

## 2019 JEFFERSON COUNTY CAPER

### 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.

In PY2019 the County received \$920,361 in HOME dollars and \$1,036,293 in CDBG dollars, and funding was used to continue to address the increasing affordable housing needs and housing services of Jefferson County residents in the City of Lakewood and the Urban County. The Urban County included the cities of Golden, Wheat Ridge, and Edgewater, the towns of Lakeside and Mountain View, and Unincorporated Jefferson County. The Town of Mountain View has since discontinued as part of the CDBG Urban County. The HOME Consortium includes the Urban County as defined above, as well as the City of Lakewood. Jefferson County is the lead agency for the Consortium's HOME funds.

As during previous years, the lack of supply of affordable housing was a top priority for Jefferson County. The County continues to be creative in utilizing Private Activity Bonds, partnering with State and other local agencies, and collaborating with non-profit, for-profit, government, and quasi-government agencies to finance and construct additional affordable housing. The County also focuses on housing stability for Jefferson County residents, in order to prevent eviction, displacement and homelessness for renters and homeowners.

#### 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
Affordable Rental Housing	Affordable Housing	CDBG: \$/ HOME: \$828325	Rental units constructed	Household Housing Unit	220	330	150.00%	233	181	77.68%

Affordable Rental Housing	Affordable Housing	CDBG: \$/ HOME: \$828325	Homeowner Housing Added	Household Housing Unit	0	0		0	0	
Affordable Rental Housing	Affordable Housing	CDBG: \$/ HOME: \$828325	Homeowner Housing Rehabilitated	Household Housing Unit	0	0		0	0	
Homeowner and Renter Rehabilitation	Affordable Housing Non-Homeless Special Needs	CDBG: \$/ HOME: \$	Homeowner Housing Rehabilitated	Household Housing Unit	100	303	303.00%	57	43	75.44%
Homeownership Assistance	Affordable Housing	CDBG: \$	Public service activities for Low/Moderate Income Housing Benefit	Households Assisted	60	23	38.33%			
Permanent Supportive Housing	Homeless Non-Homeless Special Needs	HOME: \$	Other	Other	80	181	226.25%			
Program Administration - HOME and CDBG	Affordable Housing Public Housing Homeless Non-Homeless Special Needs Non-Housing Community Development	CDBG: \$/ HOME: \$	Other	Other	2	2	100.00%	4	4	100.00%

Public Facilities	Non-Housing Community Development	CDBG: \$	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	10000	0	0.00%			
Self Sufficiency and Supportive Services	Affordable Housing	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	0	347		555	347	62.52%
Self Sufficiency and Supportive Services	Affordable Housing	CDBG: \$	Public service activities for Low/Moderate Income Housing Benefit	Households Assisted	440	1233	280.23%			
Self Sufficiency and Supportive Services	Affordable Housing	CDBG: \$	Homeless Person Overnight Shelter	Persons Assisted	0	23		0	23	
Self Sufficiency and Supportive Services	Affordable Housing	CDBG: \$	Homelessness Prevention	Persons Assisted	0	155		0	155	

**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 continues to utilize both CDBG and HOME funding to target the overwhelming housing needs in the community. The following activities were prioritized during this program year: (1) enabling low-income households to remain in their homes through rehabilitation, rental/mortgage assistance, and housing counseling and (2) improving and expanding the supply of affordable housing, particularly for families and vulnerable populations. The County was engaged in three development projects during the 2019 program year, although not all have been completed in the system so numbers are not necessarily reflective of the current work. The County also supported several other developments in Low Income Housing Tax Credit applications and in soliciting Private Activity Bonds through the County process during PY2019. Public Service programs provided housing related services, paired with other County and nonprofit navigation programs to address overall household stability.

