

# PY2021 Consolidated Annual Performance and Evaluation Report (CAPER)

# **DRAFT**

# **Adams County**

Adams County Government Center 4430 S. Adams County Pkwy, Suite W6204 Brighton, CO 80601

# **Table of Contents**

CR-05 - Goals and Outcomes	3
CR-10 - Racial and Ethnic composition of families assisted	9
CR-15 - Resources and Investments 91.520(a)	11
CR-20 - Affordable Housing 91.520(b)	18
CR-25 - Homeless and Other Special Needs 91.220(d, e); 91.320(d, e); 91.520(c)	21
CR-30 - Public Housing 91.220(h); 91.320(j)	25
CR-35 - Other Actions 91.220(j)-(k); 91.320(i)-(j)	26
CR-40 - Monitoring 91.220 and 91.230	32
CR-45 - CDBG 91.520(c)	35
CR-50 - HOME 91.520(d)	36
CP. 58 - Section 2	20

### **CR-05 - Goals and Outcomes**

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

This could be an overview that includes major initiatives and highlights that were proposed and executed throughout the program year.

Adams County is an entitlement jurisdiction receiving annual entitlement grant funds from the US Department of Housing and Urban Development (HUD). In PY 2021, the County was allocated \$1,473,412 in CDBG and \$1,061,747 in HOME entitlement funds. Together with other local resources, these funds help the County address the housing and community development objectives outlined by HUD. In PY 2021, CARES Act CDBG-CV funds continued to be utilized by the County, and CARES Activities are reported further below in this section. Below are highlights of accomplishments in PY 2021.

Affordable Housing Programs: Affordable housing was addressed through both the CDBG and HOME program. For CDBG, the County assisted LMI households with the preservation of existing housing stock through the Minor Home Repair (MHR) program. There were 47 LMI households assisted in this way in Brighton, Federal Heights, Northglenn and unincorporated Adams County. Code enforcement activities in Federal Heights had a citywide benefit of 14,370 persons. It is a benefit to Federal Heights residents and the community as a whole to provide a program to address safely and health concerns of rental housing by bringing rental properties into code compliance, ultimately reducing deterioration of neighborhoods and avoid slum and blight. There were no accomplishments reported by the HOME program in PY 2021 as HOME benefits are only reported when an activity has been completed. Currently, HOME activities in progress are new rental constructions at Crossing Pointe South and TBRA rental assistance with the Brighton Housing Authority.

Public Facility & Infrastructure Improvements: The County was able to fund public improvement activities that benefitted an estimated 8,566 persons living in LMI areas in Adams County. These include activities such as water and sewer improvements through the Caraway Tap Fees with Maiker Housing Partners, Sherrelwood ADA Sidewalks and Ramps Activity with Adams County Public Works, and the City of Brighton Historic City Hall ADA Bathroom Improvements.

Public Services: The County assisted 304 persons with homeless prevention activities through the Adams County Housing Respite Program. The outreach program, which is funded by CDBG, offers navigation services and administration of the hotel/motel stays by use of vouchers.

CARES Act Accomplishments: In PY 2021, the County funded various programs with CDBG-CV funds which helped to prevent, prepare for and respond to the pandemic. In total, these activities assisted 12,097 persons. These programs were the Growing Home Food Assistance Program, Almost Home Homeless Prevention Program, Intervention, Colorado Legal Services, Project Angel Heart Medically-Tailored Meals, and the Well

Elder Program with The Senior Hub. The Brighton Housing Authority Domestic Violence Program also assisted victims of domestic violence impacted by the pandemic. The program provides transportation and other necessities for individuals and families who may need financial assistance in order to access VAWA and domestic violence resources located within or outside of the County.

# 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	Indicator	Unit of Measure	Expected  - Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected - Program Year	Actual – Program Year	Percent Complete
Construction of New Rental Housing	Affordable Housing	НОМЕ	Rental units constructed	Household Housing Unit	150	6	4.00%	142	0	0.00%
Emergency Housing and Shelter for the Homeless	Homeless	CDBG	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	0	0	NA	NA	NA	NA
Emergency Housing and Shelter for the Homeless	Homeless	CDBG	Homeless Person Overnight Shelter	Persons Assisted	144	307	213.19%	NA	NA	NA
Expanding and Preserving Homeownership	Affordable Housing	НОМЕ	Direct Financial Assistance to Homebuyers	Households Assisted	50	1	2.00%	NA	NA	NA
Preservation of Existing Housing Stock	Affordable Housing	CDBG HOME	Homeowner Housing Rehabilitated	Household Housing Unit	38	78	205.26%	30	47	156.67%
Preservation of Existing Housing Stock	Affordable Housing	CDBG HOME	Rental units rehabilitated	Household Housing Unit	0	0	0.00%	12	0	0.00%
Preservation of Existing Housing Stock	Affordable Housing	CDBG HOME	Housing Code Enforcement/Foreclosed Property Care	Household Housing Unit	625	28740	4598.40%	625	14370	2299.20%

Public Facility Improvements	Non-Housing Community Development	CDBG	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	7484	14831	198.17%	8525	8566	100.48%
---------------------------------	---	------	---	---------------------	------	-------	---------	------	------	---------

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.

The County's use of funds addresses the priorities and objectives in the plan and supports programs and services that benefit the most vulnerable members of the community which are: the homeless or those at-risk of homelessness, LMI households, and special needs groups. The provision of funds to benefit these populations is reflected in the priorities and activities identified in the CDBG program. CDBG funds were used to assist with vital public services, public improvements and affordable housing rehabilitation. HOME funds were used to create affordable housing opportunities and ensure the long-term viability of our existing stock of affordable housing. These activities included new rental construction and TBRA assistance through the Brighton Housing Authority. CARES Act funds are summarized below and detailed in the CR-15.

In particular for CDBG funds, the breakdown of funds by priorities were:

Housing Program (MHR & Code Enforcement): \$888,649.49 (57%)

Public Infrastructure Improvements: \$237,589.03 (15%)

Economic Development (Small Business Stabilization): \$15,854.00 (1%)

Public Services (Housing Respite Program): \$137,334.61 (9%)

Admin of the CDBG Program: \$280,501.36 (18%)

Total CDBG in PY 2021: \$1,559,928.49

#### **CARES Act Funds**

The County funded several public service programs with CDBG-CV funds, which were the Growing Home Food Assistance Program, Almost Home Homeless Prevention Program, Intervention, Colorado Legal Services, Project Angel Heart Medically-Tailored Meals, the Well Elder Program with The Senior Hub, and the Brighton Housing Authority Domestic Violence Program. Altogether, these activities assisted 12,097 persons. The total amount expended for these activities was \$334,332.18 in PY 2021.

# **Actual Goal Accomplishments and Proposed Goal Outcomes Comparison**

Construction of New Rental Housing: The County had a goal for 142 Rental units constructed, however no units were completed. The County is still in the process of funding and developing new rental construction at 4220 E 104th Ave. (Crossing Pointe South) that will help to satisfy this

goal.

Preservation of Existing Housing Stock: The County had a goal to assist 30 LMI households with housing rehab activities and assisted 47 LMI households through the Minor Home Repair (MHR) program. The program is designed to maintain safe homes, preserve and improve the quality of the existing housing stock, assist seniors to age in-place, and/or the disabled to remain in their homes.

