the goals and objectives set forth in the City's current 5-year Consolidated Plan that spans the time period PY2020-PY2024 and how the projects that were proposed as part of an open request for proposal process align with the goals and objectives of the Consolidated Plan. The largest obstacle for addressing underserved needs is the limited amount of funding that is available when compared to the amount of need that is the community. The City best addresses this issue by keeping in close communication with other service providers in the community to ensure there is no overlap or duplication of services and by expending funds that are targeted towards the largest, and most underserved, needs in the City.

AP-38 Project Summary

Project Summary Information

1	Project Name	2021 Walnut Street Reconstruction
	Target Area	
	Goals Supported	Walnut Street Reconstruction
	Needs Addressed	Public Infrastructure Improvements
	Funding	CDBG: \$160,000 public - state: \$1,058,200
	Description	Funding will be used for the design and full depth reconstruction of Walnut Street from Cherry Street to Dodge Street.
	Target Date	12/31/2021
	Estimate the number and type of families that will benefit from the proposed activities	An estimated 685 residents and drivers will be impacted by this project.
	Location Description	The reconstruction of Walnut Street will take place on Walnut, from Cherry Street to Dodge Street, in a residential neighborhood in Kent, Ohio.
	Planned Activities	The City of Kent's objective is to invest in the improvement of Walnut Street. Poor pavement condition, inadequate street drainage and inadequate pedestrian sidewalks exist along the project length. An existing 6 inch water line that was abandoned due to poor condition, which has removed an interconnection of water mains between Cherry Street and Harris Street, resulting in reduced fire flows. This project will address needs by: replacing the existing seal coat pavement with full depth asphalt concrete, reconnecting the water main between Cherry Street and Harris Street improving drainage of the road and lawn areas with the addition of storm sewer piping and catch basins, adding or replacing sidewalk, improving existing driveway aprons, and grading lawn areas within the right of way from Harris Street to Dodge Street.

2	Project Name	2020 Neighborhood Policing Program
	Target Area	
	Goals Supported	Neighborhood Policing Program
	Needs Addressed	Crime Prevention
	Funding	CDBG: \$18,000
	Description	The Neighborhood Policing Program provides additional patrols and police visibility in primarily in low- to moderate-income neighborhoods and in subsidized housing complexes. The program has a goal of improving communication, trust, and understanding between residents and the Police Department. Funding for this activity is counted toward the Public Service 15% funding limitation.
	Target Date	7/31/2021
	Estimate the number and type of families that will benefit from the proposed activities	An estimated 8,097 low- to moderate-income individuals will benefit from increased police patrols, presence, and targeted intervention efforts.
	Location Description	The activities will take place in LMI neighborhoods and subsidized housing projects.
	Planned Activities	Provide additional police presence beyond normally available resources in selected LMI areas and subsidized housing projects, with the overall goal of promoting greater interaction between police officers and residents, thereby improving police-neighborhood relationships and enhancing residents' sense of well-being. The objectives of this greater interaction are to continue and improve police-neighborhood relationships, improve methods of identifying sources of crime and neighborhood disruption and increase rates of crime reporting.

3	Project Name	2021 CAC Targeted Furnace Inspection/Replacement Program
	Target Area	
	Goals Supported	Energy Efficiency Housing Rehabilitation
	Needs Addressed	Owner-Occupied Housing Rehabilitation
	Funding	CDBG: \$35,000
	Description	CDBG funds will be used for Community Action Council of Portage County's Kent Furnace Inspection/Targeted Replacement Program that provides the services of furnace inspections, tune-ups, or the replacement of failing or inefficient furnaces and/or hot water tanks for low- to moderate-income Kent households.
	Target Date	7/31/2021
	Estimate the number and type of families that will benefit from the proposed activities	An estimated 7 low- to moderate-income Kent residents of owner-occupied housing will benefit from this program.
	Location Description	The project activities will be undertaken at to be determined, scattered sites throughout the City of Kent.
	Planned Activities	Funds will be used to inspect and if necessary, replace, hot water tanks, expansion tanks, and furnaces. Combination smoke/CO detectors will be provided along with energy education.
4	Project Name	2021 F&CS Miller House Homeless Services
	Target Area	
	Goals Supported	Homeless Shelter Services
	Needs Addressed	
	Funding	CDBG: \$15,000
	Description	The Homeless Shelter Services program provides services at Miller Community House, an emergency homeless shelter. Funding helps pay for shelter nights spent by Kent residents and includes needed case management, counseling and housing placement. Funding for this activity is counted toward the Public Service 15% funding limitation.
	Target Date	7/31/2021