## 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	268	26
Black or African American	11	2
Asian	0	0
American Indian or American Native	13	3
Native Hawaiian or Other Pacific Islander	3	0
<b>Total</b>	<b>295</b>	<b>31</b>
Hispanic	96	12
Not Hispanic	199	19

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

### Narrative

Total CDBG population served in PY19 was 390. Missing from the CR-10 report is the option for an Other or Multi-Racial category that needs to be added to reflect an additional 44 persons to the overall number. Challenges with this information included the PR reports not reflecting the actual numbers entered in PY19. Specifically, activities 856, 858, 862, 863 and 864 all started in PY18, but had data entered in PY19 that was not reflected in the IDIS PR reports. Actual PY19 activities with data included in this table are: 865, 866, 868, 872, and 873. Additionally, PR23 was pulling data for PY19 from PY17/18 activities that should not have been pulled (perhaps this was due to the activity being closed in PY19). Refer to activity 849 as the PR23 example. It may not be the only incorrect activity reflecting a different program year; this is an IDIS issue.

## 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	1,038,509	1,426,077
HOME	public - federal	927,470	331,975

Table 3 - Resources Made Available

### Narrative

The "Resources Made Available" amounts have been adjusted to reflect the annual allocation amounts plus the actual Program Income amounts for CDBG and HOME, as opposed to using the expected amount listed on the AP-15. The CDBG excess expenditures of \$387,568.19 represent prior year allocations that were utilized for eligible activities included in the 2019 Annual Action Plan. The "Amount Expended" numbers were determined by completed drawdowns in the PR-05.

**Identify the geographic distribution and location of investments**

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description
All jurisdictions in the urban county and the City of Lakewood	100	100	Urban County residents and City of Lakewood

**Table 4 – Identify the geographic distribution and location of investments**

## 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.**

**MATCH:** The 2018 CAPER excess match carried over to next fiscal year should have been reported as \$5,908,136.720000001. This number was corrected and reported as excess match from prior fiscal year on this report. The County continues to highly leverage development properties with local and state partnerships, bond and LIHTC financing and strong partners who are dedicated to providing affordable housing.

**HOME PROGRAM INCOME:** A total of \$23,397.86 in HOME Program Income was leveraged and expended during PY2019. \$21,259.15 was utilized for projects and \$2,129.71 for program administration. 2 projects and 2 administration activities were funded with varying amounts of program income during PY2019.

**CDBG PROGRAM INCOME:** A total of \$71,295.35 in CDBG Program Income was leveraged and expended during PY2019. \$57,036.31 was utilized for projects and \$14,259.04 for program administration. 11 projects and 2 administration activities were funded with varying amounts of program income during PY2019.

<b>Fiscal Year Summary – HOME Match</b>	
1. Excess match from prior Federal fiscal year	5,908,137
2. Match contributed during current Federal fiscal year	523,254
3. Total match available for current Federal fiscal year (Line 1 plus Line 2)	6,431,391
4. Match liability for current Federal fiscal year	198,427
5. Excess match carried over to next Federal fiscal year (Line 3 minus Line 4)	6,232,964

**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
IDIS 859 MWS - Indy Street Flats	04/18/2019	0	459,286	0	0	0	0	0
IDIS 874 Archway - Flats at Two Creeks	04/29/2019	0	63,968	0	0	0	0	0

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 beginning 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 \$
3,881	21,297	23,398	0	1,798

Table 7 – Program Income



<b>Minority Business Enterprises and Women Business Enterprises</b> – Indicate the number and dollar value of contracts for HOME projects completed during the reporting period						
	Total	Minority Business Enterprises				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
<b>Contracts</b>						
Dollar Amount	74,050	0	0	0	0	74,050
Number	1	0	0	0	0	1
<b>Sub-Contracts</b>						
Number	0	0	0	0	0	0
Dollar Amount	0	0	0	0	0	0
	Total	Women Business Enterprises	Male			
<b>Contracts</b>						
Dollar Amount	74,050	74,050	0			
Number	1	1	0			
<b>Sub-Contracts</b>						
Number	0	0	0			
Dollar Amount	0	0	0			

**Table 8 - Minority Business and Women Business Enterprises**

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

**Table 9 – Minority Owners of Rental Property**

<b>Relocation and Real Property Acquisition</b> – 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 Displaced	Total	Minority Property Enterprises				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-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	35	52
Number of Non-Homeless households to be provided affordable housing units	557	513
Number of Special-Needs households to be provided affordable housing units	57	12
<b>Total</b>	<b>649</b>	<b>577</b>

