



City of Bentonville

Community Development Block Grant Program

2024 Consolidated Annual Performance Evaluation Report

Executive Summary — Program Year 2024 (PY24) CAPER

City of Bentonville – Community Development Block Grant (CDBG)

Overview. PY24 marked Bentonville’s transition from program start-up to delivering direct benefits to residents. Expenditures recorded this year total \$32,255.54, all tied to PY23 grant dollars drawn between August 2024 and April 2025, consistent with HUD’s practice of reporting by draw date. As a result, the first PY24 grant expenditures occurred after the close of PY24 and will appear in the PY25 CAPER.

What was accomplished in PY24. With PY23 resources drawn during PY24, the City supported public services that directly benefited 140 low- and moderate-income residents—including youth scholarships and homeless outreach—while also funding core program administration. Of the total expended, \$29,570.50 supported public services and \$2,685.04 supported administration. Early accomplishments include Boys & Girls Club and Helen Walton Children’s Enrichment Center scholarships (25 children and youth) and Northwest Arkansas Continuum of Care outreach that connected 115 individuals to case management, housing navigation, and supportive services.

Investing for impact (amendments & reprogramming). To align resources with community needs and implementation realities, the City approved a Substantial Amendment to the 2023–2027 Consolidated Plan and PY23 Annual Action Plan, approved by HUD in May 2025. This action removed an infeasible homeownership assistance goal, cancelled a withdrawn rehabilitation project, and reallocated \$256,331 to SE C Street sidewalk construction in a low-/moderate-income area. In fall 2025, the City moved a separate PY24 AAP amendment into public comment to reallocate \$245,326 from cancelled or underperforming projects to public facilities and street improvements in low/mod neighborhoods. These steps position the program for faster draws, stronger neighborhood benefits, and improved timeliness performance in PY25.

Who was served. Subrecipient reporting shows services reached a diverse group of residents—100% low-/moderate-income—with beneficiaries identifying as White, Black/African American, Asian, American Indian/Alaska Native, Native Hawaiian/Other Pacific Islander, and multi-racial; 3 beneficiaries were reported as Hispanic in IDIS. The City notes that some participants identified only as “Hispanic/Latino” without selecting a race; these were entered as “Other/Multi-Racial (Hispanic = Yes),” which may undercount the Hispanic subtotal in HUD’s roll-up. The City will continue improving the consistency of demographic reporting with its partners.

Strengthening oversight & partnerships. PY24 introduced the City’s reimbursement and on-site monitoring framework. All active public service subrecipients were monitored; one organizational concern was identified and corrected, and all three subrecipients closed the year in

compliance. The City also formalized documentation standards (beneficiary intake, receipts, timesheets/payroll) with each reimbursement request. Looking ahead to infrastructure projects beginning in PY25, the City is preparing Section 3 readiness procedures to meet HUD labor-hour and worker-eligibility reporting requirements.

The investments in PY24 have fostered robust community partnerships and strengthened Bentonville's social service capacity. Early collaborations with agencies like the Boys & Girls Club and the Continuum of Care have enabled coordinated outreach and resource leveraging, laying the groundwork for continuous program improvement and enhanced service delivery. As processes mature and monitoring expands, the City expects to leverage these relationships to reach more vulnerable residents and refine program targeting for PY25 and beyond.

Public participation & transparency. Residents were engaged through multiple public meetings and hearings throughout 2025, including Feb 12, Mar 5, Jun 4, Jul 9, and an Oct 8 (upcoming) meeting on the PY24 amendment, alongside standard comment periods. Program updates were provided during both the Annual Action Plan and Consolidated Plan amendment processes to keep the public informed of changing priorities, goals, and projects. All comments submitted during the CAPER public comment period will be included in the final CAPER.

Looking ahead to PY25. With foundational systems in place, subrecipient partnerships established, and resources reprogrammed toward public facilities and infrastructure in low/mod neighborhoods, the City expects a higher volume of expenditures, tangible neighborhood improvements (beginning with SE C Street sidewalks), and continued targeted public services (childcare, youth programming, and homeless outreach). These steps are intended to strengthen timeliness, sustain compliance, and deliver visible, equitable benefits for Bentonville residents.

How to comment. The City welcomes public input on this CAPER. Comments received during the public comment period will be reviewed and incorporated, as appropriate, and will appear verbatim in the final submission to HUD.

Overall, while PY24 accomplishments were modest in scale compared to target goals in the 2024 Annual Action Plan, they represent the foundation for Bentonville's long-term commitment to delivering equitable, visible, and compliant use of CDBG funds

CR-05 - Goals and Outcomes

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

In PY24, the City of Bentonville expended **\$32,255.54** in CDBG funds, primarily in support of **public service activities** that directly benefited low- and moderate-income residents. Activities included youth scholarship programs and homeless outreach events conducted through the Northwest Arkansas Continuum of Care.

Because IDIS records expenditures by draw date, all PY24 accomplishments reported here are tied to **PY23 grant dollars** drawn between August 2024 and June 2025. The first PY24 grant expenditures occurred in August 2025, after the close of this program year, and will be reflected in the PY25 CAPER.

PY24 marked the first year of measurable expenditures and accomplishments for Bentonville's CDBG program. After a start-up year in PY23 with no draws, the City successfully launched its first funded activities, including public service scholarships and homeless outreach, benefitting 140 low- and moderate-income residents. While this fell short of the 288-person goal established in the original 2024 Annual Action Plan, the outcomes represent meaningful progress for a new entitlement program transitioning from initiation to implementation.

The City's progress in PY24 was tempered by barriers typical of new entitlement communities. For example, the cancellation of the Habitat for Humanity rehabilitation project resulted from the subrecipient's withdrawal due to organizational changes, prompting a rapid reallocation of funds to the SE C Street sidewalk initiative. Contract execution delays narrowed the window for public service delivery, particularly for youth programming, leading to partial achievement of the intended beneficiary totals. Going forward, accelerated contracting timelines, additional technical assistance for subrecipients, and earlier engagement with partner agencies will mitigate these timing risks and maximize program reach.

