

# Draft



## Community Development Block Grant (CDBG)

### Draft

## 2024 Annual Action Plan

City of Manhattan Community Development  
Department  
1101 Poyntz Avenue  
Manhattan, KS 66502  
(785) 587-2412



To: General Public  
From: Christina L'Ecuyer, Senior Grant Administrator  
Date: May 17, 2024  
Subject: City of Manhattan, Kansas Community Development Block Grant (CDBG) 2024 Annual Action Plan (July 1, 2024, to June 30, 2025) Public Comment Draft (May 19, 2024, to June 21, 2024) and Public Hearing (May 23, 2024)

## Background

The Amended Community Development Block Grant (CDBG) 2020-2024 Consolidated Plan and the **2024 Annual Action Plan** provide basis and strategy for the use of U.S. Department of Housing and Urban Development (HUD) funds allocated to the City of Manhattan. The Community Development Department prepared the 2024 Annual Action Plan to designate the activities and planned budgets for the 2024 Program Year (PY) allocation that starts on July 1 each year and ends on the following June 30.

As of the date of publication for the 2024 Annual Action Plan, the allocation amounts for the Entitlement Grantees for CDBG PY 2024 have yet to be released. HUD guidance is to proceed with estimated amounts working through the process, and when the allocation is released, to update the 2024 Plan with the actual Project Budgets. HUD has also provided guidance that when publishing this Plan for public comment, the City should provide direction on how it will react to the actual allocation amount when it is released.

## Discussion

As the allocation amount for CDBG PY 2024 has yet to be officially released, the City has estimated a total CDBG budget of **\$552,395** to complete development of the 2024 Annual Action Plan. Regardless of increase or decrease to this amount, the City will recalculate the estimated Project Budgets below so that the regulatory caps of 20% or less will be used for Administration, Planning and Fair Housing activities, and 15% or less of the allocation will be used for Public Services activities. The remaining funds 65% will be used for Housing Rehabilitation Projects and Public Facilities and Infrastructure Projects. The City proposes to undertake these Projects in the 2024 Annual Action Plan with the estimated allocation:

### 2024 CDBG Proposed Budget

CDBG Projects	Amount	% of Allocation
Grant Administration & Planning	\$110,479	20%
Housing Rehabilitation	\$179,528	30%
Public Services	\$82,859	15%
Public Infrastructure	\$179,528	35%
<b>Total Proposed CDBG Program</b>	<b>\$552,395</b>	

Beginning on **May 19, 2024 through June 21, 2024**, all interested persons are invited to review and/or download the draft “**2024 CDBG Annual Action Plan**”, from the City’s web page: [www.cityofmnhk.com/CDBG](http://www.cityofmnhk.com/CDBG) For non-English speakers, the City website has a translation page to convert text to multiple other languages. *Para los que no hablan inglés, el sitio web de la ciudad tiene una página de traducción para convertir texto a varios otros idiomas.*

The City encourages all interested persons to review the proposed 2024 Plan and provide comments either at the Public Hearing or at any time during this 30-day review period.

## **Meeting Format**

Community Development will present additional details at **the Public Hearing** conducted by the **Manhattan Urban Area Planning Board** during their meeting at **6 pm on Monday, May 23, 2024, in the City Commission Room at City Hall**, 1101 Poyntz Avenue, Manhattan, KS, and will receive any public comments on the proposed 2024 Plan. The Public may watch this hearing on Cox Cable Channel 3, on Facebook, or stream it live or replay the recording of the meeting using the City’s “Watch a Meeting” on-line service found on the home page of the City’s website.

Interested Persons may choose to speak in person at the Public Hearing, submit comments in writing to be read into the record at the meeting, or you may direct comments and general questions regarding the proposed 2024 Plan by email to Christina L’Ecuyer, Grant Administrator at [lecuyer@cityofmnhk.com](mailto:lecuyer@cityofmnhk.com).

# Executive Summary

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

### 1. Introduction

Since 2010, U.S. Department of Housing and Urban Development (HUD) has identified the City of Manhattan as an “Entitlement Community” under the Community Development Block Grant (CDBG) Program. Compliance with CDBG’s Entitlement Program requires the City of Manhattan to prepare a 5-year Consolidated Plan and an Annual Action Plan for each year of the Consolidated Plan.

The City of Manhattan’s 2020-2024 Consolidated Plan, as amended, is the City’s third consolidated plan and includes a 5-year Strategic Plan (July 1, 2020, to June 30, 2025). The 2024 Annual Action Plan (2024 Plan) will cover the July 1, 2024, to June 30, 2025, timeframe.

The 2024 Annual Action Plan provides a basis and strategy for the use of CDBG 2024 Program Year (PY) funds and fulfills specific requirements for the City of Manhattan’s CDBG application to HUD. The 2024 Plan relates to the goals identified in the 5-year Strategic Plan, a component of the Consolidated Plan. The 2024 Plan describes how the most critical needs of the community will be addressed by various projects and activities utilizing the PY 2024 allocation. The 2024 Plan is the result of public outreach, a public hearing, and consultations with knowledgeable agencies, groups, and stakeholders.

The 2024 Annual Action Plan is available for review on the City’s website <https://cityofmnhk.com/cdbg>, in print form via the Community Development Department and was advertised as available for review in the Manhattan Mercury and on social media.

### 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.**

HUD determines the annual allocation of CDBG funds by using a formula comprised of several measures of community need including the extent of poverty, population, housing overcrowding, age of housing, lag in population growth in relationship to other metropolitan areas, and area median income. Through citizen participation, a public hearing, and consultations with various organizations, groups, and agencies, the City has determined that the five overall objectives for meeting the identified housing and community development needs between 2020 and 2024 are:

1. Sustain affordable housing opportunities by preserving the existing housing stock and supporting the creation of affordable permanent housing in standard condition.
2. Improve the livability and safety of neighborhoods through public facility and infrastructure improvements.
3. Support actions that create or improve access and improve the quality of life for low- and moderate-income residents.
4. Support public services that meet the needs of low- and moderate-income persons and families.

5. Support activities that create and sustain employment and quality jobs.

These priorities and objectives are set forth in the 2020-2024 Strategic Plan and satisfy three statutory program goals – provide decent housing, a suitable living environment, and expanded economic opportunities – with primary benefit to low- and moderate-income residents. The City’s Strategic Plan confirms that proposed projects are in line with national CDBG program objectives related to low- and moderate-income benefit.

### **3. Evaluation of past performance**

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

Over the 14 years as an Entitlement Community in the CDBG Program, the City of Manhattan’s annual allocation has averaged \$577,382. The City has had no difficulty identifying project uses for funds during the duration of previous Annual Action Plans and expects to fully expend the current funds. In the past, the City has used its annual allocations for public facility and infrastructure projects that provide immediate community benefits. These projects have included park improvements, street improvements, construction of sidewalks, and ADA improvements. The City used funding to renovate public and non-profit facilities that aided persons who were low- and moderate-income, elderly, disabled, homebound, homeless, and/or abused. The City has consistently expended funds on low-income housing preservation through a comprehensive housing rehabilitation program, and an emergency and accessibility repair program for single-family homes and mobile homes. CDBG has also provided support for public services agencies that address mental health needs, housing and budget counseling needs, landlord/tenant counseling, civil legal service needs, homelessness prevention and case management, and services for abused children.

The City has achieved and continues to support all five of the objectives identified in the Strategic Plan through the application of annual allocations. Although no specific CDBG-funded job creation project has occurred, the City provides quality housing through the Housing Rehabilitation Program, which is key for attracting and retaining workforce. The public facilities and infrastructure improvements supported by CDBG are part of placemaking which is an important factor in attracting and retaining quality jobs. The City continues to research and study current and future land use, the Manhattan Development Code, and economic development incentives to create a positive impact for quality and sustainable jobs. Additionally, beginning in 2023, the City began to collect 20% of the Economic Recovery and Relief Sales Tax, approved by voters in 2020, for job creation, recruitment, or retention initiatives. Another 10% of this tax will be used for the development of workforce housing initiatives.

In July and November of 2020, the City of Manhattan amended the 2020-2024 Consolidated Plan to incorporate HUD CARES Act funding into projects and activities that address preparation for, prevention of, and response to the COVID-19 Pandemic. Per HUD recommendations, the City amended its Citizen Participation Plan to incorporate shortened public input and hearing requirements, and efficiently apply the additional funding for preparation, prevention, and response activities. The City completed disbursement of CARES Act funds for COVID-19-related issues. The pandemic delayed the completion of some scheduled activities; however, the City has completed projects as the pandemic conditions and impacts moderated.

The City has been diligent in complying with CDBG’s national goals and objectives, and the City's use of funds to date has served 100% of LMI persons and households.

#### **4. Summary of Citizen Participation Process and consultation process**

##### **Summary from citizen participation section of plan.**

The City of Manhattan's Citizen Participation Plan (CPP) and process involves citizens in decisions that directly affect their lives and encourages full and proper citizen participation at all stages of the planning process. The process designates the structure, procedures, roles, and policies for program participants, consistent with federal requirements for the CDBG Program, in the event of federally declared disasters and the Section 108 Loan Guarantee Program. The City also has developed a social media policy that outlines rules for social media interactions, has instituted the use of an on-line suggestion box, and mines residents’ input from Facebook and Twitter. In addition to more formalized solicitation methods, City staff notes any identified issues that arise in day-to-day conversations that may be eligible for federal assistance.

The Citizen Participation Plan (CPP) uses the five actions identified in section AP-12 to promote community involvement in the planning process. As part of the CPP process for the 2024 Plan, the City established an on-line suggestion box, issued a press release inviting the public to comment during the Public Input period, and utilized social media notifications to promote input regarding the CDBG Program. The City held a public input meeting during the planning phase for PY 2024, which only one person attended. However, three residents provided suggestions through the on-line suggestion box. These comments were combined with those from local social service agencies to develop four broad categories of projects that the City should address in 2024, which include Administration and Planning, Housing Rehabilitation, Public Services, and Public Facilities and Infrastructure.

The draft 2024 Annual Action Plan was posted on the City’s website for view or download. The public was invited to review and comment during a 30-day period beginning on May 22, 2024. The City provided a link to the 2024 Plan for the Manhattan Public Library to publish on its website and via social media and the local newspaper encouraged the public to review and provide comments. The public was also invited to attend a public hearing during a Manhattan Urban Area Planning Board meeting on May 23, 2024. There were no comments received from the public at this meeting. Additionally, the public could provide comments via email to the CDBG Grant Administrator.

The City Commission authorized City staff to submit the 2024 Annual Action Plan to HUD at their June 18, 2024, legislative meeting. The meeting was noticed in advance, televised on the local cable channel, and live streamed on the City’s website and Facebook. All City Commission meetings are recorded and posted on the City’s website. Citizens had the opportunity to comment on this item during the meeting, however, no comments were made.

#### **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.**

As part of the 2024 Action Plan planning process, City staff revisits comments received in prior years’, as well as seeks any new input. The City also accepts project suggestions throughout the grant year, and specifically encourages residents and agencies to provide suggestions during the planning, consultation,

and review processes. The 2024 Plan Appendix includes a list of all suggestions received, as well as a copy of the public hearing minutes and written comments received regarding the 2024 Action Plan. The following is a summarized compilation of all suggestions received during the development phase for the 2024 Annual Action Plan.

**Housing Projects:** Suggestions included tax credits for investors to build affordable housing, assistance with modernization of Public Housing, conduct rental inspections; and enforce a housing quality standard, create, or support a housing program for “hard to house” persons, and provide affordable/suitable/workforce housing.

**Public Services Projects:** Suggestions broadly supported expansion of ATA bus routes and service hours or to offer other transportation options; affordable internet access; free parking in certain areas of town, support Mental Health Services; support services for the literally homeless who are ineligible to stay at the shelter.

