Executive Summary

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

1. Introduction

Adams County is an Entitlement Community and qualified urban county as designated by the U.S. Department of Housing and Urban Development (HUD). As such, the County is eligible to receive Community Development Block Grant (CDBG) and HOME Investment Partnerships Program (HOME) funds. These funds will be used to benefit low- to moderate-income (LMI) residents.

The County's Annual Action Plan (AAP) is required by HUD for all jurisdictions receiving CDBG and HOME funds. CDBG funds are used to address community development and housing needs of the residents of the Urban County, which includes the cities of Northglenn, Federal Heights, Brighton, the Town of Bennett, and unincorporated Adams County. The Cities of Commerce City, Thornton, and Westminster receive CDBG directly from HUD and, as such, do not receive CDBG funds from the County. HOME funds are administered by Adams County, which is the lead agency for the Adams County HOME Consortium. The HOME Consortium includes the Urban County members well as the cities of Commerce City, Thornton, and Westminster.

The Program Year (PY) 2022 AAP was developed in accordance with HUD requirements at Title 24 of the Code of Federal Regulations and addresses strategic goals and program objectives for the use of HOME and CDBG funds in PY 2022 as outlined by the 2020-2024 Consolidated Plan. Adams County's program year runs from October 1, 2022 through September 30, 2023.

2. Summarize the objectives and outcomes identified in the Plan

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

Adams County has developed its strategic plan based on an analysis of the data presented in its Consolidated Plan, and the community participation and stake holder consultation process. Through these efforts, the County has identified four (4) priority needs with associated goals to address those needs. The activities in the PY 2022 AAP will address the following priorities and goals, which are as follows:

Priority Need: Housing Needs

Preservation of Existing Housing Stock: The County will administer the Minor Home Repair (MHR) Program, which will serve low-to-moderate income homeowners throughout the cities of Federal Heights, Brighton, Northglenn, and unincorporated Adams County. The program will address essential home repairs to promote decent, safe and sanitary conditions as well as accessibility issues. Adams County will also work with Elevation Community Land Trust to provide HOME funding for a housing rehabilitation program for low-income households. Additionally, Adams County will provide funding for a rental housing inspection program in Federal Heights which is intended to preserve existing housing stock.

Construction of New Rental Housing: The County will provide funding to South Platte Crossing, a transitoriented development in Commerce City that will provide 60 units of permanently affordable rental housing. New rental housing should serve families, prioritized special needs populations, especially those at 40% AMI or less.

Expanding and Preserving Homeownership: The County has a goal of ensuring that affordable housing is available for LMI renters that want to purchase a home in Adams County. Adams County also has an objective of ensuring that prioritized populations are educated about housing and service options through counseling programs.

Priority Need: Special Needs Populations

Preservation of Existing Housing Stock: The MHR program will address essential home repairs to promote decent, safe and sanitary conditions as well as accessibility issues to special needs groups such as the elderly and persons with a disability.

Priority Need: Community and Economic Development Needs

Public Facility Improvements: The County will support public improvements throughout Adams County such as accessibility and ADA improvements. Two programs focused on improving sidewalk accessibility and ADA improvements will take place in the unincorporated Sherrelwood neighborhood in Adams County as well as Brighton.

Priority Need: Homelessness

Emergency Housing and Shelter for the Homeless: The County will support the Adams County Housing Respite Program. The program will include homeless outreach, motel vouchers, and navigation services. The administration of the hotel/motel stays will be done mostly remotely in the community, including in encampments, urban hot spots, and community/county buildings.

3. Evaluation of past performance

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

Adams County, with its partner nonprofit service agencies, community housing providers, other local units of government have made significant contributions to provide safe, decent and affordable housing and a suitable living environment for LMI households in the community. The County however continues to recognize that affordable housing and public improvements remain some of the highest priority needs in the County as documented by the current Consolidated Plan and the most recent program year 2020 Consolidated Annual Performance and Evaluation Report (CAPER).

The CAPER provides an assessment of progress towards the five-year goals and the one-year goals of HUD entitlement grants CDBG and HOME. In the most recent reporting program year 2020, the County highlighted these accomplishments:

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 31 LMI households assisted in this way in Brighton, Federal Heights, Northglenn and unincorporated Adams County. With the HOME program, the County was able to complete 6 new HOME-funded rental units as part of the 64 unit development at 4220 E 104th Ave in Thornton, known as Crossing Pointe Senior Apartments. The County was also able to assist 1 eligible LMI homebuyer household. Not reported in the table below, are 10 LMI households assisted with tenant based rental assistance (TBRA). TBRA activities were carried out by the Brighton Housing Authority. 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.

Public Facility Improvements: The Adams County Public Works Department is working to improve the overall mobility and accessibility of the Sherrelwood residential neighborhood within the southwest corner of unincorporated Adams County. This project consists of the overall enhancement of the neighborhood with ADA accessibility, connectivity including ADA compliant sidewalks and the addition of ADA pedestrian ramps. When completed, this project will increase the usage of sidewalks, provide a safer way for pedestrians to connect to areas around their neighborhood.

Public Services: The County assisted 13 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 2020, the County worked to assist 62 small businesses affected by COVID-19 with the Small Business Stabilization Program (SBSP). The SBSP helps to provide local businesses with grants to retain Annual Action Plan

jobs during the COVID-19 pandemic. The County is also working with Almost Home's Homeless Prevention Program which provides LMI households affected by COVID-19 with rental, mortgage and/or utility assistance.

4. Summary of Citizen Participation Process and consultation process

Summary from citizen participation section of plan.

Citizen participation and consultation is vital to the development of the County's housing and community development programs. The County continues to work with Urban County and HOME Consortia members, housing service providers, and key non-profit organizations in encouraging the participation of the citizens they serve, including low- and moderate-income residents who are the primary targets of HUD-funded programs. The citizen participation process is designed to encourage all citizens, including persons with limited-English, and those with disabilities to participate in determining the development of the AAP and needs in the community. Adams County made the AAP available through a public comment review period and a public hearing.

- The County held its first public meeting at Study Session on June 14, 2022 to give the public and county officials the opportunity to review and make comments on proposed AAP projects.

- The County held a 30-day public comment period from June 23, 2022 to July 25, 2022 to give the public an opportunity to review and make comments on the proposed AAP.

- The County held a Public Hearing on July 26, 2022 at 9:30 AM at the BOCC to review and discuss the AAP.

- The County held a 30-day public comment period from August 10, 2023 to September 12, 2023 to give the public an opportunity to review and make comments to the amendment to the AAP.

Details of these efforts to gather public feedback are displayed in the AP-12 Citizen Participation. All citizens were encouraged to participate and give comments on the Annual Action Plan.

5. Summary of public comments

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

There were no comments submitted during the public comment period and at the public hearing.

For more details see the citizen participation attachment in the AD-26. A summary of public comments can also be viewed in AP-12 Participation.

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

All comments and views were accepted. There were no agencies or organization types that were intentionally not consulted.

7. Summary

The PY 2022 AAP is the third year of the 5-Year 2020-2024 Consolidated Plan and will continue building on accomplishments to meet the 5-Year Plan goals. The activities funded in this AAP meet the County's priorities, goals, and objectives.

