

2018 CAPER in IDIS

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.

Community Outreach

The CDBG Office initiated new and continued community outreach contacts with CDBG related entities serving Commerce City residents. The 2018 PY outreach consisted of 18 presentations, 52 meetings and interviews, 425 individual conversations with city residents, and five booths at area events.

Projects and Activities

Public Service - DVV

The DVV Program assisted 71 people in 18 households during the 2018 PY. This expended all of the 2017 funding. DVV then started on their 2018 funding and assisted an additional 21 people in 6 households. Combined, this total year's DVV accomplishments are 24 homes and 92 people.

HRPs

The HRPs consist of three different programs, the Minor Home Repair Program (MHRP), Paint-a-Thon Program (PAT) and the Arapahoe County's Weatherization Program (ACW). The MHRP and PAT programs were launched on January 28, 2019. The initial response was impressive, the City received 74 applications within the first eight months. Forty-four applications were approved. Twenty-eight MHRP and PAT applicants were assisted by September 30, 2019.

Sidewalks and Ramps

The 2016 and 2017 PY sidewalks projects purchased the necessary easements and installed over 800 feet of new sidewalks and ramps during the 2018 PY. Sixty-seven percent of the total sidewalk funds were spent installing three separate projects sites in the Central, Kemp and Rose Hill neighborhoods. The remaining funds will be used to purchase the necessary easements and install a large fourth segment of sidewalk in the Kemp Neighborhood on 69th Avenue, by March of 2020.

Public Facilities - Economic Development - SBRC Renovations

The CEST environmental review and Notice to Proceed for the SBRC were completed in June of 2019. During the months of May - June of 2019 the City's Economic Development, Information Technology and CDBG departments prepared the project specifications, obtained the wage decisions, and let the Request for Bids on the project. By the end of July, the contractors were hired and a Preconstruction Conference was held on August 16, 2019. The renovations began in September and were more than 75% complete by the end of the 2018 Program Year.

Public Service - Economic Development - SBRC Staffing

The CDBG Office and ED Director executed the Interdepartmental Agreement in December of 2018. The environmental review was then prepared and a Notice to Proceed was given in May 2019. The SBRC Staff Person position was advertised in June, but remained unfilled for several months. In July, an additional \$10,000 in funds were reallocated to the staff position. When the per hour wage was increased, the City began to receive applications. A final interview was held in August and the new contract employee will start work in mid-October.

While the Economic Development Division sought a new staff person they worked on the small business resource assistance program and began tracking beneficiaries. The ED Division and its partners: Adelante, the Denver Metro Small Business Development Center and the Colorado Minority Business Office assisted 71 clients and held 85 client sessions at the SBRC during this time with courses such as the Food Truck Academy and several technical assistance workshops. In September of 2019, the City hosted a free workshop called *Grow with Google* for city entrepreneurs.

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
Administration and Planning	Non-Housing Community Development	CDBG: \$	Other	Other	1	1	100.00%	1	1	100.00%
Affirmatively Further Fair Housing Choice	Fair Housing	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	80	80	100.00%			
Affirmatively Further Fair Housing Choice	Fair Housing	CDBG: \$	Other	Other	0	0				
Business Incubator		CDBG: \$	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	0	0		0	0	
Business Incubator		CDBG: \$	Businesses assisted	Businesses Assisted	8	0	0.00%	0	0	
Construction of ADA Ramps	Non-Housing Community Development	CDBG: \$	Other	Other	10	8	80.00%			

Demolition and Clearance	Non-Housing Community Development	CDBG: \$	Buildings Demolished	Buildings	2	0	0.00%			
Drainage Improvements	Non-Housing Community Development	CDBG: \$	Other	Other	1	0	0.00%			
Job Training		CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	40	0	0.00%			
Local Bus Stop Improvements	Non-Housing Community Development	CDBG: \$	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	100	0	0.00%			
Local Bus Stop Improvements	Non-Housing Community Development	CDBG: \$	Other	Other	10	0	0.00%			
Minor Home Repair	Affordable Housing	CDBG: \$	Homeowner Housing Rehabilitated	Household Housing Unit	12	28	233.33%	58	28	48.28%
Public Services	Non-Housing Community Development	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	200	268	134.00%	200	156	78.00%

Public Services	Non-Housing Community Development	CDBG: \$	Public service activities for Low/Moderate Income Housing Benefit	Households Assisted	0	0		26	24	92.31%
Public Services	Non-Housing Community Development	CDBG: \$	Tenant-based rental assistance / Rapid Rehousing	Households Assisted	0	0				
Revolving Loan Fund		CDBG: \$	Businesses assisted	Businesses Assisted	8	0	0.00%			
Sidewalk Construction and Repair	Non-Housing Community Development	CDBG: \$	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	3985	3985	100.00%	0	3683	
Sidewalk Construction and Repair	Non-Housing Community Development	CDBG: \$	Other	Other	2	0	0.00%			

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.