**Public Facilities and Neighborhood Infrastructure Projects:** Improve connectivity to underserved areas of the City to expand available options. Improve streets, signage, and lighting, improve/add pedestrian crossings, sidewalks and trails for pedestrians and bicyclists in underserved areas of the community and locations lacking necessary connectivity. Improve amenities, services, and ADA access at public facilities; expand or provide new public facilities such as a substance-abuse recovery facility or expand the new mental health stabilization center.

No suggestions were received for specific economic development projects.

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

City staff reviewed all comments, questions, and suggestions to confirm CDBG eligibility, and answered questions directly. City staff also forwarded any activities deemed ineligible to the appropriate City departments for capital improvements program consideration.

## **7. Summary**

The City will continually strive to address the greatest needs as identified by Manhattan residents and public services agencies, and through consultation with key stakeholders and City staff.

## 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
CDBG Administrator	MANHATTAN	Community Development

Table 1 – Responsible Agencies

### Narrative (optional)

The City of Manhattan's Community Development Department is the lead agency that oversees the development of the Consolidated Plan and administers all projects and programs covered by each year's Annual Action Plan projects and activities. It will also oversee any private/third party Section 108 Loan Guarantee applications, should they occur.

### Consolidated Plan Public Contact Information

John Adam, AICP  
Assistant Director  
Community Development  
City of Manhattan, KS  
1101 Poyntz Ave.  
Manhattan, KS 66502  
(785) 587 2435  
John.Adam@cityofmhk.com

Christina L'Ecuyer  
Senior Grant Administrator  
Community Development  
City of Manhattan, KS  
1101 Poyntz Ave.  
Manhattan, KS 66502  
(785) 587 2430  
lecuyer@cityofmhk.com

## **AP-10 Consultation – 91.100, 91.200(b), 91.215(l)**

### **1. Introduction**

Identifying and planning to address needs is an ongoing collection of observations, requests, analysis, and opportunities. City staff continually consult with various area agencies, service providers, and key stakeholders to determine the needs that should be addressed using CDBG funds. City staff has held consultation meetings with local and regional agencies, has provided direct input, and participated in monthly group meetings to identify the most important needs for the City of Manhattan and its residents.

The City consults via phone conversations, emails, surveys, and live and virtual meetings to identify the most urgent needs affecting the community.

### **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(l))**

The Riley County Council on Social Services (RCCSSA) comprises nearly 40 agencies that provide services to Manhattan area citizens. From September to May, the RCCSSA meets to alert members of issues, coordinate activities, and provide opportunities for networking that encourage coordination among existing social service agencies to meet identified needs. Every August, RCCSSA sponsors Everybody Counts – an annual event bringing free community resources to those in need in our community. Everybody Counts is operated by a sub-committee of the RCCSSA membership. This annual one-day service and resource event is available to all residents, with specific focus on homeless and low-income residents.

Historically, the City Commission has elected to fund social service agencies from the City’s general fund to address issues related to the needs of low- to moderate-income (LMI) residents. The City Commission would also approve the allocation of funding from a state-collected special alcohol sales tax, awarded to agencies that focus on addressing drug and alcohol addiction through prevention, education, treatment, and intervention.

In February 2023, the City Commission decided to restructure the two advisory boards that oversee both aforementioned funding sources. The new consolidated board, the Community Support Funds Advisory Board (CSFAB) is responsible for recommending allocation of special alcohol sales tax funding, along with any funding the City Commission allots for social service agencies. The City anticipates approximately \$1 Million in funding will be available for the CSFAB to allocate to social service agencies in 2025.

For calendar year 2024, the CSFAB recommended the City Commission provide \$557,500 in local funds to 23 agencies, and \$515,500 from state-collected Special Alcohol sales taxes to 18 agencies’ programs that address drug and alcohol addiction issues through prevention, education, treatment, and interventions. Funded agencies provide recovery services, mental health services, homelessness and shelter, community corrections adult and juvenile services, services to disadvantaged and abused children, education services, or assist people in poverty.

The City supports the Manhattan Housing Authority (MHA) in several ways, including performing any needed Environmental Reviews. The Fire Department Risk Reduction Office requires Apartment Towers to be fire-sprinkled by 2027. The City is collaborating with MHA to assist with engineering design towards that effort and redesign of infrastructure near Apartment Towers that will include increasing the size of the water main to accommodate the needed fire sprinklers.

In the summer of 2022, the City began a conversation with a low-income housing provider to relocate and redevelop 62 senior units currently located in a floodplain. MHA is looking to obtain the project-based vouchers currently tied to property. The City Commission has given conditional approval for the MHA to redevelop a City-owned parking lot to build the replacement senior units. MHA has a concurrent project that would demolish and rebuild Carlson Plaza, a multi-story apartment building and has applied for Section 18, “Functionally Obsolete” status.

In November 2022, the City Commission adopted the Housing Market Analysis (HMA) as an amendment to the Manhattan Urban Area Comprehensive Plan. The HMA was the City’s first housing study in over twenty years. The HMA identifies Manhattan’s housing needs, goals, and implementation strategies to serve the community for the next two decades. The strategies identified in this document will be used to collaborate and partner with public, private, and non-profit entities to address housing 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.**

Manhattan and Riley County are part of the Kansas Balance of State Continuum of Care (CoC) and the City coordinates with the Kansas Housing Resources Corporation (KHRC) to administer and monitor state-operated Emergency Solutions Grant funds, and with the Manhattan Emergency Shelter, Inc. (MESI) and the Crisis Center, which ESG funds are “passed through” to. MESI and the Crisis Center are the main providers of homeless emergency shelter in Manhattan.

MESI operates the Caroline Peine Transitional Shelter, which offers 47 beds of emergency shelter for homeless men, women, and families, offers placement in permanent supportive housing, and case management. MESI also provides homeless rental assistance either to decrease the current length of homelessness, or to prevent a family from becoming homeless and entering shelter. MESI does not set aside specific beds in the shelter for the chronically homeless, but houses them as needed, and houses individuals through a CoC Program called the Opportunities Program.

The Crisis Center provides domestic violence emergency shelter and case management services. In 2018, the City utilized CDBG planning funds to contract for a study to determine needs and develop concept plans that the Crisis Center used to raise funds to build a new, higher capacity shelter that includes an ADA unit, which opened in July of 2022. The City assisted the Crisis Center in applying for ESG-CARES funds to purchase sanitary furnishing for the new shelter and addressed other COVID-related needs.

In 2018, the Flint Hills Community Care Team (CCT) was formed by the Flint Hills Wellness Coalition (FHWC) to provide person-centered care, to improve outcomes for the most vulnerable members of the community by developing wrap-around services using multi-agency partnerships and care coordination. The CCT identifies the highest need individuals through their patterns of utilization of crisis/emergency

services, hospital admission or other compelling indicators of vulnerability. The CCT optimizes services' availability to patients/clients through integrated and synchronized patient-centered care, delivered, through multi-agency partnerships and care planning, and coordinates with other providers and social service agencies whom the client may be engaged with or could receive services.

Other providers addressing the needs of homeless person or persons at risk of homelessness include the Riley County Health Department and the Flint Hills Community Clinic which provide health care for the uninsured; while Pawnee Mental Health provides services to individuals in mental distress; Be Able which provides amenities and services to the literally homeless; and Big Lakes Developmental Center provides services and job training to the intellectually disadvantaged. The Kansas Workforce Center has local offices that provide both job search assistance and job training to unskilled individuals, and the Manhattan Job Corps work with persons leaving incarceration. A HUD Veterans Affairs Supportive Housing Representative assists veterans obtain additional permanent housing and works with the MHA to secure vouchers for housing opportunities for Veterans and their Families.

**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 Manhattan does not receive Entitlement ESG funds; however, it coordinates with the Kansas Housing Resources Corporation (KHRC) to submit agency applications and administer and monitor state pass-through Emergency Solutions Grant funds. The KHRC monitored the City in March 2023 and found the City complies with KHRC ESG Program Rules, and had no findings for the ESG CARES, ESG FFY 21 and ESG FFY 22 grants. MESI and the Crisis Center were simultaneously monitored with the City and had “no findings”. KHRC confirmed that both agencies follow the HMIS policies and procedures set forth by Balance of State Continuum of Care.

The Manhattan Emergency Shelter, Inc. (MESI) is the only local agency that receives both CDBG and state sponsored ESG funds. The City and MESI consulted with the Kansas Housing Resources Corporation, which administers ESG funds that Manhattan receives, and concluded that ESG funding will not duplicate funding received from the CDBG because the funding supports separate activities. MESI uses CDBG funds to conduct Homelessness Prevention, which is not funded through their ESG grant.

In 2022, Pawnee Mental Health Services (PMHS) received CDBG funding for a Benefits Specialist and Case Manager who helps clients obtain medical benefits. In 2021, the KHRC provided PMHS with CARES Act ESG (ESG-CV) funds made available to all Community Mental Health Centers in Kansas. PMHS used these funds to temporarily house clients with a serious mental illness impacted by COVID-19, or who were exiting the PMHS Crisis Stabilization Unit during the Pandemic. Clients were given temporary housing that ranged from days to months and provided clients with Case Management to help them become permanently housed and stabilize their circumstances. PMHS has applied for ESG 2024 funding to continued support of their Transitional Housing program.

**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	<b>Agency/Group/Organization</b>	MANHATTAN EMERGENCY SHELTER
	<b>Agency/Group/Organization Type</b>	Housing Services-Persons with Disabilities Services-homeless
	<b>What section of the Plan was addressed by Consultation?</b>	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 Homelessness Prevention
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The City continually consults with MESI on CDBG, Emergency Solutions Grant (ESG) Programs, Homelessness Prevention, and other activities. Participant in the CoC activities, including PIT data collection. Community Care Team and RCCSSA members.
2	<b>Agency/Group/Organization</b>	MANHATTAN HOUSING AUTHORITY
	<b>Agency/Group/Organization Type</b>	Housing PHA Services - Housing Service-Fair Housing
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Public Housing Needs Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs Market Analysis Anti-poverty Strategy

	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Ongoing consultation on the needs for public housing in the City. The City collaborates with the MHA to improve the quality and supply of affordable housing, and services to MHA tenants. MHA is assisting with the Housing Market Analysis, gives preference to homeless persons residing at the shelters and is working with other agencies to train youth aging out of foster care regarding tenant responsibilities and life style choices to exit poverty. RCCSSA Agency.
3	<b>Agency/Group/Organization</b>	Riley County Health Department
	<b>Agency/Group/Organization Type</b>	Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-homeless Services-Health Services-Education Health Agency Child Welfare Agency Publicly Funded Institution/System of Care Other government - County
	<b>What section of the Plan was addressed by Consultation?</b>	Homelessness Strategy Non-Homeless Special Needs Market Analysis Anti-poverty Strategy Lead-based Paint Strategy Disaster Response
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The Riley County Health Department (RCHD) provides a variety of services to residents and families in the City and throughout Riley County. Development of affordable childcare options for LMI families remains a top priority. The RCHD can also identify homes where issues with LBP may be an issue. Community Care Team, FHWC and RCCSSA members.

