



PY2022 Consolidated Annual Performance and Evaluation Report (CAPER)

DRAFT

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CR-05 - Goals and Outcomes

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

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

Adams County is an entitlement jurisdiction receiving annual entitlement grant funds from the US Department of Housing and Urban Development (HUD). In PY 2022, the County was allocated \$1,417,617 in CDBG and \$1,307,955 in HOME entitlement funds. Together with other local resources, these funds help the County address the housing and community development objectives outlined by HUD. CARES Act CDBG-CV funds continued to be utilized by the County, and CARES Activities are reported further below in this section. Below are highlights of accomplishments in PY 2022.

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) and energy efficiency programs. There were 17 LMI households assisted in total across Brighton, Federal Heights, Northglenn and unincorporated Adams County. Code enforcement activities in Federal Heights had a citywide benefit of 14,370 persons. The program addresses safety and health concerns of rental housing by bringing rental properties into code compliance, ultimately reducing deterioration of neighborhoods, and avoiding slum and blight in Federal Heights. For the HOME program, there were 2 LMI households assisted with new rental unit construction activities in PY 2022. Due to the nature of multi-year projects in the HOME program, there were several other ongoing development activities, however; HOME benefits are only reported when an activity has been completed. Currently, HOME activities in progress are new rental constructions at Crossing Pointe South and TBRA rental assistance with the Brighton Housing Authority.

Public Facility & Infrastructure Improvements: The County was able to fund public improvement activities that benefitted an estimated 8,450 persons living in LMI areas in Adams County. These activities included the completion of the Sherrelwood ADA Sidewalks and Ramps and the Brighton Historic City Hall ADA Bathroom improvements.

Public Services: The County assisted 117 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. The County also provided public services for persons at-risk of homelessness, and these are reported below with CARES Accomplishments.

CARES Accomplishments: In PY 2022, the County continued to fund various programs with CDBG-CV funds which helped to prevent, prepare for and respond to the COVID-19 pandemic. While these programs were started in previous program years, the programs remain open and funded. These programs include the Intervention DV Program, Colorado Legal Services, and the Shiloh House Unaccompanied Refugee Minors Program. In total, these activities assisted 115 persons. Intervention provided financial assistance to 17 victims of reported domestic violence and alleviated the effects of financial abuse regarding housing payments, food security, broadband access, and utility bills. Colorado Legal Services provided vital legal services to 71 persons, focusing on homeless individuals or those experiencing economic, housing and health instability due to the COVID-19 pandemic. Shiloh House assisted 2 homeless youth with finding a safe place to stay while they were out of-home and provided physical and mental health services. Finally, the Brighton Housing Authority Domestic Violence Program assisted 25 more persons with emergency and supportive housing services in PY 2022.

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

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

Goal	Category	Source	Indicator	Unit of Measure	Expected – Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected – Program Year	Actual – Program Year	Percent Complete
Construction of New Rental Housing	Affordable Housing	HOME	Rental units constructed	Household Housing Unit	150	8	5.33%	60	2	3.33%
Emergency Housing and Shelter for the Homeless	Homeless	CDBG	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	0	0	0.00%			
Emergency Housing and Shelter for the Homeless	Homeless	CDBG	Homeless Person Overnight Shelter	Persons Assisted	144	307	213.19%			
Emergency Housing and Shelter for the Homeless	Homeless	CDBG	Homelessness Prevention	Persons Assisted	0	117	100.00%	27	117	433.33%
Expanding and Preserving Homeownership	Affordable Housing	HOME	Homeowner Housing Rehabilitated	Household Housing Unit	0	0	0.00%	8	0	0.00%
Expanding and Preserving Homeownership	Affordable Housing	HOME	Direct Financial Assistance to Homebuyers	Households Assisted	50	1	2.00%			

Preservation of Existing Housing Stock	Affordable Housing	CDBG HOME	Rental units rehabilitated	Household Housing Unit	0	0	0.00%			
Preservation of Existing Housing Stock	Affordable Housing	CDBG HOME	Homeowner Housing Rehabilitated	Household Housing Unit	38	95	250.00%	30	17	56.67%
Preservation of Existing Housing Stock	Affordable Housing	CDBG HOME	Housing Code Enforcement/Foreclosed Property Care	Household Housing Unit	625	43110	6897.60%	625	14370	2299.20%
Public Facility Improvements	Non-Housing Community Development	CDBG	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	7484	23281	311.07%	10580	8450	79.87%

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

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

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

TBRA assistance through the Brighton Housing Authority. CARES Act funds are summarized below and detailed in the CR-15.

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

Housing Program (MHR & Code Enforcement): \$347,391.73 (42.2%)

Public Infrastructure Improvements: \$259,600.76 (31.5%)

Public Services (Housing Respite Program): \$59,571.65 (7.2%)

Admin of the CDBG Program: \$156,513.74 (19.0%)

Total CDBG in PY 2022: \$823,077.88

Section 108 Loan: The County also corrected \$10,000,000 in Section 108 loans for the Globeville remediation project during PY 2022. The total drawn for this project was \$10,000,000, and the activity was finally completed in IDIS on July 10, 2023. Section 108 Loan principal repayments and repayments of loan interest were then made in the amount of \$10,094,566.66.