Table 11 – Number of Households

	One-Year Goal	Actual
Number of households supported through Rental Assistance	35	173
Number of households supported through The Production of New Units	118	299
Number of households supported through Rehab of Existing Units	57	105
Number of households supported through Acquisition of Existing Units	0	0
<b>Total</b>	<b>210</b>	<b>577</b>

Table 12 – Number of Households Supported

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

This section includes housing data collected from the following activities: Rental Assistance, Downpayment Assistance, Homeowner Rehabilitation, and Affordable Housing Construction completion. Data from the Housing Supportive Services activity completed this program year is not included. PY19 saw four affordable housing developments assisted by the County completed and began or completed lease-ups, leading to over 250% of the one-year goal for production of new units - which was noted as expected in the previous two years' CAPERs.

The number of households receiving rental assistance exceeded expectations, allowing more families to remain in their homes during the housing crisis. The number of homes rehabilitated remained on target and when combined with the rehabilitation of several units as an aspect of new construction, this also exceeded expectations.

The County remains confident that the overall goals and objectives of the 5-Year Consolidated Plan will be met.

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

Jefferson County does not plan to alter the manner in which future Annual Action Plans are determined unless directed by HUD otherwise.

**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.**

<b>Number of Households Served</b>	<b>CDBG Actual</b>	<b>HOME Actual</b>
Extremely Low-income	181	0
Low-income	108	0
Moderate-income	101	0
<b>Total</b>	<b>390</b>	<b>0</b>

**Table 13 – Number of Households Served**

**Narrative Information**

This section includes income data from all activities completed during the 2019 program year, including: Rental Assistance, Downpayment Assistance, Homeowner Rehab, and Housing Supportive Services.

Jefferson County makes an effort to focus on the most vulnerable populations when supporting service and housing activities, particularly when it comes to maintaining housing. Housing stability continues to be a major concern for County residents, especially for those families with extremely low incomes who often encounter additional socio-economic barriers.

## **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 2019, Jefferson County and the cities of Westminster, Arvada, Wheat Ridge, Edgewater, Lakewood, and Golden, partnered to conduct a month-long, comprehensive survey of individuals experiencing homelessness. The Jefferson County comprehensive survey attempted to reach individuals who met the US Department of Housing and Urban Development (HUD) definition of literal homelessness and those who lack stable housing. The expanded definition was informed by the 2009 Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act with the aim to capture the unique characteristics of individuals experiencing homelessness in Jefferson County. The results have helped to inform the County and facilitate the following goals:

1. Continue participation in Metro Denver Homeless Initiative Board and committees to help to shape metro wide response to homelessness
2. Support the implementation of Homeless Navigators within each municipality and Jefferson County (Lakewood, Arvada, Golden, Wheat Ridge and Edgewater, Jefferson County Human Services)
3. Continue development of and participation in Heading Home and its workgroup
4. Support the creation of permanent supportive housing to serve those who are experiencing chronic homelessness
5. Fund affordable rental housing developments
6. Look for opportunities to increase the housing and support services opportunities of residents who are at risk of becoming homeless
7. Prevent homelessness by funding programs that provide housing support services
8. Continue educating community leaders and the public about the needs of residents experiencing extreme poverty and homelessness in the County. Additionally, the cities and County have joined efforts to identify streamlined ways to address the homeless issues that are increasing west of Denver. Human Services hired a homeless navigator to better assist families experiencing homelessness navigate the various service providers and housing programs. The Cities of Arvada, Edgewater, Wheat Ridge, Golden and Lakewood have also hired homeless navigators. Given the broad geographic boundaries of Jefferson County it is difficult for all individuals/families experiencing homelessness to access the various services available so coordinated efforts between each of the cities and county help to create better access.

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

Jefferson County has a limited number of shelter beds available, therefore the majority of emergency shelter needs during periods of cold weather are met through County funding of motel vouchers. During severe weather, the county Department of Human Services, city and county police, the school system, the faith-based community and a variety of non-profit service providers utilize a communication system to share the current availability of shelter space and motel vouchers. This enables those who come into first contact with a homeless individual or family to provide accurate information during such an emergency. In addition, the county supports agencies with vouchers during non-severe weather situations, serving the homeless populations in general, as well as individuals with serious mental illness, and those residents who are being released from the criminal justice system and do not have a permanent place to live.