4	<b>Agency/Group/Organization</b>	Sunflower Children's Collective, Inc.
	<b>Agency/Group/Organization Type</b>	Services-Children Services - Victims Child Welfare Agency Not-profit Corporation FKA: Sunflower CASA Project, Inc.
	<b>What section of the Plan was addressed by Consultation?</b>	Non-Homeless Special Needs Anti-poverty Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Sunflower Childrens Collective, Inc., (formerly known as Sunflower CASA Project Inc.) provides services to children who are victims of abuse or neglect. The City and Sunflower continue to work together on identified projects assisting children. RCCSSA agency.
5	<b>Agency/Group/Organization</b>	Manhattan Area Housing Partnership, Inc.
	<b>Agency/Group/Organization Type</b>	Housing Services - Housing Services-Persons with Disabilities Certified Housing Development Organization Foundation
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homelessness Strategy Non-Homeless Special Needs Market Analysis Anti-poverty Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	City Administration contacts the Director of the Manhattan Area Housing Partnership, Inc. (MAHP), which provides low-income tax credit housing and provides services to clients who are disabled. MAHP has provided input on the Housing Market Analysis. RCCSSA Agency
6	<b>Agency/Group/Organization</b>	Crisis Center, Inc.
	<b>Agency/Group/Organization Type</b>	Services-Victims of Domestic Violence Services-homeless Regional organization Domestic Violence Shelter for 5 counties Foundation

	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homeless Needs - Families with children Homelessness Strategy Anti-poverty Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	City Administration communicated with the Director of the Crisis Center in Manhattan to determine the housing and other needs for victims of domestic violence, and operation of its shelter. The City annually assists the Crisis Center with an application for ESG funds for shelter operations and essential services.
7	<b>Agency/Group/Organization</b>	HOUSING & CREDIT COUNSELING, INC
	<b>Agency/Group/Organization Type</b>	Housing Services - Housing Services-Education Service-Fair Housing Regional organization HUD-Certified Housing Counselor
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homelessness Strategy Anti-poverty Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	HCCI counseling and education is key to homeless prevention and anti-poverty strategies. The City continues to support HCCIs efforts to assist residents on issues involving consumer credit, and tenant and landlord issues. The City refers tenants, landlords, bankers, and realtors to HCCI regarding Fair Housing issues, and HCCI collaborates with the City and other service providers to offer Fair Housing and other training events throughout the year.

8	<b>Agency/Group/Organization</b>	KANSAS LEGAL SERVICES INC
	<b>Agency/Group/Organization Type</b>	Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-Victims of Domestic Violence Services-homeless Services-Education Services-Employment Service-Fair Housing Services - Victims Regional organization Legal Aid Non-profit Corporation
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homelessness Strategy Non-Homeless Special Needs Anti-poverty Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	City Administration consulted through a variety of means with the Managing Attorney at the Kansas Legal Services, Inc. (KLS) Manhattan office regarding the civil legal services they provide including but not limited to community legal education events, legal advice, document preparation, and court representation for LMI residents. RCCSSA agency
9	<b>Agency/Group/Organization</b>	Pawnee Mental Health Services, Inc.
	<b>Agency/Group/Organization Type</b>	Services - Housing Services-Children Services-Persons with Disabilities Services-Health Services - Victims Health Agency Regional organization Services - Mental Health

	<b>What section of the Plan was addressed by Consultation?</b>	Homelessness Strategy Non-Homeless Special Needs Anti-poverty Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	City Administration consulted with the Pawnee Mental Health staff regarding services to individuals requiring assistance because of substance abuse, mental trauma and mental health issues, and sober living housing for homeless persons with co-occurring disorders. FHWC & RCCSSA members.
10	<b>Agency/Group/Organization</b>	Manhattan Area Habitat for Humanity
	<b>Agency/Group/Organization Type</b>	Housing Services - Housing Services-Persons with Disabilities Regional organization Foundation
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Non-Homeless Special Needs Market Analysis Anti-poverty Strategy Low-Income Housing Development
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The Manhattan Area Habitat for Humanity (MAHFH) is a branch of the Topeka Habitat For Humanity. MAHFH provides volunteer assistance to complete low cost, non-specialized housing rehab services to clients with projects that are usually less than \$500. The City refers clients to MAHFH on rehab projects that can be accomplished with volunteers, and MAHFH refers clients to the City when the projects are large and complex or involve lead and/or asbestos abatement. MAHFH constructs housing for qualified LMI families, on a case-by-case basis.
11	<b>Agency/Group/Organization</b>	Flint Hills Area Transportation Agency
	<b>Agency/Group/Organization Type</b>	Services-Elderly Persons Services-Persons with Disabilities Services-homeless Regional organization Services - Transportation

	<b>What section of the Plan was addressed by Consultation?</b>	Public Housing Needs Homelessness Strategy Non-Homeless Special Needs Economic Development Anti-poverty Strategy Institutional Collaboration
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	City Administration collaborates through a variety of means with the Flint Hills Area Transportation Agency to identify transportation needs and solutions for low-income areas and clients, including for KDOT pass-through funds. The FHATA coordinates other agencies to provide discounted services to LMI Clients and has agreed to have route stops at Manhattan Housing Authority properties. RCCSSA member
12	<b>Agency/Group/Organization</b>	Flint Hills Metropolitan Planning Organization
	<b>Agency/Group/Organization Type</b>	Regional organization Planning organization Federally-mandated Transportation Planning & Programming Organization
	<b>What section of the Plan was addressed by Consultation?</b>	Economic Development Anti-poverty Strategy LMI Neighborhood Infrastructure needs
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The FHMPO is the federally-mandated, designated entity to provide regional transportation planning and programming services across portions of Geary, Pottawatomie, and Riley Counties. City staff consults with FHMPO through various means. The FHMPO identifies issues and opportunities for improvements that benefit Manhattan LMI areas and residents, such as planning for safe spaces and opportunities to improve walking and biking to get there.
13	<b>Agency/Group/Organization</b>	Flint Hills Breadbasket
	<b>Agency/Group/Organization Type</b>	Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-homeless Non-profit Food Bank

	<b>What section of the Plan was addressed by Consultation?</b>	Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs Anti-poverty Strategy Food assistance and Resources Connections
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	City Administration consults with the Breadbasket staff through a variety of means. The Breadbasket provides food resources to people living in poverty and referrals to other service agencies based on household needs. The City is using CARES Act funds to replace the large outdoor freezer at the Breadbasket to ensure provision of perishable frozen food. RCCSSA member
14	<b>Agency/Group/Organization</b>	Greater Manhattan Community Foundation
	<b>Agency/Group/Organization Type</b>	Business and Civic Leaders Grant-maker supporting local needs Foundation
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Non-Homeless Special Needs Economic Development Anti-poverty Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The Greater Manhattan Community Foundation mission is to build relationships between donors and community needs. City Administration consults with GMCF via email and collaborates to meet the needs of the Manhattan Community while avoiding duplication of benefits. RCCSSA Agency
15	<b>Agency/Group/Organization</b>	Be Able Inc.
	<b>Agency/Group/Organization Type</b>	Services-homeless Services-Education Services-Employment Services - Broadband Internet Service Providers Non-profit Homeless Outreach and Services to people in Crisis

	<b>What section of the Plan was addressed by Consultation?</b>	Homeless Needs - Chronically homeless Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Anti-poverty Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Be Able Inc. conducts street outreach to the literally homeless who are not able or willing to enter shelter and provides services to people in crisis. Be Able provides computers, free Wi-Fi, coaching, advocacy, and referrals at their Community and Adult Day Center. The Be Able Executive Director and Board Chair have consulted with City staff through various means and the City will continue to connect Be Able staff and volunteers with information, opportunities, and resources that may help their clients. RCCSSA Agency
16	<b>Agency/Group/Organization</b>	Flint Hills Wellness Coalition
	<b>Agency/Group/Organization Type</b>	Housing Services-Health Non-profit promoting person-centered equitable health and environmental systems of care
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Non-Homeless Special Needs Market Analysis Anti-poverty Strategy Community Health Improvement Plan,
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The Flint Hills Wellness Coalition (FHWC) actively seeks collaboration with citizens and groups in the City of Manhattan and Riley County to develop community norms that support healthy behaviors and environments, to improve outcomes for the most vulnerable. The FHWC meets monthly with members and other agencies to identify and address the most urgent health and housing needs for the Manhattan Community. CCT founding organization and RCCSSA member.

17	<b>Agency/Group/Organization</b>	Three Rivers, Inc.
	<b>Agency/Group/Organization Type</b>	Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Health Regional organization Non-profit - In-home Care and Independent Living
	<b>What section of the Plan was addressed by Consultation?</b>	Non-Homeless Special Needs
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	3 Rivers provides a variety of independent living and accessibility services to disabled residents, and promotes self-reliance through education, training advocacy, and active support, in the City and throughout a 12 county area. The City includes 3 Rivers when NOFA opportunities are available and collaborates when opportunities arise. RCCSSA member.
18	<b>Agency/Group/Organization</b>	Manhattan-Ogden USD 383
	<b>Agency/Group/Organization Type</b>	Services-Children Services-homeless Services-Education Child Welfare Agency Publicly Funded Institution/System of Care State - Public School District Major Employer
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homeless Needs - Families with children Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs Market Analysis Anti-poverty Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	City staff consulted with USD 383 staff via various means. USD 383 provides a variety of services to unaccompanied youth and families in transition that require assistance, as well as drug and alcohol addiction counseling and prevention programs. RCCSSA Member

19	<b>Agency/Group/Organization</b>	Flint Hills Community Clinic
	<b>Agency/Group/Organization Type</b>	Services-homeless Services-Health Health Agency Regional organization Non-profit provider for uninsured persons
	<b>What section of the Plan was addressed by Consultation?</b>	Homelessness Strategy Non-Homeless Special Needs Anti-poverty Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The City consults via email with the Flint Hills Community Clinic, a private non-profit that provides health care to persons in poverty who are without health insurance. The Clinic expressed a need for access to anti-overdose drugs, especially for literally homeless; and continues to seek a larger space to provide services. RCCSSA Member
20	<b>Agency/Group/Organization</b>	North Central Flint Hills Area Agency on Aging, Inc
	<b>Agency/Group/Organization Type</b>	Housing PHA Services - Housing Services-Elderly Persons Services-Persons with Disabilities Services-Employment Regional organization Food Security/Meals on Wheels Foundation
	<b>What section of the Plan was addressed by Consultation?</b>	Non-Homeless Special Needs Market Analysis Anti-poverty Strategy Pandemic Response for Elderly

	<p><b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b></p>	<p>The North Central Flint Hills Area Agency on Aging and Disability (NCHF AAA) is a private non-profit and designated Public Housing Authority that provides Section 8 vouchers and TBRA in 18 counties, along with a variety of services to elderly and disabled clients that includes a meals program, employment assistance to older adults, counseling on a variety of topics, education opportunities, and other support services for this part of the Manhattan population.</p>
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**Identify any Agency Types not consulted and provide rationale for not consulting**

The City conducted consultations with agencies and service providers involved in implementing the Consolidated Plan and Annual Action Plan using various means. City staff have not purposely left any agency out of the invitation to communicate, and any new groups identified as not being consulted will be engaged by the City as they are discovered.

**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	Kansas Balance of State Continuum of Care	<p>The Kansas Balance of State (BoS) Continuum of Care (CoC) includes the 101 counties that do not have Entitlement status under the Emergency Solution Grant (ESG) program. The Kansas Housing Resources Corporation (KHRC) is the HMIS lead agency for the BoS CoC and ensures that all jurisdictions and agencies receiving state administered ESG funds comply with regulations. The City falls into Region 9 of the BoS CoC and consulted the Director of MESI, who is the Riley County and Region 9 CoC contact, to identify issues and to ensure consistency with the Strategic Plan. The City further provides technical assistance to applicants for state-sponsored ESG funds and supports agency funded by the BoS CoC funding opportunities.</p>

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Manhattan Urban Area Comprehensive Plan (MUACP) &	City of Manhattan	The MUAPB oversees and implements the MUACP, which guides land use, growth management, and development in the Manhattan urban area. The Plan was adopted in 2015 through a joint planning initiative with Riley County and Pottawatomie County. The study area is 93 square miles and identifies new and expanded growth areas in both counties, as well as potential redevelopment areas within the city limits. The MUAPC also includes the Manhattan Area Transportation Strategy (MATS), which focuses on a broad range of multi-modal transportation issues. The MUAPC is often amended to reference stand-alone plans, such as the Bicycle and Pedestrian Systems Plan or Housing Market Analysis.
Manhattan Housing Authority Capital Fund Project	Manhattan Housing Authority	The Manhattan Housing Authority is the local public housing agency designated by HUD. The City consults with the MHA director regularly to assess public housing issues, needs and opportunities, and conducts the Environmental Review for MHA planned CFP projects and other activities.
2020 Community Needs Assessment for Riley County	Wichita State Uni. Community Engagement Institute, coordinated by the Flint Hills Wellness Coalition	The 2020 Community Needs Assessment was designed to gain insight from the community for planning and community improvements in ten different topic areas that included quality of life, mental and physical health, social issues, children and youth, aging, housing, transportation, infrastructure, economics/personal finance, and education.
Multi-Hazard, Multi-Jurisdictional Mitigation Plan	Riley Co. Emergency Management, Pottawatomie Emergency Management, and Manhattan City Departments	This is the Hazard Mitigation Plan for Homeland Security Region 1 in Kansas to address coordination in the event of a disaster. The City, Riley and Pottawatomie Counties with other local, state, and federal agencies have undertaken a review of procedures to follow, in the event of a Federally declared disaster to determine the most efficient responses to Urgent Needs.
Connect 2040	Flint Hills Metropolitan Planning Organization (MPO)	The Flint Hills Metropolitan Planning Organization (MPO) is the designated entity providing regional transportation planning and programming services across portions of Geary, Pottawatomie, and Riley Counties. Connect 2040 is the guiding document for the future of the three-county region's multi-modal transportation system over the next twenty years. This document serves as the blueprint for achieving the vision to Enhance Mobility, Strengthen Communities, and Generate Prosperity.

