



**DRAFT**  
**Community Development Block Grant**  
**2015 Consolidated Annual Performance**  
**Evaluation Report (CAPER)**

**PUBLIC COMMENT PERIOD FROM:**  
**Nov. 10, 2016 THROUGH Nov. 23, 2016**

**PLEASE CONTACT:**

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**SPECIAL ACCOMMODATIONS:**

Arrangements can be made for special accommodations such as TDD/TTY/Relay number, or the use of interpreters, if such accommodations are needed.

Aquellas personas que desean compartir comentario deben de comunicarse con Tina Dill a 303-814-4380, [tdill@douglas.co.us](mailto:tdill@douglas.co.us), o a la dirección referida arriba. Acomodaciones razonables podrían ser provistas a los individuales discapacitados o a las personas que no hablan inglés, para asegurar el reviso significativo de este document. Arreglos para acomodaciones tienen que ser hechos por adelantado, lo cual puede incluir número de retransmisión/TDD/TTY, y el uso de intérpretes como sea necesario.

**DATED: November 9, 2016**

## CR-05 - Goals and Outcomes

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

Douglas County received an allocation of \$889,370 in CDBG funding for the 2015 program year. In addition to the 2015 allocation, \$130,638 was reprogrammed from previous program years. As of the date of this CAPER submittal, \$640,641 or 66 percent of the 2015 annual allocation has been expended. Of the 18 percent budgeted for administration of the program, \$20,425 was reallocated for various public services projects, allowing additional residents to be served. At the beginning of the 2015 program year, two 2013 projects were active and have been completed. One 2014 project is underway. Brothers Redevelopment, Inc.'s (BRI) Housing Rehabilitation Services project has \$69,044 (86 percent) remaining from its allocation. This 2014 project, along with six 2015 projects will continue to be active during the 2016 program year.

All 2015 CDBG-funded projects support the 2014-2018 Consolidated Plan priorities and goals. The majority of applications requesting Douglas County CDBG funds are for public services. Emergency assistance projects received almost 72 percent (\$95,406) of the public services allocation. Emergency rent, utilities and housing assistance through the Douglas County (DC) Cares program helps prevent homelessness by securing housing for up to 30 days. The Douglas County Housing Partnership (DCHP), in coordination with DC Cares, designed a housing option that demonstrates outcomes of family stability. The DCHP utilized CDBG funds to purchase a community-supportive housing unit that is rented at a reduced rate for participants in the DC Cares program, allowing the family time to reach self-sufficiency.

Transportation services are another high priority need in Douglas County, especially for seniors and persons with disabilities. Neighbor Network and the Parker Senior Center both received funds to support transportation coordinators, who schedule rides for seniors needing access to medical appointments, the grocery store, and other facilities to help them meet their basic needs. For example, a 72-year-old homebound woman requires transportation with wheelchair accessibility. Neighbor Network recently purchased a wheelchair-accessible vehicle with Regional Transportation District grant funds. Neighbor Network was the only affordable option within this woman's budget that had a wheelchair-accessible vehicle and offered door-through-door transportation. This client is able to continue living at home due to the transportation services available through Neighbor Network.

Two other projects funded with 2015 dollars benefitted residents with disabilities. The Audio Information Network of Colorado provides audio broadcasts of local news and other media for people who are blind and visually impaired. Promise Ranch Therapeutic Riding uses horses to provide therapy to residents with physical, intellectual, and developmental disabilities. These two projects provide unique services that improve the quality of life for residents and allow them to remain connected to their community.

The bulk of the CDBG funds are for non-public services projects. Two facility improvements projects were funded in 2015. The D/ETF received \$26,350, in addition to its 2014 allocation of \$175,000, for building renovations. An amount of \$100,790 was awarded to the Parker Task Force (PTF) to pay the water tap fee for its new building. Both projects increase the amount of usable square footage, create additional privacy for clients and build organizational capacity, allowing these agencies to increase services available. Lastly, two infrastructure projects will benefit residents, one with a clean water supply and the other with improved drainage facilities in downtown Castle Rock.

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

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

Goal	Category	Source/Amount	Indicator	Unit of Measure	Expected – Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected – Program Year	Actual – Program Year	Percent Complete
Accessible Housing	Affordable Housing Non-Homeless Special Needs	CDBG: \$80,000	Homeowner Housing Rehabilitated	Household Housing Unit	25	0	0.00%	12	2	14%
Affordable Housing	Affordable Housing Non-Homeless Special Needs	CDBG: \$178,131	Direct Financial Assistance to Homebuyers	Households Assisted	150	16	0.00%	12	16	130%
Affordable Housing	Affordable Housing Non-Homeless Special Needs	CDBG: \$568,000	Homelessness Prevention	Persons Assisted	0	0	0.00%	7	14	200%
Emergency Services	Non-Homeless Special Needs Non-Housing Community Development	CDBG: \$55,405	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	3,500	959	27.40%	801	623	78%
Infrastructure	Non-Housing Community Development	CDBG: \$264,376	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	2,250	0	0.00%	3,874	2,088	50%

Public Facilities and Improvements	Non-Housing Community Development	CDBG: \$26,350	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	25,000	21,450	85.80%	20,162	14,299	100%
Supportive Services	Homeless Non-Homeless Special Needs Non-Housing Community Development	CDBG: \$53,000	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	500	4,582	916.40%	411	234	74%
Transportation Services	Homeless Non-Homeless Special Needs Non-Housing Community Development	CDBG: \$25,000	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	50,000	260	0.52%	345	384	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 2014-2018 Consolidated Plan identifies housing and transportation as two of the highest priority needs in the county. Douglas County works closely with subgrantees throughout the program year to ensure that all projects are moving forward according to the current Annual Action Plan. This includes addressing a CDBG priority, goal and objective.

Affordable, accessible and community-supportive housing are high priorities for the use of CDBG funds. The DCHP purchased two community-supportive housing units, spending 100 percent of its 2014 CDBG allocation. These units are rented to residents participating in the DC Cares program based on an adjusted rate of 30 percent of their monthly income. This housing opportunity prevents homelessness and expands the DCHP’s programs by providing a unique option for residents motivated to obtain self-sufficiency. The remaining \$81,049 of the DCHP’s grant award will provide down payment assistance to eligible residents. Down payment assistance allows first-time qualified homebuyers the ability to purchase a home. BRI conducted minor home repairs in two households for improved safety. One was a female head of household and both of the residents assisted were elderly. Improvements included moving a mailbox for safer access next to the front door, installation of a grab bar, and the addition of a gate at the top of a staircase to prevent falling. These repairs were completed to ensure residents live in a safe, suitable living environment.