	Estimate the number and type of families that will benefit from the proposed activities	An estimated 32 homeless individuals will receive emergency shelter and supportive services.
	Location Description	The activities will be undertaken at Miller Community House, 1211 Anita Dr., Kent, OH 44240.
	Planned Activities	Homeless individuals will be provided with shelter and supportive services, to include: employment search assistance, assistance in obtaining medical services/coverage and other supportive services.
5	Project Name	2021 Small Business Development/Counseling
	Target Area	
	Goals Supported	Micro-Enterprise Assistance
	Needs Addressed	Micro-Enterprise Assistance
	Funding	CDBG: \$5,000
	Description	Funds will be used to provide one-to-one business counseling, as well as business workshops/training, to low- to moderate-income residents of the City of Kent.
	Target Date	7/31/2021
	Estimate the number and type of families that will benefit from the proposed activities	An estimated 4 low- to moderate-individuals will benefit from this service.
	Location Description	Individuals will be residents of the City of Kent.
	Planned Activities	Individuals will receive assistance in starting up their own businesses.
6	Project Name	2021 CDBG Admin
	Target Area	
	Goals Supported	
	Needs Addressed	
	Funding	CDBG: \$5,117

	Description	Funds will be used to cover grant administration costs such as the cost of staff, supplies, advertising, postage, copying, travel costs for trainings, and other related costs. Funding for this activity is counted toward the Planning and Administration 20% funding limitation.
	Target Date	7/31/2021
	Estimate the number and type of families that will benefit from the proposed activities	Funds will be used for costs associated with the oversight and administration of CDBG-funded activities.
	Location Description	Administrative activities will be undertaken at 930 Overholt Rd., Kent, OH 44240.
	Planned Activities	Oversight and administration of CDBG-funded activities
7	Project Name	2021 Fair Housing Services
	Target Area	
	Goals Supported	
	Needs Addressed	
	Funding	CDBG: \$19,000
	Description	Funds will be used to cover the cost associated with the provision of fair housing service. The consultant will provide counseling in the areas of housing discrimination and landlord-tenant issues. They will investigate fair housing complaints and provide a variety of public education and outreach services in the City. Funding for this activity is counted toward the Planning and Administration 20% funding limitation.
	Target Date	7/31/2021
	Estimate the number and type of families that will benefit from the proposed activities	An estimated 110 low- to moderate-income families will benefit from the proposed activities.
	Location Description	Scattered locations, to be determined, throughout the City of Kent.
	Planned Activities	Fair Housing Complaint intake/counseling, fair housing education, tenant/landlord dispute resolution and educational forums.

AP-50 Geographic Distribution – 91.220(f)

Description of the geographic areas of the entitlement (including areas of low-income and minority concentration) where assistance will be directed

During the last Consolidated Plan process (2015-2019), the City made the determination to shift towards targeting some of its available CDBG and other local resources toward supporting public infrastructure improvement projects and activities within the neighborhoods of the City that have some of the highest concentrations of low- to moderate-income and minority households. The City is continuing this geographic targeting of public infrastructure improvements during the PY2021 period and by contributing funding to the Walnut Street Reconstruction project, which will meet this priority need and is located in a low- to moderate-income area and an area of minority concentration as shown on the maps attached to this plan in the appendix. The Neighborhood Policing program will again be undertaken during PY2021 and provides additional police outreach to low-to-moderate income geographic areas of the City, some of which also have a higher concentrations of minority populations. The program has a goal of improving communication, trust and understanding between residents and the Police Department. The other programs being proposed during PY2021 provide a citywide benefit to residents or assistance to eligible households that could be located anywhere through the City, rather than on the basis of a geographic area.