**Table 3 – Other local / regional / federal planning efforts**

### **Narrative (optional)**

The City coordinates with the Kansas Housing Resources Corporation on the state-sponsored Emergency Solutions Grant Program for MESI and the Crisis Center. On an ongoing basis, the City collaborates as needed locally with the Manhattan Housing Authority, the Manhattan Emergency Shelter, Inc., the Riley County Council of Social Service Agencies (RCCSSA), the Flint Hills Wellness Coalition, and the Manhattan Social Services Advisory Board (SSAB), and with State and Federal agencies to identify the greatest needs and achieve the broad goals identified in each Annual Action Plan. Other City Departments, such as Parks and Recreation, Fire, and Public Works assist in identifying public facility needs that the City should address in LMI neighborhoods. The City coordinates with various Riley County and Pottawatomie County departments, as needed on planning, development, resources, policy, and emergency management issues.

The City identifies needs and receives suggestions from the public, local agencies, non-profits, and local neighborhood groups on an ongoing basis and particularly seeks input from all parties during the fall planning process. The City participated in a two-year long citizen engagement initiative called “Community Solutions to Affordable Housing” that was facilitated by the Institute for Civic Discourse and Democracy at Kansas State University and utilized its findings in developing the Consolidated Plan. More recently, the City Commission adopted as an amendment to the Manhattan Urban Area Comprehensive Plan, the Housing Market Analysis (HMA). The HMA identifies needs across the entire housing spectrum, but showed a concentrated demand for suitable workforce housing, defined as 60%-120% of HUD AMI (2022).

The City compiles the list of needs and then transforms them as applicable into projects either in the City’s Capital Improvements Plan, or as possible projects when drafting each CDBG Annual Action Plan.

## **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**

Manhattan’s Citizen Participation Plan (CPP), amended in 2020, encourages and ensures full and proper participation of residents at all stages of the CDBG planning process. Five objectives guide the basic standards by which the City measures proper citizen participation and are consistent with federal regulations at Title 24 CFR 91.105 of the Housing and Community Development Act of 1974, as amended For the Community Development Block Grant Program, the City will:

- Provide for and encourage citizen participation, with particular emphasis on participation by persons of low- and moderate-income, including non-English speaking residents.
- Provide citizens with reasonable and timely access to local meetings, information, and records.
- Provide for public hearings to obtain citizen’s views and to respond to questions at all stages of the consolidated planning process.
- Provide for technical assistance to groups representative of persons of low-and moderate income that request assistance in developing proposals.
- Provide for a timely written answer to written complaints and grievances regarding the Consolidated Plan.

The City’s annual process includes a public meeting held during the planning phase of each grant year, a public comment opportunity for the draft plan, and a 15-day public review period for the Consolidated Annual Performance Evaluation Report (CAPER) of the prior grant year. The City uses an online suggestion box that residents can use to submit ideas. Facebook and other social media platforms are utilized, and staff monitors comments and suggestions. The City will hold a public meeting to discuss any Section 108 application and its accompanying project, any Substantial Amendment required for the Consolidated and Annual Plans, and provides public meetings for complex projects to gain public input before a project begins. The City notifies the public of meetings through a variety of means including social media, newspaper ads, news releases, the City’s TV channel, "In Touch" and "Next Door" notification systems, and local radio interviews. The City posts all documents on its website and provides physical copies of documents to the Manhattan Public Library, and makes copies available to residents upon request. The documents are printable and available for download, and the City’s website has a translation option under the settings widget at the top of the home page so that the 2024 Plan may be viewed in many different languages.

The City accepts suggestions year-round, and encouraged the public to provide input during the public input phase that began January 7, 2024, and ended February, 2024. The Manhattan Urban Area Planning Board (MUAPB) held a public input Hearing during their regular meeting on

January 25, 2024. No suggestions were received at this meeting; however, the online suggestion box received 8 project and service suggestions from 5 residents covering a variety of needs. The City combined current year suggestions with agency suggestions and applications for public service funds, as well as prior years' suggestions to identify projects for consideration in the draft 2024 Annual Plan.

The availability of the draft 2024 Annual Plan using the HUD-announced allocation, was advertised to the public for 30 days beginning on May 22, 2024, with the public invited to comment and attend a public hearing on May 23, 2024, during the Manhattan Urban Area Planning Board meeting. The City notified the public of the 30-day review and public hearing through the previously mentioned means, and invited comment from residents and agencies. The City received no public comments during the 30-day public review period, nor during the public hearing.

### 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	Public Meeting	Non-targeted/broad community Residents of Public and Assisted Housing	The City held a Public Input Hearing on January 25, 2024, MUAPD attendees present.	City staff discussed the CDBG program with the attendee, but received no Comments after the meeting.	N/A.	
2	Newspaper Ad	Minorities Persons with disabilities Non-targeted/broad community Residents of Public and Assisted Housing	Advertisement promoted public input period from January 7 to March Feb 9, 2024, the public meeting, and the online suggestion box, and was extended to February 26, 2024 (2 <sup>nd</sup> ad).	See internet outreach.	All comments were accepted.	

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)
3	Internet Outreach	<p>Minorities</p> <p>Non-English Speaking - Specify other language: Spanish, and others</p> <p>Persons with disabilities</p> <p>Non-targeted/broad community</p> <p>Residents of Public and Assisted Housing</p>	<p>The City's website provides for multiple language translations.</p> <p>The City publicized the Public Input Period for the 2024 Annual Plan via direct e-mails, phone newspaper, Facebook, Twitter, and Next Door, and opened an electronic suggestion box on the City website.</p> <p>5 people provided suggestions through the online box.</p>	<p>Suggestions included issues addressing Public Services, Infrastructure, transportation, and housing needs, and taxes.</p>	<p>All comments accepted</p>	

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)
4	Newspaper Ads	<p>Minorities</p> <p>Non-English Speaking - Specify other language: Spanish and others</p> <p>Persons with disabilities</p> <p>Non-targeted/broad community</p> <p>Residents of Public and Assisted Housing</p>	<p>The City publicized a 30-day public review period from May 22, 2024 to June 21, 2024, and the Public Hearing on May 23, 2024, (separate ad) for the proposed 2024 Annual Plan. The ad invited comments and attendance at the public hearing held by the Manhattan Urban Area Planning Board. The City made the Plan available online and downloadable, online, and virtually on the City website.</p>	<p>The City received no public comments over the 30-day review period.</p>	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)
5	Internet Outreach	<p>Minorities</p> <p>Non-English Speaking - Specify other language: City's website provides a tool for multiple language translations</p> <p>Persons with disabilities</p> <p>Non-targeted/broad community</p> <p>Residents of Public and Assisted Housing</p>	The City received no responses from any agency no comments from the public at large.	N/A	All comments accepted	
6	Public Hearing	Non-targeted/broad community	The Manhattan Urban Area Planning Board held an in-person Public Hearing at their May 23, 2024, meeting. The Public could comment or ask questions about the Proposed 2024 Annual Plan. MUAPB attendees.	No Comments were received during the meeting, or afterwards.	N/A	

**Table 4 – Citizen Participation Outreach**

# Expected Resources

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

### Introduction

CDBG PY 2024 will start on July 1, 2024. HUD posted a proposed award amount of \$552,395 on the internet on May 6, 2024, and City Administration used this proposed amount to estimate the 2024 budget. HUD did not shorten the 30-day requirement for public review and public hearing. Therefore, the proposed plan was drafted using the HUD-proposed allocation with the budgets based on regulatory percentage caps for fund uses, and the public was advised that changes to the estimated budget would adhere to those regulatory caps. The City received the official HUD allocation letter confirming the award amount of \$552,395 on May \_\_, 2024, which was later than the 45-day deadline of May 17 for submission of the 2024 Plan. However, because the City used the HUD-proposed allocation, no changes were needed to the Annual Plan budgeted amounts prior to being presented to the City Commission on June 18, 2024, for authorization to submit to HUD.

The following table displays the anticipated resources that the City will allocate to projects and activities that address the needs of residents in Manhattan. The City occasionally receives Program Income from Housing Rehabilitation grant recipients reimbursing the program because they are exiting the program, but none is expected for Program Year 2024. For purposes of planning, "Remainder of Con Plan" estimate is the is \$0.00, because 2024 is the last year of the current Consolidated Plan.

### 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 Re-sources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	552,395	0	0	552,395	0	The amount allocated for 2024 will be used for planned projects under design, or their alternates. No Program Income from the Housing Rehab program is expected.
Other	public - federal	Admin and Planning Public Improvements Public Services, Other	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**

The City does not require matching funds; however, opportunities to leverage funds do occur and the City has procedures in place to manage external matching funds. Procedures are in place for individual homeowners who wish to contribute to the rehabilitation of their homes, and for public service agencies and non-profits to provide a match for their projects when the cost of improvements are greater than available CDBG funding. The City will use CDBG funds to help LMI single-family homeowners undertake home repairs designed to preserve the safety and livability of their structures. CDBG funds will be used to provide Public Services in conjunction with donations from private, local, and agency fundraising to assist agencies meet the needs of as many presumed-benefit, and LMI clients as possible. All Public Service agencies funded to date have provided a match in some amount.

The City targets CDBG funds in LMI areas to improve local public facilities and infrastructure or may use CDBG funds as match in conjunction with other federal grant dollars. The City may target funds to improve neighborhood accessibility through ADA improvements to facilities and sidewalks, make connectivity improvements such as for creating trails, and renovate sidewalks and connect gaps. CDBG may be used to improve community centers or other public facilities that directly serve LMI populations or areas, and for historic preservation. The City has often provided local funds as match for projects that exceed CDBG budgets.

CDBG funds may be used for planning activities, such as to assess public buildings serving LMI neighborhoods or persons, or to assist private non-profit agencies with planning needs. The City will use CDBG funds for economic development in instances where Section 108 Loan Guarantee funding will create or preserve jobs for LMI persons, and where the third Party agrees to repay the loan in full, however, there are no projects currently planned that address that goal.

The City operates under several disaster plans, some developed in conjunction with Riley County, which address specific disaster events including tornados, flood and levee failures, failure of Tuttle Creek Lake Dam, and ice storm events. In these instances, the City intends to use other avenues of Federal assistance to address these potential disasters and will only Substantially Amend each AAP if needed. The City reviews these disaster plans; participates in training and exercises with area partners in Riley County, Pottawatomie County, and other local, state, and federal agencies to identify areas of improvement, and determine appropriate actions to take after any potential event. Manhattan, Riley County, and local entities in the surrounding region routinely leverage Federal and State funds for training and equipment to be better prepared for a disaster.