## **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**

The County's Regional Homeless Coordinator leads the Jefferson County Heading Home Collaborative, which seeks to prevent homelessness where possible, or tries to ensure it is a rare and brief experience for residents. Additional goals of the Heading Home Action Plan include optimizing the crisis resolution system, decreasing barriers to exiting homelessness, increasing data collection and data sharing and increasing community involvement in development of the solutions to homelessness.

Collaboration with multiple non-profit service providers and Human Services divisions including Community Assistance, Children, Youth and Families, Workforce, Child Support and Head Start are key to addressing and preventing homelessness. The County continues to support the efforts of its agency partners through public services funding, and through offering assistance with coordination of new groups to address needs. Limited housing to serve the County's lowest income residents remains the most critical need in the County. The Regional Homeless Coordinator position in conjunction with Homeless Navigators in the County and each municipality helps to support a stronger infrastructure for coordinated services.

## **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**

Jefferson County is continuously improving the links between supportive services and affordable housing developments, this past year by participating in the PSH Toolkit and Built for Zero initiative. Working with the City of Lakewood and multiple area service providers and developers, these groups are dedicated to increasing the supply of additional permanent supportive housing. Community Development has implemented a requirement that all CDBG/HOME funded affordable housing projects must prioritize referrals from Human Services for housing units. This allows social services customers a greater ability to access available affordable housing units funded by CDBG and HOME dollars.

In addition, Jefferson County staff participates in a sub-committee of Heading Home called the Supportive Housing Sub-Committee. Members include Jefferson County, the City of Lakewood and a variety of affordable housing developers, service providers, faith-based institutions and members of the community. The goal of the sub-committee is to identify the unmet need for permanent supportive housing and develop a plan to create enough units to meet the need. Heading home also addresses the needs for transitional housing, as well as supportive services for low-income homeless and formerly homeless families and individuals in Jefferson County.

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

### **Actions taken to address the needs of public housing**

Jefferson County Housing Authority (JCHA) serves the entire Consortium region with the administration of Housing Choice Vouchers (about 1400) and provision of affordable housing. JCHA no longer owns public housing and instead owns and operates 19 affordable housing properties in Jefferson County: five are located in Arvada, two in Evergreen, two in Golden, two in Lakewood, seven in Wheat Ridge and one in Westminster. JCHA also supports many units through project-based vouchers including 320 units in tax credit properties and 185 senior and family units within new construction projects. JCHA does not maintain a wait list for Housing Choice Vouchers and instead uses a lottery system. The rental market continues to present challenges for voucher holders as there are few vacant units and moderate and higher income renters are willing to pay more than the allowable voucher payment standards. The application processes JCHA uses are all open, public processes and the agency is consistently held to the same requirements as all other grantees.

Metro West Housing Solutions (MWHS) serves as the housing authority for the City of Lakewood. The organization's mission is to be a leader in providing quality housing options and transformative opportunities for people and communities. MWHS does not currently own and operate public housing but instead administers the Housing Choice Voucher program and operates as an affordable housing and service provider throughout the City of Lakewood. MWHS currently owns and operates eight apartment communities and four senior living communities, with one apartment community currently under construction and one more planned. MWHS administers approximately 1,200 Housing Choice Vouchers and the wait list is typically 1,500 - 2,000. MWHS staff report that the tightening of the rental market has reduced the supply of apartments available to voucher holders and forced clients to locate in lower income, more central communities within the city. Staff report that it is much harder for clients to find affordable rentals in high opportunity areas than it has been in the past.

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

N/A; All remaining public housing has been sold by PHAs through the disposition program and funds have been redistributed to support other types of affordable housing.

### **Actions taken to provide assistance to troubled PHAs**

There are no troubled public housing agencies in Jefferson County. Jefferson County works closely with Arvada Housing Authority, Jefferson County Housing Authority and Metro West Housing Solutions.