All of the six of the City's Consolidated Plan's high priorities were as follows:

High Priority Need #1 - Neighborhood Revitalization - The sidewalk and ADA ramp installation projects all specifically address this high priority. The sidewalks spent \$132,988 of 2016 CDBG funding and \$57,070 of 2017 CDBG funding to improve pedestrian safety, accessibility and connectivity. Plus the sidewalks improve street appearance, reduce lot flooding, and counter the onset of blight conditions in these low to moderate income (LMI) neighborhoods. The PAT program spent \$25,000 to improve the external appearance of 11 homes, which also counters the onset of blight conditions.

High Priority Need #2 - Preserve & Expand Affordable Housing – To date, the HRPs directly assisted 28 LMI owner-occupied homes. To assist 17 LMI homes, the MHRP spent \$99,960 in 2017 funds and \$42,020 in 2018 funding during the 2018 CDBG PY. The PAT spent \$25,000 to help 11 LMI Homes. The work performed improved the health, safety, accessibility and energy efficiency of the home. Affordable housing was preserved and neighborhood blocks were revitalized. The residents' economic conditions were improved by the increased value of the homes. [Insert map]

High Priority Need #3 - Public Services for LMI & Special Needs Populations - the Recreational Scholarship program provides discounted recreational and educational opportunities for LMI residents. The DVV program helps the victims and their dependents escape their abuser by providing temporary housing security. This program **prevents homelessness** and reduces repeated violence and victimization, thereby reducing crime. The DVV program spent \$32,702 in 2017 funding and \$7,846 in 2018 funding to protect and provide emergency housing to 24 households with 92 victims during the 2018 PY.

High Priority Need #4 - Economic Development - The city invoiced (not yet drawn) \$43,979 for physical improvements to the SBRC during the 2018 PY. The remaining balance was invoiced in October of 2019. The SBRC purpose is to support entrepreneurs and small business development, thereby creating new employment opportunities and reducing poverty. The staff member will increase the Center's function and use, while incorporating bi-lingual outreach.

High Priority Needs #5 and #6 - Affirmatively Further Fair Housing Choice & Administration – The dissemination of fair housing rights information, increased decent and safe housing choices, and increasing the fair housing dialogue is an integral and ongoing part of the HRPs, DVV, and administrative outreach portions of the CDBG program. Hundreds of brochures, pamphlets, and dozens of presentations have informed Commerce City residents of fair housing choices and options. All of this is paid for from the City's CDBG Administrative budget. The Denver Metro Fair Housing Center and the CDBG Office have an ongoing relationship for the distribution of the above mentioned materials. [See

the attached FHEO Table]

CDBG Administration met the high priority objective with continued education at three multi-day CDBG training courses; completing 15 hours of IDIS, HEROS and general CDBG training videos; and staying in regular communication with HUD to help answer questions.

Jurisdictional Progress - Additional Text

Overall Tremendous progress was made in the City's third year of receiving CDBG funding. A total of \$403,252 was drawdown during the 2018 Program Year (PY) and another \$111,152 was obligated but not yet drawdown. Combined this totals \$514,404 expended on/for Commerce City residents, compared to \$49,472.93 expended in 2016 and \$185,101.14 in 2017. Establishing the City's Plans and Procedures The CDBG Office continued to establish the City's CDBG Program. The following administrative documents and procedures were drafted, executed, and/or adopted:

- 2017 CAPER
- 2018 CDBG Funding Application & Review Process
- 2019 Annual Action Plan (AAP)
- 2016, 2017 and 2018 AAP Amendments
- Completed all 2018 and 2019 Project Required Environmental Reviews
- Interdepartmental Agreement for Economic Development SBRC
- Staffing
- Interdepartmental Agreement for Economic Development SBRC
- Renovations
- Interdepartmental Agreement for Police Department
- DVV
- Two Amendments to the PD-DVV Interdepartmental Agreement
- Amended the Scholarship Interdepartmental Agreement
- Amended the Small Business Resource Center (SBRC) Staffing Interdepartmental Agreement
- Subrecipient Agreement with Paint-a-Thon (PAT)
- Subrecipient Agreement with Arapahoe County Weatherization (ACW)(delivered for signature)
- 2017 Minor Home Repair Programs (MHRP) Contract
- MHRP Contract Extension for 2018 Funds
- Executed a SHPO Agreement with the CO Historical Society
- Formally Monitored All Active Projects
- Met the 2019 Timeliness Test Requirements
- Performed extensive outreach on the CDBG Program and related projects