Transportation is another high priority need throughout the county. Douglas County CDBG funds contributed to two transportation programs during the 2015 program year. The Parker Senior Center (PSC) and Neighbor Network each received \$12,500 toward the

salary of a transportation coordinator. The PSC coordinator scheduled rides for 237 seniors, spending 74 percent of the allocated funds. Neighbor Network provided rides to 147 seniors and their allocation is 100 percent spent. This grant helped leverage \$266,745 in combined Federal Transit Administration, Denver Regional Council of Government, and other foundation funds. Approximately 9,100 trips were provided for seniors and persons with disabilities throughout the county. The majority of these residents depend on transportation to meet their basic needs, such as accessing groceries or attending medical appointments. Transportation addresses a high priority need and offers transit services to those who have limited resources. These projects addressed Impediment No. 1 of the 2011 Analysis of Impediments to Fair Housing Choice (AI). The impediment states that “there is a shortage of transit opportunities for persons with disabilities, seniors, and low-income residents”. The PSC and Neighbor Network provide transportation directly to this audience, thereby reducing barriers to fair housing choice.

These 2015 projects helped fill a gap in affordable and accessible housing and transportation services by meeting the needs of a small percentage of the county’s population. Additional services and options in both priority needs are critical in addressing the high demand for services. Douglas County’s growing senior population is expected to represent one in four people in the county by the year 2030. Agencies offering transportation services are experiencing increased pressure in meeting the growing needs of its clients. Residents will have a similar experience in securing an available affordable housing unit. The DCHP will continue to inform developers about the need for additional affordable housing and explain funding resources, such as Low-Income Housing Tax Credits.

## 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
White	16,551
Black or African American	963
Asian	278
American Indian or American Native	305
Native Hawaiian or Other Pacific Islander	133
Other – Multi Racial	2,092
American Indian/Alaskan Native & White	158
Asian & White	79
Black/African American & White	297
American Indian/Alaskan Native & Black/African American	13
<b>Total</b>	20,869
Hispanic	1,895
Not Hispanic	18,974

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

### Narrative

See Appendix B for a full breakdown of residents assisted, including female head of household, handicapped, and elderly.

## 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 - funding	\$2,237,630	\$640,641

Table 3 – Resources Made Available

### Narrative

In the 2015 Annual Action Plan, Douglas County estimated the amount of funds it expected to receive during the five-year Consolidated Plan period. HUD awarded Douglas County with \$889,370 in 2015 CDBG funds. The County calculated the remaining three years of the Consolidated Plan period by averaging its total annual CDBG allocation from the 2004 to 2013 program years. Staff estimated that Douglas County would receive approximately \$2,237,630 in CDBG funds from 2016 through 2018. However, Douglas County is not participating in the 2016 CDBG funding cycle. Douglas County has expended \$640,641 or 20 percent of the estimated \$2,237,630 as of the November 30, 2016 due date of this CAPER.

## 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.**

The CDBG program does not require a dollar-for-dollar match for grants awarded. Douglas County hosts an annual application workshop where the importance of leveraging is stressed and applicants are encouraged to heavily leverage CDBG project funds. Applications are evaluated and score points based on the amount of funds leveraged for their proposed project. Applicants typically leverage CDBG funds with in-kind services, donations, and other local, state and federal grants.

As of 2016, Douglas County no longer receives CDBG funds or Section 8 vouchers directly. The County does not receive HOME, ESG, or HOPWA. Subgrantees work diligently to secure additional funding sources to combine with CDBG funding to increase assistance available to residents in need.

The 13 agencies that comprise the Douglas County (DC) Cares program provide in-kind funds, as well as other grant funds equating to approximately \$1.1 million. This includes \$64,984 in Community Services Block Grant funds received by Douglas County. The Douglas County Housing Partnership (DCHP) is one of the 13 agencies participating in the DC Cares program. Their \$310,000 CDBG award for community-supportive housing was leveraged with DC Cares program funds.

The DCHP applied for and received \$178,131 in HOME funds to match its 2013 CDBG award for down payment assistance. The DCHP received a \$7,500 grant from FirstBank of Colorado and a \$5,000 grant from Chase Bank. The U.S. Department of Housing and Urban Development awarded the DCHP with a \$31,000 Comprehensive Housing Counseling Grant. DCHP's Down Payment Assistance program was further leveraged by \$16,600 in revenues from its Home Buyer Education Class and \$145,200 in general fund contributions. Additionally, DCHP's Revolving Loan Fund totaling \$308,900 was used to fund additional loans and shared equity investments for down payment assistance.

Neighbor Network combined \$12,500 in CDBG funds with the following funding sources: \$147,686 in Regional Transportation District (RTD) and Federal Transit Administration funds, \$51,059 in Denver Regional Council of Government (DRCOG) funds, and \$68,000 in other foundation funds. Funds allowed Neighbor Network to purchase an ADA-accessible vehicle to serve additional clients and a portion provided support to FirstCall, a transportation and resource call center. Additionally, 3,260 trips allowed seniors access to medical appointments, the grocery store, and other essential services.

CDBG funds awarded for rent, utility, and overnight assistance were leveraged in several ways. The Douglas/Elbert Task Force (D/ETF) contributed \$105,812 in staff, volunteer, donations, and in-kind funds for rent assistance. Approximately \$96,572 in other funds and \$99,900 in state and local funds contributed to utility assistance. The D/ETF leveraged \$44,395 in other funds for overnight assistance. St. Vincent de Paul of Castle Rock's rent assistance program used \$7,000 in CDBG funds, along with \$14,645 in other funds.



Promise Ranch Therapeutic Riding (PRTR) pooled its \$10,000 in CDBG funds with \$2,749 in other federal funds and \$57,684 in state and local funds. Clients with physical, intellectual and developmental disabilities were further assisted with \$21,517 in private funds and \$89,602 in other funds.

The PTF received \$100,790 in CDBG funds to pay for its new building's water tap fee. Approximately \$245,000 in state and local funds, more than \$1.2 million in private funds, and \$419,000 in other funds were leveraged in order for this new building to be constructed.

The Audio Information Network of Colorado (AINC) leveraged \$4,748 in state, local, and in-kind funds to serve blind and visually-impaired residents throughout Douglas County.

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## 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	51	40
Number of non-homeless households to be provided affordable housing units	247	187
Number of special-needs households to be provided affordable housing units	100	92
<b>Total</b>	<b>398</b>	<b>319</b>

Table 4- Number of Households

	One-Year Goal	Actual
Number of households supported through rental assistance	391	298
Number of households supported through the production of new units	0	0
Number of households supported through the rehab of existing units	5	2
Number of households supported through the acquisition of existing units	2	19
<b>Total</b>	<b>398</b>	<b>319</b>

Table 5 - Number of Households Supported

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

The majority of active projects met the anticipated goals and outcomes during the 2015 program year as expected. Five projects either experienced minor changes or experienced unforeseen delays in completing their projects.