## **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)**

There were no new policy changes within Jefferson County in 2019 that would have significant effects on investment for affordable housing development. Community Development continues to meet regularly with the Planning and Zoning department to discuss issues and consider potential projects. Affordable housing developers are invited to comment on any proposed zoning changes and work with both Divisions throughout the development process. Community Development regularly participates in public and community events, boards and other groups to present information regarding the barriers to affordable housing. Staff sit on the Colorado Chapter of National Housing Association and Redevelopment Official (CoNAHRO) board which advocates for inclusive and diverse housing for low-income residents and provides support to local housing authorities. The County and City elected officials have increased partnerships to look for ways to address homelessness, and wage and affordable housing inventory gaps.

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

In PY2019 the County continued to focus HOME and CDBG funds on the production of additional affordable housing units, and supporting services to keep families and individuals stably housed. Community Development works closely with other Human Services divisions, housing authorities and other service entities to improve access to employment programs, particularly for those individuals exiting the criminal justice system, individuals with physical/mental disabilities, homeless, young parents and at risk youth populations.

Addressing the housing stability issues in the County will provide a base so families and individuals can work on other immediate struggles. Studies show that stable housing will increase the chances of a person maintaining employment and further educational opportunities, therefore reducing the poverty levels.

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

Staff work closely with subrecipients to share regulatory and policy updates regarding lead-based paint. Regular monitoring ensures lead-based paint requirements are followed, and policies support lead-based paint mitigation as an eligible cost, should testing indicate this need.

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

Activities administered by the Jefferson County Community Development Division and the Human Services Department concentrate on initiatives designed to improve the quality of life and expand access and opportunity to the Counties residents in most need. These include but are not limited to: Expanding decent and affordable housing opportunities; Creating strong and vibrant neighborhoods; and, Expanding economic opportunities for low to moderate income individuals throughout the community. The division provides access to information by marketing available resources to poverty level individuals & households. Such information can be found on the Jefferson County website, or by simply reaching out to a Community Development team member. The division also coordinates these resources by ensuring that housing assistance programs are proactively linked to other resources.

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

Community Development coordinates and collaborates with government, non-profit, faith based and private sector organizations to ensure services and opportunities are streamlined in the most efficient manner possible for customers. Currently services and programs are effectively coordinated although the lack of housing options continues to be an issue. As mentioned previously, the County and Cities are working closely together to address the numerous issues facing Jefferson County. The goal of efficiency and effectiveness remains the priority for all stakeholders.

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

Community Development is uniquely situated within the Human Services Department and works very closely with community based and government social services agencies. The division is always looking for ways to improve coordination between public housing agencies and service program providers to ensure that individuals who are capable and able to reach self-sufficiency have access to opportunity. This is accomplished through coordinated and integrated services with employment programs, child care programs, skills and education programs, and other resources.

An element critical to the long term success of all housing programs is the acknowledgement of the cliff effect for residents. Policy makers at the federal level must work to reduce the negative impacts of the cliff effect that continues to disincentivize income growth for publically assisted individuals and families. In order to effectively address poverty, federal agencies must collaborate to develop policies supportive of income growth while continuing assistance from public programs. Current housing policies are restrictive and do not allow appropriate and realistic grace periods for redetermination of income eligibility. When household income grows slightly, rent increases at a faster pace as other public assistance benefits are reduced. Thus, a small growth in income equates to significant loss in benefits that does not equal the additional income. This forces many to choose continued poverty. Locally, the County and other agencies work together to proactively address the impending cliff effect, but the root of the issue is federal policy.

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

Please see the following website for the detailed Analysis of Impediments: <https://www.jeffco.us/2660/16779/Fair-Housing>.

The following impediments were identified:

Impediment 1: Lack of accessible housing limits the housing choices of persons with physical disabilities and mobility limitations.

Impediment 2: Lack of affordable housing opportunities in some parts of the county may lead to increased racial and ethnic concentrations and disproportionately impact Hispanic residents with disabilities.

Impediment 3: Fair housing information is difficult to find and is not in a language other than English. Fair housing awareness is low.

Impediment 4: Services for persons who are homeless – as well as federal resources to fund needed services – are limited in Jefferson County.