Riley County Emergency Operations Center (EOC) works during public emergencies to ensure the safety and wellbeing of the Riley County Community as part of a unified command structure that includes Riley County Emergency Management, Riley County Emergency Medical Services, Riley County Police Department, the City of Manhattan, and the Manhattan Fire Department. The EOC developed an Incident Action Plan for the COVID-19 Pandemic for Riley County and Manhattan and the City specifically revised its internal Business Continuity Plan for the COVID-19 event.

The City will follow these practices and will maintain its procedures in place to manage funds from other organizations as related to any other source of funds. To prevent duplication of benefits, agencies will be required to identify any other sources they have applied to for the same purposes and have a procedure in place to prevent its occurrence.

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

The City owns several parks, parking lots, buildings and public squares that may be able to address some of the needs identified during community consult meetings. The City has on occasion, repurposed buildings, and available spaces to meet needs as identified by various stakeholders. Examples of this include the Flint Hills Breadbasket and the Manhattan Senior Center, which are City-owned buildings leased at no charge to local groups to meet community needs. Other property occasionally becomes available, and the City may consider purchasing it to satisfy specific needs.

**Discussion**

The City, Kansas State University, and other state and local agencies have collaborated with the Flint Hills Area Transportation Agency to locate and identify needed improvements to bus stops areas in LMI neighborhoods and within the Edge District that the National Bio and Agro-Defense Facility (NBAF) will impact. The City has also consulted on the availability of funds for ATA services to Public Housing Units. The MHA ultimately signed a contract with ATA Bus to provide stops at MHA properties around town. City residents have identified sidewalks surrounding the parks and public squares in LMI neighborhoods, and sidewalks connecting other parts of town to bike and pedestrian trails, as well as public facilities improvements, as projects that will improve the livability and community connectedness of LMI neighborhoods.

The City has adopted a strategy of education as the primary method to further Fair Housing in the community. The City includes and maintains a “Fair Housing” webpage to provide educational information, resources and links for potential tenants, home purchasers and landlords. The City updates this webpage on an annual basis and developed and distributed a brochure in both Spanish and English regarding Fair Housing issues and actions tenants could take. The City also conducts an annual Fair Housing Seminar for tenants and landlords that educates Landlords and Tenants on their Rights and Responsibilities, as well as provides information to realtors, bankers, social service providers, and other interested participants. The Manhattan Housing Authority has collaborated with the City in presenting these annual seminars regarding Fair Housing Issues, and if not presenting, is usually present to answer questions regarding the Section 8 program.

# 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	Administration, Planning & Fair Housing	2020	2024	Grant Administration, Planning & Fair Housing	City of Manhattan	Administration, Planning & Fair Housing	CDBG: \$110,479	Other: 0 Other
2	Housing Rehabilitation	2020	2024	Affordable Housing Public Housing Non-Homeless Special Needs	City of Manhattan	Housing Rehabilitation	CDBG: \$179,528	Rental units rehabilitated: 188 Household Housing Unit Homeowner Housing Rehabilitated: 7 Household Housing Unit
3	Public Services	2020	2024	Homeless Non-Homeless Special Needs	City of Manhattan	Public Services	CDBG: \$82,859	Public service activities other than Low/Moderate Income Housing Benefit: 80 Persons Assisted Public service activities for Low/Moderate Income Housing Benefit: 40 Households Assisted Tenant-based rental assistance / Rapid Rehousing: 45 Households Assisted Homelessness Prevention: 56 Persons Assisted
4	Public Facilities & Infrastructure	2020	2024	Homeless Non-Homeless Special Needs Non-Housing Community Development	City of Manhattan	Public Facilities and Infrastructure	CDBG: \$179,528	Public Facility or Infrastructure Activities other than Low / Moderate Income Housing Benefit: 3170 Persons Assisted

**Table 6 – Goals Summary**

**Goal Descriptions**

<b>1</b>	<b>Goal Name</b>	Administration, Planning & Fair Housing
	<b>Goal Description</b>	Administration involves management of all the projects and their activities including monitoring, compliance and reporting, and closeout. Administration also includes Fair Housing activities and planning studies for future needs, should funds be available.
<b>2</b>	<b>Goal Name</b>	Housing Rehabilitation
	<b>Goal Description</b>	Housing Rehabilitation includes the program delivery of the following activities, Comprehensive Rehabilitation, Emergency & Accessibility Rehabilitation, and Mobile Home Emergency & Accessibility Rehabilitation, Small Repair grants. The City provides this program to maintain and preserve availability of affordable owner-occupied housing stock, improve safety, livability, and accessibility of homes, which helps stabilize neighborhoods. Homes may be located anywhere within the Manhattan City Limits and all LMI homeowners are income-qualified for eligibility. The City also preserve the Public Housing Modernization project to assist the MHA with Radon testing in ground floor public housing units and has maintained funding for the Sprinkler Project at the MHA Apartment Towers and other public housing units. Expected Low/Moderate Income Housing Benefit: 188 Households Assisted at MHA; Homeowner Housing Rehabilitated: 7 Housing Units.
<b>3</b>	<b>Goal Name</b>	Public Services
	<b>Goal Description</b>	Public Services activities include any service that benefits low- to moderate-income persons or presumed benefit populations, which prevents homelessness, increases self-sufficiency and/or provides counseling. In Program Year 2024, this will include homelessness and prevention services, mental health shelter services, essential legal services, consumer credit counseling, as well as Landlord/Tenant counseling, and services for abused children and their non-offending caregivers. Public service activities other than LMI housing Benefit: 80 Persons by CAC and KLS; Public service activities for LMI Housing Benefit: 78 Households by HCCI, Tenant-based rental assistance / Rapid Rehousing / Shelter for Co-occurring mental disorders: 43 Households by MESI and PMHS, Homelessness Prevention: 58 Persons by MESI.

4	<b>Goal Name</b>	Public Facilities & Infrastructure
	<b>Goal Description</b>	Public Facilities and Infrastructure improvements include all potential facility or infrastructure improvement projects. Facilities may include parks, buildings, or public use structures that serve a LMI area or a LMI population. Infrastructure Improvements may include filling sidewalks gaps, making transportation improvements, installation of street crossings or other neighborhood street improvements, and any ADA or other accessibility or connectivity improvements. Public Infrastructure Improvements enhance access, connectivity, and livability for LMI areas or LMI populations, and improve safety, connectivity and accessibility to services, facilities, and areas of interest. ADA improvements and other facility and infrastructure projects in LMI neighborhoods or qualified census tracts may also be addressed, depending on project development.

**Estimate the number of extremely low-income, low-income, and moderate-income families to whom the jurisdiction will provide affordable housing as defined by HOME 91.215(b)**

The City does not own any public housing or affordable housing units and the City does not receive HOME Entitlement funds. However, through other actions, the City supports the actions of the MAHP, the MHA, the Manhattan Area Habitat for Humanity and private developers which may be proposing rehabilitation and future housing development.

The Manhattan Housing Authority has plans for fire prevention improvements which the City will assist with though needed infrastructure upgrades to meet capacity requirements. MHA also plans to demolish and reconstruct a multi-story 60-unit housing complex and develop additional housing near it to relocate seniors and disabled individuals currently living in a flood zone. The MAHP, Inc. is beginning design for additional low income units, and in the past has supported the MAHP through the donation of City property and waiving of utility hook-up fees. The MAHFH is exploring the potential of becoming a CHDO to access state-sponsored HOME Funds for future affordable housing projects.

The City of Manhattan provides housing rehab to LMI Single Family homeowners through the Housing Rehabilitation Program that is distributed among the 3 low-income levels. The City estimates that over the 5 years: 10 will be extremely low income, 10 will be very low income and 15 will be low income. The City also anticipates assisting the Manhattan Housing Authority with engineering design development to install a fire sprinkler system in the Apartment Towers building, to help preserve affordable rental housing to approximately 52 extremely low-income families, 30 very low-income families and 6 Low-income families. The income of families in the rental units are changeable, therefore while the total of 88 units is accurate, the income levels are estimates only. In addition, the City is collaborating with the MHA to determine a testing schedule for Lead-based paint presence and radon in MHA housing units.

# Projects

## AP-35 Projects – 91.220(d)

### Introduction

The City of Manhattan proposes to undertake projects in the 2024 Annual Plan to benefit approximately 4,000 residents. The City selected these projects in conjunction with HUD National Objectives and identified CDBG eligible activities. The proposed activities address the needs identified by the community through the comprehensive consultation processes.

Administration and Planning Project funds are for oversight of all aspects of the CDBG program; however, no funds are set aside for a planning study in the 2024 Annual Plan due to funding limitations. The City has budgeted funds to continue to educate residents, landlords and the broader community regarding Fair Housing practices.

Housing Rehabilitation Project funds will help preserve the existing affordable housing for LMI populations. The program will offer four kinds of rehabilitation: Comprehensive (funding up to \$25,000 per home), Emergency and Accessibility (up to \$8,000 per home), Mobile Home Emergency Accessibility (up to \$5,500 per home), and small repair Grants (\$1,500). These activities make repairs necessary to maintain the safety and livability of structures and preserve existing owner-occupied affordable housing stock. Accessibility renovations are especially important to disabled individuals and the elderly. The 2022 Sprinkler Project with the Manhattan Housing Authority to prepare Apartment Towers for the first phase of the sprinkler system installation is maintained, but delayed again, and the City may continue to conduct screenings for radon in ground floor units.

The Public Services Project funds provide support to agency services that benefit LMI individuals. The supported programs address child abuse, homelessness and prevention, civil legal aid counseling, consumer credit counseling and tenant landlord counseling, and mental health shelter services.

Public Facilities and Infrastructure may include sidewalk and ADA improvements, as well as a trail connection for LMI neighborhood areas as funds allow. Public Infrastructure Improvements enhance connectivity, and livability for LMI areas or LMI populations, and improve safety and access to services, facilities, and areas of interest. No other building improvements are currently planned.

Economic Development funding will be used as a resource for the creation or preservation of quality jobs for LMI persons and will only be used as gap financing in conjunction with other funds. No Projects have been identified for CDBG funding at this time; however, a 2020 ballot measure to collect an Economic Recovery & Relief sales tax approved use of 20% of this tax to be committed to "job creation, recruitment, or retention initiatives." This effort will be a collaboration between the city and regional public, private, and non-profit partners examining a wide range of economic development possibilities. Potential areas for consideration include job training and re-training programs through local institutions; attainable housing incentive programs for rehabilitation and new builds; entrepreneurial support programs; research and action plans at the intersectionality of jobs, active transportation, and housing; and neighborhood placemaking efforts through revitalization, transportation infrastructure

improvements, and signage, landscaping, and environmental enhancements.