Geographic Distribution

Target Area	Percentage of Funds

Table 8 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

As outlined in the previous section, during the last (2015-2019) Consolidated Plan process, the City made the determination to shift towards targeting some of its available CDBG and other local resources towards neighborhoods of the City that have some of the highest concentrations of low-to-moderate income households. The intent of this shift and its continuance during this 2020 - 2024 Five-year Consolidated Plan period, and PY2021, is to ensure that resources are allocated to the geographic areas of greatest need in the City.

Discussion

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

The below outlines the number of households anticipated to be assisted during PY2021 to further affordable housing opportunities in the City.

One Year Goals for the Number of Households to be Supported	
Homeless	32
Non-Homeless	7
Special-Needs	0
Total	39

Table 9 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through	
Rental Assistance	0
The Production of New Units	0
Rehab of Existing Units	7
Acquisition of Existing Units	0
Total	7

Table 10 - One Year Goals for Affordable Housing by Support Type

Discussion

During PY2021, as outlined in **Table – 9 One Year Goals for Affordable Housing by Support Requirement**, it is anticipated that thirty-two (32) homeless individuals/households will be provided housing through an emergency homeless shelter being funded with CDBG funding. The seven (7) non-homeless households being supported include energy efficiency rehabilitation projects under the Furnace Inspection/Targeted Replacement program.

As **Table – 10 One Year Goals for Affordable Housing by Support Type** shows, it is anticipated that there will be a total of seven (7) existing units rehabilitated through the CDBG-funded owner-occupied energy efficiency housing program, under the Furnace Inspection/Targeted Replacement program.

AP-60 Public Housing – 91.220(h)

Introduction

The City is one of the smallest entitlement communities in the State of Ohio and receives a limited amount of CDBG funding on an annual basis. The City does not have the funding available to support a Tenant-Based Rental Assistance program or to complete rehabilitation activities at PMHA units located within the City. Although the City cannot provide financial assistance, it works collaboratively with the PMHA on various housing issues, including possible homeownership programs that may benefit households participating in PMHA's public housing or Section 8 voucher assistance program.

Actions planned during the next year to address the needs to public housing

The Portage Metropolitan Housing Authority (PMHA) has approximately 305 public housing units that can be used for housing extremely low-income (0-30% of AMI) and low-income households (31-50% of AMI) which includes households with annual household incomes between 0 - 50% of the area median income (AMI). The PMHA's 2020 Annual Agency Plan identified the following goals and objectives:

1. Achieve and Maintain Excellence in Tenant-Based Housing Programs

- Four households will become new homeowners through the Housing Choice Voucher Homeownership Program

2. Improve Productivity and Cost Effectiveness

- Examine opportunities to improve productivity and cost effectiveness through technology

3. Collaborate with Community Partners to Leverage Resources to Benefit Households Assisted by PMHA and Portage County

- PMHA will investigate opportunities to develop and manage permanent supportive housing.
- PMHA will investigate methods of inter-agency cooperation that will lessen barriers to assistance for applicants and participants.

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

PMHA provides programming for residents of Public Housing through a number of different measures including their Resident Opportunity Self Sufficiency (ROSS) grant program and their Good Neighbor Program which is funded through the City of Kent's local Social Service Grant Program. ROSS is a HUD Consolidated Plan KENT 118 OMB Control No: 2506-0117 (exp. 06/30/2018) funded program specifically for public housing units that

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helps families and individuals obtain self-sufficiency and improve quality of life. The Good Neighbor program provides an array of services that aim to improve the living environment of LMI families residing in public housing. Programming through the Good Neighbor program includes: a forum for interaction between public housing residents and the Kent Police Department, referral and service coordination that to meet needs of residents, distribution literature promoting healthy lifestyles, and employment services. All of these measures are taken with the goal of increasing resident involvement and improving the living environment of PMHA residents in Kent. PMHA offers a homeownership program through its Housing Choice Voucher Program. PMHA's most recent "Moving to Work" plan had a goal for four (4) residents to obtain homeownership.