Preservation of Existing Housing Stock: The County had a goal to assist 12 LMI households with rental housing rehab activities, however this goal was not completed. The County will re-evaluate this goal and revise if necessary.

Preservation of Existing Housing Stock: The County had a goal to assist 625 households with Housing Code Enforcement in Federal Heights and code enforcement activities had an area-wide benefit of 14,370 persons. It is a benefit to Federal Heights residents and the community as a whole to provide a program to address safely and health concerns of rental housing by bringing rental properties into code compliance, ultimately reducing deterioration of neighborhoods and avoid slum and blight.

Public Facility Improvements: The County had a goal of 8525 persons assisted through public infrastructure improvements in Adams County, and this goal was met with 8566 persons in low/mod areas served. Specific activities were the Sherrelwood ADA sidewalks and ramps activity, the City of Brighton Historic City Hall ADA Bathroom Improvements and the Maiker Housing Partners Caraway Tap Fees project.

# 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	HOME
White	7,077	0
Black or African American	383	0
Asian	142	0
American Indian or American Native	165	0
Native Hawaiian or Other Pacific Islander	76	0
Total	7,843	0
Hispanic	9,136	0
Not Hispanic	3,428	0

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

#### Narrative

**DATA NOTE:** The Table above does not include a category for people of "other or multiple races" or people who "refused to answer either racial or ethnic information" therefore the numbers in the above table do not necessarily match the number of people actually served through the County's CPD programs.

According to the 2016-2020 American Community Survey (ACS) 5-year estimates, the population of Adams County was 514,969 persons. A majority of the population was White with 71.0% followed by Asian with 4.0% and Black or African American with 3.4%. The rest of the population was 1.1% Native American Indian or Alaska Native (AIAN) and 0.1% were Native Hawaiian or Pacific Islander. "Some other" race was 7.9% and "Two or more" races was 12.4%. Persons identifying as ethnically Hispanic were 40.9%. The following is an assessment of how program services reached minority populations.

CDBG: The table above only 7,843 persons assisted with CDBG, however the actual total was 12,564 persons that were served during PY 2021. The data table does not have a category for "Other multi-racial" of which the County also assisted 4,721 persons. Race was reported as follows: 56.3% White; 3.0% Black; 1.1% as Asian; 1.3% as AIAN and 0.6% Native Hawaiian/Other Pacific Islander. There were also 37.6% reporting as "Other multiracial". For ethnicity, 72.7% reported as Hispanic. With the exception of Asian persons, the County assisted minority groups adequately and CDBG benefits were generally in line with the County demographic estimates. The County will continue to make efforts to include minority race/ethnic groups in CDBG program, and in particular for Asian persons.

HOME: HOME program accomplishments are only counted if the activity has been completed in the program year. In PY 2021, there were no units completed however the County is still working on completing new rental housing construction and TBRA activities, and these will be reported in the upcoming program year.

#### **Needs Assessment**

The Needs Assessment in the 2020-2024 Consolidated Plan, assesses if any race and ethnic group by income category has a disproportionate need as compared with the general population in the area with regards to housing problems, severe housing problems and housing cost burden. Households with housing problems are those that reside in units lacking complete kitchen and plumbing facilities as well as overcrowding (more than one person per room) and cost burden (spending 30% or more of income on housing per month). Households with severe housing problems are those that reside in units lacking complete kitchen and plumbing facilities as well as severely overcrowded homes (more than 1.5 person per room) and severe cost burden (spending 50% or more of income on housing per month).

Housing Problems (NA-15): According to the Needs Assessment, minority race group households that have a disproportionate need in housing problems at 0%-30% AMI are American Indian and Pacific Islander households; at 30%-50% AMI are American Indian and Pacific Islander households; at 50%-80% AMI are Pacific Islander households; and at 80%-100% of AMI are Asian and Black or African American households.

Severe Housing Problems (NA-20): Minority race group households that have a disproportionate need in severe housing problems at 0%-30% AMI are Asian, Black or African American, American Indian and Pacific Islander households; at 30%-50% AMI are American Indian and Asian households; at 50%-80% AMI are Asian households; and at 80%-100% of AMI are Asians households.

Housing Cost Burden (NA-25): For housing cost burden, Pacific Islander and Black or African American households have a disproportionate need with housing cost burden.

Housing problems exist among minority groups across all income levels. The CDBG MHR program assisted 47 LMI households in PY 2021, and 35 were white, 1 was black, 1 was Asian and 10 were other or multiracial. By Ethnicity, 21 of these households were Hispanic. In comparing the disproportionate needs of certain race/ethnic groups as described by the Needs Assessment to the beneficiary outcomes provided, the County has identified a need to reach more black or African American and Asian households. Hawaiian or Pacific Islander households also need assistance; however, it should be noted this group is small.

# CR-15 - Resources and Investments 91.520(a)

# Identify the resources made available

Source of Funds	Source	Resources Made Available	Amount Expended During Program Year
CDBG	public - federal	1,691,640	1,559,928
HOME	public - federal	2,933,860	487,575

Table 3 - Resources Made Available

#### **Narrative**

The table above shows the resources made available through the CDBG and HOME program as well as program expenditures for the program year. The following is a summary of expenditures by program.

For CDBG, there was \$1,691,640 in funds made available for program use. Sources were \$1,473,412 from the annual allocation, and \$218,228 from prior year resources. In the program year, the County expended \$1,559,928 with funds from prior program years 2018, 2019, 2020 and 2021. Funds were used for the Minor Home Repair (MHR) program, public infrastructure improvements throughout the county, the Housing Respite Program public service, code enforcement activities in the City of Federal Heights, the Small Business Stabilization Program and admin of the CDBG program. Expenditures by priorities are described below and in the CR-05.

Housing Program (MHR & Code Enforcement): \$888,649.49 (57.0%)

Public Infrastructure Improvements: \$237,589.03 (15.2%)

Economic Development (Small Business Stabilization): \$15,854.00 (1.0%)

Public Services (Housing Respite Program): \$137,334.61 (8.8%)

Admin of the CDBG Program: \$280,501.36 (18.0%)

For HOME, there were \$2,933,860 in funds made available for program use. Sources were \$1,061,747 from the annual allocation, \$44,201 from program income and \$1,827,912 from prior year resources. In the program year, the County expended \$487,575 with funds from fiscal years 2016, 2018, and 2020. Funds were utilized for new rental construction, TBRA and HOME admin. See below for a breakdown of HOME funds by activity:

New Rental Construction: \$316,681.00 (65.0%)

Tenant-Based Rental Assistance: \$116,730.00 (23.9%)

HOME Admin: \$53,974.24 (11.1%)

### **CARES Act Funds**

The CARES Act Allocation for CDBG-CV was awarded in two rounds with \$830,131 for CDBG-CV1 and \$819,890 for CDBG-CV3 for a total of \$1,650,021. In PY 2021 running from October 1, 2021 to September 30, 2022 the County expended \$334,332.18 in CDBG-CV funds towards CV public services to prevent,

prepare for and respond to COVID-19. As of the end of PY 2021, this leaves an amount of \$1,315,688.82 remaining.