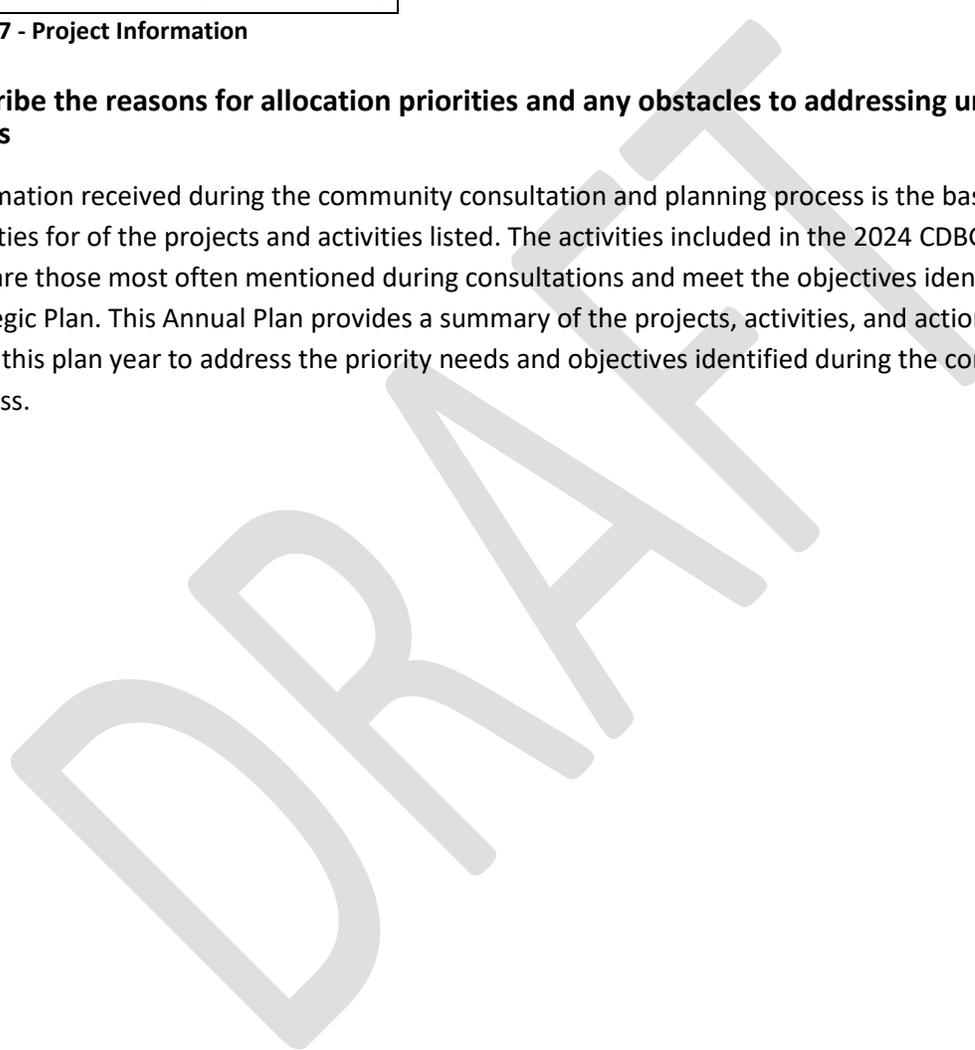
**Projects**

#	Project Name
1	Administration
2	Housing Rehabilitation
3	Public Services
4	Public Facilities & Infrastructure

**Table 7 - Project Information**

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

Information received during the community consultation and planning process is the basis of allocation priorities for of the projects and activities listed. The activities included in the 2024 CDBG Annual Action Plan are those most often mentioned during consultations and meet the objectives identified in the Strategic Plan. This Annual Plan provides a summary of the projects, activities, and actions that will take place this plan year to address the priority needs and objectives identified during the consultation process.



## AP-38 Project Summary

### Project Summary Information

<b>1</b>	<b>Project Name</b>	Administration
	<b>Target Area</b>	City of Manhattan
	<b>Goals Supported</b>	Administration, Planning & Fair Housing
	<b>Needs Addressed</b>	Administration, Planning & Fair Housing
	<b>Funding</b>	CDBG: \$110,479
	<b>Description</b>	Administration involves management of all the projects and their activities including monitoring, compliance and reporting, and closeout. Administration will also include Fair Housing activities and planning studies for future needs if funds allow. These projects will use no more than 20% of the allocation.
	<b>Target Date</b>	6/30/2025
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	This Project is for Program Delivery and has no beneficiaries.
	<b>Location Description</b>	The CDBG Program is administered at Manhattan City Hall for all projects and activities within Manhattan City Limits.
	<b>Planned Activities</b>	Activities will include administration of the CDBG Grant Projects, Fair Housing activities. No Planning activities are expected.
<b>2</b>	<b>Project Name</b>	Housing Rehabilitation
	<b>Target Area</b>	City of Manhattan
	<b>Goals Supported</b>	Housing Rehabilitation
	<b>Needs Addressed</b>	Housing Rehabilitation
	<b>Funding</b>	CDBG: \$179,528
	<b>Description</b>	Housing Rehabilitation includes the management and completion of the following activities, Comprehensive Rehabilitation, Emergency & Accessibility Rehabilitation, Mobile Home Emergency & Accessibility Rehabilitation and Small Repair Grants. The City provides this program to maintain and preserve availability of affordable owner-occupied housing stock, improve safety, livability, and accessibility of homes, and to help stabilize neighborhoods. The city has also preserved 2022 funds to assist with radon testing in some Public Housing Units and will maintain the 2022 MHA Sprinkler project.
	<b>Target Date</b>	9/30/2025
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Approximately and 7 single-family households, and 188 public housing units' households.
	<b>Location Description</b>	LMI-owned single-family homes within City limits, and low-income ground-floor housing units owned by the Manhattan Housing Authority.
<b>Planned Activities</b>	Activities will include Comprehensive Rehab, Emergency and Accessibility Rehab, Mobile Home Rehab, Small Repair Grants, and public housing modernization.	
<b>3</b>	<b>Project Name</b>	Public Services

<b>Target Area</b>	City of Manhattan
<b>Goals Supported</b>	Public Services
<b>Needs Addressed</b>	Public Services
<b>Funding</b>	CDBG: \$82,859
<b>Description</b>	Public Services activities include any service that benefits low- to- moderate income persons or presumed benefit populations to prevent and address homelessness, increase self-sufficiency, and provide counseling. In Program Year 2024, this will include services that include Essential Legal Services, Tenant/Landlord Counseling, and Housing and Consumer Credit Counseling, Homelessness Prevention/Rapid Rehousing, the Discovery Sober Living House for adult men with co-occurring mental health and addiction disorders, and services for abused children. This Project will use no more than 15% of the 2024 allocation.
<b>Target Date</b>	6/30/2025
<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Approximately 221 LMI individuals in 90 households.
<b>Location Description</b>	All activities will be provided to residents living within the City Limits of Manhattan.
<b>Planned Activities</b>	Activities will provide funding support for operations that provide consumer credit and housing counseling, Tenant-Landlord counseling, services for abused children, rapid rehousing services for people at risk of homelessness, services persons with a mental illness, and services for civil legal issues.
<b>4 Project Name</b>	Public Facilities & Infrastructure
<b>Target Area</b>	City of Manhattan
<b>Goals Supported</b>	Public Facilities & Infrastructure
<b>Needs Addressed</b>	Public Facilities and Infrastructure
<b>Funding</b>	CDBG: \$179,528
<b>Description</b>	Public Facilities and Infrastructure improvements include all potential facility or infrastructure improvement projects. Facilities may include parks, buildings, or public use structures that serve a LMI area or a LMI population. Infrastructure Improvements may include filling sidewalks gaps, making transportation improvements, installation of street crossings or other neighborhood street improvements, and any ADA or other accessibility or connectivity improvements. The proposed projects may include upgrades to the Senior Service Center, and repairs to a historic building located in and used by an LMI neighborhood, depending on project readiness. ADA improvements and other facility and infrastructure projects in LMI neighborhoods or qualified census tracts may also be addressed, if funds are available.
<b>Target Date</b>	9/30/2025

<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Approximately 3,170 LMI and disabled individuals.
<b>Location Description</b>	Facilities and Neighborhood Infrastructure will be in locations serving LMI populations and LMI neighborhood areas within City Limits. The proposed 2024 project involves ADA and Pedestrian improvements at City Hall and in LMI neighborhoods intersection, and possibly renovations to a historical building used as a community center, which is located in an LMI neighborhood
<b>Planned Activities</b>	The planned activities under design include ADA and Pedestrian Improvements which may involve relocation of street storm drains and addition of bulb-outs on corners. Truth Park improvements, if it occurs, will include ADA access improvements.

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## **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**

All projects and activities will occur within the City limits. Area benefit projects will be confined to areas identified by the 2011-2015 ACS estimates of LMI Census Tracts and/or block groups. Housing rehabilitation efforts can occur anywhere in Manhattan excluding flood zones if the household is LMI. Public Services benefit LMI individuals that are residents of Manhattan. Public Facilities and Neighborhood Infrastructure improvements will occur in LMI areas, and/or funds will only be applied to projects that serve presumed benefit categories, or for ADA improvement purposes anywhere.

### **Geographic Distribution**

<b>Target Area</b>	<b>Percentage of Funds</b>
City of Manhattan	100

**Table 8 - Geographic Distribution**

### **Rationale for the priorities for allocating investments geographically**

Projects are allocated geographically as required by HUD regulations to benefit identified LMI areas and neighborhoods, and LMI persons.

### **Discussion**

The City believes the projects identified will best serve the citizens' needs as they exist now. The City will reconsider suggestions provided during the Consolidated Plan Input processes for each Annual Plan year covered by the Amended 2020-2024 Consolidated Plan.

# Affordable Housing

## AP-55 Affordable Housing – 91.220(g)

### Introduction

The Manhattan Area Housing Partnership, Inc. (MAHP), a local Kansas Community Housing Development Organization (CHDO), as well as other private developers, provide affordable housing in Manhattan. In 2019, the Kansas Housing Resources Corporation awarded MAHP tax credits and HOME funds to construct an additional 36 units of affordable senior housing on land previously owned by the City. The City supported local efforts to expand affordable housing through the waiving of building permit and utility hook-on fees. In the past, the MAHP has collaborated with agencies in the City to provide additional public and affordable housing, and units for homeless persons. The City does not own or operate any housing units.

The Housing Market Analysis that the city adopted into the MUACP provided new insights into the housing needs for Manhattan. It also repeated themes heard from other reporting including the 2000 Housing Market Analysis and those identified in the 2020-2024 CDBG Consolidated Plan, which showed a lack of supply at all price points of the housing spectrum, and the struggle to provide housing availability in all Area Median Income brackets, regardless of if they were labeled “affordable”, “attainable”, “workforce”, “first-time homebuyers”, “beginner homes” and others.

Within the spectrum of availability at low-and moderate-incomes, a 2020 ballot measure approved by voters dedicated 10% of the Economic Recovery & Relief sales tax towards, “workforce housing initiatives”. The volunteer-appointed Workforce Housing Steering Committee will spend 3 years (2023-2025) discussing and recommending appropriate allocations of the tax revenue to the City Commission who will be the final decision-makers on any workforce housing policies or programs.

Through the Housing Rehabilitation project, the City proposes to rehabilitate 7 homes, and provide radon testing to the Manhattan Housing Authority for units first scheduled for remodel or acquisition, and eventually all units owned by the MHA (approximately 150 People). This was initially planned for 2022, and that funding is maintained though the project may not be completed until later in 2024.

The City has no plans to acquire or build housing units. The City continues to collaborate with the Manhattan Housing Authority for public housing modernization efforts.

<b>One Year Goals for the Number of Households to be Supported</b>	
Homeless	23
Non-Homeless	7
Special-Needs	23
Total	53

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

<b>One Year Goals for the Number of Households Supported Through</b>	
Rental Assistance	23
The Production of New Units	0
Rehab of Existing Units	7
Acquisition of Existing Units	0
Total	30

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

## Discussion

In the table above, the City is asked to estimate the one-year goal for the number of households to be supported for the “Homeless” category. The City follows the definition of homeless as “someone who is living in a place not fit for human habitation” and leaves this as 0 as the City itself does not provide a homeless shelter. However, in the past few years, some of the CDBG-funded Public Services have reported that they have “found housing” for their clients who may be homeless at the time of service. This will be reported annually on the CAPER, if there are any.

The major housing issue in Manhattan is the lack of supply of units across the entire demand spectrum. The City undertook a 15-month housing market study to look at current conditions, needs, and impacts on the Manhattan housing market. The Housing Market Analysis (HMA) revealed affordability as a key issue in the low- to moderate-income households, compounded by the high cost of new construction and percentage of cost burdened households.

With the adoption of the HMA as an amendment to the Comprehensive Plan, the City is now engaged with elected and volunteer officials, consultants, community organizations, and key industry stakeholders to analyze and recommend the most effective financial tools available and create a multi-source, geo-graphically dispersed, and sustainable policy for directing public tax dollars towards programs that will address affordability, location, access, and quality of housing options.