CARES Act Funds

The County funded several public service programs with CDBG-CV funds. These programs include the Intervention DV Program, Colorado Legal Services, and the Shiloh House Unaccompanied Refugee Minors Program. The total amount expended for these activities in PY 2022 was \$140,781.71 which brings total expenditures in the CV program to \$475,113.89. This leaves a remaining balance of \$1,174,907.11 for CDBG-CV.

PY 2022 Actual Goal Accomplishments and Proposed Goal Outcomes Comparison

Construction of New Rental Housing: The County had a goal for 60 Rental units constructed, and 2 units were completed. The County is still in the process of funding and developing new rental construction at 4220 E 104th Ave. (Crossing Pointe South) that will help to satisfy this goal.

Expanding and Preserving Homeownership: The County had a goal to assist 8 LMI households with housing rehab activities, but unfortunately there were no LMI households through the Household Housing Unit (ECLT) program in PY 2022 as the County focused on TBRA and new rental construction activities. The ECLT program's goal was to renovate homes to standard safe and decent quality by installing new bathrooms, kitchens, flooring, water heaters and furnaces, windows where needed, interior and exterior doors, light fixtures and paint, etc.

Preservation of Existing Housing Stock: The County had a goal to assist 30 LMI households with housing rehab activities through the Minor Home Repair (MHR) program, and assisted 17 LMI households. The program is designed to maintain safe homes, preserve and improve the quality of

the existing housing stock, assist seniors to age in-place, and/or the disabled to remain in their homes.

Preservation of Existing Housing Stock: The County had a goal to assist 625 households with Housing Code Enforcement in Federal Heights and code enforcement activities had an area-wide benefit of 14,370 persons. The activity addresses safety and health concerns of rental housing by bringing rental properties into code compliance, ultimately reducing deterioration of neighborhoods and avoiding slum and blight.

Public Facility Improvements: The County had a goal of 10,580 persons assisted through public infrastructure improvements in Adams County, and this goal was nearly met with 8,450 persons living in LMI areas in Adams County. These activities included the completion of the Sherrelwood ADA Sidewalks and Ramps and the Brighton Historic City Hall ADA Bathroom improvements.

Emergency Housing and Shelter for the Homeless: The County had a goal to assist 27 individuals with the Respite Housing Program, and exceeded this goal by assisting 117 LMI persons. The intent of diversion through Respite Housing is to give those who are at-risk or already homeless a positive alternative to entering emergency shelter. The County also assisted 115 persons with homeless services using CDBG-CV funds.

CR-10 - Racial and Ethnic composition of families assisted

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

91.520(a)

	CDBG	HOME
White	216	0
Black or African American	8	1
Asian	7	0
American Indian or American Native	5	0
Native Hawaiian or Other Pacific Islander	1	0
Total	237	1
Hispanic	115	1
Not Hispanic	134	1

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

Narrative

DATA NOTE: The Table above does not include a category for people of “other or multiple races” and activities that benefitted area-wide populations, therefore the numbers in the above table do not necessarily match the number of people actually served through the County’s CPD programs.

According to the 2018-2022 American Community Survey (ACS) 5-year estimates, the population of Adams County was 520,149 persons. A majority of the population was White (65.8%), followed by Asian with 4.0% of the population and Black or African American with 3.5%. The rest of the population was 1.4% Native American Indian or Alaska Native (AIAN) and 0.2% were Native Hawaiian or Pacific Islander. Persons who identified as “some other” race made up 9.3% of the population, and “Two or more” races were 15.9%. Persons identifying as ethnically Hispanic were 41.4% of the population. The following is an assessment of how program services reached minority populations.

CDBG: The table above only reported 237 persons assisted with CDBG, however the actual total was 249 persons served during PY 2022 for activities reporting race/ethnicity. The data table does not include a category for “Other multi-racial” of which the County also assisted 12 persons. For all persons reporting by race in the CDBG program, the following demographics were recorded: 86.7% White; 3.2% Black; 2.8% Asian; 2.0% AIAN and 0.4% Native Hawaiian/Other Pacific Islander. There were also 4.8% reporting as “Other multiracial”. For ethnicity, 46.2% reported as Hispanic. With the exception of Asian persons, the County assisted minority groups adequately and CDBG benefits were generally in line with the County demographic estimates. The County will continue to make efforts to include minority racial/ethnic groups in CDBG program, and in particular for Asian persons.

HOME: HOME program accomplishments are only counted if the activity has been completed in the program year. In PY 2022, there were two (2) households assisted with new rental development at the

Maiker Housing Partners Caraway site. One household identified as Black or African American and the other household s “Other multi-racial. By ethnicity, one of the households identified as Hispanic. There are several open HOME activities that will be reported in the upcoming year’s CAPER report, and they include new rental construction units and TBRA.