Several barriers limited progress toward planned goals:

- Timing of expenditures: All PY24 accomplishments reflect draws from the PY23 grant. No PY24 entitlement funds were expended before the close of the program year.
- Subrecipient initiation: Contracts for the 2023 Program Year were executed late in 2024, reducing the amount of time for service delivery before the CAPER reporting cutoff. Contracts for the 2024 Program Year activities were not executed until February, 2025 leading to a delay in project initiation and draw down of funds for reimbursement. Those accomplishments will be reported in the 2025

CAPER. Late contract execution limited how quickly services could begin, but in the future, the City will launch projects earlier and offer technical assistance upfront.

- Shifting priorities: The City determined that the original homeownership assistance program was not feasible due to rising housing costs and beneficiary eligibility barriers. This required a Substantial Amendment to the Consolidated Plan and AAP, realigning program goals midstream.

The largest challenges faced in PY24 were funding delays and unexpected changes from partners. To address this, Bentonville worked with HUD to amend its plans and refocus resources where they could have the greatest impact

To address these challenges, the City:

- Adopted a Substantial Amendment to the 2023–2027 Consolidated Plan and PY23 AAP, approved by HUD in May 2025, removing homeownership assistance and reallocating \$256,331 to a sidewalk project in a low/mod area
- Prepared a Substantial Amendment to the PY24 AAP, reallocating \$245,326 from homeownership assistance and a cancelled public service project to public facility and street improvements.

2024 Annual Action Plan Amendment

- Strengthened monitoring procedures, conducting the City's first on-site monitoring visits in PY24 and requiring detailed documentation with each reimbursement request.
- Increased public engagement, holding multiple hearings and meetings to inform residents of changing program priorities and goals.

Impact and future direction

While PY24 outcomes were limited in scale, they provided critical lessons for program administration. The City now has:

- A functioning reimbursement and monitoring system,
- Established subrecipient partnerships delivering services, and
- Revised Consolidated Plan goals that reflect realistic, impactful use of CDBG funds.

Looking ahead, the City anticipates:

- Expanded infrastructure investment (sidewalk construction beginning with PY23 reprogrammed funds),
- Continued targeted public services (childcare, youth programming, homeless outreach), and
- Improved timeliness compliance as reallocated funds are drawn more quickly.

Self-evaluation

Overall, the City is confident that the foundation laid in PY24 positions the program for stronger performance in PY25 and beyond. The transition from planning to accomplishment, combined with mid-course corrections through Substantial Amendments, demonstrates Bentonville's commitment to transparent, compliant, and impactful use of CDBG resources.

Because IDIS reports expenditures by draw date, it is typical for new entitlement communities to experience a lag between when projects are initiated and when accomplishments appear in CAPER reporting. While PY24 outcomes reflect PY23 resources, this is a normal timing issue during program start-up and will stabilize as projects progress. The City has taken corrective steps, including Substantial Amendments and earlier contracting timelines, to ensure that future accomplishments are more closely aligned with program year allocations.

Comparison of the proposed versus actual outcomes for each outcome measure submitted with the consolidated plan and explain, if applicable, why progress was not made toward meeting goals and objectives. 91.520(g)

Categories, priority levels, funding sources and amounts, outcomes/objectives, goal outcome indicators, units of measure, targets, actual outcomes/outputs, and percentage completed for each of the grantee's program year goals.

| Goal | Category | Source / Amount | Indicator | Unit of Measure | Expected – Strategic Plan | Actual – Strategic Plan | Percent Complete | Expected – Program Year | Actual – Program Year | Percent Complete |
|----------------|----------------|-----------------|---|---------------------|---------------------------|-------------------------|------------------|-------------------------|-----------------------|------------------|
| Administration | Administration | CDBG: \$ | Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit | Persons Assisted | 0 | 0 | | | | |
| Administration | Administration | CDBG: \$ | Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit | Households Assisted | 0 | 0 | 0 | 0 | 0 | |

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|----------------|----------------|-------------|--|------------------------|---|---|--|--|--|--|
| Administration | Administration | CDBG: \$ | Public service activities other than Low/Moderate Income Housing Benefit | Persons Assisted | 0 | 0 | | | | |
| Administration | Administration | CDBG: \$ | Public service activities for Low/Moderate Income Housing Benefit | Households Assisted | 0 | 0 | | | | |
| Administration | Administration | CDBG: \$ | Facade treatment/business building rehabilitation | Business | 0 | 0 | | | | |
| Administration | Administration | CDBG: \$ | Brownfield acres remediated | Acre | 0 | 0 | | | | |
| Administration | Administration | CDBG: \$ | Rental units constructed | Household Housing Unit | 0 | 0 | | | | |
| Administration | Administration | CDBG: \$ | Rental units rehabilitated | Household Housing Unit | 0 | 0 | | | | |
| Administration | Administration | CDBG: \$ | Homeowner Housing Added | Household Housing Unit | 0 | 0 | | | | |
| Administration | Administration | CDBG: \$ | Homeowner Housing Rehabilitated | Household Housing Unit | 0 | 0 | | | | |
| Administration | Administration | CDBG: \$ | Direct Financial Assistance to Homebuyers | Households Assisted | 0 | 0 | | | | |