The City will continue to focus CDBG efforts on rehabilitating existing owner-occupied housing stock to preserve availability of affordable single-family units through its existing programs. It will assist the MHA with modernization activities to its existing structures, and MAHP with affordable dwelling projects for senior LMI residents. The City is including all types of housing units identified in the Housing Market Analysis and final recommendations will include policies that address the whole housing picture.

## **AP-60 Public Housing – 91.220(h)**

### **Introduction**

The City of Manhattan owns no Public Housing units, but supports the Manhattan Housing Authority (MHA), which is the local Public Housing Authority (PHA) in its efforts to improve existing facilities. The MHA administers federal, state, and local housing and related programs, owns, and operates 202 units of public housing, and manages a mixed finance LIHTC/Public Housing property of 58 units located throughout the City of Manhattan. The MHA also administers a Housing Choice Voucher program consisting of 197 Housing Choice Vouchers (HCV), 55 HUD-VASH (Veterans) vouchers and 25 Family Unification Program (FUP) Vouchers assisting youth who have aged out of foster care.

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

The City supports the MHA public housing needs in the activities planned for improving its housing units. The City assisted the MHA by financing the remaining repairs at Apartment Towers through a \$1 million bond that included replacing the leaking windows and addressing the deteriorated sanitary sewer lines. The next improvements to this MHA building are to install fire sprinklers in the units. To meet the required water pressure to accommodate the 8-story building, the City will address water line capacity while completing an infrastructure project at the intersection nearest to Apartment Towers in 2024 or 2025.

For several years now, the City and National Church Residences (NCR) have been discussing a FEMA buyout for Garden Grove, a 62-unit senior housing structure, located in the floodplain. In 2022, a collaboration between the NCR and MHA was established, as NCR desires to leave the Manhattan housing market. MHA is working with NCR to transfer project-based vouchers from Garden Grove to a new structure. The City Commission has provided conditional approval for MHA to redevelop a city-owned parking lot to build a replacement building for the Garden Grove project-based vouchers. MHA has applied for Low-Income Housing Tax Credits to assist with financing the new structure. The City will wave Permit and hookup feed and approved Industrial Revenue Bonds up to \$7 million for a Sales Tax Exemption. .

The MHA also proposes to acquire ownership of two other NCR-owned units and is executing a comprehensive repositioning plan with Phase 1 specific to creating a “Downtown Affordable Housing Campus” that includes three individual housing properties.

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

The Manhattan Housing Authority promotes involvement in management and encourages residents to participate in homeownership through First Time homebuyer training with Housing & Credit Counseling, Inc. The MHA also refers residents to Habitat for Humanity for Homeownership opportunities.

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

The current Public Housing Assessment System (PHAS) score for the MHA is “Troubled,” due to depletion of its capital reserve fund needed to complete critical repairs, and under-leasing and due to

COVID impacts. HUD did not give the MHA a score for 2023, yet. However, HUD is changing the scoring system to INSPIRE, and the MHA had its first real Physical Inspection under the new scoring system in the spring of 2024 and MHA scored 92 for the units it owns, and 75 for FHI Apartments which it manages.. The MHA believes it will have a favorable report under the new system. Currently the MHA has forecasted \$798,000 in MHA Public Housing Operating Subsidy for 2024, which added to HUD capital funds and FHI Apartment public housing support means the MHA will exceed \$1 million in HUD support to operate Public Housing in Manhattan.

The MHA has achieved 7 of the 9 action items that are part of the HUD Recovery Agreement from 2021 and HUD is monitoring “Performance” standards for the rest of the term. HUD will maintain the agreement in an Open Status while the MHA begin to re-build its reserve fund and reposition its assets. The City plans to utilize CDBG funds to assist with some improvements and provided CDBG-CARES funds to assist with hiring staff for cleaning and sanitizing MHA housing units and public areas of its buildings, during the Pandemic.

The MHA’s Carlson Plaza, which held 47 units, was vacated in February of 2023, in preparation for repositioning. The MHA has applied for a Section 18 “Functionally Obsolete” status and proposes to demolish and rebuild the structure in partnership with non-profit 3<sup>rd</sup> parties. This will preserve and potentially expand the number of affordable housing units in Manhattan.

## **Discussion**

The MHA offers housing through several means to LMI individuals, including MHA managed housing units, and several types of Section 8 vouchers and low-income tax credit housing. These methods have been discussed in the Strategic Plan and will be a part of MHA’s programming for the near future.

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

### **Introduction**

The City does not receive HOPWA funds; however, does pass through state-provided ESG funds to the Crisis Center and MESI, and the City also provides MESI with CDBG funding support for homeless prevention activities. Pawnee Mental Health Services (PMHS) will occasionally locate housing for persons with a Severe Persistent Mental Illness (SPMI) and as a regional organization, directly received ESG funds from the state. PMHS also receives CDBG funding to support a Benefits Specialist-Case Manager that identifies resources for adults with SPMI who are uninsured. Local government, Public and social service agencies collaborate monthly either at the Flint Hills Wellness Coalition meeting, the Riley County Council of Social Service Agencies meeting, or as members of the Community Care Team to ensure no resident is left unserved.

### **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**

In 2018, the Flint Hills Community Care Team (FHCCT) formed, which is a collaborative effort of nearly two dozen core agencies that identify persons who are chronic users of area emergency resources. MESI also has processes to assist the homeless population who self-report at the shelter. In 2020, Be Able, Inc., which conducts street outreach to homeless individuals, opened a community and adult day center for the literally homeless and families suffering adversity to create connections, cultivate skills, and open doors to opportunities that help break the cycle of poverty and homelessness.

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

MESI operates a 47-bed facility that provides a place for people to stay while they secure housing and provides programs funded through donations and state-operated ESG funds. The City provides CDBG funds to MESI's for Homeless Prevention and Rapid Re-Housing activities to prevent residents from becoming homeless and entering shelter.

The Manhattan Emergency Shelter, Inc. (MESI) receives state administered ESG funds to address the needs of the homeless and operates specific programs that house special populations. There are five affordable housing developments in Manhattan that set aside apartments specifically for housing homeless persons as they stabilize their situations. Through rent and utility support funding, CDBG funds will assist MESI with homeless prevention for an estimated 20 households.

The Crisis Center also receives state-administered ESG funds to provide housing for victims who are homeless due to fleeing domestic violence. Other special needs populations in Manhattan are too small to warrant their own housing services funding, and local agencies have incorporated services for them into their mainstream programs. The new Crisis Center shelter provides 35 beds for individuals and their children, who are homeless due to abusive situations, and has housed 96 unduplicated clients for a total of 4,234 bed nights since opening the new shelter in July 2022.

Disposition of the old shelter building is still being determined. The Crisis Center Shelter is a secure facility that operated under strict protocols for the duration of the Pandemic. Whenever possible, the Crisis Center assists victims to remain in their homes.

Be Able, Inc. aids the literally homeless who do not want to, or cannot go into a shelter, and provided a temporary warming shelter for homeless persons who did not want to go to the City-operated warming shelter. The City will open temporary shelters in extreme weather emergencies, such floods, tornados, and warming/cooling shelters in extreme cold or heat for people who may not be homeless, but who temporarily may not have safe living conditions due to the emergency.

**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**

Homeless persons are identified through several sources including self-identifying at the local hospital, school district, law enforcement, Pawnee Mental Health, the Flint Hills Breadbasket, MESI and other agencies.

The City falls within the Flint Hills Region (9) of the Kansas BoS CoC, which passes through state provided ESG funds to the Crisis Center and MESI for CoC programs that assist homeless persons and families transition to permanent housing. The Director of MESI is the Riley County regional coordinator and co-hosts monthly CoC Region 9 meetings and participates with agencies within the balance of the state. MESI's programs and case management are designed to help chronically homeless individuals become stably housed and maintain independent living. MESI also uses Rapid Rehousing funds to shorten the time clients are homeless or in transition to stable housing.

The Riley County Health Department and the Flint Hills Community Clinic address the health needs for the homeless and uninsured. Other regional non-profits such as Konza Prairie Community Health are optional resources for various medical needs. The Flint Hills ATA Bus provides reduced fare transportation to individuals needing transportation to agencies that assist the homeless. Big Lakes Developmental Center, Inc., provides job and life skills training specifically to intellectually disadvantaged individuals to help them become self-sufficient and secures housing for these clients. The MHA collaborates with the HUD VASH representative who solely aids veterans and their families through the "Housing First" principle to access the services needed for transition to permanent housing. Other agencies address special needs in conjunction with activities for the population at large; a new non-profit called Be Able Inc., provides the literally homeless with access to services and resources.

The Crisis Center shelters victims and families who must flee domestic violence within their homes and certifies those seeking shelter are homeless due to domestic violence. They provide emergency shelter only for those who are in danger and cannot remain in their own homes. In addition to shelter, the Crisis Center provides counseling and services in collaboration with many agencies and organizations, including the Manhattan Housing Authority, to provide permanent housing for their clients.

The Manhattan Emergency Shelter is not able to house any minor children without a parent or guardian. The Shelter staff must call authorities to report the child is without a parent/guardian and is seeking shelter for unaccompanied youth under the age of 18. If the unaccompanied youth is between ages 18-24, MESI will house them and create a case plan for permanent housing.

USD 383 identifies unaccompanied youth as children living on their own or with an adult who is not their legal guardian, and children in homeless families. The School District's Families in Transition (FIT) program tracks families and unaccompanied youth and assists them through a variety of means designed to assure educational opportunities continue, as well as address urgent needs involving nutrition, health care, basic necessities, and housing.

**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.**

Agencies in Manhattan are very effective in communicating with each other regarding the needs of their clients.

Persons who are being discharged from a publicly funded institution or system are not to be discharged into homelessness. Government funded institutions are not allowed to use the Manhattan Emergency Shelter as a "discharge plan" unless the individual was homeless before entering the institution and resided in the institution for less than 90 days. In the event someone has slipped through the cracks or has been discharged to a location where they are no longer welcome, MESI will house them in their emergency shelter, as they are considered homeless at that time. MESI works with the institutions and refers them to other housing options in the community or surrounding area. It is the responsibility of each institution's discharge plan to find its clients suitable housing and not discharge someone into homelessness.

The HUD approved housing counseling agency, Housing and Credit Counseling, Inc. (HCCI) receives referrals from numerous agencies in Manhattan and provides other services including first time homebuyer training. Local providers work with HCCI to provide financial counseling to individuals at risk of becoming homeless. MESI operates a Homelessness Prevention program which provides counseling and rent and utility arrears or rapid re-housing services to individuals and families in need of shelter. The Crisis Center specifically provides housing for victims of domestic violence and their children who need a safe place to stay. Pawnee Mental Health Services (PMHS) coordinates with MESI, MHA, and MAHP, Inc. to secure housing for individuals with mental illness. Kansas Legal Services, Inc. (KLS) provides legal counseling for civil issues that may involve tenant/landlord issues, child custody orders and other issues that may be a result of poverty and/or eviction. Shepherd's Crossing provides counseling and grants for emergency issues.

MAHP's Financial Assurance Program assists Social Security and Veteran's Administration benefit recipients who cannot adequately manage their monthly disability benefit payments, and whose benefits depend on a third-party payee. MAHP staff work directly with LMI disabled individuals to help them budget and pay for their housing, food, medical, and other needs required to maintain independence. MAHP, Inc. is the only Social Security Administration approved organizational payee in the Manhattan area.

The Sunflower CASA Project, Inc, Family/Victim Advocate connects non-offending caregivers of abused children with housing resources listed above when a perpetrator lives in the home or is on the lease,

and the caregiver must find a safe place for the family member(s).

### **Discussion**

The local government and public service agencies in Manhattan are very efficient at working together to meet the needs of residents. The City supports these agencies through locally raised funds to support essential public services, and capital improvement needs.