Housing Needs Assessment

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

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

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

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

Housing problems exist among minority groups across all income levels. The CDBG MHR program assisted 17 LMI households in PY 2022, and 12 were White, and 5 were Other multi-racial. By Ethnicity, 4 of these households were Hispanic. Two households were assisted with new rental housing development in the HOME program and one identified as Black or African American and the other household as “Other multi-racial”. In comparing the disproportionate needs of certain racial/ethnic groups as described by the Needs Assessment to the beneficiary outcomes provided, the County has identified a need to reach more Black or African American and Asian households. Hawaiian or Pacific Islander households also need assistance; however, it should be noted this group is small.

CR-15 - Resources and Investments 91.520(a)

Identify the resources made available

Source of Funds	Source	Resources Made Available	Amount Expended During Program Year
CDBG	public - federal	1,732,070	17,917,645
HOME	public - federal	3,111,893	959,549

Table 3 - Resources Made Available

Narrative

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

For CDBG, there was \$1,732,070 in funds made available for program use. Sources were \$1,477,499 from the annual allocation, and \$254,621 from prior year resources. In the program year, the County expended \$17,917,645, however it should be noted that the vast majority of these funds were from draws associated with the Section 108 Loan (\$8,000,000) and Loan Repayments (\$9,094,567). A total of \$823,078 in CDBG EN funds were drawn during the program year and were used for the Minor Home Repair (MHR) program, public infrastructure improvements throughout the county, the Housing Respite Program public service, code enforcement activities in the City of Federal Heights, and admin of the CDBG program. Expenditures by priorities are described below and in the CR-05.

Housing Program (MHR & Code Enforcement): \$347,391.73 (42.2%)

Public Infrastructure Improvements: \$259,600.76 (31.5%)

Public Services (Housing Respite Program): \$59,571.65 (7.2%)

Admin of the CDBG Program: \$156,513.74 (19.0%)

Total CDBG in PY 2022: \$823,077.88

Section 108 Loan:

Globeville Remediation: \$10,000,000

Section 108 Loan principal repayments and loan interest: \$10,094,566.66.

For HOME, there were \$3,111,893 in funds made available for program use. Sources were \$1,307,955 from the annual allocation, and \$1,803,938 from prior year resources. In the program year, the County expended a total of \$959,549, including funds from fiscal years 2016, 2018, 2019, 2020 and 2021. Funds were utilized for new rental construction, TBRA, and HOME admin. See below for a breakdown of HOME funds by activity:

New Rental Construction: \$750,000.00 (78.2%)

Tenant-Based Rental Assistance: \$172,442.00 (18.0)

HOME Admin: \$37,106.92 (3.9%)

Total HOME in PY 2022: \$959,548.92

CARES Act Funds

The CARES Act Allocation for CDBG-CV was awarded in two rounds with \$830,131 for CDBG-CV1 and \$819,890 for CDBG-CV3 for a total of \$1,650,021. The County funded several public service programs with CDBG-CV funds. These programs were the Intervention DV Program, Colorado Legal Services, and the Shiloh House Unaccompanied Refugee Minors Program. The total amount expended for these activities in PY 2022 was \$140,781.71, which brings total expenditures in the CV program to \$475,113.89. This leaves a remaining balance of \$1,174,907.11 for CDBG-CV. The PR26 CDBG-CV Financial Report has been attached to the CR-00 to confirm these expenditures.

HOME-ARP

In September 2021, HUD announced Adams County would receive a HOME-ARP allocation of \$3,848,071. HOME-ARP funds are intended to support qualifying populations who are homeless or at risk of homelessness through eligible activities such as rental housing development, supportive services, administration and planning. The County's HOME-ARP plan was recently submitted in April of 2023, and the County has not drawn any funds yet. The County will continue to report HOME-ARP expenditures throughout the life of the program in future CAPER reports.

FY CDBG Grant Allocation Close-Out

In PY 2022, the County fully expended FY 2018 (B18UC080001) CDBG funds. The final voucher draw for FY 2018 was completed on 8/4/2023. FY 2018 funds were allocated towards LMA, LMC, LMH and LMJ national objectives. The County met all grant requirements and did not exceed the respective planning and administration and public service grant caps of 20% and 15%. The County will contact its HUD office to initiate the grant close out process for FY 2018 CDBG grant funds, as noticed by CPD-22-14.

Identify the geographic distribution and location of investments

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description
City of Brighton	6	31	MHR & Historic City Hall ADA Bathroom
City of Federal Heights	3	6	MHR & Code Enforcement
City of Northglenn	8	15	MHR
City of Thornton	8	0	N/A
City of Westminster	20	0	N/A
County-Wide	54	47	MHR, Public Improvements and Public Services Countywide
Town of Bennett	0	0	N/A

Table 4 – Identify the geographic distribution and location of investments

Narrative

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

The planned allocations for the target areas are displayed above, however due to funds being expended from previous program years to complete activities started prior to PY 2022 and available new funds not yet expended, the actual allocations differ from the planned allocations.

Leveraging

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

CDBG and HOME funded activities are used to leverage a variety of other local and private funds to cover the total cost of projects. CDBG is typically used to leverage locally funded projects and/or help support gaps in funding that meet the goals of the ConPlan. HOME funds are used to leverage Low Income Housing Tax Credit (LIHTC) equity, State of Colorado funds, private equity, and other resources to cover the cost of the development.