The County will work closely with Urban County and HOME Consortia members as well as service providers to serve the community needs with the help of CDBG and HOME funding. The County will work to ensure that projects meet the national objectives set by HUD and are implemented according to the federal regulations and guidance. Public participation will continue to be an on-going initiative to ensure that Adams County residents and community members are aware of how the CDBG and HOME funds are being spent and are invited to participate in the CDBG and HOME processes.

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

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

The following are the agencies/entities responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

Agency Role		Name		Department/Agency
Lead Agency		ADAMS COUNTY		
CDBG Administrator ADAM		S COUNTY	Adams County Community & Economic Development	
HOME Administrator	ADAM	S COUNTY	Adams County	Community & Economic Development
ESG Administrator				

Table 1 – Responsible Agencies

Narrative

The Adams County Community & Economic Development Department, through the Housing Policy & Community Investments Division (HPCI), administers Adams County's annual CDBG and HOME funding. Adams County is the lead entity for preparing the Consolidated Plan and PY 2022 AAP for the Urban County and HOME Consortium, although all members of the Urban County and HOME Consortium members participated in development of the plans. Thornton, Westminster, and Commerce City complete their own Consolidated Plan and AAPs for CDBG funds for their respective communities.

Urban County Lead Agency (CDBG Administrator)

Adams County works in partnership with the members of the Urban County, which includes the cities of Brighton, Northglenn, and Federal Heights, and the Town of Bennett, and serves unincorporated Adams County. Each year, the Urban County members are awarded a proportionate share of CDBG funds that are to be utilized to meet the community and housing needs of each community. At minimum, 70% of CDBG funds benefit low-to-moderate income residents within the Urban County areas. As the lead agency of the Urban County, Adams County assumes the responsibility of administering the CDBG funds and completes all required CDBG reporting. Adams County retains up to the allowable 20% cap of CDBG for program administration. Each year the Urban County members submit a CDBG application for projects.

Annual Action Plan 2022 Applications are reviewed for eligibility with CDBG by HPCI staff. Upon review, HPCI presents eligible applications to the Board of County Commissioners for final approval.

HOME Consortium Lead Agency (HOME Administrator)

Adams County works in partnership with the cities of Commerce City, Thornton, and Westminster to make up the Adams County HOME Consortium. Each year, the HOME Consortium and Urban County areas are awarded a proportionate share of HOME funds that are to be utilized to meet the affordable housing needs of each community. A minimum, 90% of HOME funds benefit low-to-moderate income residents within the Urban County and HOME Consortium areas. As the lead agency of the HOME Consortium, Adams County assumes the responsibility of administering HOME funding and completes all required HOME reporting. Adams County retains the allowable 10% cap of HOME funds for administration expenses. Each year, Adams County opens a Notice of Funding Availability (NOFA) annually to announce the HOME application cycle. The County will open a NOFA for HOME applications twice for PY 2022. Affordable housing developers apply for HOME funds directly from the County. Applications are reviewed for eligibility with HOME by HPCI staff and presented to the HOME Consortium members. Upon review, HPCI presents eligible applications to the Board of County Commissioners for final approval.

Consolidated Plan Public Contact Information

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

1. Introduction

Collaborating with private and nonprofit service providers, advocacy agencies, housing developers, and other key stakeholders that serve the low-income population creates a stronger force for addressing issues in the community, especially for low-income residents, special populations, and those who are experiencing homeless. For this reason, the County has established ongoing relationships with stakeholders in an effort to define the needs of these residents and determine how to best serve these populations. Consultation included regular meetings with housing and community development staff from partner jurisdictions; participation in meetings with the County's Poverty Reduction Team to develop a countywide plan to address homelessness; coordination with stakeholders on Response and Recovery Teams to address emerging and critical needs related to the COVID-19 pandemic; presentations to the Adams County Commissioners. The County 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.

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

Adams County staff in Community & Economic Development and Community Safety & Well-Being continue to be actively involved in several task forces to address regional challenges of homelessness; facilitate coordinated service provision; and continue to deploy funds to mitigate economic losses and homelessness stemming from the COVID-19 pandemic. Regional groups meet regularly and local providers and service agencies included: Tri-County Health; Maiker Housing Partners; Growing Home; Rocky Mountain Cradle to Career Partnership; the Early Childhood Partnership of Adams County; Adams County School Districts; Colorado 9 to 5; Mile High Connects; Enterprise Community Partners; and the Colorado Center on Law and Policy.

Adams County also works in collaboration with the cities of Westminster and Thornton through the HOME Consortium to distribute HOME funds for eligible projects that create or preserve housing. In accordance to HOME regulations, Adams County also works with local certified Community Housing Development Organizations (CHDOs) and local housing authorities to provide essential housing services. These organizations include Community Resources and Housing Development Corporation (CRHDC), Maiker Housing Partners, and the Brighton Housing Authority (BHA).

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

The County works closely with the Metro Denver Homeless Initiative (MDHI), the Continuum of Care provider for the seven-county area including Adams County, to build a homeless crisis response system that gets people back into housing as quickly as possible. MDHI is a member of the Adams County task force overseeing development of a countywide plan to address homelessness. Adams County's full time Homeless Liaison Coordinator and Community Safety & Well-Being staff focus on developing and implementing strategies to assist those who are homeless with getting their immediate needs met and taking steps towards self-sufficiency. These efforts include working with MDHI and the local homeless providers to fund programs serving homeless individuals, families, veterans, youth, and persons at risk of becoming homeless.

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

Not applicable; Adams County does not receive ESG funds directly. The CoC is responsible for the administration of ESG in the CoC area as well as performance standards of the regional program and is also responsible for development, policies and procedures of the operation of the Homeless Management Information System (HMIS) in the area.

2. Agencies, groups, organizations and others who participated in the process and consultations

Table 2 – Agencies, groups, organizations who participated

1	Agency/Group/Organization	City of Westminster
	Agency/Group/Organization Type	Other government - Local
	What section of the Plan was addressed by Consultation?	Public Housing Needs Economic Development
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Agency participated in the development of the AAP by discussing proposed HOME activities.
2	Agency/Group/Organization	CITY OF THORNTON
	Agency/Group/Organization Type	Other government - Local
	What section of the Plan was addressed by Consultation?	Public Housing Needs Economic Development
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Agency participated in the development of the AAP by discussing proposed HOME activities.
3	Agency/Group/Organization	Maiker Housing Partners (Adams County Housing Authority)
	Agency/Group/Organization Type	Housing Services - Housing
	What section of the Plan was addressed by Consultation?	Public Housing Needs Affordable Housing
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Agency participated in the development of the AAP by discussing proposed activities.

4	Agency/Group/Organization	BRIGHTON HOUSING AUTHORITY				
	Agency/Group/Organization Type	Housing Services - Housing				
	What section of the Plan was addressed by Consultation?	Public Housing Needs Affordable Housing Agency participated in the development of the AAP by discussing proposed activities.				
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?					
5	Agency/Group/Organization	CITY OF FEDERAL HEIGHTS				
	Agency/Group/Organization Type	Other government - Local				
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs Economic Development				
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Agency participated in the development of the AAP by discussing proposed CDBG activities.				
6	Agency/Group/Organization	CITY OF BRIGHTON				
	Agency/Group/Organization Type	Other government - Local				
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs Economic Development				
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Agency participated in the development of the AAP by discussing proposed CDBG activities.				
7	Agency/Group/Organization	CITY OF NORTHGLENN				
	Agency/Group/Organization Type	Other government - Local				

	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs Economic Development
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Agency participated in the development of the AAP by discussing proposed CDBG activities.
8	Agency/Group/Organization	BENNETT
	Agency/Group/Organization Type	Other government - Local
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs Economic Development
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Agency participated in the development of the AAP by discussing proposed CDBG activities.
9	Agency/Group/Organization	ADAMS COUNTY
	Agency/Group/Organization Type	Other government - County Grantee Department
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Non-Homeless Special Needs Economic Development Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Adams County Community and Economic Development Department and the Board of County Commissioners participated in the development of the 2022 AAP by discussing proposed CDBG and HOME activities.