Two transportation projects met their goals and outcomes while using their grants for coordinator salaries instead of purchasing a vehicle. Neighbor Network and the Parker Senior Center (PSC) were both awarded \$12,500 for the purchase of an ADA wheelchair-accessible vehicle and a shuttle bus, respectively. Neighbor Network was awarded funds from the Regional Transportation District, allowing them to purchase the ADA vehicle without the use of CDBG funds. The PSC had an opportunity to purchase the shuttle bus prior to signing a contract for 2015 CDBG funds. For these reasons, both organizations requested to use the grant funds to pay a portion of their transportation coordinator's salary. The purpose of the awards was to increase the transportation options and services within the county, which did not change. Both organizations served the same number of clients through their transportation programs, as originally intended.

The Douglas County Housing Partnership (DCHP) requested \$310,000 in 2015 CDBG funds to purchase two community-supportive housing units for the Douglas County (DC) Cares program. The DCHP expended \$228,952 of the grant to purchase a condominium in Castle Rock. The

remaining \$81,049 was inadequate to purchase a second unit, and was shifted to down payment assistance. The \$81,049 is expected to assist four households with down payment assistance.

Brother's Redevelopment, Inc. (BRI) received \$80,000 in 2014 CDBG funds for Housing Rehabilitation Services. Extensive outreach efforts were conducted to reach homeowners. BRI publicized the availability of rehabilitation services through specific organizations that serve income-eligible clients most likely to need housing repairs or accessibility features installed. BRI has offered similar housing rehabilitation services in other jurisdictions, but this program is fairly new to Douglas County. Developing the program took longer than anticipated, but two qualified households have now been assisted and more applications are coming in.

Several factors inhibited Sedalia Water and Sanitation District (SWSD) from moving forward with their 2015 water system improvements project. Referral responses from the Environmental Review resulted in the need for a cultural survey. SWSD did not have the financial means to conduct a cultural survey and discussed possible options with CDBG staff. Staff plans to use CDBG administrative funds to pay for the survey, allowing the Environmental Review to proceed. A contract will then be prepared and signed and SWSD will complete the project.

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

The general outcomes expected are to improve self-sufficiency and increase transportation and housing opportunities for income-eligible residents. These outcomes would not have an impact on future annual action plans. The CDBG Advisory Board awards projects based on these expectations and factors in multiple criteria when reviewing applications and awarding funds. Project outcomes from previous program year's are considered during the evaluation process. The Advisory Board scores applicants on the timeframe by which funds were spent, and if reports were submitted on time and with accuracy.

An organization's ability to spend down funds within a timely manner can affect future funding awards. The U.S. Department of Housing and Urban Development (HUD) annually reviews Douglas County's draw ratio. The County cannot have more than 1.5 times the annual allocation in its line of credit. The Advisory Board and staff note the reasoning behind project delays. The CDBG Advisory Board also pays close attention to the number of residents served through the project.

The Advisory Board is supportive of high-performing programs that score well during the evaluation of the applications. Funds are often granted to programs offering services that are in high demand and have a significant success rate among clients. For example, a large number of families are referred to the DC Cares program, demonstrating a need for services leading to self-sufficiency. The 13 participating DC Cares agencies review applications and determine which families are the best fit for the program. These families are informed of the six- to nine-month commitment they must agree to and the expectations associated with program participation. Of those who have completed the program, 76 percent report having increased employment, 75 percent obtained housing, and 64 percent have successfully become self-sufficient. These outcomes demonstrate the positive impact this program has in our community.

CDBG funds are unlikely to be awarded for minor home repair projects in the future as they have consistently demonstrated low performance in Douglas County. Over the years, funds have been granted to a variety of organizations offering eligible homeowners the opportunity to have home improvements conducted at no cost. Programs of this nature are very helpful for

seniors and persons with disabilities who benefit from home modifications that increase access and safety. Some organizations, like BRI, went to great lengths to market the program to target audiences to increase program interest. These organizations found it challenging to secure eligible clients and spend down funds. These services do not appear to be in high demand at this time.

**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 Persons Served	CDBG Actual
Extremely Low-income	11,009
Low-income	5,165
Moderate-income	2,101
<b>Total</b>	<b>18,275</b>

Table 6 – Number of Persons Served

### Narrative Information

Douglas County’s actuals for Table 4 were calculated in the following manner:

- **Homeless Households Provided Affordable Housing Units (40 total):** Hotel vouchers were provided by the D/ETF (45 households, 18 with disabilities) and DC Cares (10 households). The DCHP assisted 3 households with community-supportive housing. This equals a total of 58 households. However, 18 of those served were persons with disabilities. This number was subtracted and included with the special needs households.
- **Non-Homeless Households Provided Affordable Housing Units (187 total):** The following organizations provided affordable housing units: D/ETF rent and utility (162 households; 64 with disabilities), PTF rent and utility (15 households, 4 with disabilities), SVdP rent (28 households), DC Cares (38 households, 3 with disabilities), BRI housing rehabilitation (2 households), and DCHP down payment assistance (16 households; 3 with disabilities). A total of 261 non-homeless households were assisted. Of the 261 households that received assistance, 74 had a person with disabilities. This number was subtracted from the total and included with the special needs households.
- **Special Needs Households to be Supported (92 total):** The number of persons with disabilities served from each of the categories above totals 92.

Actuals for Table 5 were calculated in the following manner:

- **Households Supported through Rental Assistance (298 total):** A total of 298 households were assisted through the following organizations to maintain housing: the D/ETF rent, utility and hotel (207 households), PTF rent and utility (15 households), SVdP rent (28 households), DC Cares housing assistance (48 households).
- **Households Supported through Rehabilitation of Existing Units (2 total):** BRI served two households.
- **Households Supported through Acquisition of Existing Units (19 total):** The DCHP assisted 16 households with down payment assistance and three households were assisted with community-supportive housing.

The number of persons served at the income levels identified in Table 6 include all active 2013 and 2014 projects. Douglas County served 200 residents who were non low- and moderate-

income residents (80 percent of the area median income and above). These residents live within the project area boundaries, are seniors, and persons with disabilities.

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## **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**

The immediate goal is to identify homeless individuals and families to assess their needs and link them to appropriate available services. Douglas County coordinates with the Metropolitan Denver Homeless Initiative's (MDHI) Point-in-Time (PIT) Survey to identify homeless persons. The "Strive to Thrive" event, planned in conjunction with the PIT Survey, offers an opportunity to provide on-site services and beneficial information to residents in need. Assessment of their needs is an ongoing process through the services provided by the Douglas County Department of Human Services, DC Cares, and local non-profit organizations.