Publicly Owned Land Used to Address the Needs in the Plan

In recent years, Adams County has donated land to Maiker Housing Partners and the Brighton Housing Authority. Maiker Housing Partners completed the Caraway Apartments, a new affordable rental housing development in PY 2022.

HOME Program Income

According to the PR09 Receipt Fund Type Detail Report, at the beginning of the reporting period Adams County had \$304,427.64 in program income on hand. These receipted funds are associated with the Homeownership Assistance Program, Minor Home Rehab and CHDO Acquisition/Rehab activities. Funds by program year are:

2018 (PI): \$8,278.15

2019 (PI): \$22,549.68

2020 (PI): \$50,415.14

2021 (PI): \$223,184.67

Total Program Income at beginning of PY 2021 (PI): \$304,427.64

In the program year, the County receipted a total amount of \$276,441.60 and expended \$272,228.51 in HOME program income funds. As a result, the balance on hand at the end of PY 2022 was \$308,640.73. There were no HOME PI funds spent on TBRA.

HOME Match

Adams County encourages applicants to work with the applicable local jurisdictions to provide matching contributions in the form of development incentives for HOME activities. Activities funded by HOME are required to have twenty-five (25%) match funds. To be considered HOME match, the funding must be a non-federal permanent contribution to affordable housing contributed in an eligible manner and properly

documented. All HOME funded projects are encouraged to have program funding match. In FY 2022, Adams County did not report any new match funds; however, there is excess match from prior Federal FYs in the amount of \$7,930,573 which has been documented by the County. According to the PR33 HOME Match Liability Report, the match liability amount for FY 2023 was \$162,553, which reduces the excess match to be carried over to \$7,768,020.

HOME MBE/WBE

There were no new contracts made in PY 2022.

Fiscal Year Summary – HOME Match	
1. Excess match from prior Federal fiscal year	7,930,573
2. Match contributed during current Federal fiscal year	0
3 .Total match available for current Federal fiscal year (Line 1 plus Line 2)	7,930,573
4. Match liability for current Federal fiscal year	162,553
5. Excess match carried over to next Federal fiscal year (Line 3 minus Line 4)	7,768,020

Table 5 – Fiscal Year Summary - HOME Match Report

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

Table 6 – Match Contribution for the Federal Fiscal Year

HOME MBE/WBE report

Program Income – Enter the program amounts for the reporting period				
Balance on hand at begin-ning of reporting period \$	Amount received during reporting period \$	Total amount expended during reporting period \$	Amount expended for TBRA \$	Balance on hand at end of reporting period \$
\$304,428	\$276,442	\$272,229	\$0	\$308,641

Table 7 – Program Income

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

Table 8 - Minority Business and Women Business Enterprises

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

Table 9 – Minority Owners of Rental Property

Relocation and Real Property Acquisition – Indicate the number of persons displaced, the cost of relocation payments, the number of parcels acquired, and the cost of acquisition						
Parcels Acquired						
Businesses Displaced						
Nonprofit Organizations Displaced						
Households Temporarily Relocated, not Displaced						
Households Displaced	Total	Minority Property Enterprises				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
Number						
Cost						

Table 10 – Relocation and Real Property Acquisition

CR-20 - Affordable Housing 91.520(b)

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

	One-Year Goal	Actual
Number of Homeless households to be provided affordable housing units	0	0
Number of Non-Homeless households to be provided affordable housing units	94	19
Number of Special-Needs households to be provided affordable housing units	0	0
Total	94	19

Table 11 – Number of Households

	One-Year Goal	Actual
Number of households supported through Rental Assistance	0	0
Number of households supported through The Production of New Units	60	2
Number of households supported through Rehab of Existing Units	34	17
Number of households supported through Acquisition of Existing Units	0	0
Total	94	19

Table 12 – Number of Households Supported

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

Table 1 - Household Type

The first table shows the program year goals for assistance by household type. The County had a goal to assist 94 LMI Non-Homeless households with affordable housing activities. This includes goals for 26 households to be assisted through owner-occupied housing rehab in the CDBG Minor Home Repair (MHR) program. The goal also include 8 households assisted with rental-occupied housing rehab through the HOME ECLT program and the construction of new rental units with HOME funds for 60 households at Brinshore Development.

Through the MHR program, the County assisted 17 LMI owner-occupied households assisted in Brighton, Federal Heights, Northglenn and unincorporated Adams County. Several activities are still open and the County anticipates these activities will be reported in the upcoming program year.

For HOME programs, there were 2 LMI renter households assisted with the development of new rental housing at The Caraway by Maiker Housing Partners. Due to the nature of multi-year development projects, the goal for 60 LMI renter households through the planned Brinshore Development was not completed yet. The County will continue to monitor this development and report its progress in the upcoming program year. Unfortunately there were also no housing rehab activities completed as the County focused on completing rental housing development and working with the Brighton Housing Authority and their TBRA program. These activities remain in progress, and as they are completed, accomplishments will help to meet the established goals for HOME.