### Identify the geographic distribution and location of investments

Target Area	Planned	Actual	Narrative Description
	Percentage of	Percentage of	
	Allocation	Allocation	
			MHR and public infrastructure
City of Brighton	8	13	improvements
City of Federal			
Heights	5	10	MHR and code enforcement
City of			
Northglenn	10	11	MHR
City of Thornton	23	0	No activities started yet in PY 2021
City of			
Westminster	8	15	New Rental Development
			Adams County provides services
			throughout the entire county, no specific
County-Wide	45	51	targets
Town of Bennett	1	0	None in PY 2021

Table 4 – Identify the geographic distribution and location of investments

### **Narrative**

The Urban County Intergovernmental Agreement (IGA) was recertified for another three (3) year requalification period in PY 2020 and next year a new agreement will be made. CDBG funding allocations can be made up to the amounts in the agreement if the local governments have eligible projects each year. Applications for funding were made to Adams County and reviewed for eligibility within the CDBG and HOME program guidelines. Public improvements were made in jurisdictions identified in the AAP and must serve low-to-moderate income census tracts.

The planned allocations for the target areas are displayed above, however due to funds being expended from previous program years to complete activities started prior to PY 2021 and available new funds not yet expended, the actual allocations differ from the planned allocations.

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.

County funded projects with CDBG and HOME are used to leverage a variety of other local and private

funds to cover the total cost of projects. CDBG is typically used to leverage locally funded projects and/or

help support gaps in funding that meet the goals of the Con Plan. HOME funds are used to leverage Low

Income Housing Tax Credit (LIHTC) equity, State of Colorado funds, private equity, and other resources to

cover the cost of the development.

Publicly Owned Land Used to Address the Needs in the Plan

In recent years, Adams County has donated land to Maiker Housing Partners and the Brighton Housing Authority. Maiker Housing Partners is currently developing Caraway Apartments, an affordable housing

development and this activity is underway.

**HOME Program Income** 

According to the PR09 Receipt Fund Type Detail Report, at the beginning of the reporting period Adams

County had \$316,693.47 in program income on hand. These receipted funds are associated with the Homeownership Assistance Program, Minor Home Rehab and CHDO Acquisition/Rehab activities. Funds

by program year are:

2018 (PI): \$40,781.49

2019 (PI): \$225,496.84

2020 (PI): \$50,415.14

Total Program Income at beginning of PY 2021 (PI): \$316,693.47

In the program year, the County receipted a total amount of \$223,184.67 and expended \$235,450.50 in

HOME program income funds. As a result, the balance on hand at the end of PY 2021 was \$304,427.64.

The County also reports that \$116,730 was expended for TBRA activities. These funds were drawn from

EN and not program income funds.

**HOME Match** 

Adams County encourages applicants to work with the applicable local jurisdictions to provide matching

contributions in the form of development incentives for HOME activities. Activities funded by HOME are required to have twenty-five (25%) match funds. To be considered HOME match, the funding must be a non-federal permanent contribution to affordable housing contributed in an eligible manner and properly documented. Adams County encourages all HOME funded projects to have program funding match. In PY 2021, Adams County donated land to the Brighton Housing Authority that qualifies as HOME match. The appraised amount was \$2.2 million. According to the PR33 HOME Match Liability Report, the match liability amount for FY 2021 was zero.

### **HOME MBE/WBE**

There were no contracts awarded from the HOME program.

Fiscal Year Summary – HOME Match						
1. Excess match from prior Federal fiscal year	5,730,573					
2. Match contributed during current Federal fiscal year	2,200,000					
3. Total match available for current Federal fiscal year (Line 1 plus Line 2)	7,930,573					
4. Match liability for current Federal fiscal year	0.00					
5. Excess match carried over to next Federal fiscal year (Line 3 minus Line 4)	7,930,573					

Table 5 – Fiscal Year Summary - HOME Match Report

	Match Contribution for the Federal Fiscal Year									
Project No. or Other ID	Date of Contribution	Cash (non-Federal sources)	Foregone Taxes, Fees, Charges	Appraised Land/Real Property	Required Infrastructure	Site Preparation, Construction Materials, Donated labor	Bond Financing	Total Match		
N/A										

Table 6 – Match Contribution for the Federal Fiscal Year

# **HOME MBE/WBE report**

Program Income – Enter the program amounts for the reporting period								
Balance on hand at begin-ning of reporting period \$	Amount received during reporting period \$	Total amount expended during reporting period \$	Amount expended for TBRA \$	Balance on hand at end of reporting period \$				
316,693.47	223,184.67	235,450.50	116,730.00	304,427.64				

Table 7 – Program Income

value of conti	1	projects comple			ou .	
	Total	Minority Business Enterprises			White Non-	
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non- Hispanic	Hispanic	Hispanic
Contracts						
Dollar						
Amount	0	0	0	0	0	C
Number	0	0	0	0	0	C
Sub-Contract	S					
Number	0	0	0	0	0	C
Dollar						
Amount	0	0	0	0	0	C
	Total	Women Business Enterprises	Male			
Contracts						
Dollar						
Amount	0	0	0			
Number	0	0	0			
Sub-Contract	s					
Number	0	0	0			
Dollar						
Amount	0	0	0			

Table 8 - Minority Business and Women Business Enterprises

Minority Owners of Rental Property – Indicate the number of HOME assisted rental property owners and the total amount of HOME funds in these rental properties assisted **Total** White Non-**Minority Property Owners** Alaskan Asian or **Black Non-**Hispanic Hispanic Native or **Pacific** Hispanic **American** Islander Indian Number 0 0 0 0 0 0 Dollar 0 0 Amount 0 0 0

Table 9 - Minority Owners of Rental Property

**Relocation and Real Property Acquisition** – Indicate the number of persons displaced, the cost of relocation payments, the number of parcels acquired, and the cost of acquisition

Parcels Acquired	0	0
Businesses Displaced	0	0
Nonprofit Organizations		
Displaced	0	0
Households Temporarily		
Relocated, not Displaced	0	0

Households	Total		Minority Property Enterprises					
Displaced		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non- Hispanic	Hispanic	Hispanic		
Number	0	0	0	0	0	0		
Cost	0	0	0	0	0	0		

Table 10 – Relocation and Real Property Acquisition

# 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	184	47
Number of Special-Needs households to be		
provided affordable housing units	0	0
Total	184	47

Table 11 - 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	142	0
Number of households supported through		
Rehab of Existing Units	30	47
Number of households supported through		
Acquisition of Existing Units	12	0
Total	183	47

Table 12 - Number of Households Supported

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

#### Table 1 - Household Type

The first table shows the program year goals for assistance by household type. The County had a goal to assist 183 LMI Non-Homeless households with affordable housing activities. This includes goals for owner-occupied housing rehab through CDBG and rental-occupied housing rehab and the construction of new rental units through HOME.

Through CDBG funds, the County assisted LMI households with the preservation of existing housing stock with the Minor Home Repair (MHR) program. There were 47 LMI owner-occupied households assisted in this way in Brighton, Federal Heights, Northglenn and unincorporated Adams County.

There were no accomplishments reported by the HOME program in PY 2021 as HOME benefits are only reported when an activity has been completed. Currently, HOME activities in progress are a new rental

construction at Crossing Pointe South and TBRA rental assistance with the Brighton Housing Authority. As these activities are completed, these accomplishments will help to meet the established goals for HOME.

#### Table 2 - Unit Type

The second table show the program year goals for assistance by affordable housing project type. The County had a goal to assist 142 LMI households with the production of new housing units, and this goal was not yet completed. Maiker Housing Partners is still developing this 206 unit project, Crossing Pointe South, and the County anticipates this project will be completed in the upcoming program year.