10	Agency/Group/Organization	Adams County Office of Emergency Management					
10	Agency/Group/Organization Type	Agency - Managing Flood Prone Areas Agency - Management of Public Land or Water Resources Agency - Emergency Management					
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Non-Homeless Special Needs					
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The County OEM department plans, coordinates and supports activities that help our community reduce its vulnerability to disaster. This is accomplished through the following mitigation, emergency preparedness, emergency response and recovery programs.					
11	Agency/Group/Organization	Anythink Libraries					
	Agency/Group/Organization Type	Services - Broadband Internet Service Providers Services - Narrowing the Digital Divide					
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs Anti-poverty Strategy					
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The County library system offers free access to the internet and other services to County residents.					
12	Agency/Group/Organization	Metro Denver Homeless Initiative					
	Agency/Group/Organization Type	Services-homeless Services-Health Regional organization Continuum of Care					

	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Unaccompanied youth Homelessness Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The County works closely with MDHI, the Continuum of Care provider for the seven-county area including Adams County, to build a homeless crisis response system that gets people back into housing as quickly as possible. MDHI is a member of the Adams County task force overseeing development of a countywide plan to address homelessness.
13	Agency/Group/Organization	CITY OF COMMERCE CITY
	Agency/Group/Organization Type	Other government - Local
	What section of the Plan was addressed by Consultation?	Public Housing Needs Economic Development
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Agency participated in the development of the AAP by discussing proposed HOME activities.

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

All comments and views were accepted. There were no agencies or organization types that were intentionally not consulted.

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

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?					
Continuum of Caro	Metro Denver Homeless	Adams County uses the MDHI Point in Time annual homeless count, and other research					
Continuum of Care	Initiative (MDHI)	and coordination efforts to develop plans for serving homeless persons in Adams County.					

Table 3 – Other local / regional / federal planning efforts

Narrative

N/A

AP-12 Participation - 91.401, 91.105, 91.200(c)

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

The County pursued a variety of outreach efforts to notify, inform, and include the public in the 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. The draft PY 2022 AAP was available on the County's website for public comment period of 30 day and a public hearing to review and approve the final plan for submittal to HUD.

Citizen Participation Outreach

Sort Orde r	Mode of Outreac h	Target of Outreac h	Summary of response/attendanc e	Summary of comment s receive d	Summary o f comment s not accepted and reason S	URL (If applicable)
1	Public Commen t Period	Non- targeted/ broad communi ty	The County held a 30-day public comment period from June 23, 2022 to July 25, 2022 to give the public an opportunity to review and make comments on the proposed AAP. The AAP could be viewed at the Housing Policy & Community Investments office at 4430 S. Adams Pkwy., Brighton, CO 80601 and online at www.adcogov.org/h ousing-policy- community- investments. Written comments can be returned to the contact in the PR-05.	No comment s were submitte d.	All comments are accepted.	https://www.adcogo v.org/housing-policy- community- investments

Sort Orde r	Mode of Outreac h	Target of Outreac h	Summary of response/attendanc e	Summary of comment s receive d	Summary o f comment s not accepted and reason s	URL (If applicable)
2	Public Hearing	Non- targeted/ broad communi ty Board of County Commissi oners (BOCC)	The County held a Public Hearing on July 26, 2022 at 9:30 AM at the BOCC to review and discuss the AAP. BOCC meetings are held at the Adams County Government Center, First Floor Public Hearing Room, 4430 S. Adams County Pkwy., Brighton, CO 80601. For more information on how to attend the meeting, please see the following link: http://adcogov.legist ar.com/calendar.asp x	No comment s were submitte d.	All comments are accepted.	http://adcogov.legist ar.com/calendar.asp x
3	Internet Outreach	Non- targeted/ broad communi ty	The County utilized its website to continually updates the public on upcoming public hearings, funding allocations, and reports, including the AAP.www.adcogov.o rg/housing-policy- community- investments	N/A	N/A	https://www.adcogo v.org/housing-policy- community- investments

Table 4 – Citizen Participation Outreach

Expected Resources

AP-15 Expected Resources - 91.420(b), 91.220(c)(1,2)

Introduction

Adams County anticipates receiving CDBG and HOME grant funds from HUD that will help address the goals and objectives identified in the AAP. The County is the lead agency for Urban County and the HOME Consortium, and cities that are members of these respective groups will partner with the County on the use of these funds. The Urban County includes the cities of Northglenn, Federal Heights, Brighton, the Town of Bennett, and unincorporated Adams County. The HOME Consortium includes the Urban County cities, as well as the cities of Thornton, Commerce City, and Westminster.

Based on HUD allocation notices, the grant fund allocations for PY 2022 will be \$1,417,617 for CDBG and \$1,307,955 for HOME. In addition to the PY 2022 grant allocations, Adams County has unused prior year funds in the amount of \$254,621 from CDBG and \$1,803,939 from HOME. These funds will be reallocated towards housing activities.

Program	Source	Uses of Funds	Expe	cted Amou	nt Available Yo	ear 1	Expected	Narrative Description
	of Funds		Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$	Amount Available Remainder of ConPlan \$	
CDBG	public -	Acquisition						Adams County will allocate CDBG funds to
	federal	Admin and						the Urban County members and
		Planning						unincorporated Adams County for eligible
		Economic						projects approved by the County
		Development						Commissioners. PY 2022 is the third year
		Housing						of the ConPlan. The expected amount
		Public						available for the remainder of the ConPlan
		Improvements						is 2x more years of the annual allocation.
		Public Services	1,4 <u>77,449</u>	0	254,621	1, <u>732,070</u>	2, <u>954,898</u>	

Anticipated Resources

Program	Source	Uses of Funds	Expe	cted Amou	nt Available Y	ear 1	Expected	Narrative Description
	of Funds		Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$	Amount Available Remainder of ConPlan \$	
HOME	public -	Acquisition						Adams County will use funds throughout
	federal	Homebuyer						the County to address community housing
		assistance						needs. PY 2022 is the third year of the
		Homeowner						ConPlan. The expected amount available
		rehab						for the remainder of the ConPlan is 2x
		Multifamily						more years of the annual allocation.
		rental new						
		construction						
		Multifamily						
		rental rehab						
		New						
		construction for						
		ownership						
		TBRA	1,307,955	0	1,803,938	3,111,893	2,615,910	

Program	Source	Uses of Funds	Expe	cted Amou	nt Available Ye	ear 1	Expected	Narrative Description
	of Funds		Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$	Amount Available Remainder of ConPlan \$	
ESG	public -	Conversion and						
	federal	rehab for						
		transitional						
		housing						
		Financial						
		Assistance						
		Overnight						
		shelter						
		Rapid re-housing						
		(rental						
		assistance)						
		Rental Assistance						
		Services						
		Transitional						
		housing	0	0	0	0	0	