Table 2 - Unit Type

The second table show the program year goals for assistance by affordable housing project type. The County had a goal to assist 60 LMI households with the production of new housing units, and this goal was not yet completed. The County assisted 2 LMI households with the Maiker Housing Partners - The Caraway development. Maiker Housing Partners is still developing this 206 unit project, Crossing Pointe South, and the County anticipates this project will be completed in the upcoming program year. There are another 60 affordable units planned at the Brinshore Development in Commerce City. The development is 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.

There was a goal to assist 26 LMI homeowner households with housing rehab through the MHR program, and the County assisted 17 households. Finally, there was a goal to assist 8 LMI households through housing rehab funded through the HOME ECLT Homeownership Rehabilitation Program. This activity is in development by the ECLT and not yet completed.

Discuss how these outcomes will impact future annual action plans.

Adams County continues to prioritize the need for affordable housing development and preservation as planned in its Annual Action Plans. The outcomes for PY 2022 continue to demonstrate that the County is making efforts to meet its overall affordable housing. As such, the County will continue to fund programs such as the CDBG Minor Home Repair program, HOME affordable rental housing developments and HOME CHDO activities that help to increase and preserve the affordable housing stock in Adams County. HOME activities are only reported in the year they are completed, and the County will make sure to track these accomplishments in future CAPER reports. The affordable housing goals in this section will continue to have outcomes in future plans.

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

Number of Households Served	CDBG Actual	HOME Actual
Extremely Low-income	5	0
Low-income	7	2
Moderate-income	5	0
Total	17	2

Table 13 – Number of Households Served

Narrative Information

For CDBG, there were 17 households assisted in the CDBG Minor Home Repair (MHR) program across the County. The breakdown of households assisted by income were 5 extremely low-income, 7 low-income and 5 moderate-income households. All the households assisted with MHR were homeowners.

In the HOME program, there were 2 low-income renter households assisted with the development of new rental housing at The Caraway by Maiker Housing Partners.

Worst Case Housing Needs

Those with worst case needs are individuals or households at-risk of or experiencing homelessness and/or are extremely low-income. The County will continue to prioritize and work with partners that assist these groups. In the program year, there were 5 extremely low-income households in the CDBG Minor Home Repair Program (MHR) program. Households served in the MHR program were assisted with housing rehabilitation to maintain the condition of their housing. Households with extremely low-incomes lack the funds to properly upkeep their homes which may promote unsafe conditions and contribute to situations that lead to homelessness.

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

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

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

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

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

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

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

The County's Severe Weather Activation Program (SWAP) provides hotel vouchers for families at risk of homelessness during severe cold weather.

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

Addressing the emergency shelter and transitional housing needs of homeless persons

The County refers to the agencies listed above to address the homeless emergency shelter and transitional housing needs in Adams County. Almost Home has 30 beds and can accommodate up to 6 families. ACCESS Housing has 16 beds for families. As mentioned earlier, these agencies also provide wrap-around services to help individuals and families.

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

The CSWB developed an action plan, Homeward Adams, which has identified the priorities and goals for addressing homelessness and is currently developing the objectives, strategies and action steps needed to implement the plan. The goals and strategies are measurable and subject to evaluation and modification at a minimum of annual reviews. The results of the plan were coordinated effort, with minimal duplication and a continuum of services that reflects the demographics and needs of those experiencing homelessness in Adams County. The taskforce obtained feedback, input, and innovative ideas from all stakeholders in the community including those with lived experience, service providers, first responders, local government and city planners, County commissioners, mayors and representatives of local government and community members. The agenda of these engagements was not only to hear about the need perspective but also to inventory current services available, to create a plan that is in alignment with the stakeholders and to gain support for the action plan. The action plan serves to provide a roadmap for how the County will support, guide, and unite efforts to improve systems, elevate people, and improve neighborhoods. Three overarching focus areas with objectives were identified, which were: homeless prevention, homelessness services and strengthening the housing continuum. The implementation of the plan will be overseen by the CSWB Poverty Reduction team. The plan could be viewed at: <https://www.adcogov.org/sites/default/files/Homeward-Adams.pdf>

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

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

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

While individuals and families who 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:

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

For those likely to be homeless after being discharged from publicly funded institutions or systems of care, the County works together to ensure individuals moving through corrections services and/or discharged, and those who have substance abuse treatment are cared for and served. The County refers individuals to three centers, also known as the half-way house programs, to assist with transition programs to the community and independent living situations. The Intervention Community Corrections Services (ICCS) is a nonprofit corrections agency and helps with community offender programs, substance abuse treatment and reintegration services. CoreCivic Adams and CoreCivic Commerce operate male-only safe facilities that provide education and effective reentry programming so they can return to the community successfully.

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

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

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

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

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

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

Actions taken to address the needs of public housing

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

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

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

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

Actions taken to provide assistance to troubled PHAs

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

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

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

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

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

Goals

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

Policies

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

Past Actions

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

affordable housing.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Adams County leads a HOME Consortia with the City of Westminster, the City of Commerce City, and the City of Thornton. A percentage of the County's annual HOME allocation is reserved for 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 funding to:

- Community Development Housing Organizations (CHDO)
- Local housing authorities;
- Non-profit housing developers; and
- For-profit developers.