The Projects and Activities accomplished during the 2018 Program Year:

- Completed the 2017 DVV funding and started the 2018 DVV program
- Constructed over 800 feet of sidewalk with ramps in the Core City
- Launched the Home Repair Programs (HRPs) in early 2019
- Received 74 applications, approved 44
- Completed 34 Tier 2 Environmental Reviews
- Completed 14 Minor Home Repair Program (MHRP) with 2017 funds and 3 with 2018 funds (17 total)
- 13 more MHRP applications are in progress
- Completed 11 PAT projects for elderly home owners and have 19 applicants ready for completion with 2019 funding in the spring and summer of 2020
- Seven CDBG HRP applicants received weatherization services through non-CDBG funding, 14 applications are vetted and authorized for ACW to execute the CDBG Subrecipient Agreement, and two more applications are being processed for weatherization
- The SBRC Renovation is 75% complete
- Hiring the SBRC staff person was completed, the staff person will start in early October 2019

Community Outreach The CDBG Office initiated new and continued community outreach contacts with CDBG related entities serving Commerce City residents. The 2018 PY outreach consisted of 18 presentations, 52 meetings and interviews, 425 individual conversations with

city residents, and five booths at area events. Other outreach methods included:

- Door-to-door by Neighborhood Services new homeowner outreach program
- South Adams County Fire District's free, door-to-door smoke and carbon monoxide detector program to City mobile home parks.
- City's website, Facebook, Twitter and NextDoor postings
- Connected Newsletter ads and articles
- Commerce City Sentinel notices
- Denver Post article
- La Prensa notices
- Telemundo news coverage
- Channel 8 screen shots
- Display Shelves and Flyers
- Point of service displays
- Hundreds of promotional flyers, magnets and screen covers
- CDBG emailed and direct mail updates

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	103
Black or African American	10
Asian	0
American Indian or American Native	0
Native Hawaiian or Other Pacific Islander	0
Total	113
Hispanic	77
Not Hispanic	36

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

Narrative

.

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	556,444	403,252

Table 3 - Resources Made Available

Narrative

Identify the geographic distribution and location of investments

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description
Citywide	20	6	
Core City	80	94	

Table 4 – Identify the geographic distribution and location of investments

Narrative

The MHRP had four homes outside of the Core City totaling \$22,528.55 in funding. The DVV program, due to privacy protection for the victims cannot be tracked by location, so we assume 100% in the Core City. All of the PAT, Sidewalk, SBRC Facilities, and Scholarship Program funding was spent in the Core City.

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.

Several segments of City owned right-of-way were utilized for the construction of the three sidewalk segments. The CDBG program does not require funding matches from other sources, however, the City encourages leveraging from itself, its Subrecipients, other forms of government, community partners, businesses and residents.

The 2018 PY was augmented by several City resources and community partners. All of the entities below gave either their staff time, knowledge, skill, facilities for meetings, and materials for distribution at events to help implement the City's CDBG program:

1. Arapahoe County Weatherization's WAP Program
2. South Adams County Fire District
3. Brothers Redevelopment Inc. (MHRP and PAT)
4. Commerce City Housing Authority
5. Commerce City Recreation Centers
6. Commerce City Senior Center
7. Community Resource Network
8. Housing and Urban Development
9. Kids First Health Care
10. Urban Land Institute
11. Twelve Commerce City Departments:

- City Attorney
- City Council
- City Manager - Communications
- Community Development
- Economic Development
- Finance
- Human Resources
- Information Technology
- Neighborhood Services
- Parks, Recreation & Golf
- Police Department

- Public Works Department

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	41	17
Number of Special-Needs households to be provided affordable housing units	16	11
Total	57	28

Table 5 – 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	0	0
Number of households supported through Rehab of Existing Units	57	28
Number of households supported through Acquisition of Existing Units	0	0
Total	57	28

Table 6 – Number of Households Supported

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

Minor Home Repair Program (MHRP) and Arapahoe County Weatherization (ACW) Programs

Serious delays occurred in launching the 2017 MHRP, the 2018 MHRP, and the 2018 ACW program. The MHRP was a start-up program and all of the necessary forms, webpages, applications, policies, agreements, contracts, documentation, checklists, accounting and reporting mechanisms did not exist. All of these documents had to be drafted, legally reviewed, finalized and executed. This took

approximately 10 months. Additionally, the CDBG Coordinator had to take long-term disability from fall of 2017 through winter of 2018 – coinciding with the start of the 2018 MHRP. These two delays pushed the launch of the MHRPs into January of 2019, 16 months behind schedule. Fortunately once launched, the 2017 MHRP only took six months to complete. The launch of the 2018 MHRP quickly followed and is only eight months behind schedule and this includes the 2019 amendment **adding** \$94,000 to the 2018 AAP's MHRP. This added funding will extend the completion of the 2018 MHRP by a few months.

