

U. S. Department of Housing and Urban Development



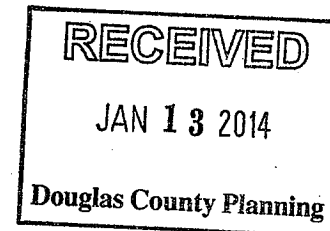
Community Planning and Development

Region VIII, Denver
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JAN 10 2014

Chairman Jack Hilbert
Douglas County
100 Third Street
Castle Rock, CO 80104



Dear Chairman Hilbert:

Community Planning and Development (CPD) is striving to strengthen its working relationship with our State and local government partners to help achieve greater results in meeting the housing and community development needs of our low- and moderate-income customers. One of our important responsibilities in this ongoing process is the periodic assessment of your accomplishments and performance in the administration of funds provided by CPD and in meeting key program and Departmental objectives, as mandated by the statutes governing these programs.

This review examines information provided by Douglas County for its 2012 program year. In conducting this assessment, we examine your activities for consistency with the priorities and objectives outlined in the Consolidated Plan and Annual Action Plan. We use the information contained in the Consolidated Annual Performance and Evaluation Report (CAPER), and the Integrated Disbursement Information System (IDIS) as well as any monitoring reviews conducted during the course of the program year. Our assessment report that is enclosed covers the following areas

- Meeting the statutory purposes of the programs
- Consistency with strategies and goals in the Consolidated Plan and Annual Action Plan
- Performance Measures
- Fair Housing and Equal Opportunity
- Timeliness
- Caps on Obligations – CDBG-Administration, Public Service
- IDIS – Consistency and accuracy of data and reports
- Homeless

Based upon our analysis and examination of the data available to us, we have determined that Douglas County's overall progress has improved during the current program year. The 60 day timeliness test conducted on June 2, 2013, resulted in the county having a 1.05 grant years of

funds remaining in the Line of Credit, well below the 1.5 grant years allowed by regulation. We encourage the county to continue to meet this important measure of performance.

The county was monitored by the CPD Representative during the week of June 18, 2012 through June 22, 2012 for compliance of the CDBG and CDBG-R Programs. The visit concluded with two findings which the county has since cleared. With the exception of the two findings, the county during the period August 1, 2012 through July 31, 2013 has carried out its program substantially as described in its Consolidated Plan, and is working to carry out its approved program in a timely manner. These conclusions on your overall program performance are based solely upon the information available to this office and do not constitute a comprehensive evaluation or approval of specific activities.

You have the opportunity to provide us with your review and comment on the draft Annual Community Assessment. Please provide any review and comment within 30 days of the date of this letter. We may revise the Assessment after considering your views. If we do not receive any response by the end of the 30-day period, the draft Annual Community Assessment will become final without further notice.

The final Annual Community Assessment must be made readily available to the public. You can assist us in this regard by sharing the final Annual Community Assessment with the media, with a mailing list of interested persons, with members of your advisory committee, or with those who attended hearings or meetings. You must also provide a copy of the final Annual Community Assessment to your independent public auditor. HUD will make the final Annual Community Assessment available to the public upon request and may provide copies to interested citizens and groups.

If you have any questions, please do not hesitate to contact me or Mary Ann Geissel, Community Planning and Development Representative. We can be reached at (303) 672-5414.

Sincerely,

for  

LeRoy Brown
Director

Enclosure

cc: Jennifer Eby
Community and Resource Services Manager

✓ cc: Tina Dill
CDBG Administrator

ANNUAL COMMUNITY ASSESSMENT

JURISDICTION - Douglas County, Colorado

PROGRAM YEAR START - August 1, 2012

PERIOD COVERED BY ASSESSMENT – August 1, 2012 through July 31, 2013

HUD is required to conduct an annual review of performance by grant recipients according to the provisions of the Housing and Community Development Act and the National Affordable Housing Act. We must determine that each recipient complies with the statutes and has the continuing capacity to implement and administer the programs for which assistance is received. This is to report the results of our review of the 2012 program year Community Development Block Grant (CDBG) performance by the Douglas County Community Planning and Sustainable Development, Planning Services Division.

Part I. Summary of Consolidated Plan/Action Plan Review and Assessment

Douglas County is meeting the primary objective of the CDBG Program, which is the development of viable urban communities by providing decent housing and a suitable living environment and expanding economic opportunities, principally for persons of low and moderate income. Consistent with this primary objective, not less than 70 percent of the aggregate of the federal assistance shall be used for the support of activities that benefit persons of low-and moderate-income (LMI). Douglas County reports on this objective annually, and the county expended 100 percent of the federal funds in the current program year to benefit LMI persons. This indicates the county is providing low- to moderate-income benefit well beyond the required 70 percent overall benefit for the certification period.

Projects funded in the current year are consistent with strategies and goals in the Consolidated Plan and Annual Action Plan. The county was monitored by the CPD Representative during the week of June 18, 2012 through June 22, 2012 for compliance of the CDBG and CDBG-R Programs. The visit concluded with two findings which the county has since cleared.

Douglas County includes the performance measure indicators as prescribed by HUD in the narrative of accomplishments. In addition, the HUD Integrated Disbursement and Information System (IDIS) reports reveal Douglas County is inputting these measurements into the system as required.