If the PHA is designated as troubled, describe the manner in which financial assistance will be provided or other assistance

N/A

Discussion

AP-65 Homeless and Other Special Needs Activities – 91.220(i)

Introduction

Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including

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

Services for the homeless in Portage County are usually undertaken by one of two housing and services providers in the area, Family & Community Services (F&CS) and Coleman Professional Services (CPS). The City plans to fund both of these agencies during PY2021 for the services that they provide to the homeless. The City anticipates to fund F&CS's Homeless Shelter Services Program, which provides emergency shelter nights at an emergency homeless shelter along with connected supportive services that aim to meet the specific needs of each client. Services through Coleman Professional Services will be funded through the City of Kent's Social Services program.

Addressing the emergency shelter and transitional housing needs of homeless persons

The City will use CDBG funding for Family & Community Services' Homeless Shelter Services Program during PY2021, which provides emergency housing for individuals and families, as well as supportive services that may be needed.

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 goals mentioned above are designed to help individuals and families transition from homelessness to a stable housing situations. Services needed for self-sufficiency vary depending on the needs of each specific client. An assessment is conducted at intake by local housing providers that identifies needs with the goal always being sustaining a self-sufficient housing/living situation as expeditiously as possible given the unique characteristics of each client. Local services providers, including the agencies mentioned in this section who are scheduled to receive funding from the City during PY2021, coordinate well with each other and keep in close contact through a number of different forums, most notably the Portage County Housing Services Council. These agencies, including the City of Kent, are cognizant of programming that is available in the Community that provides services and emergency, transitional and supportive housing. These relationships are key to facilitating a housing and support service structure

that, to the Consolidated Plan KENT 120 OMB Control No: 2506-0117 (exp. 06/30/2018) greatest extent feasible, ensures no gaps exist.

Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: 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); or, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs.

The support network described in the previous sections is designed to prevent homelessness and provide housing and any needed services to those who become homeless. This support structure is in place with the intention of limiting the amount of time individuals or families experience homelessness and to provide tools for them to become self-sufficient. In addition to the projects and activities mentioned in the previous areas of this section, the City allocates local social service funding to Family & Community Services and Coleman Professional Services for homelessness prevention rental assistance programs. Social Service funding is also provided to the local Community Action Agency for a job training program designed to provide marketable computer skills for low-to moderate income Kent residents. Unfortunately, the City of Kent is one of the smallest entitlement communities in the State and the needs for many different services far outweigh the resources that are available with CDBG funding alone. For this reason the City and local service providers rely on the pooling of different funding sources and good coordination among providers to ensure the best housing and service delivery network is in place, given the amount of resources that are available, to meet the needs of the homeless.

Discussion

AP-75 Barriers to affordable housing – 91.220(j)

Introduction:

Actions it planned 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

The City of Kent does not have any local public policies that serve as barriers to affordable housing. The primary barrier to affordable housing for many low- to moderate-income households remains the limited number of affordable housing units in the community. The City is home to Kent State University and the student population has created a large rental market in the community. The City recognizes that there still is a need for more affordable housing in the community and that the City's large student population does limit the availability of rental units for low- to moderate-income households, especially larger families. The City has implemented code violation and zoning ordinances to address some of the issues that have developed over the years as a result of the student renters. These ordinances are not restrictive in terms of limiting the availability of affordable housing, but rather, are focused on property maintenance issues to ensure landlords maintain safe and decent housing. The zoning code, and its enforcement, also limits the use of boarding houses in the city, which can be rented out by the bedroom. This enforcement helps the affordability of housing by lowering rent structures that can escalate as a result of houses rented on a per bedroom basis. The City does not have tax policies or other public policies that affect the valuation of land or other property in a manner that adversely impacts the availability of housing in the community. It is also challenging for many low- to moderate- income households to make the transition from being renters to homeowners because of the difficulties associated with saving for a down payment and securing financing from traditional lenders.