There was a goal to assist 30 LMI households with housing rehab, and the County exceeded this goal with 47 households through the MHR housing rehab program.

Finally, there was a goal to assist 12 LMI households through the acquisition of multifamily housing for the purpose of rehab. This activity is in development by the Brighton Housing Authority.

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

The County continues to prioritize the need for affordable housing development and preservation as planned in its Annual Action Plans. The outcomes for PY 2021 continue to demonstrate that the County is making efforts to meet its overall affordable housing. As such, the County will continue to fund programs such as the CDBG Minor Home Repair program and HOME CHDO activities that help to increase and preserve the affordable housing stock in Adams County. HOME activities are only reported in the year they are completed, and the County will make sure to track these accomplishments in future CAPER reports. The affordable housing goals in this section will continue to have outcomes in future plans.

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

Number of Households Served	CDBG Actual	HOME Actual
Extremely Low-income	16	0
Low-income	24	0
Moderate-income	7	0
Total	47	0

Table 13 - Number of Households Served

# **Narrative Information**

For CDBG, there were 47 households assisted in the CDBG Minor Home Repair Program (MHR) program across the County. The breakdown of households assisted by income were 16 extremely low-income, 24

low-income and 7 moderate-income households. All the households assisted with MHR were homeowners.

In the HOME program, there were two ongoing activities however HOME only reports accomplishments when they are completed. These two activities were a new rental construction site and TBRA rental assistance. The County anticipates these activities will be completed in the following program year.

#### Worst Case Needs

Those with worst case needs are individuals or households at-risk of or experiencing homelessness and/or are extremely low-income. The County will continue to prioritize and work with partners that assist these groups. In the program year, there were 16 extremely low-income households in the CDBG Minor Home Repair Program (MHR) program. Households served in the MHR program were assisted with housing rehabilitation to maintain the condition of their housing. Households with extremely low-incomes lack the funds to properly upkeep their homes which may promote unsafe conditions and contribute to situations that lead to homelessness.

The CDBG MHR prioritizes the elderly and persons with a disability, and is administered and managed by Adams County Community Development. The MHR is intended to impact the health, safety, and sanitary conditions for low-to-moderate income owner-occupied households in the County. Applicants are income-verified and screened for eligibility prior providing repairs.

# 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

There are four (4) primary service providers in Adams County who have strong presence in the community and provide services specifically for people experiencing homelessness. These agencies include Almost Home, ACCESS Housing, Cold Weather Care, and Growing Home, which are located in various areas of the County and provide numerous services, including shelter, housing navigation, case management, employment services, as well as homelessness prevention and life skill classes to reduce and end homelessness.

Almost Home has thirty (30) beds and can accommodate up to seven (7) families. During their stay, each family attends weekly classes, receives case management and must show progress in reestablishing self-sufficiency. Almost Home was previously awarded an ESG Rapid Rehousing grant from the region's Continuum of Care (CoC) to accommodate two people at a time.

ACCESS Housing has sixteen (16) beds for families and provides rental assistance, case management, housing navigation, street outreach, and food assistance.

Cold Weather Care provides shelter through October to April with a group of rotating churches. Twenty (20) beds are available for single adults and families with children experiencing homelessness.

Growing Home is a leading anti-poverty organization in the County, offering a rich pipeline of programs for children and families. Growing Home's wrap-around approach serves the whole family with intensive support to overcome immediate and long-term obstacles. It strengthens families during times of crisis by offering food, healthcare, and homeless prevention assistance. Their early childhood interventions nurture children from birth through age 8 with evidence-based programs that help prepare young kids for kindergarten and keep older kids on the path to school success. Its Blocks of Hope neighborhood initiative is enlisting an entire community to join forces toward its common goal to transform lives. Growing Home is in the process of bolstering their homelessness prevention efforts through flexible, short-term financial assistance, eviction prevention, housing navigation, service navigation, and follow-up services.

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

The County refers to the agencies listed above to address the homeless emergency shelter and transitional housing needs in Adams County. Almost Home has 30 beds and can accommodate up to 6 families. ACCESS Housing has 16 beds for families. Cold Weather Care provides 20 beds available for single adults and families with children experiencing homelessness. As mentioned earlier, these agencies

also provide wrap-around services to help individuals and families.

The Community Safety & Well-Being Department is responsible for assisting in the coordination, creation, implementation, and oversight of services and programs for citizens dealing with homelessness. The Division was formed in response to the growing homeless population in various parts of the County.

The Community Safety & Well-Being Department is currently developing the Adams County Homelessness Action Plan, which has identified the priorities and goals for addressing homelessness and is currently developing the objectives, strategies and action steps needed to implement the plan. The goals and strategies will be measurable and subject to evaluation and modification at a minimum of annual reviews. The results of the Plan will be a coordinated effort, with minimal duplication and a continuum of services that reflects the demographics and needs of those experiencing homelessness in Adams County. The taskforce is actively seeking feedback, input, and innovative ideas from all stakeholders in the community including those with lived experience, service providers, first responders, local government and city planners, County commissioners, mayors and representatives of local government and community members. The agenda of these engagements is not only to hear about the need perspective but also to inventory current services available, to create a plan that is in alignment with the stakeholders and to gain support for the Adams County Homelessness Action Plan.

Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: likely to become homeless after being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); and, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs

Many individuals and families who experienced homelessness remain in a vulnerable state and case management services play a critical role at this stage. Case management services include:

- Housing and service navigation;
- Rental, utility, and deposit assistance, as well as homelessness and eviction prevention services;
- Job development programs focusing on a client's employment objectives and long-term goals;
- Plans and/or enrollment in furthering education or training;
- Budgeting classes;
- Strategy for self-sufficiency; and
- Twelve-step recovery programs and other support groups in the community for maintaining sobriety.

While individuals and families who experiencing homelessness access mainstream resources on an individual basis, local providers and advocates work in varying capacities to influence program implementation, funding priorities, and the coordination of service delivery through system wide

collaboration. Programs in place to assist people experiencing homelessness are:

- Medicaid: Homeless service providers screen clients for Medicaid eligibility and refer for enrollment when appropriate;
- Children's Health Insurance Program: For children not eligible for Medicaid, the State administers the Children's Health Insurance Program, which provides low-cost health, dental, and vision coverage to children in low wage families;
- Temporary Aid for Needy Families (TANF): Administered by the Adams County Community Support Services Division provides funding to eligible families while enrolled into a self-sufficiency program;
- Food Assistance Program: Administered by the Adams County Community Support Services
  Division, this program is a supplement to the household's nutritional needs for the
  month. Eligibility is based upon the household's income, resources, household size, and shelter
  costs. Benefits are given to eligible households through the Colorado Quest Card. Certain food
  assistance recipients will be referred to the Employment First Program for assistance in
  employment and training needs; and
- Workforce Investment Act: The Adams County Workforce & Business Center receives funding to
  provide training and job placements. The Workforce & Business Center also works with the
  County's housing authority to provide a job development program for homeless clients. The
  housing authority administers the distribution of vouchers to clients referred by Workforce &
  Business Center counselors.

Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again

The County funds and supports the local network of service providers which provide homelessness prevention services to households at high-risk of homelessness. By using a prevention strategy, service providers are better able to help households maintain stability in their housing. To maintain stability, financial assistance for rent, mortgage, utility and other household necessities is provided by partner agencies. The programs also provide case management and referral services to assist that family in overcoming the challenges that brought them to the brink of homelessness.