A substantial amount of outreach ensures a more accurate representation of homelessness in the PIT Survey. The survey's purpose is to count the number of HUD-defined homeless people on one specific night. The MDHI selects the last Monday in January to conduct this count. The County coordinator for the PIT Survey works with the Community of Care Network (CCN) to distribute and collect surveys. The CCN consists of over 35 agencies that collaborate to address issues of poverty and homelessness in the county.

Approximately 25 to 30 CCN agencies host a booth at the annual "Strive to Thrive" event to inform homeless and vulnerable residents about services. This event serves as an avenue for disseminating and collecting PIT Surveys. "Strive to Thrive" is promoted through local newspaper ads and agency websites. CCN agencies notify clients about the event by providing posters and postcards in both English and Spanish. These materials, along with free transportation, ensure that residents are equally informed and have access to attend the event.

The January 26, 2016 "Strive to Thrive" event provided information that generally meets the transportation, employment, supportive, and emergency services goals. Organizations assessed homeless and vulnerable residents to determine what resources would best meet their needs. Referrals for critical services were offered. Veterans were evaluated with the Vulnerability Index-Service Prioritization and Decision Assistance Tool. The purpose of the evaluation is to identify participants for specific housing and support intervention. Local agencies distributed surveys throughout the week asking respondents where they spent the night on January 25. The County coordinator gathered surveys from all agencies and provided them to the MDHI for analysis.

Residents who chose to visit a non-profit or government agency after the "Strive to Thrive" event were further assessed. Depending on eligibility and individual needs, they may be given food, a motel voucher, or rent assistance. Douglas County also refers clients to Denver metro agencies, if necessary.

Survey results and client assessments allow Douglas County and other agencies to better understand the factors leading to homelessness and improve services. HUD's definition of homelessness is narrowly focused and doesn't account for residents who are truly vulnerable to becoming homeless. Douglas County's largest homeless population lives in unstable situations,

such as staying temporarily with family or friends. Data collected aids in future planning efforts. Data indicates the type of housing that would be most beneficial, such as an emergency shelter, supportive- or permanent-housing, and any specialized services. Analyzing surveys helps agencies assess if a particular demographic has a higher number of people experiencing homelessness. Agencies can collaboratively brainstorm ideas, reach out to this specific demographic, and implement services to help these residents out of poverty. HUD distributes federal dollars providing housing support for homeless populations. The MDHI uses these funds to execute the Continuum of Care homeless service delivery system.

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

Recent data from the 2015 American Community Survey (ACS) revealed that 3.5 percent of the population (11,151 people) had incomes below the poverty level. Sixteen percent of the population (44,385 people) has low- or moderate-incomes, according to the ACS 5-year 2006-2010 Low- and Moderate-Income Summary Data. Douglas County assists at-risk residents to prevent them from becoming chronically homeless and in need of an emergency shelter or transitional housing. When averting homelessness isn't possible, organizations collaborate to provide shelter and services to the most vulnerable residents.

According to the January 26, 2016 PIT Survey results, 65 people experienced homelessness in Douglas County. The low survey results give the impression that homelessness is not a serious issue. Douglas County's homeless population largely consists of residents who are temporarily living with friends or family, or in a hotel or vehicle. These residents are not included in the PIT Survey as they do not meet HUD's definition of homelessness. The County and local agencies have served an influx of residents in need that greatly exceeds 65 people. Douglas County School District alone identified 676 homeless students during the 2015-2016 school year, 499 of which attended schools within county boundaries. Many organizations in the county share concerns regarding the number of residents who are at risk of becoming homeless.

Douglas County's emergency shelter is shifting away from a traditional short-term shelter to providing long-term community-based advocacy. The Crisis Center serves women, men, and children in need of domestic violence support and provides critical resources. This new approach will continue to provide a safe environment for clients through motel vouchers or rent assistance. The current 28-bed shelter will be renovated to retain seven beds for residents from the 18<sup>th</sup> Judicial District catchment area who are in imminent danger. Clients will benefit from a more transitional housing option that includes intensive case management, support and advocacy.

Motel vouchers offer an alternative to emergency shelters. The Douglas County Department of Human Services, the Douglas/Elbert and Parker Task Forces, local law enforcement, and local churches provide vouchers for overnight and short-term emergency shelter. The Douglas/Elbert Task Force (D/ETF) received \$5,000 in 2015 CDBG funds, assisting 45 households (73 residents) with overnight lodging assistance. Motels have become a form of affordable, transitional housing for many Douglas County residents.

Faith-based organizations have established a Winter Shelter Network with churches offering their facilities as a shelter for women and children. The shelter location rotates among churches and operates from November through March. Clients will be assessed to determine if domestic violence or other dangers pose a concern. Motel vouchers may be provided for these circumstances. Men will be directed to a local non-profit organization where they will receive a

motel voucher from an existing program and additional resources. The Winter Shelter Network opened for the first time on November 1, 2016.

The Douglas County Housing Partnership (DCHP) purchased four community-supportive housing units that offer transitional housing for families participating in the Douglas County Cares program. Each housing unit is typically rented for six months up to a year, depending on the family's specific circumstances. Additional resources are provided to assist families in obtaining and maintaining self sufficiency.

Douglas County works closely with other jurisdictions and organizations in monitoring the needs of residents. Agency collaboration and data sharing allows Douglas County to make informed decisions about shelter and housing in the future.

**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**

Douglas County introduced a Reintegration Program designed to reduce recidivism. The program prepares offenders with the necessary resources prior to being released from jail. This prevents offenders from leaving the jail without the means to meet their basic needs. Inmates are informed of the local non-profit organizations that offer donated food and temporary shelter. Arapahoe/Douglas Works! assigns staff to provide employment education in the jail. A Human Services eligibility technician works at the jail twice a week enrolling inmates in the Medicaid program. Medical coverage and medications are made available at the time the inmate is released. Out of the 542 inmates assisted through this program in 2015, 20 percent requested mental health treatment and 32 percent requested intensive substance abuse treatment. Preparing inmates for release and organizing mental health or substance abuse treatment can help to resolve the core problems associated with recidivism.

The Juvenile Assessment Center (JAC) involves multiple agencies working cohesively to provide early intervention and assessments to improve access to services for at-risk youth. Youth assessments evaluate social, emotional, and behavioral needs, which are then addressed through case management. A single point of contact for all services is provided to prevent or reduce at-risk, delinquent and truant behavior. This approach diminishes the amount of time officers need to address youth in crisis. The JAC partners with the newly formed Family Resource Pavilion (FRP) that serves both Arapahoe and Douglas County residents. The FRP has a total of 12 beds available with three reserved for Douglas County clients. Children are housed at the FRP and work with staff and their families to overcome behavioral issues. The FRP eliminates the need for clients to travel to various locations for services as all community partners assist clients on site. This coordinated network of support streamlines services, removes duplicative efforts, and improves communication among providers.