The City is committed to allocating CDBG funds to affordable housing initiatives and has designated offering housing programs to provide safe and decent housing for low-to moderate-income households as a primary funding objective for PY2020 and during the 2020-2024 Consolidated Plan period. In addition, the City will utilize Community Housing Impact and Preservation (CHIP) funds from the State of Ohio to help expand affordable housing opportunities for the low- to moderate-income households in Kent. All of these efforts are a strategy to remove barriers to affordable housing by increasing the supply and availability of affordable housing. The City is always continuing its housing code enforcement that targets illegal boarding houses that rent to students on a per bedroom basis that limit available housing for larger families and can increase rent levels. The City of Kent participates in the Portage County Housing Services Council (PCHSC), which is a collaborative volunteer group comprised of nonprofit agencies, developers and government agencies that are involved with housing programs throughout Portage County. The PCHSC meets quarterly and routinely discusses strategies to remove barriers to affordable housing.

AP-85 Other Actions – 91.220(k)

Introduction:

Actions planned to address obstacles to meeting underserved needs

The City will continue its collaboration with area nonprofit organizations in order to identify the most immediate underserved needs in the community along with possible funding sources that can be accessed to address these needs. The City provides CDBG funding for several programs that serve the needs of the underserved in the City of Kent. Often organizations that received CDBG funding through the City use the grant award as match to try and secure additional funding from other government or private sources in order to expand or create new programs to meet the needs of the underserved. The largest obstacle for addressing underserved needs is the limited amount of funding that is available when compared to the amount of need that is the community. The City best addresses this issue by keeping in close communication with other service providers in the area to ensure there is no overlap or duplication of services and by expending funds that are most targeted towards the largest, and most underserved, needs in the City. The various projects undertaken in past Community Development Block Grant (CDBG) program years, in this PY2021 CDBG Action plan and through the City's locally funded Social Service Grant Program are rooted in the purpose of addressing underserved needs in the Community.

Actions planned to foster and maintain affordable housing

The City has identified offering programs to provide safe and decent housing for low- to moderate-income households as a primary funding objective during the PY2020-2024 Consolidated Plan and anticipates undertaking activities on a continuing basis to further this objective. During PY2020, the City plans to foster and maintain affordable housing by undertaking the Energy Efficiency Housing Rehabilitation program at seven (7) households and to have RLF funding available for the Owner-Occupied Housing Rehabilitation that can assist with substantial and emergency water/sewer connection housing rehabilitation. Earlier in this Consolidated Plan period eight (8) eligible households were assisted with substantial housing rehabilitation through the Community Housing Impact and Preservation (CHIP) program funding from the State of Ohio's Development Services Agency, Office of Community Development. The City will continue to fund the Homeless Shelter Services program, which will provide emergency housing for an estimated one-hundred (100) homeless persons. The City has recently allocated CHIP revolving loan funding to Coleman Professional Services to cover a portion of costs related to the construction of ten (10) new units of permanent supportive housing for transitional youth, which is now fully leased. Concurrently with this Action Plan, the City is preparing a Community Housing Impact and Preservation (CHIP) grant through the State of Ohio Development Service Agency's, Office of Community Development to help expand affordable housing opportunities for the low- to moderate-income households in Kent. If this CHIP grant can be secured it will result in the substantial rehabilitation eligible

owner-occupied households in the City.

Actions planned to reduce lead-based paint hazards

The City and its subrecipient agencies that are involved in housing rehabilitation activities, continue to implement the current requirements involving the reduction of lead-based paint hazards. Depending on the nature of each individual project and scope of work, the City requires that contractors working on housing rehabilitation projects have the proper Renovation, Repair and Painting (RRP) Certification through the Environmental Protection Agency (EPA) or lead-based paint abatement licensure through the Ohio Department of Health (ODH). A licensed third-party vendor is used for conducting both lead risk assessments and clearance testing. In addition, a City staff member that oversees the entire rehabilitation process has received lead-based paint training and holds lead-licensure as a certified lead-abatement contractor. Anytime construction activity is undertaken on housing that was built prior to 1978, all required lead-based paint measures are taken to ensure that all regulatory guidelines are met and the safety of its occupants.