Table 2 - Expected Resources – Priority Table

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

The County encourages subgrantees and subrecipients to leverage other resources to cover the total cost of projects. CDBG funded projects leverage general funds from the County, the member Urban County cities and in-kind donations. State and private grants may be used to fill gaps in funding, especially with public service projects. HOME funded projects may use Low Income Housing Tax Credit (LIHTC) equity, Private Activity Bonds, State of Colorado funds, private equity, and other resources to cover the cost of the development. Activities funded by HOME will have the required twenty-five (25%) match from previous program years and from fee reductions by member HOME Consortia members. To

Annual Action Plan 2022 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. If appropriate, describe publically owned land or property located within the jurisdiction that may be used to address the needs identified in the plan

Discussion

N/A

Annual Goals and Objectives

AP-20 Annual Goals and Objectives - 91.420, 91.220(c)(3)&(e)

Goals Summary Information

Sort	Goal Name	Start	End	Category	Geographic	Needs Addressed	Funding	Goal Outcome Indicator
Order	Droconvotion of	Year	Year	Affordable	Area	Llousing Noods	CDBG:	Llamaaunar Llausing Dahahilitatad
1	Preservation of	2020	2024		County-	Housing Needs		Homeowner Housing Rehabilitated:
	Existing Housing			Housing	Wide	Special Needs	\$6 <u>98,028</u>	30 Household Housing Unit
	Stock				City of	Populations	HOME:	Housing Code
					Federal		\$363 <i>,</i> 598	Enforcement/Foreclosed Property
					Heights			Care: 625 Household Housing Unit
					City of			
					Northglenn			
					City of			
					Brighton			
2	Public Facility	2020	2024	Non-Housing	County-	Community and	CDBG:	Public Facility or Infrastructure
	Improvements			Community	Wide	Economic	\$789,534	Activities other than Low/Moderate
				Development	City of	Development		Income Housing Benefit: 10580
					Brighton	Needs		Persons Assisted
3	Emergency Housing	2020	2024	Homeless	County-	Homelessness	CDBG:	Homelessness Prevention: 27
	and Shelter for the				Wide		\$244,508	Persons Assisted
	Homeless							
4	Construction of New	2020	2024	Affordable	County-	Housing Needs	HOME:	Rental units constructed: 60
	Rental Housing			Housing	Wide		\$643,598	Household Housing Unit

Sort	Goal Name	Start	End	Category	Geographic	Needs Addressed	Funding	Goal Outcome Indicator
Order		Year	Year		Area			
5	Expanding and	2020	2024	Affordable	County-	Housing Needs	HOME:	Homeowner Housing Rehabilitated:
	Preserving			Housing	Wide		\$2,104,697	8 Household Housing Unit
	Homeownership				City of			
					Brighton			

Table 3 – Goals Summary

Goal Descriptions

1	Goal Name	Preservation of Existing Housing Stock
Description member cities and unincorporated Adams County. The program will address essential h		The Minor Home Repair (MHR) Program will serve low-to-moderate income homeowners throughout the Consortium member cities and unincorporated Adams County. The program will address essential home repairs to promote decent, safe and sanitary conditions as well as accessibility issues. County staff will administer the MHR program.
		City of Federal Heights will utilize its remaining CDBG allocation to continue operating its Rental Inspection Program. The Rental Inspection Program promotes affordable, safe rental housing for its residents by administering a city-wide program to bring rental properties into code compliance.
2	2 Goal Name Public Facility Improvements	
	Goal Description	CDBG funding will be utilized for public facilities and infrastructure improvement projects in the Urban County member cities and unincorporated Adams County.
3	Goal Name	Emergency Housing and Shelter for the Homeless
	Goal Description	Funds will be used to provide emergency housing and shelter for homeless individuals and families, including homeless outreach, motel vouchers, and navigation services.

4	Goal Name	Construction of New Rental Housing	
	Goal Description	Adams County will provide funding and support to encourage the development of new affordable rental housing that is constructed for low and very low income residents of Adams County, especially in areas adjacent to services, including transit. New rental housing will serve LMI families and prioritized special needs populations.	
5	Goal Name	Expanding and Preserving Homeownership	
	Goal Description	The County has a goal of ensuring that affordable housing is available for LMI renters that want to purchase a home in Adams County.	

AP-35 Projects - 91.420, 91.220(d)

Introduction

In PY 2022, up to 20% of the CBDG allocation and 10% of the HOME allocation will be used to support the administration of these programs. The remainder of the grants will fund projects that will benefit LMI households and special needs groups and meet a priority need identified in the plan.

#	Project Name
1	CDBG: Administration (20%)
2	CDBG: Housing
3	CDBG: Public Facilities
4	CDBG: Public Services
5	HOME: Administration (10%)
6	HOME: CHDO Reserves (15%)
7	HOME: Adams County
8	HOME: Commerce City
9	HOME: Thornton
10	HOME: Westminster

Table 4 – Project Information

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

Housing has become a priority because, even though parts of Adams County are considered ideal firsttime home buyer locations, the high cost of housing in Adams County and the adjacent counties in the region is driving people farther from their places of work, public transportation routes, medical services, childcare, and other services. Also, the pandemic has resulted in many people who are still behind on medical bills and housing payments, or who need to retrain for different jobs. This situation has created a major need for affordable housing and preservation of existing housing that allow people to live in safe, decent, and healthy environments.

Funding public facility and infrastructure projects with CDBG is a priority in 2022 to support safe neighborhoods, including the infrastructure to deliver water to LMI households or providing a safe place for people in an LMI neighborhood to gather and recreate. Public improvements are also focused on ADA and accessibility improvements for special needs groups.

The HOME allocations are spread out throughout Adams County to serve residents and communities throughout the county. Adams County and the HOME Consortium members receive an allocation of HOME funding each year through their participation in the Urban County to support housing projects. The allocations are identified through a formula basis. The County works with the HOME Consortium members, developers, housing authorities, and the local Continuum of Care organization to identify strategies to increase the amount of affordable housing, help LMI people purchase homes, or assist low-

Annual Action Plan

income residents with remaining in their homes. While the funding allocations are broken out between Adams County, the local CHDO, and the HOME Consortium, all members collaborate to achieve the goals of the HOME funds and the Consolidated Plan.

One of the obstacles of addressing the underserved community through these federal funds is the ability of the Entitlement and the Consortia members to move several projects forward in a timely fashion. Therefore, Adams County reserves the right to re-assign funds to any of the other existing approved 2022 projects. The re-assigned funds can include any reserve projects; any of the 2022 projects or proposed activities that are not able to start by the required timeframe; have unused or remaining funds after they commence; or are completed. Some of the reasons a project may not be able to start including changes in the original scope of the project, an inability to meet the timing requirements for spending funds, an inability to adequately report outcomes, an inability to meet contract requirements, and/or the failure to meet or abide by federal regulations.