The Chafee Foster Care Independent Living Program helps youth transition from foster care to independent living. Shiloh House administers this program on Douglas County's behalf. They assist current or former foster care youth ages 18 to 22. The County currently has nine clients involved in the emancipation process that work with Shiloh House on applying for affordable housing and developing life skills. Arapahoe/Douglas Works! offers a Youth Employment



Program, as well as guidance on job searching and resume writing. Temporary Assistance for Needy Families (TANF) funds can be used to pay for a case manager to work with youth in creating an individualized case management plan. These programs provide clients with access to the resources and support necessary to transition them into adulthood.

The AllHealth Network (AllHealth), previously called Arapahoe/Douglas Mental Health Network, offers substance abuse and mental health services to families, adults, and children. AllHealth offers housing options through Section 8 vouchers and rental apartments for eligible clients. Treatment and temporary housing is available for residents due to medical necessity. A weekly Housing 101 class shares strategies on how to find housing for people with mental health illnesses, particularly in this tight market.

**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**

Douglas County initiated several programs to develop additional housing options and increase services for the homeless population. Inter-agency data sharing is helpful in identifying gaps and barriers, making strategic decisions, and creating a more effective and efficient system.

Collaboration led to the creation of DC Cares, a program that increases opportunities for homeless and vulnerable residents. Providers participating in the program share their unique areas of expertise and leverage funds to assist clients. Douglas County provides staff and administrative support through general funds. The Community Services Block Grant (CSBG) funds, which increased by \$15,000 in 2016, are used for direct client assistance. These funds, along with CDBG dollars, are primarily used for housing and employment support. This enables clients to address other barriers needed to maintain housing after completing the program.

An existing barrier for homeless families in the Denver metro area is finding a willing property manager to accept Section 8 vouchers. This issue is being addressed regionally by Housing Connects, and locally by the DCHP. They plan to increase the housing options available by building relationships and working closely with property managers to encourage them to accept Section 8 vouchers. Another barrier residents with a poor credit history face is that they are not considered when applying for a rental unit. As clients progress through the DC Cares program, they will begin to improve their credit score, making it easier to secure housing and employment in the future.

Few housing options exist for residents earning below 60 percent of the AMI. For this reason, the DCHP works with developers to communicate the need for these units. The DCHP coordinated with the developer of a Low-Income Housing Tax Credit property to reserve four units for residents at 40 percent of the AMI. Construction of this apartment complex in unincorporated Douglas County is currently underway. Apartment units that accept residents at lower AMI levels help families transition out of homelessness.

The Douglas County Department of Human Services administers the TANF program to maintain unified families and prevent homelessness. Funding depends on family size and must include a 19-year-old or younger living in the home. Adults are required to demonstrate they are working, searching for employment, or enrolled in school, in order to receive the monthly payment. The

Basic Cash Assistance program provides eligible clients with a small cash benefit (\$300 to \$500) for rent or other purposes. The TANF Diversion program allows clients to receive a more substantial benefit. The advantage of this program is the flexibility for which funds can be used, such as housing assistance or costly car repairs. The end result is families are provided stable housing and a suitable living environment where they can thrive.

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

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

Douglas County does not have any public housing.

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

N/A

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

N/A

DRAFT

## **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)**

Douglas County spearheaded efforts to eliminate problems in Colorado construction defect law. The current Colorado law inhibits the construction of owner-occupied, multi-family housing. Legislative resolution would assist in allowing more owner-occupied, multi-family housing to be built. In addition, the County has drafted a plat note meant to encourage developers to build multi-family housing while potentially limiting extraordinary litigation costs. The County plans to continue supporting this effort to further affordable and accessible housing for residents.

Douglas County staff attend pre-submittal meetings for applicants proposing to develop land. Community Resource Services staff assesses the viability of projects that include an affordable housing component and offer recommendations for leveraging funds. Staff provides applicants with pertinent contact information that might benefit the proposal. For example, the Douglas County Housing Partnership (DCHP) might be able to apply for HOME funds or issue Private Activity Bonds for the project. Applicants can request permit fee waivers from local jurisdictions to reduce building costs.

The DCHP was formed in 2004 to increase affordable housing options in the county. The agency has ongoing discussions regarding internal policies and implementation strategies to increase the number of affordable units in the county. Developers are often referred to the DCHP from developers who have completed projects in the county, local jurisdictions, and financial institutions. Collaboration among these agencies increases creative ideas in addressing barriers and establishing programs to increase affordable housing opportunities.

Douglas County works with developers to facilitate their applications for Low-Income Housing Tax Credits (LIHTC) and Private Activity Bonds (PABs). The DCHP was awarded 2015 CDBG funds to purchase a community-supportive housing unit and provide down payment assistance to eligible first-time homebuyers.

The DCHP continues to engage in ongoing discussions with developers to ensure affordable housing is built. Construction of the Copper Steppe Apartments in unincorporated Douglas County is currently underway. The DCHP worked with the Copper Steppe developer to reserve four apartment units for residents earning 40 percent of the area median income (AMI). The remainder of the units will be available to residents earning 60 percent of the AMI. Completion will result in 264 additional units of affordable housing. The DCHP plans to schedule meetings with each of the local jurisdiction's planning departments to discuss increasing affordable housing throughout the county.

The Douglas County Comprehensive Master Plan includes objectives and policies that guide the review of land use applications in the county. Two objectives related to attainable housing include:

- Objective 6-1D: Promote the development of attainable housing, and
- Objective 6-1E: Create incentives for, and remove barriers to, attainable housing.

For the Copper Steppe application, Douglas County made its private activity bond allocation available to the project, in keeping with Policy 6-1D.5, which states that the County should “support attainable housing in municipalities and use the County’s allocation of PABs, when appropriate, to assist this effort.” Additionally, the Master Plan contains Policy 6-1E.3, which seeks to “promote flexible standards to encourage attainable housing.” Through the review of the Copper Steppe application, the applicant proposed, and Douglas County granted an alternate parking standard for the development. The alternate standard, which was equivalent to the Town of Parker’s parking requirement, increased the feasibility of the development on the site.

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

A combination of two grants from the Denver Regional Council of Governments (DRCOG) benefitted seniors by allowing them to remain safely in their homes. Many seniors have the vitality to live independently, but cannot feasibly handle all of the work associated with owning a home. Vision challenges and hearing loss are common issues for seniors, making it difficult to drive or maintain a home. Douglas County signed contracts with eight different providers in four service areas. Seniors received 9,100 one-way trips to medical appointments, the grocery store, and senior center between July 2015 to June 2016. Seniors took advantage of 3,822 hours of homemaker and 714 hours of chore and handyman services creating a more suitable living environment. Adult day care services offered 2,678 hours of respite to family members and caregivers.