Impediment 5: Group home regulations may create disparate treatment of group homes for person with certain types of disabilities.

Community Development has continued to support and market educational opportunities for Jefferson County residents and landlords, increasing public awareness of Fair Housing issues and laws. Information about Fair Housing is posted throughout the County including the government campus, at non-profit organizations and housing authorities. The division continues to fund housing counseling programs to address these issues.

## **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**

Objectives for Jefferson County:

- To comply with U.S. Department of Housing and Urban Development and Colorado Department of Local Affairs monitoring requirements
- To Identify and define the key elements of monitoring within the separate grants administered by the Community Development Division
- To standardize and record monitoring methods and forms for implementation by current and future staff
- To provide guidance to subrecipients in the form of written policies and procedures and applicable forms

General Policies:

Types of Monitoring-Throughout the life of a project or activity, County will provide ongoing technical assistance using various methods deemed appropriate to the project and/or required by the rules and regulations pertaining to the specific programs—CDBG, HOME or CSBG

Regular Contact-Through regular phone and email contact, as often as weekly or monthly, projects are monitored on an ongoing basis. As the COVID-19 pandemic hit Colorado, Staff implemented weekly calls with subrecipients directly involved in aiding those affected.

Drawdown Requests-To assure the validity of all requests to drawdown funds, back up documentation is required with each request. This information is reviewed by the project manager and the Division Director. Requests must clearly describe the expenditure and is reviewed for eligibility, consistency with approved project expenses, verification of remaining balance, and proof of expense(invoice) and proof of payment(check).

Quarterly Reporting-Quarterly reports are required for all active projects. Through the submission of quarterly reports by all active projects, staff analyzes the progress and status of projects. This includes an analysis of an agency's accomplishments-to-date and rate of expenditures. Jefferson County acquired the Neighborly Software platform this year to help standardize and streamline the reporting and oversight of its programs.

Active Monitoring-Jefferson County Community Development is currently in the process of monitoring all its activities through a virtual process including document reviews and interviews with subrecipient

staff. The current monitoring will include all county developments that remain in their affordability periods. This process has an all-encompassing risk assessment and is the first in a standardized regime to ensure best practices in both the County and its subrecipients. These monitorings typically include the two below types, dependent upon time since last site visit and risk assessment.

**Desk Audit**-Includes a review of the project file, including progress reports(quarterly and annual) and financial information(drawdown requests).

**Site Visit**-All active projects typically will receive an on-site monitoring as least once during the first year of activity; COVID-19 has interrupted this process as it is determined to be unsafe for both County staff and subrecipient staff. Completed and/or multiple year projects may be targeted for a site visit if compliance issues or areas of concern are identified during other monitoring methods. If the project or activity included acquisition, rehabilitation, or demolition of a property the review will also include a visit to the project site.

Areas monitored may include: Overall management system, record keeping and progress in activities; National Objectives; Environmental Review; Financial Management; Property Management; Rent Rolls and Tenant Files; Procurement; Efforts to utilize small, minority and women owned businesses; Labor Standards; Non-construction contract between grantees and consultants; Subrecipients; Civil Rights; Acquisition/Relocation; Housing rehabilitation and Lead-based paint; Citizen Participation.

### **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.**

Jefferson County Community Development published a public notice in the non-legal section of a local newspaper featuring a summary of contents and purpose as well as the availability and locations to review draft copies of the Consolidated Annual Performance Evaluation Report (CAPER) on November 4, 2020. The notice further included the details for a public comment period as well as a virtual public hearing on November 16th and noted that the above was also posted on the Jefferson County Community Development website. The notice invited “all interested agencies, groups or persons wishing to comment on the report to submit written comments for consideration”.

The County adheres to its Citizen Participation Plan; ensuring that accommodations are provided for non-English speakers with the utilization of translation services and for hearing-impaired individuals with the State Relay number at all public hearings. Copies of the CAPER were available for review at the Community Development Division office, located at 3500 Illinois Street Jefferson County Pkwy, Golden, CO 80401, or digitally upon request, throughout the full comment period. No comments or review requests were received. The following required HUD reports were also made available for citizen review during this time period: Summary of Accomplishments, Summary of Consolidated Plan Projects for 2018

program year, CDBG Financial Summary Report, CDBG Summary of Activities, CDBG Performance Measures Report, CDBG Strategy Area, CDFI, and Local Target Area, and the HOME Housing Performance Report.