The County is partnering with and supporting Colorado Legal Services to target individuals and families on the brink of losing their current housing due to an eviction. Services are provided by appointment at a Westminster Public Library (Irving St.) as well as a walk-in basis at the County Courthouse. Service providers are also working to coordinate and implement a diversion or rapid resolution program for people who may resolve their housing crisis before entering the homelessness service system. The County

is also proactively looking at zoning and code to preserve and prevent displacement of current mobile home communities.

ACCESS provides services for families looking to make the transition from homelessness to permanent housing. Participants in the Family Shelter Program are assigned an ACCESS Housing Case Manager who provides weekly case management to help families. Case managers help these families work towards goals of permanent housing while also providing supporting services such as food services, clothing, transportation, and referrals to the Adams County Workforce and Business Center.

The Community Safety & Well-Being Department has a coordinator that works with eligible households with homeless coordination, services to attain housing and housing and workforce programs. Through these activities the Department can help homeless individuals and families find stable housing and transition to independent living.

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

# Actions taken to address the needs of public housing

The programs coordinated by Maiker Housing Partners and the Brighton Housing Authority remain the primary providers of affordable housing in the County for households in the lowest income categories. The only other alternative is federally subsidized housing. Maiker Housing Partners and the Brighton Housing Authority manage and maintain conventional public housing developments throughout the County and several scattered-site developments. Both Maiker Housing Partners and the Brighton Housing Authority own and operate public housing units, senior and disabled affordable units, and administer tenant and project-based Section 8 vouchers. The County supports these agencies by providing HOME funds to obtain and maintain affordable properties.

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

Maiker Housing Partners values the input of its residents. Maiker Housing Partners has a Resident Advisory Board (RAB), that is made up of residents of Maiker properties, and meets quarterly to discuss the housing authority's priorities and property improvements. Maiker Housing Partners' Board of Commissioners includes a seat for an Adams County resident of low-income housing and currently this seat is held by a resident of a Maiker property. Annually, the housing authority surveys all residents of its properties to gather feedback across a wide array of topics pertaining to resident housing. Additionally, during the planning stage of any future developments, Maiker Housing Partners will solicit input from residents of its existing properties and area residents for design and programming.

The Brighton Housing Authority maintains an active webpage regarding its public housing and wait lists, if any. The organization works closely with Colorado Housing and Finance Authority (CHFA) to direct those that are interested in home ownership to attend one of CHFA's housing counseling workshops. The CHFA has a homeownership program that helps with homebuyer education, down-payment and closing cost assistance and referrals to lenders.

### Actions taken to provide assistance to troubled PHAs

Not applicable. Maiker Housing Partners and the Brighton Housing Authority are not designated as "troubled".

# 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)

Adams County has identified affordable housing as a high priority and has moved to address this through several planning efforts including the Adams County 2020-2024 Con Plan. Through the development of the Housing Needs Assessment (HNA) and Balanced Housing Plan (BHP), the County focused on creating a plan that provides a roadmap to addressing some of the County's housing barriers by focusing on a balance of the housing.

Balanced Housing is achieved by a community's ability to provide a variety of housing choices that reflect an individual's financial and lifestyle needs. By recognizing that housing needs are shaped by access to jobs, education, and amenities, the BHP is designed as a guide for the County as it strives to provide its residents with housing opportunities that meet their needs and achieving a greater quality of life. The BHP was the next step in county-wide recommendations and set forth the following goals and policies:

#### Goals

- Utilize New and Existing Tools
- Reduce constraints to development
- Expand Opportunities

### **Policies**

- Improve and support housing opportunities for all residents in Adams County
- Foster an environment the promotes "balanced housing"
- Encourage connection and access between schools and housing
- Promote the preservation of the County's current housing stock
- Integrate development practices the increase diversity in housing options

#### Past Actions

In 2015, the county adopted its Analysis of Impediments to Fair Housing Choice which also included a summary of the barriers to affordable housing. With a reorganization of county departments, the Community & Economic Development Department was created thus breaking down silos to share information and speed up the development review process. As such, the Development Review division began working closely with the Community Development to include them in developer discussions to encourage the inclusion of affordable housing in prospective projects. As a result, many developers became knowledgeable about HOME funds and were interested in developing projects to include

### affordable housing.

Mid-July 2017, the county ratified the Balanced Housing Plan and Needs Assessment (BHPNA). The BHPNA is an in-depth analysis of the barriers to housing as a whole and a plan to effectively address identified barriers. The BHPNA demonstrates how the county plans to address missing middle housing and density issues, among other strategies.

In 2019, the county amended the Zoning Code to allow for accessory dwelling units (ADUs). The purpose of the amendment was to (1) provide homeowners with an opportunity for companionship and security; (2) better utilize existing infrastructure and community resources; (3) provide a housing type that responds to changing needs and lifestyles (e.g., small families, retirees, caretakers); (4) add to the County's stock of affordable dwelling units; and (5) protect neighborhood character and stability by ensuring that visible ADUs are compatible with surrounding land uses.

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

One of the obstacles to meeting underserved needs is the size of the County. Adams County is a large county, which makes it difficult to adequately deliver services to both urban and rural constituencies. The mixture of urban and rural land throughout the county poses both service delivery and service recipient challenges due to distance. Many of the core agencies working with the County are located in the urban portions of the County, which are primarily located in the western areas of Adams County. This complicates meeting the needs of all residents, in particular service delivery in the eastern and northern rural regions. Further, the lack of adequate transportation and service providers in the rural areas are a barrier to meeting the needs of the underserved throughout the entirety of the county. The County has worked to include the northern and rural areas by working closely with agencies that specialize in these areas and as part of the IGA a significant portion of CDBG funds have been set-aside for programs and projects designated for Unincorporated Adams County.

A lack of adequate funding is also an obstacle to meeting underserved needs in Adams County. To try to address this, the County works with its local governments and subrecipients to use federal funds to leverage other state and local funds for its projects that further the goals of the plan. However, there is an increasing need for services requested by residents, which continues to put a strain in County resources and its ability to provide adequate care and services to its most vulnerable and in need.

Another area of weakness that the County continues to face is a fully functional referral system. This can be attributed to the recent funding uncertainties within all federally funded areas (TANF, Food Stamps, Medicaid, etc.) and the vast geographic parameters of service-delivery agencies. The County has continued to increase the availability of information for service-providers to be carried on to residents. The County has also opened a new Human Services Center which provides a centralized location for residents to seek services such as TANF, Children & Family Services, Community Support Services, Domestic Violence Services & Shelter, Child Support Services, Foster Care, and the Workforce & Business Center.

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

The County's Minor Home Repair (MHR) program has implemented stringent policies to ensure lead-based paint hazards are addressed proactively and in compliance with Federal regulations. In compliance with HUD's Lead Safe Housing Rule (24 CFR Part 35) and EPA's Lead Renovation, Repair, and Painting Program Rule (40 CFR Part 745), lead-safe practices are administered for any eligible household with housing constructed prior to 1978. Only lead-certified contractors are solicited to bid for these housing projects.

Lead-safe practices include providing the family with the Lead Safe Information pamphlet, a "Notice of Presumption" or "Notice of Evaluation" (as applicable), a copy of the final clearance completed by a licensed examiner, and a "Notice of Lead Hazard Reduction" - the required documents for projects receiving rehabilitation assistance between \$0-\$24,999 per unit. A lead hazard screen and/or full risk assessment is also be performed, as necessary, for projects receiving rehabilitation assistance.