AP-38 Project Summary

Project Summary Information

1	Project Name	CDBG: Administration (20%)
	Target Area	County-Wide
	Goals Supported	Preservation of Existing Housing Stock Public Facility Improvements
	Needs Addressed	Housing Needs Special Needs Populations Community and Economic Development Needs
	Funding	CDBG: \$283,523
	Description	Adams County will retain up to the allowable twenty percent (20%) of PY 2022 CDBG funding for Adams County HPCI staff to administer the program.
	Target Date	9/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	N/A
	Location Description	N/A
	Planned Activities	CDBG administration (21A). The use of the funds is presumed to meet the national objective benefiting low and moderate-income persons since 100% of Adams County CDBG funds are used to benefit for low-to- moderate income persons or areas.
2	Project Name	CDBG: Housing
	Target Area	County-Wide
	Goals Supported	Preservation of Existing Housing Stock
	Needs Addressed	Housing Needs Special Needs Populations
	Funding	CDBG: \$ <u>603,521</u>
	Description	CDBG funding will be utilized for minor home repair for Urban County members and unincorporated Adams County residents, and a rental housing code enforcement inspection program in Federal Heights.
	Target Date	9/30/2023

	Estimate the number and type of families that will benefit from the proposed activities	Homeowner Housing Rehabilitated: 26 Household Housing Unit (MHR) Housing Code Enforcement/Foreclosed Property Care: 625 Household Housing Unit (Rental Housing Inspection program)
	Location Description	The MHR program will serve the Urban County cities and unincorporated Adams County. The Rental Housing Inspection Program will serve Federal Heights.
	Planned Activities	The Minor Home Repair (MHR) Program will serve low-to-moderate income homeowners throughout the cities of Federal Heights, Northglenn, Brighton, and unincorporated Adams County. The program will address essential home repairs to promote decent, safe, and sanitary conditions as well as accessibility issues. County staff will administer the MHR program. (Matrix Code/National Objective – 14A/LMH) City of Federal Heights will utilize its remaining CDBG allocation to continue operating its Rental Housing Inspection Program. The Rental Housing Inspection Program promotes affordable, safe rental housing for its residents by administering a city-wide program to bring rental properties into code compliance. (Matrix Code/National Objective – 15/LMA)
3	Project Name	CDBG: Public Facilities
	Target Area	County-Wide
	Goals Supported	Public Facility Improvements
	Needs Addressed	Community and Economic Development Needs
	Funding	CDBG: \$695,026
	Description	CDBG funding will be utilized for infrastructure projects in the Urban County member cities and unincorporated Adams County.
	Target Date	9/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 10,580 Persons Assisted
	Location Description	The outlined activities will be undertaken in eligible low/mod areas of Urban County cities and unincorporated Adams County.

	Planned Activities	Adams County, Sherrelwood ADA Sidewalk Improvements. The intention of the project is to facilitate the continuation of overall mobility and accessibility improvements in the Sherrelwood residential neighborhood. This project will consist of the reconstruction of curb ramps, sidewalks, and related work to improve accessibility and improve compliance of the neighborhood infrastructure with American with Disability Act (ADA), and helping to provide safer pedestrian connectivity within the neighborhood and to the surrounding areas. (Matrix Code/National Objective - 03L/LMA)
		Brighton ADA Sidewalk Improvements. The City of Brighton will improve 8th Ave from Midland Ave to just north of Bridge St and Longs Peak Street, from its intersection at 8th Ave to its intersection at 19th Ave. The program will bring sidewalk infrastructure into compliance with the Americans with Disabilities Act (ADA). (Matrix Code/National Objective - 03L/LMA)
4	Project Name	CDBG: Public Services
	Target Area	County-Wide
	Goals Supported	Emergency Housing and Shelter for the Homeless
	Needs Addressed	Homelessness
	Funding	CDBG: \$150,000
	Description	Adams County will fund a housing respite program which will provide emergency housing and shelter for homeless individuals and families, including homeless outreach, motel vouchers, and navigation services.
	Target Date	9/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	Homelessness Prevention: 27 Persons Assisted
	Location Description	Countywide, eligible.
	Planned Activities	The Almost Home, Respite Housing Program (RHP) is an immediate response program that quickly diverts households from entering homelessness through light-touch case management and a short-term hotel/motel stay for up to fourteen (14) calendar days. The intent of diversion through Respite Housing is to give someone who has become homeless (or is about to become homeless) a positive alternative to entering emergency shelter. (05Z) LMC

Project Name	HOME: Administration (10%)		
Target Area	County-Wide		
Goals Supported	Preservation of Existing Housing Stock Construction of New Rental Housing Expanding and Preserving Homeownership		
Needs Addressed	Housing Needs Special Needs Populations		
Funding	HOME: \$130,795		
Description	Adams County will retain ten percent (10%) of HOME funding for Adams County HPCI staff for HOME program administration. Further, ten percent (10%) of applicable Program Income (PI) from prior year(s) activities will also be used for administration.		
Target Date	9/30/2023		
Estimate the number and type of families that will benefit from the proposed activities	N/A		
Location Description	N/A		
Planned Activities	The use of the funds is presumed to meet the national objective benefiting low and moderate-income persons since 100% of Adams County HOME funds are used to benefit for low-to-moderate income persons or areas.		
Project Name	HOME: CHDO Reserves (15%)		
Target Area	County-Wide		
Goals Supported	Preservation of Existing Housing Stock Construction of New Rental Housing		
Needs Addressed	Housing Needs		
Funding	HOME: \$925,192		
Description	Adams County will set aside 15% of the HOME grant for CHDO affordable housing development activities. Funding for this project will be 15% of HOME funds with \$196,193 and prior year funds of \$728,998		
Target Date	9/30/2023		
	Target AreaGoals SupportedGoals SupportedNeeds AddressedFundingDescriptionTarget DateEstimate the number and type of families that will benefit from the proposed activitiesLocation DescriptionPlanned ActivitiesProject NameTarget AreaGoals SupportedNeeds AddressedFundingDescription		

	Estimate the number and type of families that will benefit from the proposed activities	TBD
	Location Description	County-wide, eligible.
	Planned Activities	CHDO affordable housing development activities.
7	Project Name	HOME: Adams County
	Target Area	County-Wide
	Goals Supported	Preservation of Existing Housing Stock Construction of New Rental Housing
	Needs Addressed	Housing Needs
	Funding	HOME: \$1,102,802
	Description	The County will fund affordable rental housing construction and homeowner housing preservation projects in HOME Consortium member cities and throughout Adams County. Funding from this project will be \$421,815 from the PY 2022 allocation and \$680,987 from prior year funds.
Target Date 9/30/2023		9/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	Rental units constructed: 60 Household Housing Unit Homeowner Housing Rehabilitated: 8 Household Housing Unit (ECLT)
	Location Description	County-wide, eligible.