This year staff continued to provide the public with information concerning program operations, activities, and developments. While traditionally community groups and residents regularly attend city council meetings, county commissioner hearings and other fora internal and external to County Operations to advocate and respond to these programs and fair housing practices due to the public outreach, COVID-19 interrupted much of these fora in the latter half of the Program Year. This outreach typically fosters two critical components 1) education, and 2) feedback about the programs and the outcomes in each community. Additionally, the County conducted a Community Needs Assessment this year, reaching over one-thousand members of the community and receiving their feedback and concerns. While the performance report did not receive any comments, the response received through different avenues helps inform the activities that the County funded with the CDBG and HOME funds it receives.

## **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 County's CDBG activities continued to target the overwhelming housing needs in the community. Public Service programs provided housing related services, paired with other County and nonprofit navigation programs to address overall household stability. The consistent targeting and leveraging of these funds over the past decade have creating lasting impacts on the community. There were no significant changes to the CDBG program for PY2019. The County will continue to provide support to agencies serving the low to moderate income populations through homeowner rehabilitation and public service activities. The community's greatest needs will be considered as outlined in the strategic plan, and adapted if changes are needed.

## **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.

Three affordable rental housing projects funded in part with HOME funds were completed during the 2019 program year: Flats at Two Creeks, Indy Street Flats, and Eaton Street Apartments. Flats at Two Creeks is a new construction that resulted in seventy-eight new units of affordable rental housing, including four HOME units; HOME rental and unit tenant data as well as inspection reports have been collected and reviewed for this project. Indy Street Flats is a new construction and rehabilitation development that created 103 new affordable units and rehabilitated twelve; of these 115 units, four are floating HOME units. As with the previous development, HOME rental and unit tenant data and inspection reports have been collected and reviewed. Eaton Street Apartments is also a new construction and resulted in 118 units of affordable rental housing, including four floating HOME units; HOME rental and unit tenant data as well as inspections reports have been collected and reviewed. These developments received on-site visits during construction and following completion.

Additionally, Jefferson County completed one affordable rental housing project funded in part with CDBG funds; Eiber Village is a rehabilitated historic property that was converted to affordable senior housing. The development now consists of fifty units of affordable senior housing, of which forty-nine are reserved for CDBG eligible households. This development received on-site visits during and following construction and the County received the required CDBG rental and unit tenant data and inspection reports.

The County did not perform inspections on 'historic' HOME projects in their affordability periods during PY2019, due in part to the COVID19 pandemic. Jefferson County was in the process of beginning its monitoring and inspection processes in March 2020 when the initial shutdowns occurred, causing the County to put this process on hold for both County and project staff safety. However, Jefferson County took the opportunity provided by this interruption to revamp its monitoring procedures, implement an Asset Management software through Neighborly Software, and is currently in the process of virtually monitoring all of its HOME developments. Though the County is not undertaking in-person and in-unit inspections at this time due to the status of COVID-19 in its jurisdiction, it has taken advantage of the HUD HOME waiver on in-unit inspections through September 30, 2021. Per the requirements of this waiver, Jefferson County Community Development intends to complete unit inspections and in-person visits of ALL of its HOME properties in their affordability periods before a 120 day period following September 30, 2021, pandemic permitting



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

Affirmative marketing compliance is assessed for all HOME projects during monitoring visits. Affirmative marketing plans, efforts, reports, and compliance with requirements are reviewed. To this point, no HOME issues were found with affirmative marketing reviews.