Seniors, people with disabilities and low- and moderate-income residents are often transit dependent. In March 2016, a consultant presented a countywide Transit Services Demand Analysis to Douglas County. The analysis outlines a transportation needs assessment and summary of findings. Data collected demonstrates transit service needs and areas where services are in high demand. The County plans to discuss options before determining next steps.

The Regional Transportation District (RTD) awarded the County \$135,000 in local funds. Half of the funding allocation will be used to support an estimated 2,260 trips for low- and moderate-income residents accessing employment and critical services. This is valuable for residents who do not qualify for transportation under existing grant-funded programs. A portion of these funds will be awarded to a transportation provider to purchase an ADA-accessible vehicle. In 2015, RTD funds were awarded to Neighbor Network for the purchase of an ADA vehicle. To date, the new vehicle has provided 1,134 trips. Douglas County’s goal is to increase transit providers’ ability to provide trips, which is why another ADA vehicle purchase will be granted in 2016. RTD funds also contributed to First Call, an information and assistance call center. First Call operators aid approximately 1,400 callers a month with information related to transit services, senior housing, medical resources, and other local services. Operators can schedule trips for Neighbor Network clients and provide referrals to other transit agencies. Additionally, the County distributed \$93,000 in Developmental Disability Mill Levy (DDML) funding to transit agencies that provide trips for residents with disabilities. The program cycle for using these funds began in October 2016.

The Colorado Department of Transportation (CDOT) awarded the County \$202,472 for capital operating and \$175,050 for mobility management in Federal Transit Administration (FTA) funds. Capital operating funds provide on-demand transportation trips for older adults and adults with disabilities. Mobility management funds pay the salary for Douglas County’s mobility manager who oversees the County’s transportation programs. The manager also is responsible for the

administration of Douglas County Transit Solutions' Local Coordinating Council.

Douglas County also discussed options with the faith-based community regarding sheltering the homeless during the winter months. After many lengthy conversations and additional outreach, the Winter Shelter Network was established. Faith-based organizations began offering their facilities on a rotational basis to serve as a shelter for homeless women and children beginning on November 1, 2016 and will continue through March 2017. Homeless men may receive access to resources and a motel voucher.

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

Vox Media worked with the Washington State Department of Health to map lead exposure risk nationally by census tract. Housing and poverty data were used to calculate areas of risk. Douglas County received low lead risk scores of one or two out of a possible 10. An article describing the map and data used stated, "Areas of the country with lower risk are typically located in less populated Western states like Nevada, Arizona, or Colorado, where more than 25 percent of the areas have a lead risk score of 1."

The populations most at risk for lead poisoning are children between the ages of six months to six years living in a pre-1978 home. The Colorado Department of Public Health and Environment's (CDPHE) Disease Control and Environmental Epidemiology Division is responsible for overseeing lead-based paint abatement, pre-renovation notification, and the certification of lead professionals in the state of Colorado. In 2014, the CDPHE tested blood lead levels for 16,555 children ages six years and under from throughout the state. Out of the 16,555 children tested, a total of 373 had blood lead levels greater than or equal to 5 ug/dL. CDPHE also provides data specific to each county. Tests were conducted on 481 Douglas County children under six years of age in 2014. Five cases of blood lead levels were greater than or equal to 5 ug/dL from the age group tested. The CDPHE recommends different types of follow up based on the results of their lead level. Tri-County Health Department performs home investigations on children with confirmed elevated blood lead levels.

Lead-based paint hazards are minimal in Douglas County because 81 percent of the housing units were built after 1990. Douglas County has approximately 6,100 housing units that were built prior to 1978, the year lead-based paint was banned nationwide for consumer use. These homes are potential sources of exposure to lead-based paint. While 6,100 homes is a relatively small number, the residents who live in these homes are potentially at risk of lead poisoning.

Exposure to lead hazards can lead to lower intelligence, learning disabilities, and behavioral issues. Adults exposed to lead hazards can suffer from high blood pressure, headaches, and memory loss. In addition, populations living below the poverty level are more likely to have other factors that increase their risk of lead poisoning. Risk factors include poor nutrition and sub-standard housing.

Actions taken to reduce lead-based paint hazards included:

- Ensuring safe lead-based paint work practices met HUD and EPA requirements for any residential units that received funding through the CDBG program.
- Screening all residential units built prior to 1978 for lead-based paint hazards when those homes received rehabilitation services through CDBG-funded activities.

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

According to the 2015 American Community Survey 1-Year Estimates, 3.5 percent of the population had incomes below the poverty level. The population with incomes below two-times the poverty rate is 9 percent or 28,903 people. Douglas County is committed to reducing the number of poverty-level households by supporting programs that improve self-sufficiency, reduce barriers to affordable housing, and decrease the number of homeless families. Poverty is a complex problem that is best addressed with a multi-faceted approach. These obstacles are addressed through the comprehensive approach offered by DC Cares.

Douglas County invests resources to reduce the number of poverty-level families through the DC Cares program. This partnership has grown from four to 13 organizations. Participating families are assigned a facilitator from the agency best suited to meet their needs based on their assessment. Case managers work closely with families in acquiring stable housing and increasing employment opportunities. The program also addresses other barriers such as unreliable child care, health problems, and lack of transportation. Participants are comprised of the DCHP, the Douglas County School District, AllHealth Network, Bridge of Hope, Catholic Charities of Central Colorado, Cherry Hills Community Church, Crisis Center, Parker Task Force, Southeast Community Outreach, and the Church of the Rock. Each agency contributes their own unique set of skills, along with leveraged funds, enabling the program to serve additional clients. Families benefit from the coordination between all partner agencies.

Temporary Assistance for Needy Families (TANF), RTD, and DDML funds also assist in reducing poverty. TANF-eligible residents must demonstrate that they have a job, are searching for a job, or are receiving education that provides job skills. Residents without access to a vehicle, or who are not located near an RTD service area, can take advantage of grant funds to get to and from work. Douglas County received RTD funds to provide an estimated 2,260 trips for low- and moderate-income residents to access employment. Douglas County set aside approximately \$90,000 in DDML funds for employment-related transportation. Organizations apply for these funds by submitting a proposal stating why the funds are needed.

The Douglas County Sheriff's Office supports alternative placement for sentencing through its Work Release Program. Incarcerated individuals are afforded the opportunity to continue working while serving their sentence. This allows them to maintain their current job, provide for their family, and reduces the possibility of them falling into poverty. This approach eliminates the need to secure a new job or housing after being released from jail.