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

### **Introduction:**

The City implements its planning, zoning, and subdivision authority through the Manhattan Development Code (MDC). In conjunction with City staff, the Manhattan Urban Area Planning Board and Manhattan City Commission develop, adopt, and update the comprehensive plan and other policy documents for the Manhattan Urban Area, and implement the MDC for the City. The Manhattan Urban Area Comprehensive Plan (MUACP), adopted in 2015 by the Riley County Planning Board, Pottawatomie County Planning Commission, Riley County, Pottawatomie County, and the Manhattan City Commission, provides the highest-level policy guidance regarding affordable housing and contains guiding principles, goals, and policies in various chapters that address affordability.

The City actively works with the local finance and development community in progressing workforce housing and other innovative housing options. However, the primary barriers to meeting affordable housing needs are the lack of supply in units of all price ranges, which puts downward pressure on existing units regardless of conditions, decreased or static federal funding for public housing projects, a competitive landscape for non-profits, and free market conditions that disincentivize private parties to serve low- and moderate-income residents, including fewer funding partners, lack of available land, and not enough skilled labor to make these housing developments financially feasible.

### **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**

In November 2022, the City Commission amended the Comprehensive Plan to incorporate by reference the Housing Market Analysis.

Also in 2022, the City implemented the Manhattan Development Code (MDC), which updated and combined zoning and subdivision regulations into one integrated document.

The MDC implements the Comprehensive Plan, together with other adopted plans such as the Bicycle and Pedestrian Systems Plan and the Housing Market Analysis, to promote neighborhoods that include a mixture of housing options located throughout the community and our connected by intermodal transportation systems.

Although the MDC is newly implemented, City staff continues to monitor the MDC as it relates to the housing challenges within the community, including supply, inventory, and affordability with distinction drawn between established neighborhoods and new developments. This will be accomplished by requesting and analyzing feedback from the development community about barriers to, researching best practices and modifications from other communities, and reviewing potential flexibilities that may need to be introduced to respond to market conditions and/or sustaining neighborhood viability.

### **Discussion:**

There are currently no known negative effects of City policy related to affordable housing and residential investment. The City Commission adopted the Housing Market Analysis as an amendment to the Comprehensive Plan, as it provides data on housing needs and the City is analyzing potential tools to

assist with development decision making. City staff have reviewed the HUD-developed Affirmatively Furthering Fair Housing guidelines, and proposed tools will be developed with these in mind.

The City Commission approved adoption of the 2021 International Building Code Series, and the 2020 National Electrical Code effective on January 1, 2023. The City prefers to use the Federal Fair Housing guidelines for accessibility compliance in covered multifamily dwellings, which references the American National Standards Institute (ANSI) requirements for accessibility. The Risk Reduction Division of the Manhattan Fire Department ensures through the permitting and enforcement process that new multifamily housing containing four or more dwelling units complies with all federal regulations of the Fair Housing Act.

The Comprehensive Plan contains policies and guiding principles, which promote neighborhoods that contain a mixture of land uses and diversified housing options to serve a growing and changing population. It includes housing that is affordable and design that allows for multi-modal connectivity between adjacent neighborhoods, commercial areas, parks, and open space. Housing and neighborhood goals include maintaining the quality and character of established neighborhoods throughout the Manhattan area and ensuring that infill and redevelopment is compatible with existing neighborhoods and is appropriate in size, scale, design, and use. New neighborhoods will be located where residents of all ages, abilities, and financial means will have access to the full range of infrastructure, facilities, and services to lead active, healthy lifestyles.

## **AP-85 Other Actions – 91.220(k)**

### **Introduction:**

The greatest obstacle to meeting all identified needs in Manhattan is a lack of funding. The City will participate in and encourage collaboration with and amongst agencies to address needs as they are identified, including those for affordable, innovative or workforce housing.

### **Actions planned to address obstacles to meeting underserved needs**

In 2023, the City formed the Community Services Fund Advisory Board (CSFAB) which recommends to the City Commission the financial support needed by public service agencies for their efforts addressing underserved persons. For 2024 the CSFAB recommended the City Commission provide \$557,500 in local funds to 23 agencies for services support. The Special Alcohol Fund Advisory Board recommended the City grant \$515,500 from state-collected special alcohol sales taxes to 18 agencies that address drug and alcohol addiction issues through prevention, education, treatment, and interventions.

In early 2023, the MHA in cooperation with the University For Man (UFM) applied for a YouthBuild Grant, which is a “Community Engaged Construction” program that trains youth aging out of foster care in construction practices, including for housing, which may contribute to the meeting the needs of the community and potentially affordable housing needs as identified in the Housing Market Analysis recommendations. This grant was awarded and UFM has begun working with local educational entities to provide training to these youth.

In late 2022, the FWHC began collaborating with the Riley County Health Department’s Community Health Improvement Plan (CHIP). Members of the FHWC participated in an event to identify and address the most critical needs for the area, and ultimately 3 workgroups were formed, the Housing Workgroup, the Transportation Workgroup, and the Mental Health Workgroup. City staff participate in the housing and transportation workgroups and have helped to guide the discussion of how to address the most pressing needs.

In 2020, Manhattan voters supported a ballot measure providing 10% of a sales tax funding to support “workforce housing initiatives”. Collection of the sales tax began 2023. The Housing Market Analysis will provide a basis of data to inform workforce housing initiatives, and an early identified action was the formation of a Workforce Housing Steering Committee, which has already been approved by the City Commission and formed. This Committee will propose recommendations for using the percentage of the sales tax dedicated to workforce housing.

An 11-member leadership team with support from City and Riley County staff members and elected officials was formed to guide the creation of the Food System Master Plan. Leadership team members represented key sectors of the food system and the community such as agricultural production, emergency food assistance, waste management, food retail, and at-risk populations. Eventually, permission was given by USD 383 to create an MOU between USD 383 and Common Table concerning the use of the cafeteria-kitchen area at 901 Poyntz Avenue with the intention of serving community meals at the facility. The MHA aims to partner with Common Table to ensure all MHA residents have access to daily meals and groceries through a collaboration with the Flint Hills Breadbasket.

### **Actions planned to foster and maintain affordable housing**

The City plans to continue the Housing Rehabilitation Program to preserve safety, livability, and accessibility of existing affordable owner-occupied housing, and to help stabilize lower-income neighborhoods. Currently, Housing and Credit Counseling, Inc. collaborates with Manhattan Area Habitat for Humanity (MAHFH) to provide home ownership counseling to eligible LMI Clients throughout the local area. The City has recently had discussions with MAHFH regarding collaboration on needed rehabs. Recently, the MAHFH has hired a homeowner services coordinator who conducts intake and qualifications for their program and assesses whether the agency can assist the client. If the project is likely too large or requires specialized work, MAHFH will refer the client to the City for assistance. The City will refer clients to MAHFH when the assistance needed is not complicated and can be accomplished by volunteers.

The City Commission appointed Workforce Housing Steering Committee will spend the next three years (2023-2025) discussing and recommending how to utilize 10% of the Economic Recovery & Relief Sales Tax on workforce housing initiatives. The City has defined “workforce housing” as HUD household incomes between 60% to 120% area median income (AMI).

### **Actions planned to reduce lead-based paint hazards**

The City follows the HUD lead-based paint regulations and was recertified with the state of Kansas as a lead-based paint (LBP) activity firm in April 2019, and renewed this certification in the spring of 2023. Whenever the Rehabilitation Project will be disturbing paint, the City tests for LBP in homes that were built in or before 1978. When it is found, the City requires contractors to be LBP-certified and use lead-safe work practices. Persons living in homes where lead-based paint is found and will be addressed as part of the rehabilitation work, are temporarily relocated during the completion of work to address lead-based paint hazards.

### **Actions planned to reduce the number of poverty-level families**

The City’s Comprehensive Plan contains goals, policies and guiding principles that promote neighborhoods that contain a mixture of land uses and diversified housing options including affordable housing, to serve all income levels and a growing and changing population. The Public Service activities’ goals to reduce the number of persons in poverty through counseling and essential short-term direct aid such as through case management of shelter clients and activities addressing the root causes of poverty which assist people in becoming self-sufficient in the long-term.

Examples of programs that directly influence people's ability to escape poverty include civil legal services, tenant and landlord counseling, household budgeting training, resource location and case management for special populations, and homeless prevention. Infrastructure and Public facility projects indirectly affect poverty through improved access or by providing facilities that are no longer substandard and improve the LMI community at-large. Only projects that directly benefit low- and moderate-income residents or serve low- and moderate-income neighborhoods are funded with CDBG, and the City often contributes to the cost of projects.

### **Actions planned to develop institutional structure.**

The Comprehensive Plan includes housing that is affordable and neighborhood designs that promote multi-modal connectivity between adjacent neighborhoods, commercial areas, parks, and open space. Housing and neighborhood goals include maintaining the quality and character of established neighborhoods throughout the Manhattan Urban Area and ensuring that infill and redevelopment is compatible with existing neighborhoods and is appropriate in size, scale, design, and use. New neighborhoods will be located where residents of all ages, abilities, and financial means will have access to the full range of infrastructure, facilities, and services to lead active, healthy lifestyles.

Riley County has several Disaster Plans that address different potential catastrophic events. The City has reviewed these individual plans and has participated activities to identify weaknesses in the existing plans and take appropriate actions to resolve. The City's efforts regarding disaster planning include conducting a tabletop exercise with the Corps of Engineers related to a catastrophic flood event caused by a hypothetical failure of the Manhattan Levee System; and educating responders regarding the most vulnerable section of the City and County and actions that should be taken. The City and Riley County have also conducted the Resilient Wildcat Creek initiative to address flash flooding issues in the basin and specifically identify and address social vulnerabilities that typically impact LMI residents. This planning will be expanded to other parts of the community that is impacted by flooding and can be used in the event of other types of disasters.

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

The City will continue to work closely with the Manhattan Housing Authority, Manhattan Area Housing Partnership, Inc., and other local and regional low-income housing providers to connect the needs of the LMI population with the services and providers best able to address those needs. The City will encourage collaboration between non-profits, financial institutions, housing providers and investors to provide, establish and improve facilities for those needs. The City will investigate new initiatives and opportunities established by the American Recovery Plan Act to deliver innovative choices for all residents.

The Flint Hills Community Care Team is a collaboration of City departments agencies that identify and assist individuals who are repeat users of emergency assistance, for non-emergency issues. The Riley County Health Department provides a variety of services to residents and families in Manhattan and throughout Riley County, and along with Riley County Emergency Medical Services and Ascension Via Christi Hospital, is a key member of the Flint Hills Community Care team. The City will continue to participate in the bi-weekly meeting intended to identify proper service providers for chronic users of emergency services.

The Riley County Police Department and the Manhattan Risk Reduction Department are part of the Community Care Team. The Manhattan Risk Reduction Department will continue to offer free inspections to Tenants who request it, and actively coordinate for services to residents who need it.

### **Discussion:**

Support from the City to housing providers and agencies delivering necessary and critical services has long been established. Manhattan is committed to maintaining a good quality of life for all individuals and families.

# Program Specific Requirements

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

### Introduction:

The City of Manhattan does not expect to receive any program income in the 2024 Program Year. The only source of Program Income that the City receives is from repayment of Housing Rehabilitation Grants by homeowners who have not maintained the terms of their grant agreement or are leaving the program. The City does not have any Urban Renewal Settlements and has returned no grant funds to the line of credit.

### Community Development Block Grant Program (CDBG)

#### Reference 24 CFR 91.220(I)(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
<b>Total Program Income:</b>	<b>0</b>

### 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. 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.	71.00%

The City estimates that most CDBG funds currently used for activities that benefit LMI persons will exceed 70% over the years covered by the 2020 to 2024 Strategic Plan. This is based on the current rate of 100% of prior years' funds that have been used for activities beneficial to LMI persons. This Plan is included in the 3-year period that covers 2022, 2023, and 2024