**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**

A total of \$92,346.15 in program income was drawn during PY 2019, of which \$78,087.11 was for projects and \$14,259.04 was for program administration. 15 projects were funded with varying amounts of program income as seen below, with detail regarding tenant and owner characteristics for those projects funded during the 2019 program year:

**IDIS Activity #848: Action Center; Rental Assistance**

**30 Persons – 24 White (11 Hispanic), 3 Black/African American, 3 Other Multi-Racial (3 Hispanic)/ 19 Extremely-Low Income, 11 Low Income**

**IDIS Activity #849: Brothers Redevelopment Inc.; Housing Counseling**

97 Households – 87 White (18 Hispanic), 2 Black/African American, 2 Asian, 2 American Indian, 1 Asian & White, 3 Other (3 Hispanic)/43 Extremely Low Income, 24 Low Income, 18 Moderate Income, 12 Non Low-Moderate Income

**IDIS Activity #851: Jefferson Center for Mental Health; Homeless Prevention**

33 Persons – 24 White (3 Hispanic), 3 Black/African American (1 Hispanic), 1 Asian (1 Hispanic), 1 American Indian (1 Hispanic), 1 Black/African American & White, 3 Other Multi-Racial (3 Hispanic)/30 Extremely-Low Income, 3 Low Income

**IDIS Activity #852: CDBG Administration**

**IDIS Activity #856: Brothers Redevelopment Inc.; Housing Counseling**

9 Households – 9 White / 4 Extremely-Low Income, 2 Low Income, 3 Moderate Income

**IDIS Activity #858: Jefferson County Housing Authority; Homeowner Rehabilitation**

0 Households

**IDIS Activity #862: Community Faith in Action; Homeowner Rehabilitation**

15 Households – 15 White (3 Hispanic) / 13 Extremely-Low Income, 2 Low Income

**IDIS Activity #863: Brothers Redevelopment Inc.; Housing Information Services**

174 People – 144 White (41 Hispanic), 6 Black/African American, 2 American Indian, 1 Native Hawaiian, 1 American Indian & White, 20 Other Multi-Racial (2 Hispanic) / 91 Extremely-Low Income, 16 Low Income, 67 Moderate Income

**IDIS Activity #865: Action Center; Emergency Subsistence Assistance**

69 People – 36 White (6 Hispanic), 3 Black/African American (1 Hispanic), 3 American Indian, 27 Other Multi-Racial (5 Hispanic) / 63 Low Income, 6 Moderate Income

**IDIS Activity #867: CDBG Administration**

**IDIS Activity #871: Blue Spruce Habitat for Humanity; Forest Estates Land Acquisition**

0 Housing Units (OPEN)

**IDIS ACTIVITY #872: Jefferson County Human Services; Homelessness Prevention**

26 People – 19 White (17 Hispanic), 5 American Indian (5 Hispanic), 2 Native Hawaiian (2 Hispanic) / 2 Extremely-Low Income, 4 Low Income, 20 Moderate Income (OPEN)

**IDIS ACTIVITY #873: Salvation Army; Emergency Subsistence Payments**

33 People – 32 White (20 Hispanic), 1 Black/African American / 25 Extremely-Low Income, 8 Low Income

**IDIS ACTIVITY #874: Archway Housing; The Flats at Two Creeks**

78 Completed Units – 4 HOME Assisted, 20 Designated for Homeless Persons and Families (20 For Chronically Homeless) (OPEN)

**IDIS ACTIVITY #878: MWHS; SAGE CORNER**

0 Housing Units (OPEN)

**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)**

Jefferson County Community Development focused its HOME and CDBG resources on keeping residents in their homes, providing access to emergency housing, and creating additional affordable housing units

in Program Year 2019. As shown by the Community Needs Assessment performed in this PY, the preservation and expansion of affordable housing continues to be the highest need experienced by Jefferson County residents. To this effect, the County awarded a HOME contract to Metro West Housing Services for the development of a new forty-three unit affordable housing property in PY 2019 and a majority of its expended CDBG funds go towards Housing Rehabilitation and Homelessness Prevention.

The County plans years in advance for large development projects and looks for ways to creatively allocate both HOME and CDBG in order to provide additional affordable housing. The County provides letters of support for developers applying for Low Income Housing Tax Credits and leverages these dollars to create additional affordability for low- and very low-income residents. The County also continues to work with the Colorado Housing and Finance Authority to administer bond funds in support of programs offered specifically for County residents. Particular to this PY, the County also increased its CDBG emergency grant payments programs as a result of the COVID-19 Pandemic.