It appears the county continues to possess a variety of resources to leverage its CDBG funds. We congratulate Douglas County on meeting the goals as set out in the Consolidated Plan.

Part II. Summary of Grantee Performance

Fair Housing and Economic Opportunity (FHEO)

A review of the Douglas County's 2012 Consolidated Annual Performance and Evaluation Report (CAPER) has been completed by the HUD Office of Fair Housing. The review indicated the county is low risk and is sufficiently documenting its affirmative efforts to involve racial and ethnic minorities specifically in the citizen participation process. The county should provide more information for projects such as street improvements, sidewalks, parks, etc., that received funding during the current program year and provide a description of the census tracts for the location of such projects.

The county has completed an updated 2011 Analysis of Impediments to Fair Housing Choice along with a supplemental report to address the public transit services. Our review of the CAPER indicates Douglas County is committed to continuing its efforts to affirmatively further fair housing and to obtaining a balanced living pattern within its community. The county is in the process of updating its 2012 Analysis of Impediments.

CDBG

The regulations require that sixty days prior to the end of the grantee's current program year the amount of entitlement grant funds available, but undisbursed by the U.S. Treasury, be not more than 1.5 times the entitlement grant amount for the current program year. The county had 1.05 grant years of funds remaining in the Line of Credit, therefore meeting the timeliness requirement. We congratulate you on being timely and urge you to continue to meet this important measure of performance.

The county obligated \$136,627.12 in program year 2012 for planning and administration which is under the 20 percent program limitation. Public service obligations are likewise limited to 15 percent of grant funds and include prior year program income. The county obligated \$101,457.71 (13.32 percent) of the funding to public service activities in 2012 which is under the 15 percent cap.

The Douglas County Consolidated Annual Performance and Evaluation Report CDBG Financial Summary Report (PR 01) indicated receipt of Revolving Loan Funds (RLF) program income for the Douglas County Housing Partnership (DCHP) through their Home Ownership and Shared Equity Programs in the amount of \$130,063.53 for program year 2012. The IDIS PR01 report reflects the program income available has been fully expended.

Each RLF must be held in an interest bearing account, and any interest is considered interest earned on cash advances and must be remitted to HUD (no less frequently than annually) as required by 24 CFR §570.500(b). The county submitted \$30.67 on August 12, 2013 for RLF interest payable HUD for PY 2012 as of the date of this report.

Douglas County has shown significant improvement in documenting the accomplishments of its projects and activities as reflected in the reports generated by the IDIS system as well as the inputting of data and numbers on the income categories for those who benefitted from the activities. The county is encouraged to collect and input this information on a quarterly basis. In addition, the IDIS PR 03 report indicates the county is documenting the number of persons assisted with its CDBG Program and the race and ethnicity information is provided. The county is reminded to ensure the number of persons who are provided assistance shown as a part of the accomplishment narratives also be included under the correct category, such as female-headed households. When reporting the data for public service activities, the county is asked to utilize the most specific IDIS matrix code in relation to the type of activity/population served to ensure that the activities are not placed under the Matrix Code 05, Public Services (General) if at all possible.

The county continues to provide its required performance measurement indicators for all open activities as prescribed by HUD. A review of the IDIS PR 83, CDBG Performance Measure Report, and the IDIS PR 85, Housing Performance Report, reveals Douglas County is inputting these measures into the Integrated Disbursement Information System (IDIS).

According to these reports, the county provided assistance to a total of five LMI households in providing a suitable living environment and providing decent housing. The county's public facilities activities provided improved access to its facilities for 3,273 persons, and provided new or continuing access to services for a total of 1,625 persons. The report also reflects the county's efforts in providing assistance to 49 LMI individuals with emergency housing and overnight shelter activities. The county provided emergency financial assistance to 318 LMI households which supported the goal of preventing homelessness for these families within its communities. In addition, the county assisted 13 first time LMI homebuyers. We commend the county for meeting these important requirements, and we encourage you to continue inputting these measures into IDIS on a regular basis.

During the previous year CAPER review by HUD CPD, it was noted there was a possibility that some of the activities reported could be shown as completed in IDIS reporting. During the program year 2012, the county made efforts to review its open activities and as a result, there are no open at-risk activities at the time of this review.

Part III. HUD Evaluation and Conclusions

A. OVERALL EVALUATION

Overall, Douglas County appears to be making strides in providing affordable housing and addressing its community development needs.

B. CONCLUSIONS AND FINDINGS

Community Planning and Development, Rocky Mountain, Denver, has reviewed available facts and data pertaining to the performance of Douglas County for its Consolidated Plan and the formula Community Development Block Grant Program specified in that Plan, during the period specified above. Based on the overall review record and the information summarized above, CPD makes the following findings:

1. During the period specified above, Douglas County has carried out its program substantially as described in its Consolidated Plan as approved and amended.
2. The Consolidated Plan, as implemented, complies substantially with the requirements of applicable laws and regulations.
3. Douglas County has the continuing capacity to carry out its approved program in a timely manner.

Part IV. APPROVAL

SUMMARY PREPARED BY

Mary Ann Geissel

CPD Representative

1/10/14
Date

REVIEW AND CONCURRENCE

Edward Atencio

Program Manager

January 10, 2014
Date

Edward Atencio

APPROVAL

LeRoy Brown *[Signature]* *[Signature]*

LeRoy Brown

Director CPD

01-10-2014
Date