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

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

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

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

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

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

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

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

To address these impediments to fair housing the County developed a Fair Housing Action Plan as part the AI, which lists recommended action items on what the County can reasonably do to address these impediments and affirmatively further fair housing in Adams County. These actions can be viewed in the full documents on the County's website at: <https://www.adcogov.org/resources-reports>

Actions Taken

In PY 2022, the County worked to address the following impediments identified in the AI:

Shortage of affordable, accessible housing units: Through the HOME program, activities in progress are a new rental construction at Crossing Pointe South in Thornton which will provide 206 units when completed, and TBRA rental assistance with the Brighton Housing Authority. Additionally, construction of Brinshore Development's rental housing at South Platte Crossing will provide 60 units of permanently affordable rental housing. These activities will be reported in upcoming CAPERs when they are completed.

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

Lack of resources to address poor housing conditions: During PY 2022, the County assisted 17 LMI households with the preservation of existing housing stock through the Minor Home Repair (MHR) program. The LMI households were assisted in this way in Brighton, Federal Heights, Northglenn and all throughout the County. The program is designed to maintain safe homes, preserve and improve the quality of the existing housing stock, assist seniors to age in-place, and/or the disabled to remain in their homes. The County also helped fund code enforcement activities that benefitted LMI areas in Federal Heights.

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

CR-40 - Monitoring 91.220 and 91.230

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

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

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

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

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

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

MBE/WBE and Section 3

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

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

Citizen Participation for PY 2022

Adams County adheres closely to its HUD approved Citizen Participation Plan (CPP) which guides the County in providing constituents with adequate opportunity to participate in the development of plans and review of performance reports as per 24 CFR 91.105. The County pursued a variety of outreach efforts to notify, inform, and include the public in the 2022 Annual Action Plan (AAP) development. These efforts included conversations with service providers and key partners, placing announcements in the local newspapers, meetings with Urban County and HOME Consortia members, posting information on the County's webpage, and holding a public comment period and a public hearing. It also encouraged the participation of those in specialized populations such as non-English speaking, persons with disabilities, residents of public housing, low-income residents, and seniors. Information regarding the draft AAP and the proposed 2022 activities was available on the County's website for public comment for more than 30 days. This period was followed by a public hearing to approve the final plan for submittal to HUD. Stakeholders engaged throughout the process include Maiker Housing Partners, Growing Home, Adams County Homelessness Task Force, Family Tree, Adams County Education Consortium, Adams 12 Student and Family Outreach Program, Adams County Workforce and Business Center, and CASA.

The following outreach efforts were made: 1.) 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, 2.) 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, 3.) The County held a Public Hearing on July 26, 2022 at 9:30 AM at the BOCC to review and discuss the AAP, 4.) The County held a second 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. No comments were received at the public meeting, public comment periods, or at the public hearing.

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

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

To meet the requirements for citizen participation for the PY 2022 CAPER, the County gave notice in the local paper and on its website that the draft CAPER report would be available for a public comment and review period and a public hearing at a regularly scheduled Board of County Commissioners meeting to discuss the CAPER. Below are directions on how citizens can participate in the review of the draft CAPER.

PUBLIC COMMENT PERIOD: The County held a 15-day public comment period starting from **January 25, 2024 to February 13, 2024**. The draft CAPER is available to view at the following locations:

ADDRESS: Housing Policy & Community Investments Division, Adams County Government Center, 4430 S. Adams County Pkwy, Brighton, CO 80601

ONLINE: <https://www.adcogov.org/HPCI>

A summary of comments will be provided after the public comment period.

PUBLIC HEARING: A public hearing was held **February 13, 2024 at 9:30 AM** to approve the draft CAPER. Public Hearings are held in the First Floor Public Hearing Room at the Adams County Government Center located at 4430 S Adams County Parkway, Brighton, CO. The public hearing will also be held at online at <https://adcogov.legistar.com/Calendar.aspx>. Residents are encouraged to attend and participate.

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

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

CR-45 - CDBG 91.520(c)

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

The PY 2022 CAPER is the third reporting year for the County's 2020-2024 Consolidated Plan and there were no changes to the original Strategic Plan priorities or goals. The County will continue to improve internal processes and keep working on maximizing CDBG and HOME to its fullest potential. Adams County staff continue to improve and will be increasingly effective in properly directing funds to activities that have the greatest impact on the community's quality of life.

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

CDBG-CV

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

The COVID-19 pandemic continued to present health and safety concerns in PY 2022, and the County worked to meet the goals established for the CDBG-CV program to address these concerns. CDBG-CV funds were targeted towards COVID-19 emergency response activities such as homeless prevention and other vital services for the most vulnerable groups in the County. These include persons at-risk of homelessness, abused or neglected children, and victims or those fleeing domestic violence.

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

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

No

CR-50 - HOME 24 CFR 91.520(d)

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

Please list those projects that should have been inspected on-site this program year based upon the schedule in 24 CFR §92.504(d). Indicate which of these were inspected and a summary of issues that were detected during the inspection. For those that were not inspected, please indicate the reason and how you will remedy the situation.