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|----------------|----------------|-------------|---|------------------------|---|---|--|--|--|--|
| Administration | Administration | CDBG: \$ | Tenant-based rental assistance / Rapid Rehousing | Households Assisted | 0 | 0 | | | | |
| Administration | Administration | CDBG: \$ | Homeless Person Overnight Shelter | Persons Assisted | 0 | 0 | | | | |
| Administration | Administration | CDBG: \$ | Overnight/Emergency Shelter/Transitional Housing Beds added | Beds | 0 | 0 | | | | |
| Administration | Administration | CDBG: \$ | Homelessness Prevention | Persons Assisted | 0 | 0 | | | | |
| Administration | Administration | CDBG: \$ | Jobs created/retained | Jobs | 0 | 0 | | | | |
| Administration | Administration | CDBG: \$ | Businesses assisted | Businesses Assisted | 0 | 0 | | | | |
| Administration | Administration | CDBG: \$ | Housing for Homeless added | Household Housing Unit | 0 | 0 | | | | |
| Administration | Administration | CDBG: \$ | Housing for People with HIV/AIDS added | Household Housing Unit | 0 | 0 | | | | |
| Administration | Administration | CDBG: \$ | HIV/AIDS Housing Operations | Household Housing Unit | 0 | 0 | | | | |
| Administration | Administration | CDBG: \$ | Buildings Demolished | Buildings | 0 | 0 | | | | |
| Administration | Administration | CDBG: \$ | Housing Code Enforcement/Foreclosed Property Care | Household Housing Unit | 0 | 0 | | | | |

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|----------------|--|-------------|---|---------------------|---|---|--|--|--|--|
| Administration | Administration | CDBG: \$ | Other | Other | 0 | 0 | | | | |
| Decent Housing | Affordable Housing Housing rehabilitation | CDBG: \$ | Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit | Persons Assisted | 0 | 0 | | | | |
| Decent Housing | Affordable Housing Housing rehabilitation | CDBG: \$ | Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit | Households Assisted | 0 | 0 | | | | |
| Decent Housing | Affordable Housing Housing rehabilitation | CDBG: \$ | Public service activities other than Low/Moderate Income Housing Benefit | Persons Assisted | 0 | 0 | | | | |
| Decent Housing | Affordable Housing Housing rehabilitation | CDBG: \$ | Public service activities for Low/Moderate Income Housing Benefit | Households Assisted | 0 | 0 | | | | |
| Decent Housing | Affordable Housing Housing rehabilitation | CDBG: \$ | Facade treatment/business building rehabilitation | Business | 0 | 0 | | | | |
| Decent Housing | Affordable Housing Housing rehabilitation | CDBG: \$ | Brownfield acres remediated | Acre | 0 | 0 | | | | |

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|----------------|--|-------------|--|------------------------|----|---|-------|--|--|--|
| Decent Housing | Affordable Housing Housing rehabilitation | CDBG: \$ | Rental units constructed | Household Housing Unit | 0 | 0 | | | | |
| Decent Housing | Affordable Housing Housing rehabilitation | CDBG: \$ | Rental units rehabilitated | Household Housing Unit | 0 | 0 | | | | |
| Decent Housing | Affordable Housing Housing rehabilitation | CDBG: \$ | Homeowner Housing Added | Household Housing Unit | 0 | 0 | | | | |
| Decent Housing | Affordable Housing Housing rehabilitation | CDBG: \$ | Homeowner Housing Rehabilitated | Household Housing Unit | 20 | 0 | 0.00% | | | |
| Decent Housing | Affordable Housing Housing rehabilitation | CDBG: \$ | Direct Financial Assistance to Homebuyers | Households Assisted | 0 | 0 | | | | |
| Decent Housing | Affordable Housing Housing rehabilitation | CDBG: \$ | Tenant-based rental assistance / Rapid Rehousing | Households Assisted | 0 | 0 | | | | |
| Decent Housing | Affordable Housing Housing rehabilitation | CDBG: \$ | Homeless Person Overnight Shelter | Persons Assisted | 0 | 0 | | | | |

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|----------------|--|-------------|---|------------------------|---|---|--|--|--|--|
| Decent Housing | Affordable Housing Housing rehabilitation | CDBG: \$ | Overnight/Emergency Shelter/Transitional Housing Beds added | Beds | 0 | 0 | | | | |
| Decent Housing | Affordable Housing Housing rehabilitation | CDBG: \$ | Homelessness Prevention | Persons Assisted | 0 | 0 | | | | |
| Decent Housing | Affordable Housing Housing rehabilitation | CDBG: \$ | Jobs created/retained | Jobs | 0 | 0 | | | | |
| Decent Housing | Affordable Housing Housing rehabilitation | CDBG: \$ | Businesses assisted | Businesses Assisted | 0 | 0 | | | | |
| Decent Housing | Affordable Housing Housing rehabilitation | CDBG: \$ | Housing for Homeless added | Household Housing Unit | 0 | 0 | | | | |
| Decent Housing | Affordable Housing Housing rehabilitation | CDBG: \$ | Housing for People with HIV/AIDS added | Household Housing Unit | 0 | 0 | | | | |
| Decent Housing | Affordable Housing Housing rehabilitation | CDBG: \$ | HIV/AIDS Housing Operations | Household Housing Unit | 0 | 0 | | | | |

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|---------------------------|--|----------|---|------------------------|----|---|-------|----|---|-------|
| Decent Housing | Affordable Housing Housing rehabilitation | CDBG: \$ | Buildings Demolished | Buildings | 0 | 0 | | | | |
| Decent Housing | Affordable Housing Housing rehabilitation | CDBG: \$ | Housing Code Enforcement/Foreclosed Property Care | Household Housing Unit | 0 | 0 | | | | |
| Decent Housing | Affordable Housing Housing rehabilitation | CDBG: \$ | Other | Other | 0 | 0 | | | | |
| Home Ownership Assistance | Non-Housing Community Development Public improvements and infrastructure | CDBG: \$ | Direct Financial Assistance to Homebuyers | Households Assisted | 25 | 0 | 0.00% | 10 | 0 | 0.00% |
| Public Services | Public Services | CDBG: \$ | Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit | Persons Assisted | 0 | 0 | | | | |
| Public Services | Public Services | CDBG: \$ | Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit | Households Assisted | 0 | 0 | | | | |