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

The activities reported in this CAPER worked directly to reduce the number of poverty-level families in Adams County. Public facilities improvements made to LMI areas in its cities and unincorporated Adams County helped to improve streets and sidewalks for ADA compliance and also provide overall safe connectivity. Accessibility improvements were also made to neighborhood facilities. Public improvements help to increase the attractiveness of the area of more local public and private investments into these areas.

The Minor Home Repair program also helps to serve LMI residents throughout the cities of Federal Heights, Brighton, Northglenn, and unincorporated Adams County. The program helped address essential home repairs to promote decent, safe and sanitary conditions as well as accessibility issues. Housing rehabilitation activities also help to maintain adequate housing conditions for LMI residents that might otherwise lead to conditions that cause homelessness.

Adams County Community & Economic Development Department worked with the Adams County Community Safety & Well-Being Department, Adams County Workforce Business Center, local municipalities, and community agencies to identify the emergent employment needs of the low-income population and help develop appropriate responses to these needs. The Workforce and Business Center provides routine classes and training to enhance the skills of the emerging labor force. Housing authorities and housing providers are engaged to identify those residents in need of training and/or interested in participating with the Section 3 initiative.

The Maiker Housing Partners provides family self-sufficiency (FSS) services to residents of their housing units and clients of the Section 8 voucher program. The FSS program helps residents gain the skills necessary to move themselves out of poverty.

Homeless providers funded through the statewide ESG program also provide clients with self-sufficiency case management services and referrals so that households can earn higher incomes and reduce their chances of re-entering the cycle of homelessness.

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

Adams County is the lead agency in both the CDBG Urban County and the HOME Consortia. Adams County's Urban County consists of:

- Town of Bennett
- City of Brighton
- City of Federal Heights
- City of Northglenn
- Unincorporated Adams County

Every three years, these jurisdictions are re-invited to renew their Intergovernmental Agreement (IGA) with the county. Each of them receives a percentage of the county's CDBG allocation. As the lead agency Adams County monitors each jurisdiction's projects to ensure they meet national objectives, eligibility, and compliance. In addition to the Urban County jurisdictional proportional allocation, Adams County targets a percentage of its CDBG funding to community agencies. All projects are assessed through an application process for appropriateness and eligibility. During Program Year 2020, the Urban County and HOME Consortia renewed the Intergovernmental Agreements to continue receiving CDBG and HOME funds for the 2022, 2023, and 2024 PYs.

Adams County leads a HOME Consortia with the City of Westminster, the City of Commerce City, and the City of Thornton. A percentage of the County's annual HOME allocation is reserved to each of these municipalities based on a formula determined and posted annually by HUD (Annual Share Percentage Report). The County also provided portions of its HOME application to:

- Community Development Housing Organizations (CHDO) (15% set-aside requirement);
- Local housing authorities;
- Non-profit housing developers; and
- For-profit developers.

Adams County has increased CHDO qualification strategies to align with the 2013 HOME Final Rule amendments and HUD best practices. Adams County is also in the process of seeking and certifying new CHDOs throughout Adams County for the purposes of expanding the County's capacity to undertake projects. Housing development agencies operating within the County are small and perform minimal development activities.

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

Adams County continues its efforts to provide technical assistance to community partners as part of its coordination between public and private housing and social service agencies, as well as encouraging subgrantees to collaborate in leveraging resources and knowledge. The County Community & Economic Development Department is working with other County departments to determine the highest priority projects and best use of all funding received by the division. The County continues to work with Planning and Development, Public Works, Human Services, Regional Affairs, Long Range Planning, Community Safety & Well Being, and various other partners to strengthen the delivery of services to all areas of the County.

Designated local governmental agencies, known as the Urban County, are eligible to apply for Adams County CDBG funding. Urban County members include the cities of Brighton, Northglenn, Federal Heights, Town of Bennett, and unincorporated Adams County. Through the application process, technical assistance is provided and members are guided through eligible activities and uses of funds. A subrecipient handbook is provided as a training resources. Coordination is enhanced as each year members increase their capacity for service delivery through the knowledge gained in the application process.

The County also provides technical assistance to housing providers in the HOME program. These include qualified Community Housing Development Organizations (CHDOs), Public Housing Agencies, For-Profit Developers, and/or Nonprofit Organizations (501(c) 3 or 4). As well, the County works with organizations applying for CHDO status. Construction resources are provides as well as technical assistance during the application process, which helps applicants learn more about eligible activities and uses of funds in the HOME program.

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

The County completed its 2020 Analysis of Impediments to Fair Housing Choice (AI) on November 5, 2020, that continues to guide the County in affirmatively furthering fair housing for the next four years of the Consolidated Plan period. The impediments identified in the AI included:

- Shortage of affordable, accessible housing units.
- Discrimination in rental transactions.
- Barriers to homeownership.
- Lack of resources to address poor housing conditions.
- Disparate access to opportunity.
- Limited zoning code and land use regulations.

To address these impediments to fair housing the County developed as part the AI a Fair Housing Action

Plan, which lists recommended action items on what the County can reasonably do to address these impediments and affirmatively further fair housing in Adams County. These actions can be viewed in the full documents on the City's website at: https://www.adcogov.org/resources-reports

#### Actions Taken

In PY 2021, the County worked to address the following impediments identified in the AI:

<u>Shortage of affordable, accessible housing units:</u> Through the HOME program, activities in progress are a new rental construction at Crossing Pointe South in Thornton which will provide 206 units when completed and TBRA rental assistance with the Brighton Housing Authority. These activities will be reported in upcoming CAPER reports when they are completed.

<u>Barriers to homeownership:</u> While there were no direct activities to assist residents with homeownership, the County's programs help to provide access to a more stable living situation and better quality of life. These include the housing respite program, food assistance, homeless prevention, medical programs and legal services. These programs help to offset other basic need costs, and encourage residents to continue the path towards self-sustainability and hopefully homeownership opportunities.

<u>Lack of resources to address poor housing conditions:</u> The County assisted 47 LMI households with the preservation of existing housing stock through the Minor Home Repair (MHR) program. The LMI households assisted in this way in Brighton, Federal Heights, Northglenn and all throughout the County. The program is designed to maintain safe homes, preserve and improve the quality of the existing housing stock, assist seniors to age in-place, and/or the disabled to remain in their homes. The County also helped fund code enforcement activities that benefitted LMI areas in Federal Heights.

<u>Disparate access to opportunity:</u> The County funded activities that improved public facilities and infrastructure in LMI areas such as sidewalk improvements and improvements to neighborhood facilities and community buildings. These investments invite other developments into the area. The County also funds a variety of public services such as a housing respite program, food assistance, homeless prevention services, medical programs, elderly programs and legal services.

# 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

Adams County conducts its monitoring process through four types of monitoring of its Subgrantees/Subrecipients as outlined below:

<u>Individual Monitoring:</u> This includes ongoing contact with the Subrecipients/Subgrantees to provide guidance to prevent potential issues and ensure compliance with Federal regulations.