During PY 2022, Adams County inspected a total of 61 units across 19 HOME funded rental sites. HOME staff provides technical assistance to all property owners/managers and notifies them of their annual obligations (i.e., rent rolls, financial audits, affirmative marketing plan, etc.) for desktop monitoring. They are also made aware of on-site monitoring which will take place at a minimum of every 3 years. Monitoring determines if units under the affordability period are in compliance, have concerns or if there are findings. Units with findings have deficiencies in program performance based on statutory or regulatory requirements, and/or property standards for which corrective action is required. The following summaries are provided for each of the 19 sites inspected and a full report of all units has been attached in the CR-00.

Alto A Apts, 3045 W 71st Ave, Westminster; Inspected 7/27/2023 (5 units); 1 concern and 2 findings for affordability. Corrective action initiated. All property standards compliant.

Baker School Apts, 3555 W 64th Ave, Denver; Inspected 7/20/2023 (4 units); 2 findings for affordability. Corrective action initiated. All property standards compliant.

Creekside Place Apts, 9189 Gale Boulevard, Thornton; Inspected 7/18/2023 (2 units); 2 findings for affordability. Corrective action initiated. All property standards in compliance.

Crossing Pointe N Apts, 4220 East 104th Ave, Thornton; Inspected 8/3/2023 (2 units); All units were in compliance with affordability and property standards.

Four-Plex Acquisition, 1481 West 71st Place, Denver; Inspected 7/27/2023 (4 units); 2 concerns with affordability and 2 concerns with property standards. No action required but recommended.

Greenleaf Apts, 1571 Beeler St, Aurora; Inspected 7/10/2023 (3 units); 3 findings for affordability. Corrective action initiated. All property standards compliant.

Holly Gardens, Holly St, Commerce City; Inspected 8/8/2023 (8 units); 1 findings for affordability. Corrective action initiated. All property standards compliant.

Hughes Station Apts, 233 N Main St, Brighton; Inspected 8/1/2023 (2 units); 2 findings for affordability. Corrective action initiated. All property standards compliant.

Jessup Duplexes, 539-585 E Jessup St, Brighton; Inspected 8/1/2023 (4 units); All units were in compliance with affordability and property standards.

Libretto Apts, 575 S 8th Ave, Brighton; Inspected 8/1/2023 (3 units); All units were in compliance with affordability and property standards.

Orchard Hill Apts, 1353 W 88th Ave, Thornton; Inspected 7/18/2023 (2 units); 2 findings for affordability. Corrective action initiated. All property standards compliant.

Prairie Creek Senior Living, 56175 Sunset Ave, Strasburg; Inspected 7/24/2023 (1 units; 1 finding for affordability. Corrective action initiated. All property standards compliant.

Prairie Rose Plaza, 6285 Kearney St, Commerce City; Inspected 7/31/2023 (4 units); All units were in compliance with affordability and property standards.

Panorama Pointe, 8310 Clay St, Westminster; Inspected 7/11/2023 (2 units); 2 findings for affordability. Corrective action initiated. All property standards compliant.

Rockview Terrace, 388 East 88th Ave, Thornton; Inspected 7/20/2023 (2 units); 1 finding for affordability. Corrective action initiated. All property standards compliant.

Village of Yorkshire Apts, 10370 Brendon Way, Thornton; Inspected 8/3/2023 (5 units); 3 findings for affordability. Corrective action initiated. All property standards compliant.

Vistas at Panorama Pointe, 8305 Alcott St, Westminster; Inspected on 7/11/2023 (3 units); 3 findings for affordability. Corrective action initiated. 1 concern with property standards as the 3rd unit did not receive an inspection. Will review.

Westchester Apts, 7240 Newton St, Westminster; Inspected 7/7/2023 (3 units); 1 finding for affordability. Corrective action initiated. All property standards compliant.

Westminster Commons, 3180 W 76th Ave, Westminster; Inspected 7/13/2023 (3 units); All units were in compliance with affordability and property standards.

Provide an assessment of the jurisdiction's affirmative marketing actions for HOME units. 24 CFR 91.520(e) and 24 CFR 92.351(a)

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

The County will provide technical assistance as needed, but all HOME projects must have an approved affirmative marketing plan. Furthermore, as part of the HOME monitoring, the County annually requests and reviews HOME recipients affirmative marketing plan to ensure continued HOME compliance. In PY 2022, the County has determined that all current open activities are compliant with affirmative marketing actions for HOME units.

HOME MBE/WBE

There were no new contracts made in PY 2022, and therefore no MBE/WBE contracts.

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

According to the PR09 Receipt Fund Type Detail Report, at the beginning of the reporting period Adams County had \$304,427.64 in program income on hand. These receipted funds are associated with the Homeownership Assistance Program, Minor Home Rehab and CHDO Acquisition/Rehab activities. Funds by program year are:

2018 (PI): \$8,278.15

2019 (PI): \$22,549.68

2020 (PI): \$50,415.14

2021 (PI): \$223,184.67

Total Program Income at beginning of PY 2021 (PI): \$304,427.64

In the program year, the County receipted a total amount of \$276,441.60 and expended \$272,228.51 in HOME program income funds. As a result, the balance on hand at the end of PY 2022 was \$308,640.73. There were no HOME PI funds spent on TBRA.