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|-----------------|-----------------|-------------|--|------------------------|-----|-----|--------|-----|-----|--------|
| Public Services | Public Services | CDBG: \$ | Public service activities other than Low/Moderate Income Housing Benefit | Persons Assisted | 945 | 140 | 14.81% | 288 | 140 | 48.61% |
| Public Services | Public Services | CDBG: \$ | Public service activities for Low/Moderate Income Housing Benefit | Households Assisted | 0 | 0 | | | | |
| Public Services | Public Services | CDBG: \$ | Facade treatment/business building rehabilitation | Business | 0 | 0 | | | | |
| Public Services | Public Services | CDBG: \$ | Brownfield acres remediated | Acre | 0 | 0 | | | | |
| Public Services | Public Services | CDBG: \$ | Rental units constructed | Household Housing Unit | 0 | 0 | | | | |
| Public Services | Public Services | CDBG: \$ | Rental units rehabilitated | Household Housing Unit | 0 | 0 | | | | |
| Public Services | Public Services | CDBG: \$ | Homeowner Housing Added | Household Housing Unit | 0 | 0 | | | | |
| Public Services | Public Services | CDBG: \$ | Homeowner Housing Rehabilitated | Household Housing Unit | 0 | 0 | | | | |
| Public Services | Public Services | CDBG: \$ | Direct Financial Assistance to Homebuyers | Households Assisted | 0 | 0 | | | | |

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|-----------------|-----------------|-------------|---|------------------------|---|---|--|---|---|--|
| Public Services | Public Services | CDBG: \$ | Tenant-based rental assistance / Rapid Rehousing | Households Assisted | 0 | 0 | | | | |
| Public Services | Public Services | CDBG: \$ | Homeless Person Overnight Shelter | Persons Assisted | 0 | 0 | | 0 | 0 | |
| Public Services | Public Services | CDBG: \$ | Overnight/Emergency Shelter/Transitional Housing Beds added | Beds | 0 | 0 | | 0 | 0 | |
| Public Services | Public Services | CDBG: \$ | Homelessness Prevention | Persons Assisted | 0 | 0 | | | | |
| Public Services | Public Services | CDBG: \$ | Jobs created/retained | Jobs | 0 | 0 | | | | |
| Public Services | Public Services | CDBG: \$ | Businesses assisted | Businesses Assisted | 0 | 0 | | | | |
| Public Services | Public Services | CDBG: \$ | Housing for Homeless added | Household Housing Unit | 0 | 0 | | | | |
| Public Services | Public Services | CDBG: \$ | Housing for People with HIV/AIDS added | Household Housing Unit | 0 | 0 | | | | |
| Public Services | Public Services | CDBG: \$ | HIV/AIDS Housing Operations | Household Housing Unit | 0 | 0 | | | | |
| Public Services | Public Services | CDBG: \$ | Buildings Demolished | Buildings | 0 | 0 | | | | |
| Public Services | Public Services | CDBG: \$ | Housing Code Enforcement/Foreclosed Property Care | Household Housing Unit | 0 | 0 | | | | |

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|-----------------|-----------------|-------------|-------|-------|---|---|--|--|--|--|
| Public Services | Public Services | CDBG: \$ | Other | Other | 0 | 0 | | | | |
|-----------------|-----------------|-------------|-------|-------|---|---|--|--|--|--|

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

Assess how the jurisdiction's use of funds, particularly CDBG, addresses the priorities and specific objectives identified in the plan, giving special attention to the highest priority activities identified.

In PY24, the City of Bentonville's use of CDBG funds began to move from program initiation into measurable outcomes. Expenditures totaled **\$32,255.54**, all from the PY23 grant, and were directed toward **public service activities and program administration**. While accomplishments fell below original projections, these activities directly addressed the **highest priority needs** identified in the Consolidated Plan:

- **Public Services for LMI Residents:** Youth scholarships through the Boys & Girls Club and Helen Walton Children's Enrichment Center expanded access to safe programming and affordable childcare, benefitting **25 children and youth from low- and moderate-income households**. These services directly addressed community priorities around youth development and affordable childcare.
- **Homeless Outreach and Prevention:** Continuum of Care outreach events assisted **115 individuals** experiencing homelessness, connecting them with case management, housing navigation, and supportive services. This aligns with the Consolidated Plan's priority to address homelessness and provide supportive services to vulnerable residents.
- **Program Oversight and Capacity-Building:** Administrative expenditures supported the City's monitoring, compliance, and citizen participation processes, laying the foundation for stronger program management in future years.

During PY24, the City also undertook a **Substantial Amendment to the 2023–2027 Consolidated Plan** to remove the infeasible homeownership assistance goal and redirect resources to **public facilities and infrastructure projects in low/moderate-income neighborhoods**. This amendment ensures that future investments are both impactful and achievable, addressing community-identified needs for neighborhood improvements and aligning with HUD's timeliness requirements.

CR-10 - Racial and Ethnic composition of families assisted

Describe the families assisted (including the racial and ethnic status of families assisted).
91.520(a)

| | CDBG |
|---|------|
| White | 93 |
| Black or African American | 19 |
| Asian | 5 |
| American Indian or American Native | 3 |
| Native Hawaiian or Other Pacific Islander | 2 |
| Other/Multi-Racial | 18 |
| Total | 140 |
| Hispanic | 3 |
| Not Hispanic | 137 |

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

Narrative

In PY24, CDBG-funded activities served a total of **140 persons**. Racial and ethnic composition data were collected from subrecipients and outreach partners as part of IDIS accomplishment reporting.