	Planned Activities	Brinshore Development – South Platte Crossing, affordable rental housing construction: Nesbitt Development, LLC and Brinshore Development, LLC present a Transit Oriented Development, SP Crossing Apartments, 60 units of permanently affordable rental housing for families located in Commerce City near the intersection of Colorado Boulevard and 72nd Avenue (the "Project"). In addition to its proximity to the Commerce City/72nd Ave Commuter Rail Station, the Project will be built to encourage indoor/outdoor resident interaction while maintaining safety and security in a growing neighborhood. The Project, a four-story, elevator-serviced building, will include two studios, 29 one-bedroom units, 26 two-bedroom units, and 3 three-bedroom units and serve families earning up to 30% - 80% AMI.
		ECLT Homeownership - Rehabilitation Program: ECLT will renovate 8 homes to homeownership quality by installing new bathrooms, refinishing and installing new kitchen cabinets, new flooring, all new water heaters and furnaces, new windows where needed, new interior and exterior doors, new countertops, sinks and faucets, light fixtures and paint, etc. Once renovated, the homes will be preserved with the Community Land Trust Model. ECLT will separate the legal ownership of the land from the ownership of the improvements. ECLT will market these homes to low to moderate-income homebuyers (up to 80% AMI) who will purchase only the improvements and lease the land from ECLT for \$100 per month. When the owner decides to sell their home, the new sales price is determined through the ECLT resale formula, which sets a maximum sales price by adding 25% of appreciation to the initial sales price, and requires that the sale must be to another low-income homebuyer. The Land Trust model allows ECLT to keep the home permanently affordable for the next buyer and also for generations of other buyers.
8	Project Name	HOME: Commerce City
	Target Area	County-Wide
	Goals Supported	Construction of New Rental Housing
	Needs Addressed	Housing Needs
	Funding	HOME: \$98,096
	Description	Funding will be provided for South Platte Crossing, a new construction affordable housing project.
	Target Date	9/30/2023

	Estimate the number and type of families that will benefit from the proposed activities	60-units of new affordable housing.
	Location Description	City of Commerce City, eligible.
	Planned Activities	New Construction of Affordable Housing
9	Project Name	HOME: Thornton
	Target Area	City of Thornton
	Goals Supported	Construction of New Rental Housing
	Needs Addressed	Housing Needs
	Funding	HOME: \$235,432
	Description	TBD
	Target Date	9/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	TBD
	Location Description	City of Thornton, eligible.
	Planned Activities	Rental housing development activities
10	Project Name	HOME: Westminster
	Target Area	City of Westminster
	Goals Supported	Construction of New Rental Housing
	Needs Addressed	Housing Needs
	Funding	HOME: \$619,576
	Description	TBD.
	Target Date	9/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	TBD

Location Description	City of Westminster, eligible.
Planned Activities	TBD

AP-50 Geographic Distribution - 91.420, 91.220(f)

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

Adams County encompasses approximately 1,183.6 square miles. It extends 72 miles west to east, and 18 miles north to south. It is adjacent to Denver and is one of the 10 counties that make up the Denver-Aurora-Lakewood metropolitan statistical area. All of Colorado's interstate highways (I-25, I-70, and I76) and their associated loops (I-225, I-270) converge in Adams County. In addition, US Highways 36, 287, 6 and 85 also run through the County. E-470 completes the connection from C-470 in the south, through Denver International Airport and finally to I-25.

Adams County, which historically has been agricultural in nature, has undergone a development typical of counties near a major metropolitan city. Urbanization has occurred most rapidly in the western part of the County around the interstates and highway systems because of the continued growth in the Denver Metro region. The eastern section of the County, except for the Towns of Bennett and Strasburg, are comprised mainly of farms and rangeland. The Town of Bennett has experienced historic growth throughout the last year and has developed a strategic plan for growth largely due to its proximity to Front Range Airport, one hour drive to downtown Denver and the cost of housing, which is 11% lower than the Colorado housing cost average.

Cities within the geographic County include Arvada, Aurora, Brighton, Commerce City, Federal Heights, Northglenn, Strasburg, Thornton and Westminster and the Town of Bennett. Adams County has a diverse mix of large suburban communities, smaller towns, and rural farming communities that have an extensive range and mix of housing, commercial enterprises, and public services.

Adams County does not plan to target funds to "geographic priority" areas, however, allocations have been made to specific communities throughout Adams County for projects that are local priorities. The following communities receive allocations of CDBG funds based upon their total populations and lowincome populations and apply to Adams County to use the funds within their own communities based on local priorities and needs: Unincorporated Adams County, the Town of Bennett, and the Cities of Brighton, Federal Heights, and Northglenn.

The communities of Commerce City, Thornton, and Westminster receive direct CDBG allocations from HUD and are part of the HOME Consortium. Consortium members are allocated a set-aside of HOME funds for projects within their communities. The remaining HOME funds are allocated by Adams County.

Geographic Distribution

Target Area Percentage of Funds

Target Area	Percentage of Funds
County-Wide	54
City of Thornton	8
City of Westminster	20
City of Federal Heights	3
Town of Bennett	0
City of Northglenn	8
City of Brighton	6

Table 5 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

In 2022, the Urban County Intergovernmental Agreement (IGA) was recertified for another three (3) year requalification period. 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 are to be made in eligible areas identified in the AAP and must serve low-tomoderate income areas tracts, which have been defined by the HUD CDBG Low Mod Income Summary Data (LMISD), which has defined the eligible tracts within the jurisdiction. The identified census block group tracts within the jurisdiction that are considered low-moderate income can be found on the HUD Exchange website at: https://www.hudexchange.info/programs/acs-low-mod-summary-data/

Discussion

Affordable Housing

AP-55 Affordable Housing - 91.420, 91.220(g)

Introduction

Adams County will fund affordable housing projects with CDBG and HOME funds, including homeowneroccupied rehabilitation and new construction of affordable rental housing.

One Year Goals for the Number of Households to be Supported	
Homeless	0
Non-Homeless	94
Special-Needs	0
Total	94

Table 6 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through		
Rental Assistance	0	
The Production of New Units	60	
Rehab of Existing Units	34	
Acquisition of Existing Units	0	
Total	94	
Table 7 - One Year Goals for Affordable Housing by Support Type		

Table 7 - One Year Goals for Affordable Housing by Support Type

Discussion

Homeowner Housing Rehabilitated: 26 Household Housing Unit (MHR)

Homeowner Housing Rehabilitated: 8 Household Housing Unit (ECLT)

Rental units constructed: 60 Household Housing Unit (Brinshore Development)

AP-60 Public Housing - 91.420, 91.220(h) Introduction

This section covers public housing needs in Adams County and actions to address those needs. The Housing Authority of the County of Adams, dba Maiker Housing Partners, Brighton Housing Authority, and Commerce City Housing Authority are the primary providers of affordable housing in the county for households in the low- to moderate- income categories. The only other alternative is federally subsidized housing. Maiker Housing Partners and Brighton Housing Authority manage and maintain conventional public housing developments throughout the county and several scattered site developments. Both housing authorities own and operate public housing units, senior and disabled affordable units, and administer tenant and project-based Section 8 vouchers. The Commerce City Housing Authority manages two affordable properties, facilitates Housing Choice Vouchers, and provides housing resources to help residents buy, rent, or improve their homes.

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

As describe above, the Housing Authority of the County of Adams, dba Maiker Housing Partners, Brighton Housing Authority, and Commerce City Housing Authority are the primary providers of affordable housing in the county for LMI households. The housing authorities all work continually to improve the quality of life for public housing residents. Adams County supports these agencies by providing HOME funds to obtain and maintain affordable properties, as well as donating land or buildings, when possible.

The Commerce City Housing Authority is working with a developer to create 60 units of affordable housing. Currently this project has Low Income Housing Tax Credits and is seeking other financing.

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

Maiker Housing Partners has a Resident Advisory Board made up of residents of Maiker properties. It meets quarterly to discuss Maiker Housing Partners' priorities and property improvements. Maiker Housing Partners' Board of Commissioners includes a seat for an Adams County resident of low-income housing; currently this seat is held by a resident of a Maiker property. Annually, Maiker Housing Partners surveys all residents of its properties to get 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.

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 Commerce City Housing Authority has a website with low- and moderate-income housing information and housing resources. Their strategic plan, which is available on the website, was created with public input received through an open house forum, surveys and in-person presentations.