The following actions also facilitate reduction in the number of poverty-level families:

- Provided \$40,000 in 2015 CDBG funds for housing assistance to DC Cares families.
- Distributed \$55,400 in 2015 CDBG funds for emergency assistance programs.
- Awarded non-CDBG funds to transit agencies to provide work-related rides to low-income residents.
- Encouraged subgrantees to apply for additional grant opportunities.
- Provided technical assistance to subgrantees, as needed.
- Promoted grant opportunities, network events, and training sessions to local organizations.
- Encouraged organizations to collaborate, share resources and leverage funds to serve additional clients.

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

Douglas County's Board of County Commissioners (BCC) serves as the legislative, policy-making and administrative body governing the unincorporated areas of Douglas County. The BCC performs legislative, executive and quasi-judicial functions, which includes establishing policies to ensure the safety, health, and well-being of the community.

The BCC appoints a County manager to carry out the policy directions of the Board and to supervise and coordinate the work of department staff under direct control of the Board. The Department of Community Development is one of these departments.

The Community and Resource Services Division within the Community Development Department oversees several grant programs that benefit the Douglas County community. The division administers the CDBG and Community Services Block Grant programs, as well as grant funds received from the Colorado Department of Transportation, FTA, DRCOG, RTD, and DDML. These dollars predominantly assist low- and moderate-income residents, seniors, and persons with disabilities. The goals of these grant programs align with several programs offered through the Human Services Department.

The Integrated Services Work Group was initiated and includes representatives from eight County departments that manage grant-based programs. Representatives from each department meet to present program information and share program knowledge. This is useful when referring clients to the appropriate agency for services. The meetings provide opportunities to collaborate on projects, avoid duplication of services, and allow for development of best practices.

Continuing actions demonstrate Douglas County's commitment to developing institutional structure:

- Work with the Partnership of Douglas County Governments.
- Implement goals, objectives, and policies to support, encourage, and promote a variety of housing options through Douglas County's 2035 Comprehensive Master Plan (CMP).
- Support programs that provide safety net services.
- Facilitate and foster partnerships to broaden the services available to residents.
- Provide updates to the CDBG Advisory Board on the progress of subgrantees, new rules and regulations from HUD, and fair housing information.
- Implement the 2014-2018 Consolidated Plan and the 2015 Annual Action Plan for the CDBG program.
- Ensure clients benefit to the fullest extent from the resources available through inter-departmental coordination.

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

Douglas County's Human Services Department expanded its presence throughout the county to make services more accessible to residents. A/D Works! and Human Services staff an office once a week at the Parker Task Force and three to four days per week at the Douglas County Detention Center. Clients have the opportunity to receive employment-related assistance and help in completing eligibility paperwork for specific services. Eligible inmates can apply for services to begin upon their release. The goal is to reduce recidivism by providing the necessary resources at the time inmates are released. Once a month, Human Services accepts



applications and answers questions at the Castle Rock Senior Center. Broadening service availability throughout the county strengthens relationships with residents and local organizations.

The County's connections with the faith-based community increased the number of families interested in the county's foster care program. Douglas County's foster care program is part of a three-county collaborative with Arapahoe and Jefferson Counties. With few local foster care families, children are often placed away from their birth families in these adjacent counties. Douglas County Human Services staff engaged with local faith-based organizations requesting their assistance in reaching families who have an interest in fostering children. As a result of this outreach effort, a larger number of families attended informational meetings. Additional foster families in the county allows children to remain in their school and in closer proximity to their birth families.

Another example of public and private coordination is through the Family Resource Pavilion. The facility serves both Arapahoe and Douglas Counties with substance abuse treatment, counseling, and respite services. Besides Arapahoe and Douglas Counties, five other committed agencies provide a wide range of services to address each family's unique situation. This cooperative network of support services was designed for families with children who have school and behavioral issues, family conflict, drug use, or juvenile court involvement. Several agencies provide services in one location, simplifying the process and empowering families to participate in the solutions and achieve personal goals. This eliminates the need to drive to various locations for services and strengthens collaboration between providers dedicated to helping families achieve success.

The regional Metro Denver Homeless Initiative's Landlord Tenant campaign involves recruiting landlords and property managers to work with public housing authorities and non-profit organizations. The ideal outcome is for landlords and property managers to accept formerly homeless and low-income tenants at reasonable rental rates.

Additional actions taken to enhance coordination between public and private housing and social service agencies include:

- Awarded the DCHP with \$310,000 in 2015 CDBG funds for community-supportive housing and down payment assistance.
- Granted BRI \$80,000 in 2014 CDBG funds for housing rehabilitation services.
- Discussed with developers the possibility of issuing Private Activity Bonds for new affordable housing options.
- Continued working with the Community of Care Network (CCN) to comprehensively address issues of poverty and homelessness.
- Supported the Douglas County Transit Solutions efforts to increase transportation options by coordinating services and leveraging funds.
- Informed potential partners about the benefits of participating in the CCN.
- Encouraged inter-agency cooperation to apply for funds and leverage resources to the fullest extent.
- Provided opportunities for housing and social service agencies to network and build capacity.
- Offered referrals to new organizations that would benefit from the leadership, programs, services or collaboration with other organizations.
- Participated in the Denver Regional Council of Governments (DRCOG).

**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 2011 Analysis of Impediments to Fair Housing Choice (AI) identified four fair housing barriers in the county. Progress was made in addressing the following impediments:

**Impediment No. 1. There is a shortage of transit opportunities for persons with disabilities, seniors, and low-income residents.**

CDBG funds were allocated for two transportation projects to increase transit opportunities for persons with disabilities and seniors. Funds support two transportation coordinators who work for Neighbor Network and the Parker Senior Center, scheduling trips for clients. Douglas County's dedicated transportation mobility manager works with local transit agencies on an ongoing basis. Douglas County applied for funds through the Federal Transit Administration, the Regional Transportation District (RTD), and DRCOG. Douglas County distributes these funds to applicants that serve residents throughout the county. Funds are predominantly awarded to agencies providing services to seniors, low-income residents, and persons with disabilities. For example, Neighbor Network received RTD funds to purchase an ADA-accessible vehicle, allowing them to increase the number of transit trips they provide.

**Impediment No. 2. The County could be more diverse and balanced.**

CDBG funds designated for emergency services, transportation, and affordable housing help to maintain balance and diversity in the county. Rent, utility, and overnight assistance allow residents an opportunity to avoid eviction. Transportation and affordable housing offer residents housing and work options. Housing rehabilitation services available through BRI improves safety and health for residents who cannot afford much-needed repairs. Many older homes in the county are owned by elderly residents in need of simple modifications to remain safely in their homes. Several CDBG projects specifically address needs for residents with disabilities, such as audio information services for blind and visually-impaired residents; occupational therapy for residents with physical, developmental, and intellectual disabilities; and ADA surface improvements for better access to Castle Rock's downtown area.