Actions planned to reduce the number of poverty-level families

The City of Kent's goal for reducing the number of poverty level families in this current economic climate is to promote economic development initiatives that will result in job creation. The City completed a \$100+ million dollar downtown redevelopment project that is generating new employment opportunities. With the initial investment in the core of downtown is completed, and the City is focusing on leveraging and expanding upon these investments to the areas immediately surrounding the downtown core and throughout other areas of the City. The development of downtown has and is still creating many temporary and permanent jobs; the nature of these jobs is varied and includes everything from white collar business jobs to service related positions. The City anticipates that some of these jobs will be filled by persons currently living at the poverty level. In addition to job creation by investing in the City's core, during PY2021, the City will also continue to provide financial support to the various nonprofit agencies in the community that work with persons living at the poverty level. During PY2021 the Summit-Medina Business Alliance's Micro-Enterprise Development Program, which provides business counseling and consulting services to low- to moderate-income entrepreneurs and business owners who are below the poverty level, will continue to be available to residents. Many of the services local non-profit agencies provide, including housing initiatives and supportive services have a primary goal of reducing the number of families and individuals living below the poverty-level. Infrastructure investment, such as the Walnut Street Reconstruction project, within low- to moderate-income Census Block Groups that are likely to have a higher proportion of families below the poverty line, are designed in-part to help improve the economic conditions within those areas. As mentioned earlier in this report, the City is currently writing a Community Housing Impact and Preservation (CHIP) grant through the State of Ohio Development Service Agency's, Office of Community Development to help expand affordable housing opportunities for the low- to moderate-income households in Kent, including those below the poverty-level. Many of the activities undertaken in past Community Development Block Grant (CDBG) program years, in this PY2019 CDBG

Action plan and through the City's locally funded Social Service Grant Program share a common goal of reducing the number of poverty-level families.

Actions planned to develop institutional structure

The City plans to work closely with local social service agencies and nonprofit housing providers during the FY2021 Action Plan year to identify local needs within the community and to identify possible methods for minimizing the gaps in service. By maintaining its working relationship with local agencies, the City has an ongoing understanding of the needs of special needs populations within the community. The local institutional structure is further supported through the coordination of activities provided through the Portage County Housing Services Council. The City will continue its involvement in the FY2021 year because such involvement creates an important link to a number of social service agencies and housing providers in Kent and throughout Portage County. The Community Resource Connect will help further solidify institutional structure. Beyond providing information and resources for residents in the community, Community Resource Connect will allow service and housing providers to further collaborate, or make new connections, that helps ensure the provision of housing and related services from various organizations in the community is as efficient as possible.

Actions planned to enhance coordination between public and private housing and social service agencies

Discussion:

Program Specific Requirements

AP-90 Program Specific Requirements – 91.220(l)(1,2,4)

Introduction:

Projects planned with CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income available for use in projects which will be undertaken in PY2021.

Community Development Block Grant Program (CDBG)

Reference 24 CFR 91.220(l)(1)

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out.

- | | |
|--|----------|
| 1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed | 0 |
| 2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan. | 0 |
| 3. The amount of surplus funds from urban renewal settlements | 0 |
| 4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan | 0 |
| 5. The amount of income from float-funded activities | 0 |
| Total Program Income: | 0 |

Other CDBG Requirements

- | | |
|---|---------|
| 1. The amount of urgent need activities | 0 |
| 2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. | 100.00% |

Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.

All activities planned for PY2021 will benefit the low- to moderate-income population of Kent. The three year period that would be assessed as part of the PY2021 Action Plan would span the time period of PY2019-PY2021. All activities undertaken over this three-year time period also benefit low-to moderate income households.