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

Not applicable. Maiker Housing Partners and the Brighton Housing Authority are not designated as "troubled". The Commerce City Housing Authority is not covered by a PHA Plan and is not subject to a HUD review or designation of this type.

Discussion

AP-65 Homeless and Other Special Needs Activities - 91.420, 91.220(i) Introduction

The Board of County Commissioners has identified addressing homelessness and reducing poverty as priority needs for the County. The Commissioners have recently accepted a homeless reduction strategic plan titled Homeward Adams. The implementation of the plan will be the responsibility of the Community Safety and Well-Being Division, a division that coordinates initiatives related to homelessness, housing, neighborhoods, and quality of life. Implementation strategies will include the County continuing to collaborate with local homeless providers, the Metro Denver Homeless Initiative (MDHI), and municipalities to reduce homelessness prevention, strengthening the housing continuum, and homelessness services.

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

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

Adams County will work with homeless service providers to learn about the needs of the homeless and support the efforts of a broad-based community network of service providers which provide homeless assistance in the County and the municipalities. Service providers supported by the County provide outreach and case management to assess individual needs and link people to resources. 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, homelessness prevention and life skill classes to reduce and end homelessness. Below is a highlight of each organization.

Almost Home has thirty (30) beds and can accommodate up to six (6) families. During their stay, each family attends weekly classes, receives case management, and must show progress in reestablishing their self-sufficiency. The City of Brighton and Almost Home developed a Housing Respite program funded with CDBG to provide people, especially domestic violence victims and those with unhealthy home situations, with hotel vouchers for emergency housing assistance.

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

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. The long-term approach for family self-sufficiency and economic stability is the Collaborative Coaching program. Collaborative Coaching is an evidence-based case management system that supports families in setting goals to enhance their stability and creating paths to achieve those goals, such as homeless encampments and vaccinations for people who are homeless, and long term strategies to create a resource navigation network and a coordinated entry system that will help people retain housing.

The Adams County Community Safety and Well-Being Department and the cities in the County developed a severe weather activation program to fund hotel vouchers for emergency overnight shelter.

Addressing the emergency shelter and transitional housing needs of homeless persons

The number of people experiencing homelessness in Adams County, especially those in camps along the Clear Creek and the South Platte River, has grown over the past several years, prompting the County to re-examine its approach to addressing this issue. As a result of increasing public concern, the County created the Community Safety & Well-Being Division. This division will oversee the implementation of the goals and objectives of the homeless reduction strategy. Within this division is a Homelessness Outreach Coordinator. The Homelessness Outreach Coordinator is responsible for assisting in the coordination, creation, implementation, and oversight of services and programs for people dealing with homelessness. During the next year the Coordinator will work on increasing protections for those living in mobile home parks and extended stay motels; supporting efforts to provide pathways for people to exit homelessness, reduce barriers to receiving one-time financial assistance, and homeless prevention assistance. The Coordinator and division will work track service connections through outreach to those who are experiencing homelessness, establish a day shelter program, track usage or mobile showers and laundry and determine if there are other mobile service needs, promote the Day Works program to those who are at-risk of losing housing due to lack of employment.

Almost Home has a Severe Weather Activation Plan (SWAP), which provides shelter at different hotels/motels for homeless individuals from October to April each year. This program helps to offset the needs at the emergency shelters and transitional housing when they are capacity in the coldest months of the year.

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

Annual Action Plan 2022 Adams County strives to help LMI individuals and families that are currently homeless or are at-risk of homelessness to find needed and appropriate services and support. Resources offered by community partners and the CoC members such as MDHI, Almost Home, ACCESS Housing, Cold Weather Care, and Growing Home have the purpose of helping LMI individuals and families avoid homelessness, including those at-risk of becoming homeless after being discharged from systems of care and those who are already receiving various types of housing or supportive public services. Helping individuals and families to avoid chronic homelessness is vital in the effort to ending homelessness in Adams County.

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 are 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 listed below. Through the help of these programs, homeless persons can make the transition to permanent housing and independent living 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 Service Division provides funding to eligible families while enrolled into a self-sufficiency program;
- Food Assistance Program: Administered by the Adams County Community Support Service 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 low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); or, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs.

The County funds and supports the local network of service providers which provide homelessness prevention services to households in danger of homelessness. This year the County has partnered with the three housing authorities and The Community Firm, a nonprofit organization that is operating a COVID Eviction Defense Project to distribute Emergency Rental Assistance from the U.S. Treasury to those at risk of losing their housing. Also, the County is partnering with and supporting Colorado Legal Services to help individuals and families on the brink of losing their current housing due to an eviction. Colorado Legal Service can help people over the phone and will be offering limited times at the Westminster Public Library (Irving St.) and the County Courthouse. Also, the County has funded a Tenant Based Rental Assistance program that will serve people for 12 months with financial assistance while those served achieve a plan for self-sufficiency with the help of regular case management.

Adams County currently is not funding programs that focus on ensuring that persons returning from mental and physical health institutions receive appropriate supportive housing, and no such coordinated effort currently exists in the county. However, Adams County offers extensive homelessness outreach which connects services with people experiencing homelessness, understand their needs in services, and provide resource navigation. Outreach efforts received funding from the Colorado Department of Local Affairs' (DOLA) Emergency Solutions Grant (ESG). Adams County works with its municipal partners to collaborate and align outreach efforts. Case workers refer residents exiting systems of care to the county's Homelessness Coordinator and Community Safety and Well-Being manager to access services.

Discussion

AP-75 Barriers to affordable housing -91.420, 91.220(j) Introduction

Adams County has experienced rapid population growth due to the County's current housing climate, geographic location, a desirability to move near large employers, such as Amazon. In addition, a diversity of land uses from cities to suburbs and open rangeland gives the County a unique identity aiding in its growth. The resulting pressures of this growth and housing stock demands have pushed housing prices to a point where many residents struggle to either find attainable housing or maintain their housing.

In a proactive effort to create solutions to the County's housing challenges, the County commissioned the 2017 Housing Needs Assessment (HNA). The HNA created a thorough economic and demographic description of the County, including its strengths and challenges as they relate to housing. The HNA identified findings that were then presented to various stakeholders who provided valuable input and possible solutions. This input helped build the framework for developing the County's 2018 Balanced Housing Plan (BHP), which defined goals and recommendations to achieve housing that meets the needs of the County's diverse and growing population. The BHP determined that the following were barriers to balanced housing:

Finding 1: Housing is less affordable

Finding 2: Increasing affordability gap at all income levels

Finding 3: Housing supply is not meeting demand

Finding 4: Adams County has distinct socioeconomics

As recommended by the Balanced Housing Plan, the County continuously supports affordable housing developments through various means. At this time, there are three developments underway that will result in 270 new units of affordable housing upon completion. The County has provided over \$2.55M in HOME and CDBG to these projects. In 2019, the County deeded the decommissioned Children & Family Services building to Maiker Housing Partners. This housing development will provide 116 total units. In 2021, the County deeded Brighton Housing Authority vacant land in Brighton to develop an affordable housing development. These affordable housing projects are in various stages of development, however when completed they will increase the number of affordable units in the County.