<u>Desktop Monitoring:</u> This monitoring is conducted on an ongoing basis while the project is still open and completed annually after closeout. This includes review of Subrecipients'/Subgrantees' quarterly or annual reports, financial audits, and compliance with CDBG and HOME and crosscutting Federal regulations. This type of monitoring enables the County to analyze information such as accomplishments and expenditures and compliance with Federal regulations, which, in turn, helps determine the need for additional technical assistance or future on-site visits. This monitoring also ensures that completed activities continue to be used for the same purpose and continue to benefit eligible populations. The review of reports is completed on a quarterly basis for current projects, and annually for previously funded projects that are required to continue to benefit low- and moderate-income populations. If Davis-Bacon is applicable to the project, the payrolls are reviewed on an ongoing basis until the project is fully completed.

<u>On-site Monitoring:</u> All activities are monitored on-site upon final payment. As a standard, Adams County will conduct subsequent on-site monitoring every three years until the compliance or affordability period is met. However, depending on the results of the desktop and/or on-site monitoring, the county may monitor more frequently if there is an indication of instability in the Subrecipient/Subgrantee. The monitoring consists of interviews with key staff and a review of pertinent records. The County has also regularly conducted on-site Davis-Bacon interviews for construction projects.

<u>Drawdown Requests:</u> County staff reviewed drawdown requests and supporting documents for compliance with all reporting requirements and to verify the Subrecipient/Subgrantee is requesting reimbursement for approved purchases as outlined in the contract. This process is completed through a three-tiered review by staff.

# MBE/WBE & Section 3

In addition to the above, if an activity is subject to Section 3 of the Housing and Urban Development Act or required to report on Minority or Women Owned Businesses (MBE/WBE) utilized, Adams County provides additional information, technical assistance, and forms. The County complies with Section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C 1701u) and implementing regulations at 24 CFR Part 75. County staff discusses the requirements applicable to the regulations with both the

Subgrantee and subcontractor during the RFP process, pre-construction meetings, Davis-Bacon interviews, and post completion technical assistance.

#### **Citizen Participation for PY 2021**

Adams County adheres closely to its HUD approved Citizen Participation Plan (CPP) which guides the County in providing constituents with adequate opportunity to participate in the development of plans and review of performance reports as per 24 CRF 91.105. The County pursued a variety of outreach efforts to notify, inform, and include the public in the 2021 Annual Action Plan (AAP) development. These efforts included conversations with service providers and key partners, placing announcements in the local newspapers, meetings with Urban County and HOME Consortia members, posting information on the County's webpage, and holding a public comment period and a public hearing. It also encouraged the participation of those in specialized populations such as non-English speaking, persons with disabilities, residents of public housing, low-income residents, and seniors. Information regarding the draft AAP and the proposed 2021 activities was available on the County's website for public comment for more than 30 days. This period was followed by a public hearing to approve the final plan for submittal to HUD. Stakeholders engaged throughout the process include Maiker Housing Partners, Growing Home, Adams County Homelessness Task Force, Family Tree, Adams County Education Consortium, Adams 12 Student and Family Outreach Program, Adams County Workforce and Business Center, and CASA.

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

Describe the efforts to provide citizens with reasonable notice and an opportunity to comment on performance reports.

To meet the requirements for citizen participation for the PY 2021 CAPER, the County gave notice in the local paper and on its website that the draft CAPER report would be available for a public comment and review period and a public hearing at a regularly scheduled Board of County Commissioners meeting to discuss the CAPER. Below are directions on how citizens can participate in the review of the draft CAPER.

<u>PUBLIC COMMENT PERIOD:</u> The County will hold a 20-day public comment period starting from February 2, 2023 to February 21, 2023. The draft CAPER is available to view at the following locations:

ADDRESS: Community Development Division, Adams County Government Center, 4430 S. Adams County Pkwy, Suite W6204, Brighton, CO 80601

ONLINE: https://www.adcogov.org/community-development

A summary of comments will be added at the conclusion of the public comment period.

<u>PUBLIC HEARING:</u> A public hearing is scheduled to be held February 21, 2023 at 9:30 AM to approve the draft CAPER. Public Hearings are held in the First Floor Public Hearing Room at the Adams County Government Center located at 4430 S Adams County Parkway, Brighton The public hearing will also be

held at online at https://adcogov.legistar.com/Calendar.aspx. Residents are encouraged to attend and participate.

A summary of comments will be added after the public hearing.

ACCESSIBILITY: Adams County encourages participation from all citizens including those with special needs. Persons with disabilities or in need of language translation service should notify the County in advance of three (3) days to make appropriate arrangements and accommodations. Requests can be made by phone at (720) 523-6200 or at the address above. More information on how to contact the Community Development Department can be found on the website: https://www.adcogov.org/community-development

# CR-45 - CDBG 91.520(c)

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

The PY 2021 CAPER is the second reporting year for the County's 2020-2024 Consolidated Plan and there were no changes to the original Strategic Plan priorities or goals. The County will continue its momentum with improvement of its internal processes and continues to work toward improving its internal goals of maximizing CDBG and HOME to its fullest potential. Adams County staff continue to improve and will be increasingly effective in properly directing funds to activities that have the greatest impact on the community's quality of life.

The County does not anticipate any changes in the original program objectives that would result in changes to its current programs, however if at any point in the future it determines there is a need to revise objectives, the County will provide documentation to support the need for a change and will follow proper substantial amendment procedures to the plan and any citizen participation requirements as a result of these changes.

#### **CDBG-CV**

In response to the COVID-19 pandemic, the CARES Act was voted into law to assist impacted residents. CDBG-CV funds were granted to entitlement communities, including Adams County, to fund activities that prevent, prepare for and respond to the coronavirus. The total amount of CDBG-CV funds awarded to the City was \$1,650,021.

The COVID-19 pandemic continued to present health and safety concerns in PY 2021, and the County worked to meet the goals established for the CDBG-CV program to address these concerns. CDBG-CV funds were targeted towards COVID-19 emergency response activities such as the Small Business Stabilization Program for businesses impacted by the pandemic, and vital public services such as homeless prevention, food programs, financial assistance and services for the elderly.

The County will continue to closely monitor the continued impact of the pandemic and continue to address the needs of LMI residents as they arise. CDBG-CV accomplishments have been summarized in the CR-05 and expenditures are detailed in the CR-15.

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

No

# CR-50 - HOME 91.520(d)

Include the results of on-site inspections of affordable rental housing assisted under the program to determine compliance with housing codes and other applicable regulations

Please list those projects that should have been inspected on-site this program year based upon the schedule in §92.504(d). Indicate which of these were inspected and a summary of issues that were detected during the inspection. For those that were not inspected, please indicate the reason and how you will remedy the situation.

During PY 2021, Adams County staff conducted a total of [TBA] on-site inspections. There was a COVID-19 waiver extension for no on-site inspections until December 31, 2021, however as the waiver ended in the program year, inspections have resumed.

Staff provide technical assistance to all property owners/managers and they are aware of their annual obligations (i.e., rent rolls, financial audits, affirmative marketing plan, etc.) for desktop monitoring. They are also aware of on-site monitoring which will take place at a minimum of every three years. Lastly, the County emphasizes property owners to keep County staff apprised of any changes in management, financial concerns or conditions which would make the property not in compliance with HOME rules.

A SUMMARY OF INSPECTIONS WILL BE INCLUDED IN THE CAPER SUBMISSION

# Provide an assessment of the jurisdiction's affirmative marketing actions for HOME units. 92.351(b)

As part of the underwriting and subsidy layering review, Adams County requires all HOME applicants to provide the agency's affirmative marketing plan. Without a complete and compliant affirmative marketing plan, the County will not approve the underwriting and will not move the project forward for Board approval.