**Impediment No. 3. There is a lack of understanding of fair housing issues among residents in Douglas County.**

Douglas County reduced Impediment No. 3 by offering fair housing education to providers and residents on an ongoing basis. CDBG staff provided fair housing information to the CDBG Advisory Board, subgrantees, and the public. The CDBG Advisory Board and staff frequently discussed HUD's new Affirmatively Furthering Fair Housing requirements. Douglas County's website has a fair housing web page that provides a variety of fair housing materials, as well as links to HUD and the Denver Metro Fair Housing Center. An "I Speak" card and a minority population map are included in the appendix of Douglas County's Language Assistance Plan (LAP). The "I Speak" card allows clients to point to their spoken language so an interpreter can be contacted to translate. Fair housing was discussed during the 2016 CDBG application workshop and the LAP was provided to attendees.

The Spanish Speakers Outreach Group also received a copy of the LAP, along with other fair housing materials. New organizations awarded 2015 grant funds were invited to project management training that included fair housing information.

**Impediment No. 4. Potential barriers to fair housing choice exist in zoning regulations.**

Douglas County has taken steps to remove the potential for inconsistent interpretation which could create impediments to fair housing from the zoning resolution. A broader definition of

family will accommodate non-traditional families or the composition of modern families. Adjustments to the group home definition ensures compliance with the Fair Housing Act.

See Appendix E for a list of 2015 projects and the impediments being addressed.

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## **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**

All subgrantees receiving federal funding will be monitored for regulatory and statutory compliance by the County's CDBG staff. Informal monitoring in the form of phone calls, emails, reviewing draw requests, site visits and progress reports occur on an ongoing basis. An annual risk assessment tool is used as the formal mechanism to conduct a desk audit and monitor all active programs. During the 2015 program year, projects such as the drainage facilities improvements in the Town of Castle Rock, received desk monitoring and on-site visits. Staff attended the pre-construction meeting and regularly discussed progress with Town staff to stay informed. Davis-Bacon Act interviews were conducted, providing additional insight into the project.

Staff uses the annual risk assessment tool, which is modeled after HUD's annual assessment of CDBG entitlement communities. CDBG staff designed this tool to expedite the annual review of each open activity. This tool is reviewed and revised on an as-needed basis to ensure its effectiveness. Each rating sheet includes pre-determined criteria used to evaluate the subgrantee, specific rating considerations, and point assignments. This risk assessment tool also includes a scoring system intended to help identify a subgrantee that may require additional technical assistance and the type of assistance needed. A score of 0 to 34 is a low risk, 35-70 is considered a medium risk, and 71 and above is a high risk.

This assessment provides staff with an equitable basis to determine who should receive an on-site monitoring visit. Subgrantees are ranked from highest to lowest risk based on their assessment score. An on-site monitoring visit is conducted when an organization has a high risk score. High scores can indicate the need for additional technical assistance to reduce the risk of not using funds in a timely manner. Exceptions to an on-site monitoring are considered on a case-by-case basis.

CDBG staff worked closely with subgrantees to provide technical assistance and move programs forward throughout the 2015 program year. The average risk assessment score was 40.5. The median score was 55. Brothers Redevelopment, Inc.'s (BRI) housing rehabilitation program was the only organization scoring in the high range when risk assessments were performed. The primary reasons for the high score were due to the low percentage of funds that have been spent, as well as the length of time the program has been active. Douglas County's housing stock is fairly new with 93 percent built after 1980. The limited number of older homes appears to have limited the number of applications received.

As the County will no longer be accepting CDBG funds, special consideration will be given to ensure compliance with federal regulations, protect previous investments of federal funds, and spend down the remaining grants. Staff typically conducts on-site monitoring when a subgrantee scores high on the annual risk assessment. BRI will receive an on-site monitoring visit due to their score. In addition, as new subgrantees to the program, Neighbor Network, Promise Ranch Therapeutic Riding, and the Parker Task Force will be monitored during the first quarter of 2017. County staff will use this as an opportunity to ensure they are provided adequate technical assistance to finalize reports and maintain files once their projects are completed.

## **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.**

The CAPER public outreach process complied with the Citizen Participation Plan approved as part of the 2014-2018 Consolidated Plan. Once the CAPER was drafted, the following steps were implemented to include public participation:

- A public notice was printed in all five Douglas County newspapers on November 10, informing citizens about the public comment period from November 10-23. Contact information was included so residents could provide input and request accommodations for special needs. It also stated that the document could be translated, and an interpreter could be present to discuss comments or questions.
- The CAPER and information from the public notice were posted on the CDBG web page to provide easy access to residents with internet services.
- Hard copies of the document were available at each Douglas County Library reference desk and the Douglas County Philip S. Miller Building lobby.
- CDBG staff emailed its contact list of approximately 140 service providers and residents to encourage them to review the CAPER and provide comments.

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## **CR-45 - CDBG 91.520(c)**

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

The County's objectives did not change. However, Douglas County approved two changes in CDBG activities during the 2015 program year that involved the redistribution of CDBG funds.

Due to a lag in spending funds, County staff determined that Brothers Redevelopment, Inc.'s (BRI) 2015 CDBG allocation would better serve the community if it were reallocated. BRI received \$80,000 in 2014 CDBG funds for housing rehabilitation services and an additional \$25,000 in 2015 funds for the same project. Homeowners in need of rehabilitation services are limited in Douglas County. BRI was in constant contact with CDBG staff to discuss reaching the targeted population of seniors, persons with disabilities, and low-income residents. Staff provided contact information and offered outreach recommendations. BRI extensively marketed the program and developed awareness and interest among eligible residents. BRI has been able to assist seven residents recently, and additional applications are being processed. Douglas County decided to redistribute the \$25,000 in 2015 CDBG funds since BRI still had a large amount of their 2014 grant to spend down.

Another change during the 2015 program year included the redistribution of \$28,000 for the Sedalia Water and Sanitation District (SWSD). The District received CDBG funds for a 2013 water tank evaluation and repairs project, as well as a 2015 water system improvements project. The water tank's roof was in need of immediate repairs that SWSD was not able to afford without utilizing \$28,000 from the 2015 grant. Tank repairs were completed and Sedalia has \$186,376 remaining for their 2015 water system improvements project.

Other funds remaining from previous program years will be reallocated to subgrantees listed in the 2015 Annual Action Plan. The following table describes the 2015 subgrantees that were recommended for 2016 CDBG funds, the activities they propose and the amount of CDBG funding allocated to each activity.

Douglas County will continue to closely monitor programs and services and make adjustments as needed to ensure funds meet federal requirements and local needs.

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

No.

**[BEDI grantees] Describe accomplishments and program outcomes during the last year.**

No.