The County completed an Analysis of Impediments to Fair Housing Choice (AI) in 2020. The AI heavily relied on public input which was obtained through a housing survey. The housing survey was launched in the fall of 2019 and ended on February 28, 2020. It is important to note that the survey was completed before the COVID-19 pandemic and the County is studying the effects this might have on the AI. At this time, impediments found were:

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

Actions it planned to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment

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 Consolidated Plan and an update to the Comprehensive Plan update (with Transportation and Parks/Open Space/Trails updates) for the unincorporated areas of Adams County to envision a population of 40,000 more residents by 2040. The future land use categories established in this update will aid us in our 2022 Zoning Code (Development Standards and Regulations) update.

The County has been working to address the barriers identified in the 2018 Balanced Housing Plan through various means including policy change. As such, the County has been working to 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; and integrate development practices the increase diversity in housing options.

One of the changes has been the creation of the Accessory Dwelling Unit standards and regulations in Chapter 4 of the Development Standards and Regulations, Section 4-03-03-02-01, to allow homeowners the ability to create an accessory dwelling unit. Another change that is in the process is adding an affordable housing component to the Transit-Oriented Development (TOD) zone district that would allow the County to provide incentives to developers constructing affordable housing for low- and moderate-income residents at TOD sites.

The PY 2022 will address the preservation of affordable housing through the County's and HOME Consortium Minor Home Repair (MHR) Program, which will serve low-to-moderate income homeowners throughout the cities of Federal Heights, Brighton, Northglenn, and unincorporated Adams County. The program will address essential home repairs to promote decent, safe and sanitary conditions as well as accessibility issues.

Discussion

AP-85 Other Actions - 91.420, 91.220(k)

Introduction

This section covers other actions to meet underserved needs, foster and maintain affordable housing, reduce lead-based paint hazards, reduce the number of poverty-level families, and develop institutional structure including improved coordination.

Actions planned to address obstacles to meeting underserved needs

One of the obstacles to meeting underserved needs is the size of the County. Adams County is a large county and is 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. Many of the core agencies are in the more urban portions of the county which makes service delivery in the eastern and northern rural portions of the county difficult. The lack of adequate transportation and service providers in the rural areas are a hindrance to meeting the needs of the underserved throughout the county. An action the County has planned is to continue 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 is that the County continues to need 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 continues 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 planned to foster and maintain affordable housing

Adams County has made the construction of affordable rental housing, home buyer assistance, and the preservation of existing affordable housing priorities for HOME and CDBG funds. Funds may be used to construct new rental housing, provide TBRA, purchase and rehabilitate older rental units, rehabilitate

owner-occupied housing, and aid low- and moderate-income homebuyers. Adams County works with the local housing authorities, nonprofit housing agencies and private developers to expand and preserve the affordable housing stock throughout the County.

The PY 2022 will address the preservation of affordable housing through the County's Minor Home Repair (MHR) Program, which will serve low-to-moderate income homeowners throughout the cities of Federal Heights, Brighton, Northglenn, and unincorporated Adams County. The program will address essential home repairs to promote decent, safe and sanitary conditions as well as accessibility issues. Adams County accepts online applications from eligible LMI households for the MHR 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 by the Community Development department. A representative from the County will then 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 also 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

Actions planned to reduce lead-based paint hazards

The County's 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 housing assisted through the MHR program.

Lead-safe practices include providing households assisted through County programs 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 planned to reduce the number of poverty-level families

The activities developed for the PY 2022 AAP will work directly to reduce the number of poverty-level families in Adams County. Public facilities improvements will be made to LMI areas in Urban County Annual Action Plan

cities and unincorporated Adams County. These activities will involve improvements to streets and sidewalks for ADA compliance and also provide overall safe connectivity. Accessibility improvements are also targeted to neighborhood facilities in LMI areas. Public improvements will help to increase the attractiveness of the area of more local public and private investments into these areas.

The MHR program also helps to serve LMI residents throughout the cities of in Urban County and the HOME Consortium. The MHR 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 works 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 self-sufficiency 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 planned to develop institutional structure

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 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

Annual Action Plan

targets a percentage of its CDBG funding to community agencies. All projects are assessed through an application process for appropriateness and eligibility. In PY 2022, the Urban County and HOME Consortia have renewed their Intergovernmental Agreements (IGA) to continue receiving CDBG and HOME funds.

Adams County leads a HOME Consortium with the City of Commerce City, City of Westminster, 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's) (15% requirement);
- Local housing authorities;
- Nonprofit 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 the 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 planned to enhance coordination between public and private housing and social service agencies

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 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, 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.

Discussion

Program Specific Requirements

AP-90 Program Specific Requirements - 91.420, 91.220(I)(1,2,4)

Introduction

This section covers program specific requirements in Adams County.

Community Development Block Grant Program (CDBG) Reference 24 CFR 91.220(I)(1)

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

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

Other CDBG Requirements

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit	
persons of low and moderate income. Overall Benefit - A consecutive period of one,	
two or three years may be used to determine that a minimum overall benefit of 70%	

of CDBG funds is used to benefit persons of low and moderate income. Specify the vears covered that include this Annual Action Plan.

80.00%

HOME Investment Partnership Program (HOME) Reference 24 CFR 91.220(I)(2)

1. A description of other forms of investment being used beyond those identified in Section 92.205 is as follows:

Adams County does not plan to use any other forms of investment beyond those identified in

Section 92.205.

2. A description of the guidelines that will be used for resale or recapture of HOME funds when used for homebuyer activities as required in 92.254, is as follows:

There are no activities identified in the 2022 program year that require resale or recapture provisions.

3. A description of the guidelines for resale or recapture that ensures the affordability of units acquired with HOME funds? See 24 CFR 92.254(a)(4) are as follows:

There are no activities identified in the 2022 program year that require resale or recapture provisions.

4. Plans for using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds along with a description of the refinancing guidelines required that will be used under 24 CFR 92.206(b), are as follows:

Adams County does not utilize HOME funds to refinance existing debt of multi-family housing so 24 CFR 92.206 (b) does not apply.

- 5. If applicable to a planned HOME TBRA activity, a description of the preference for persons with special needs or disabilities. (See 24 CFR 92.209(c)(2)(i) and CFR 91.220(l)(2)(vii)).
- 6. If applicable to a planned HOME TBRA activity, a description of how the preference for a specific category of individuals with disabilities (e.g. persons with HIV/AIDS or chronic mental illness) will narrow the gap in benefits and the preference is needed to narrow the gap in benefits and services received by such persons. (See 24 CFR 92.209(c)(2)(ii) and 91.220(I)(2)(vii)).
- If applicable, a description of any preference or limitation for rental housing projects. (See 24 CFR 92.253(d)(3) and CFR 91.220(I)(2)(vii)). Note: Preferences cannot be administered in a manner that limits the opportunities of persons on any basis prohibited by the laws listed under 24 CFR 5.105(a).

Emergency Solutions Grant (ESG)

- 1. Include written standards for providing ESG assistance (may include as attachment)
- 2. If the Continuum of Care has established centralized or coordinated assessment system that meets HUD requirements, describe that centralized or coordinated assessment system.
- 3. Identify the process for making sub-awards and describe how the ESG allocation available to private nonprofit organizations (including community and faith-based organizations).
- 4. If the jurisdiction is unable to meet the homeless participation requirement in 24 CFR 576.405(a), the jurisdiction must specify its plan for reaching out to and consulting with homeless or formerly homeless individuals in considering policies and funding decisions regarding facilities and services funded under ESG.
- 5. Describe performance standards for evaluating ESG.