- **Youth scholarships** at the Boys & Girls Club (21 youth) and Helen Walton Children's Enrichment Center (4 children) primarily benefitted White and Black/African American households, with smaller numbers identifying as Asian or multi-racial
- **Continuum of Care homeless outreach** (115 individuals) reached a broader demographic mix, including White, Black/African American, Asian, American Indian/Alaska Native, and Native Hawaiian/Pacific Islander persons
- Overall, the demographic breakdown shows that CDBG services reached diverse populations, with **100% of beneficiaries qualifying as low- or moderate-income**.

HUD's PRO3 summary output reflects **3 Hispanic beneficiaries**. However, this figure **undercounts the actual number of Hispanic/Latino persons served**. Many participants in Continuum of Care outreach identified only as "Hispanic/Latino" without selecting a race. These individuals were entered into IDIS as "**Other/Multi-Racial**" with **Hispanic = Yes**, but the system's aggregation method does not consistently roll those records into the Hispanic subtotal.

Based on subrecipient intake records, the City believes the actual number of Hispanic/Latino beneficiaries is higher than the IDIS report indicates. The City will continue working with its partners to improve the consistency of demographic reporting in IDIS while maintaining compliance with HUD reporting requirements.

All beneficiaries of PY24-funded activities were **low- or moderate-income persons (100%)**, consistent with CDBG program requirements.

CR-15 - Resources and Investments 91.520(a)

Identify the resources made available

| Source of Funds | Source | Resources Made Available | Amount Expended During Program Year |
|-----------------|------------------|--------------------------|-------------------------------------|
| CDBG | public - federal | 310,326 | 32,255.54 |

Table 3 - Resources Made Available

Narrative

Of the \$32,255.54 in funds expended, \$29,570.50 were expended for public services, and \$2,685.04 for administrative costs.

Identify the geographic distribution and location of investments

| Target Area | Planned Percentage of Allocation | Actual Percentage of Allocation | Narrative Description |
|---------------------|----------------------------------|---------------------------------|--|
| City of Bentonville | 100 | 100 | All took place within the City of Bentonville. |

Table 4 – Identify the geographic distribution and location of investments

Narrative

All activities took place within the City and served exclusively Bentonville residents.

Leveraging

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

Although no formal match was required, subrecipients leveraged private donations and nonprofit resources to expand services. For example, the Boys & Girls Club leveraged private fundraising to support additional scholarships beyond those funded by CDBG.

CR-20 - Affordable Housing 91.520(b)

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

| | One-Year Goal | Actual |
|--|---------------|----------|
| Number of Homeless households to be provided affordable housing units | 0 | 0 |
| Number of Non-Homeless households to be provided affordable housing units | 10 | 0 |
| Number of Special-Needs households to be provided affordable housing units | 0 | 0 |
| Total | 10 | 0 |

Table 5 – Number of Households

| | One-Year Goal | Actual |
|--|---------------|----------|
| Number of households supported through Rental Assistance | 0 | 0 |
| Number of households supported through The Production of New Units | 0 | 0 |
| Number of households supported through Rehab of Existing Units | 0 | 0 |
| Number of households supported through Acquisition of Existing Units | 10 | 0 |
| Total | 10 | 0 |

Table 6 – Number of Households Supported

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

Original PY24 AAP goals for homeownership assistance are no longer applicable following the Consolidated Plan amendment. The reported “0% completion” on certain housing goals reflects the fact that they were formally voided through the Substantial Amendment, not a failure to perform. HUD’s IDIS system retains the original baseline goals even after amendments, but they no longer represent current program priorities. The City is committed to aligning all future reporting with revised, achievable Consolidated Plan goals to avoid misinterpretation.

Discuss how these outcomes will impact future annual action plans.

The strategic choice to reprogram housing bond funds towards infrastructure, such as the SE C Street sidewalk, responds to Bentonville's rapidly shifting housing market—marked by rising costs and constrained eligibility for down payment assistance. Community needs assessments and public hearings indicated that safe, accessible pedestrian infrastructure was a high priority for residents in low/mod neighborhoods, with expectations for improved connectivity to schools and services. By pivoting away from infeasible homeownership goals, the City is actively aligning CDBG investments with the most urgent and actionable needs identified by stakeholders.

Include the number of extremely low-income, low-income, and moderate-income persons served by each activity where information on income by family size is required to determine the eligibility of the activity.

Due to the realignment of strategic goals in the Substantial Amendment to the 2023 Consolidated Plan, the initial goals for affordable housing support were made void. Another Substantial Amendment addressing the 2024 Annual Action Plan is expected to be submitted to HUD in October of 2025.

| Number of Households Served | CDBG Actual | HOME Actual |
|-----------------------------|-------------|-------------|
| Extremely Low-income | 0 | 0 |
| Low-income | 0 | 0 |
| Moderate-income | 0 | 0 |
| Total | 0 | 0 |

Table 7 – Number of Households Served

Narrative Information

During PY24, the City of Bentonville did not expend CDBG funds on housing activities. No households were assisted through rental assistance, rehabilitation, acquisition, or direct homeownership support.

This outcome reflects two key factors:

Program Initiation Delays in PY23 – As noted in the 2023 CAPER, no funds were drawn in PY23 due to program startup, subrecipient changes, and timing of Consolidated Plan approval. Housing-related projects planned in PY23 (homeownership assistance and Habitat for Humanity rehabilitation) were not implemented before the end of that year.

Substantial Amendment to Consolidated Plan and PY23 AAP – In May 2025, HUD approved a Substantial Amendment to the City's 2023–2027 Consolidated Plan and 2023 Annual Action Plan. This amendment:

Removed Homeownership Assistance as a five-year goal and cancelled the associated down payment assistance program, due to affordability challenges and limited beneficiary eligibility.

Removed Habitat for Humanity's 2023 rehabilitation project after the organization withdrew from the program.

Reallocated \$256,331 to a new public facility improvement project: construction of sidewalks along SE C Street in a low- to moderate-income area.