Describe other actions taken to foster and maintain affordable housing. 24 CFR 91.220(k) (STATES ONLY: Including the coordination of LIHTC with the development of affordable housing). 24 CFR 91.320(j)

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

Adams County has implemented a more robust underwriting and subsidy layering review and will not commit HOME funds nor recommend projects to the Board of County Commissioners unless an applicant has secured all necessary funding. In line with this approach, and to continue fostering and maintaining affordable housing in Adams County. Multifamily projects typically require LIHTC, thus, the County works

closely with the developers in coordinating efforts for project feasibility. Additionally, the County is in the process of developing a local Housing Trust Fund (HTF), a specific strategy outlined in the Balanced Housing Plan and Housing Needs Assessment, with local funds to further support affordable housing.

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

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

HOME-ARP

In September 2021, HUD announced Adams County would receive a HOME-ARP allocation of \$3,848,071. HOME-ARP funds are intended to support qualifying populations such as the homeless through eligible activities such as rental housing development, supportive services, administration and planning. The County's HOME-ARP plan was recently submitted in April of 2023, and the County has not drawn any funds yet. The County will continue to report HOME-ARP expenditures throughout the life of the program in future CAPER reports.

The County has determined to use the bulk of the funds for the development or acquisition of non-congregate shelters (NCS). This was identified through the plan's community needs assessment, using both analyzed data and the stakeholder feedback as it relates to the current trends and highest needs. Nearly all of the stakeholders recognized the need for NCS in the community to assist with those households and individuals who are literally homeless. This was also seen in the data that was analyzed. The County recognizes that there are significant needs throughout the region for each of the HOME-ARP eligible activities; however, for this one-time allocation, the County will pursue a long-term solution via NCS development. The County will administer the program directly and will determine projects and developers through a request for proposal process. These projects will be determined based on their ability to deliver on the priority needs identified within this plan.

CR-58 - Section 3

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

Total Labor Hours	CDBG	HOME
Total Number of Activities	1	0
Total Labor Hours	709	0
Total Section 3 Worker Hours	16	0
Total Targeted Section 3 Worker Hours	0	0

Table 14 – Total Labor Hours

Qualitative Efforts - Number of Activities by Program	CDBG	HOME
Outreach efforts to generate job applicants who are Public Housing Targeted Workers	0	0
Outreach efforts to generate job applicants who are Other Funding Targeted Workers.	0	0
Direct, on-the job training (including apprenticeships).	0	0
Indirect training such as arranging for, contracting for, or paying tuition for, off-site training.	0	0
Technical assistance to help Section 3 workers compete for jobs (e.g., resume assistance, coaching).	0	0
Outreach efforts to identify and secure bids from Section 3 business concerns.	1	0
Technical assistance to help Section 3 business concerns understand and bid on contracts.	0	0
Division of contracts into smaller jobs to facilitate participation by Section 3 business concerns.	0	0
Provided or connected residents with assistance in seeking employment including: drafting resumes, preparing for interviews, finding job opportunities, connecting residents to job placement services.	0	0
Held one or more job fairs.	0	0
Provided or connected residents with supportive services that can provide direct services or referrals.	0	0
Provided or connected residents with supportive services that provide one or more of the following: work readiness health screenings, interview clothing, uniforms, test fees, transportation.	0	0
Assisted residents with finding child care.	0	0
Assisted residents to apply for, or attend community college or a four year educational institution.	0	0
Assisted residents to apply for, or attend vocational/technical training.	0	0
Assisted residents to obtain financial literacy training and/or coaching.	0	0
Bonding assistance, guaranties, or other efforts to support viable bids from Section 3 business concerns.	0	0
Provided or connected residents with training on computer use or online technologies.	0	0
Promoting the use of a business registry designed to create opportunities for disadvantaged and small businesses.	0	0

Outreach, engagement, or referrals with the state one-stop system, as designed in Section 121(e)(2) of the Workforce Innovation and Opportunity Act.	0	0
Other.	0	0

Table 15 – Qualitative Efforts - Number of Activities by Program

Narrative

This section reports on Section 3 eligible activities in PY 2022.

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

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

Section 3 activities cover housing rehab/construction and public improvement construction activities assisted under HUD grant programs that provide housing and community development financial assistance that exceeds a threshold of \$200,000 per activity. A \$100,000 activity threshold applies to grants under HUD's Lead Hazard Control and Healthy Homes programs.

In PY 2022, there was one (1) activity that met the Section 3 reporting threshold. Under the CDBG program, activity #2126 City of Brighton City Hall ADA Bathroom Improvements reported total labor hours of 709 hours. Section 3 workers only worked 16 of those hours, which did not meet the safe harbor benchmark of 25% of hours to be performed by Section 3 workers. While this benchmark was not reached, the County and the City of Brighton did make outreach efforts to identify and secure bids from Section 3 business concerns.