The County will provide technical assistance as needed, but all HOME projects must have an approved affirmative marketing plan. Furthermore, as part of the HOME monitoring, the County annually requests and reviews HOME recipients affirmative marketing plan to ensure continued HOME compliance. In PY 2021, the County has determined that all current open activities are compliant with affirmative marketing actions for HOME units.

#### HOME MBE/WBE

There were no construction contracts awarded through the HOME program in PY 2021, therefore there were no contracts awarded to MBE/WBE owned businesses.

# Refer to IDIS reports to describe the amount and use of program income for projects, including the number of projects and owner and tenant characteristics

According to the PR09 Receipt Fund Type Detail Report, at the beginning of the reporting period Adams County had \$316,693.47 in program income on hand. These receipted funds are associated with the Homeownership Assistance Program, Minor Home Rehab and CHDO Acquisition/Rehab activities. Funds by program year are:

2018 (PI): \$40,781.49 2019 (PI): \$225,496.84 2020 (PI): \$50,415.14

Total Program Income at beginning of PY 2021 (PI): \$316,693.47

In the program year, the County receipted a total amount of \$223,184.67 and expended \$235,450.50 in HOME program income funds. As a result, the balance on hand at the end of PY 2021 was \$304,427.64.

The County also reports that \$116,730 was expended for TBRA activities. These funds were drawn from EN and not program income funds.

# Describe other actions taken to foster and maintain affordable housing. 91.220(k) (STATES ONLY: Including the coordination of LIHTC with the development of affordable housing). 91.320(j)

To address the local housing challenges and create solutions for residents, the County commissioned a Housing Needs Assessment in 2017. The Housing Needs Assessment described the economic and demographic background of the County and identified findings which helped build the framework for developing the Balanced Housing Plan. The Balanced Housing Plan's purpose is to take the Housing Needs Assessment's information and stakeholder input, and present defined goals and outcomes through a multifaceted and collaborative approach. It is truly a balanced housing plan as it seeks to build a platform that allows all areas of the county to achieve housing of all types, and meets the needs of the County's diverse and growing population. It contains three overarching goals, with five supportive policies and recommendations that have specific actions and measurable outcomes. On June 28, 2018, the Planning Commission adopted the Balanced Housing Plan and the Board of County Commissioners ratified the Plan on July 10, 2018.

Adams County has implemented a more robust underwriting and subsidy layering review and will not commit HOME funds nor recommend projects to the Board of County Commissioners unless an applicant has secured all necessary funding. In line with this approach, and to continue fostering and maintaining affordable housing in Adams County. Multifamily projects typically require LIHTC, thus, the County works closely with the developers in coordinating efforts for project feasibility. Additionally, the County is in the process of developing a local Housing Trust Fund (HTF), a specific strategy outlined in the Balanced Housing Plan and Housing Needs Assessment, with local funds to further support affordable housing.

Adams County accepts online applications from eligible LMI households for its Minor Home Repair program. Housing repairs are ranked in accordance with program requirements, with top priority given to those items needed to establish a safe, sanitary, accessible, and energy efficiency. When an application is accepted, eligibility is determined that you are eligible, by the Community Development department. A representative from the County will conduct an on-site visit to determine essential repairs needed. A description of work and cost estimate is prepared and released for a competitive bid to approved and licensed local contractors. Once a qualified contractor is selected to complete the, all work will be inspected for completeness and compliance with local building codes and permits.

The County provides Fair Housing information for residents on its website. Information includes Federal Fair Housing Act and State of Colorado Fair Housing laws, where to go to help in case of housing discrimination, resources and other useful website links. The County Fair Housing website is located at: https://www.adcogov.org/fair-housing-laws

#### **HOME ARP**

In September 2021, HUD announced the allocation of \$3,848,071 to Adams County, for a new grant called the Home Investment Partnerships Grant American Relief Plan (HOME-ARP). The purpose of HOME-ARP funds is to provide homelessness assistance and supportive services through several eligible activities. Eligible activities include acquisition and development of non-congregate shelter, tenant based rental assistance, supportive services, rental housing development, administration and planning, and nonprofit operating and capacity building assistance.

HOME-ARP funds must also assist people in HOME-ARP "qualifying populations", which include:

- Sheltered and unsheltered homeless populations
- Those currently housed populations at risk of homelessness
- Those fleeing or attempting to flee domestic violence or human trafficking
- Other families requiring services or housing assistance or to prevent homelessness
- Those at greatest risk of housing instability or in unstable housing situations

To receive HOME-ARP funding, the County is developing a HOME-ARP Allocation Plan which describes the distribution of HOME-ARP funds and also identifies the use of eligible activities to address these needs. The County anticipated that it will administer programs directly. Once the County has received the full HOME-ARP grant award from HUD, the County will conduct a Request for Proposals for a specified period of time to ensure a competitive process in awarding HOME ARP funds. During this time any organization, developer, subrecipient, or Community Housing Development Organization (CHDO) is eligible to apply. At the close of the application period, all applications received will be reviewed on a set of criteria determined by the County, HUD eligibility guidelines and finally their ability to carry out the project meeting all eligibility criteria. The County will allocate a majority of its allocation to the development of affordable rental housing. The remaining funds will go toward HOME-ARP Supportive Services and Administration and Planning.

# CR-58 - Section 3

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

Total Labor Hours	CDBG	HOME
Total Number of Activities	0	0
Total Labor Hours	0	0
Total Section 3 Worker Hours	0	0
Total Targeted Section 3 Worker Hours	0	0

# Table 14 – Total Labor Hours

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

Outreach, engagement, or referrals with the state one-stop system, as designed in	
Section 121(e)(2) of the Workforce Innovation and Opportunity Act.	
Other.	

Table 15 - Qualitative Efforts - Number of Activities by Program

#### **Narrative**

This section reports on Section 3 eligible activities in PY 2021.

On October 29, 2020, HUD made effective a Final Rule, which set new benchmarks for Section 3 under 24 CFR 75. Section 3 establishes economically sustainable communities by ensuring that employment and other economic opportunities generated by Federal assistance, such CDBG development programs are directed towards very low- and low-income persons to the greatest extent possible, and in particular Section 3 attempts to provide these economic opportunities to those who are the recipients of the Federal assistance. The Final Rule changes the performance tracking from the number of qualified new hires in Section 3 projects, to tracking the total labor hours worked by qualified Section 3 workers.

To qualify as "safe harbor" or satisfactory performance under Section 3, the benchmark for Section 3 workers was set at 25 percent or more of the total number of labor hours worked by all workers on a Section 3 project. The benchmark for Targeted Section 3 workers was set at 5 percent or more of the total number of labor hours worked by all workers on a Section 3 project. For more information on the definitions of Section 3 workers and Targeted Section 3 workers, see the link to the Federal Register: https://www.govinfo.gov/content/pkg/FR-2020-09-29/pdf/2020-19183.pdf

Section 3 activities cover housing rehab/construction and public improvement construction activities assisted under HUD grant programs that provide housing and community development financial assistance that exceeds a threshold of \$200,000 per activity. A \$100,000 activity threshold applies to grants under HUD's Lead Hazard Control and Healthy Homes programs. In PY 2021, there were no activities that were subject to the Section 3 reporting threshold.