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

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

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

In PY24, the City of Bentonville made significant progress compared to PY23 by launching its first funded Continuum of Care (CoC) outreach activities. Using PY23 CDBG funds drawn during PY24, the CoC conducted **five outreach events** between July 2024 and January 2025. These events reached **115 individuals** experiencing homelessness, including unsheltered persons, through direct engagement, case management, and connection to housing resources.

The January outreach coincided with the regional Point-in-Time count, ensuring coordination with HUD-mandated data collection.

Addressing the emergency shelter and transitional housing needs of homeless persons

While no CDBG-funded emergency shelter or transitional housing beds were added in PY24, CoC outreach provided referrals to existing emergency shelter providers and connected individuals to available transitional housing resources. The City continued to coordinate with regional partners to strengthen the local service network for unsheltered residents.

Helping low-income individuals and families avoid becoming homeless

Outreach activities emphasized prevention by identifying at-risk individuals during engagement. Referrals to case management and supportive services were made to connect participants with housing navigation, healthcare, and benefits access. These interventions reduce the likelihood of prolonged or repeated homelessness.

Helping homeless persons make the transition to permanent housing and independent living

Through its CoC partnership, the City supported pathways toward housing stability. While CDBG dollars were limited to outreach in PY24, participants were linked to permanent supportive housing and transitional housing programs funded through other regional sources.

Assessment

The City successfully transitioned from a **planning-only year in PY23** to direct service delivery in PY24, assisting 115 individuals through CoC outreach. These outcomes represent a clear progression from PY23, when no homeless accomplishments were reported. While no CDBG dollars were expended directly on shelter or housing units this year, outreach laid the foundation for expanded service delivery in future years and strengthened Bentonville's role as a partner in the Northwest Arkansas Continuum of Care.

These outreach efforts also advance HUD's national priorities to reduce unsheltered homelessness by directly integrating CDBG-funded activities with regional case management, housing navigation, and Point-in-Time (PIT) data collection. Although no shelter beds or housing units were funded in PY24, the City's investment in outreach strengthens the local service system and builds the foundation for future expansion of homeless assistance activities.

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

Actions taken to address the needs of public housing

The City of Bentonville does not directly administer or own public housing units. Public housing within the City is overseen by the **Northwest Housing Authority** and other regional providers. As such, the City has no direct role in the management, modernization, or capital improvements of public housing stock.

While no CDBG funds were expended on public housing in PY24, the City continued to coordinate with regional housing partners and monitor opportunities to support low- and moderate-income households through complementary activities. Public service programs funded during PY24, including scholarships for youth and childcare as well as homeless outreach, indirectly supported housing stability by reducing household cost burdens.

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

Because the City does not own or operate public housing, it did not carry out direct activities in this area. However, the City remains supportive of efforts by the Northwest Housing Authority and other providers to engage residents in decision-making and self-sufficiency programs.

Actions taken to provide assistance to troubled PHAs

While Bentonville has no direct public housing role, CDBG-funded public services in PY24 indirectly supported housing stability for low- and moderate-income households. These investments complement the Northwest Housing Authority's programs by reducing family cost burdens and enhancing access to supportive services.

CR-35 - Other Actions 91.220(j)-(k); 91.320(i)-(j)

Actions taken to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment. 91.220 (j); 91.320 (i)

The City continued to participate in **Plan Bentonville**, a community-wide planning process addressing land use and growth management. Affordable housing remained a central theme in public engagement, and CDBG staff monitored opportunities to connect housing policy with future zoning and land use decisions. While no CDBG funds were expended on housing in PY24, the Substantial Amendment to the 2023 Consolidated Plan, approved by HUD in May 2025, shifted resources away from homeownership assistance toward **public facility improvements** in low/mod neighborhoods, reflecting a strategic response to affordability challenges and barriers in the housing market.

The City affirms its ongoing compliance with all applicable CDBG, fair housing, and non-discrimination requirements, ensuring that all program services and activities are accessible to eligible residents as defined by HUD guidelines.

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

In PY24, the City funded its first public service activities, including youth scholarships, childcare assistance, and homeless outreach. These activities directly served **140 low- and moderate-income persons**, representing meaningful progress in meeting underserved needs compared to PY23, when no accomplishments were reported. The City also held a public hearing and 30-day comment period for a Substantial Amendment to the Consolidated Plan, ensuring that future funding aligns more closely with documented community needs.

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

No CDBG-funded housing rehabilitation or construction projects were undertaken in PY24; therefore, no lead hazard reduction activities occurred. The City continues to maintain compliance with HUD lead-based paint requirements and will ensure that future housing activities address lead hazards as applicable.

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

While no direct poverty-reduction initiatives were undertaken, public service programs funded in PY24 (childcare, youth programming, and homeless outreach) supported vulnerable households and provided indirect poverty alleviation through access to services. The City anticipates greater poverty reduction impact as CDBG resources shift toward **public facilities and infrastructure investments** in PY25 and beyond, improving neighborhood access and conditions in low/mod areas. In addition, upcoming infrastructure investments — such as sidewalk construction in low/mod neighborhoods — will indirectly

support poverty reduction by improving mobility, access to employment centers, and neighborhood safety.

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

In PY24, the City focused on **strengthening internal processes** for program monitoring and reimbursement. Subrecipients were required to provide documentation of race, income, and demographics with all reimbursement requests, along with receipts for materials and timesheets for labor. While desk monitoring was limited due to late program initiation, on-site monitoring of all active public service subrecipients was completed, reinforcing institutional accountability. Going forward, the City will expand both desk and on-site monitoring to build a more robust oversight framework.

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

The City continued coordination with the **Northwest Arkansas Continuum of Care** and local nonprofit partners, including the Boys & Girls Club and Helen Walton Children's Enrichment Center. These partnerships improved service delivery and ensured CDBG funds complemented other regional resources. While Bentonville does not administer public housing, collaboration with housing and service providers remains a priority, particularly as funds shift toward infrastructure projects that support low/mod neighborhoods.

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

No new actions were undertaken in PY24 to address impediments directly, as the City focused on initiating its first funded activities. However, Bentonville remains aware of key impediments identified in its Analysis of Impediments, particularly **high housing costs and limited affordable options**. The removal of homeownership assistance as a Consolidated Plan goal reflects a strategic acknowledgment of these barriers, and future CDBG allocations will focus on public facilities and infrastructure in low/mod areas to indirectly support fair housing choice through improved neighborhood accessibility. No new impediments to fair housing were identified in PY24. The City continues to monitor conditions and will incorporate any newly documented impediments into future planning processes.

CR-40 - Monitoring 91.220 and 91.230

Describe the standards and procedures used to monitor activities carried out in furtherance of the plan and used to ensure long-term compliance with requirements of the programs involved, including minority business outreach and the comprehensive planning requirements

Standards and Procedures

The City of Bentonville requires that all CDBG-funded subrecipients submit detailed supporting documentation with each reimbursement request to ensure eligibility and compliance with HUD requirements:

- **Beneficiary documentation** – Subrecipients must provide participant intake forms capturing race, ethnicity, household income, and other demographic data to verify compliance with low- and moderate-income benefit requirements.
- **Receipts for materials** – Any reimbursement request for supplies or tangible goods (e.g., Continuum of Care outreach materials) must include receipts.
- **Time and payroll documentation** – Any reimbursement request for staff costs must include timesheets and payroll records supporting the hours charged to the program.

This reimbursement process ensures that accomplishments are reported accurately and that all costs are supported with appropriate source documentation.

PY24 Monitoring Activities

Because program activities began late in PY24, the City focused on **on-site monitoring** rather than desk monitoring. Three subrecipients operating under PY23-funded contracts were monitored on-site during the program year:

- **Continuum of Care (CoC)** – Outreach participant data, receipts for outreach materials, and reimbursement documentation were reviewed. No findings were identified.
- **Boys and Girls Club of Benton County** – Scholarship eligibility records and reimbursement documentation were reviewed. One concern was identified regarding the accessibility of participant files. The subrecipient was advised to reorganize its filing system to improve access to records. A follow-up visit confirmed corrective action was taken, and the subrecipient passed monitoring.
- **Helen Walton Children's Enrichment Center** – Participant eligibility documentation, timesheets,

and reimbursement records were reviewed. No findings were identified.

All three subrecipients were determined to be in compliance with HUD requirements at the close of PY24.

Future Monitoring Plans

As program implementation moves beyond initiation into regular operations, the City will expand its monitoring to include both **desk reviews** of reimbursement requests and **on-site visits**. This will ensure ongoing compliance, provide technical assistance to subrecipients, and help the City identify and resolve any issues proactively. Formal desk monitoring will be a regular feature in PY25 and beyond.

The City is also preparing for future Section 3 compliance as infrastructure projects begin. Staff are developing standard procedures to track labor hours, worker eligibility, and contracting opportunities in anticipation of the PY25 sidewalk project, ensuring readiness for HUD's reporting requirements.

Future Steps to Address Subrecipient Performance

The delayed execution of subrecipient contracts in both PY23 and PY24 reinforced the necessity of earlier solicitation and award processes. Beginning in PY25, the City will implement an expedited contracting calendar and offer training sessions for new partner agencies to minimize future delays in project start-up and beneficiary service delivery.

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

Public Meetings and Engagement in PY24

In addition to the CAPER comment period, the City conducted multiple public meetings throughout 2024 as part of its ongoing CDBG planning and amendment processes:

- **February 12, 2025** – Public hearing on the draft PY25 Annual Action Plan.
- **March 5, 2025** – Public meeting on the proposed Substantial Amendment to the 2023–2027 Consolidated Plan and PY23 Annual Action Plan
- **June 4, 2025** – Public meeting to provide program updates and discuss revised goals following approval of the 2023 Substantial Amendment.
- **July 9, 2025** – Public hearing on the draft PY25 Annual Action Plan.
- **October 8, 2025 (upcoming)** – Public meeting on the Substantial Amendment to the PY24 Annual Action Plan, reallocating funds to public facilities and improvements

These meetings, combined with public comment opportunities, ensured residents were kept informed of the City's **changing program priorities, goals, and projects**. During public meetings and comment periods, residents consistently emphasized the need for expanded public service support to offset the

rising costs of living and expenses associated with childcare, and safe public infrastructure in established neighborhoods. This feedback directly shaped the City's decision to prioritize public improvement projects and maintain public service investments in PY25.

In addition to these meetings, all comments submitted during the CAPER public comment period will be included in the final version of this report. While no substantial changes to program priorities resulted from the comments received to date, all input was considered in the planning process, and public feedback remains a central component of Bentonville's CDBG program transparency.

Program Transparency and Updates

During PY24, the City approved its first Substantial Amendment to the Consolidated Plan, shifting priorities away from homeownership assistance and toward public facility improvements in low/mod neighborhoods. To ensure community awareness and engagement, staff provided updates during both the **Annual Action Plan process** and the **Consolidated Plan amendment process**, clarifying how program resources and objectives were being realigned.

CR-45 - CDBG 91.520(c)

Specify the nature of, and reasons for, any changes in the jurisdiction's program objectives and indications of how the jurisdiction would change its programs as a result of its experiences.

Nature of and Reasons for Program Changes

Program Year 2024 was the City of Bentonville's first year of measurable CDBG expenditures and accomplishments. All draws recorded in PY24 were tied to **PY23 grant funds**, as no PY23 expenditures occurred before the close of the prior year. As a result, IDIS reports for PY24 reflect spending and accomplishments from prior-year projects, consistent with HUD's expenditure-by-draw reporting requirements.

During the year, the City initiated its first subrecipient activities, including Boys & Girls Club youth scholarships, Helen Walton Children's Enrichment Center childcare scholarships, and Continuum of Care homeless outreach. These activities produced the first measurable accomplishments of the City's CDBG program, benefitting **140 low- and moderate-income persons**.

Substantial Amendments

Two major amendments shaped the CDBG program during PY24:

- **2023 Consolidated Plan and AAP Amendment (approved by HUD in May 2025):**

- Removed **Homeownership Assistance** as a five-year goal and project, due to affordability constraints and limited program viability.
- Removed the **Habitat for Humanity housing rehabilitation project**, following the agency's withdrawal from the program.
- Reallocated \$256,331 to a new **public facility project**: sidewalk construction along SE C Street in a low/mod income area.
- Revised the Consolidated Plan's goals to focus on **Quality and Affordable Housing** and **Public Facilities and Improvements**, and designated two new geographic priority areas
- **2024 Annual Action Plan Amendment (public comment Sept–Oct 2025):**
 - Removes the PY24 **Homeownership Assistance Program (\$236,326)** and the **WayStation Job Readiness and Training project (\$9,000)**.
 - Reallocates \$245,326 to **public and street improvements in low/mod neighborhoods**

These amendments effectively void many of the original PY24 Action Plan objectives, ensuring that CDBG investments align with revised Consolidated Plan goals and reduce the City's risk of timeliness noncompliance.

Program Direction Going Forward

PY24 marked the transition from **program initiation** (no expenditures in PY23) to **first accomplishments**. Moving forward, the City is repositioning its CDBG program to focus on:

- **Public facilities and infrastructure projects** in low/mod neighborhoods (multi-year sidewalk construction beginning with PY23 reprogrammed funds).
- **Targeted public service programs** addressing childcare, youth programming, and homeless outreach.
- **Enhanced monitoring and compliance** through routine desk and on-site reviews of subrecipients, building on the first monitoring visits conducted in PY24.

Assessment

While PY24 expenditures and accomplishments fell short of original Action Plan targets, this reflects timing and program realignment rather than underperformance. The City has now established its monitoring framework, completed Substantial Amendments (with the Substantial Amendment to the 2023 Consolidated Plan already approved) to better align goals with community needs, and set the foundation for stronger program performance in PY25 and beyond.

With major reallocations in place, the City anticipates a significantly higher volume of expenditures in PY25, improving timeliness performance and reducing risk of HUD findings.

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

No, there are no BEDI grants.

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

There are no BDEI grants.

CR-58 – Section 3

Identify the number of individuals assisted and the types of assistance provided

| Total Labor Hours | CDBG | HOME | ESG | HOPWA | HTF |
|---------------------------------------|------|------|-----|-------|-----|
| Total Number of Activities | 0 | 0 | 0 | 0 | 0 |
| Total Labor Hours | 0 | | | | |
| Total Section 3 Worker Hours | 0 | | | | |
| Total Targeted Section 3 Worker Hours | 0 | | | | |

Table 8 – Total Labor Hours

| Qualitative Efforts - Number of Activities by Program | CDBG | HOME | ESG | HOPWA | HTF |
|---|------|------|-----|-------|-----|
| Outreach efforts to generate job applicants who are Public Housing Targeted Workers | 0 | | | | |
| Outreach efforts to generate job applicants who are Other Funding Targeted Workers. | 0 | | | | |
| Direct, on-the job training (including apprenticeships). | 0 | | | | |
| Indirect training such as arranging for, contracting for, or paying tuition for, off-site training. | 0 | | | | |
| Technical assistance to help Section 3 workers compete for jobs (e.g., resume assistance, coaching). | 0 | | | | |
| Outreach efforts to identify and secure bids from Section 3 business concerns. | 0 | | | | |
| Technical assistance to help Section 3 business concerns understand and bid on contracts. | 0 | | | | |
| Division of contracts into smaller jobs to facilitate participation by Section 3 business concerns. | 0 | | | | |
| Provided or connected residents with assistance in seeking employment including: drafting resumes, preparing for interviews, finding job opportunities, connecting residents to job placement services. | 0 | | | | |
| Held one or more job fairs. | 0 | | | | |
| Provided or connected residents with supportive services that can provide direct services or referrals. | 0 | | | | |
| Provided or connected residents with supportive services that provide one or more of the following: work readiness health screenings, interview clothing, uniforms, test fees, transportation. | 0 | | | | |
| Assisted residents with finding child care. | 0 | | | | |
| Assisted residents to apply for, or attend community college or a four year educational institution. | 0 | | | | |
| Assisted residents to apply for, or attend vocational/technical training. | 0 | | | | |
| Assisted residents to obtain financial literacy training and/or coaching. | 0 | | | | |
| Bonding assistance, guaranties, or other efforts to support viable bids from Section 3 business concerns. | 0 | | | | |
| Provided or connected residents with training on computer use or online technologies. | 0 | | | | |
| Promoting the use of a business registry designed to create opportunities for disadvantaged and small businesses. | 0 | | | | |
| Outreach, engagement, or referrals with the state one-stop system, as designed in Section 121(e)(2) of the Workforce Innovation and Opportunity Act. | 0 | | | | |
| Other. | 0 | | | | |

Table 9 – Qualitative Efforts - Number of Activities by Program

Narrative

No activities were undertaken in PY24 that would trigger Section 3, as all activities were either public services or administrative costs. The City anticipates Section 3 applicability in PY25 with the initiation of the SE C Street sidewalk project.

With the initiation of the SE C Street sidewalk project, the City anticipates Section 3 labor hour requirements will come fully into effect. Preparations include developing a targeted outreach strategy to identify qualified Section 3 workers and business concerns, hosting information sessions for local contractors, and collaborating with workforce development agencies to encourage competitive bidding by small and disadvantaged businesses. Projected job types include general labor, equipment operation, and concrete finishing, with anticipated labor hours to be closely tracked to ensure robust compliance and reporting for HUD.