For the MHRPs, 14 of the 16 2017 MHRP's homes were completed with the allotted funds and the City is on track to complete the 27 MHRP projects by August of 2019.

The 2018 ACW program was delayed by the reasons mentioned above, plus the additional five months consumed by ACW to execute the Agreement. During the 2018 PY, no homes were assisted with 2018 CDBG weatherization funds. However, while waiting, the CDBG Office referred all of its weatherization projects to ACW. Seven homes received the ACW's Weatherization Assistance Program's (WAP) assistance as a result of the referrals. Once the ACW's Agreement is executed 14 weatherization projects are ready, with another 16 applications in the queue.

As the large amount of funding spent suggests, the HRP's are catching up with the initial proposed timelines, but it may take 12-18 months to fully reach our goals in the timelines initially set.

Paint-a-Thon Program (PAT)

The PAT launched in February of 2019 was completed by August of 2019. Despite the delays, the PAT program moved quickly and on time completing 11 of the anticipated 17 homes. Cost estimates were too low per household costs, especially when testing for lead based paint was involved. The PAT was five households short of the initial 2018 AAP goals because their initial per household cost estimates were short by \$500 to \$1,000 per home. The CDBG Office agreed to the increase per home cost, recognizing it would reduce the number of homes assisted.

Discuss how these outcomes will impact future annual action plans.

The CDBG Office can operate at a faster pace in executing Subrecipient Agreements and all of the supporting documents.

The CDBG Office will adjust the cost expectations with future contracts and will hold down per home cost overruns with the HRP Subrecipients and Contractors. Future PAT applications for funding, will reflect the higher per unit costs.

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	8	0
Low-income	9	0
Moderate-income	11	0
Total	28	0

Table 7 – Number of Households Served

Narrative Information

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

With the homeless shelter Access Housing declining their grant award, the 2018 Program Year the CDBG Program focused on preventing homelessness by reaching out to LMI homeowners in need of home improvements for health, safety, accessibility and efficiency.

1. All total, 28 homes were rehabilitated with CDBG funds and seven additional homes from ACW's WAP funds. Many of these homes were also made more accessible with walk-in showers, stair lifts, and ramp construction which allowed elderly and persons with disabilities to remain in their homes and avoid homelessness. All of these homes were made safer and more affordable, which helped to stabilize the LMI owners economically - keeping them in their homes.
2. Provided funding to the PAT Program which assisted 11 elderly and/or disabled owners maintain and afford their home, increasing the home's value and safety thereby avoiding homelessness.
3. Provided Fair Housing educational materials on the laws, regulations, and rights of the individual to hundreds of residents and organizations. This will help prevent future housing discrimination and promote discrimination reporting and resolution. Helping to prevent discrimination will allow better access to housing and increased retention of housing, thereby avoiding homelessness.
4. Met with and maintained contact with Commerce City's local homeless shelters and support services: Access Housing, Star Girlz, and Almost Home, on a regular basis. Two of these organizations applied for CDBG funding. Access Housing was funded in 2018 but had to decline the grant due to reorganization issues.
5. Continued to serve as an informational referral resource for residents on services for residents facing homelessness, and other service needs. The CDBG office talked with hundreds of residents about housing and other services. Hundreds of referrals were made on the phone, and 118 HRP applications with other pertinent information were sent by mail.6. The CDBG Office also contacts the area homeless shelters to coordinate efforts and encourage submitting a grant application for CDBG funding. The CDBG Office also refers non-City residents to the Adams Co. HRP - sending almost a dozen applications to AdCo.

Other than the \$250,000 in CDBG HRP Funds in 2018 PY...

The City's Quality Community Foundation (QCF) funded \$36,625 in housing and homelessness assistance from their 2019 budget. Plus, they provided staff to run the foundation, and supported the City appointed QCF Board.

During the 2018 PY, the City completed two housing studies: the *City of Commerce City Housing Needs Assessment* and the *Commerce City Balanced Housing Plan & CCHA Affordable Housing Implementation Plan*. The first provides current C3 data, current housing overviews, identifies barriers to affordable housing plus housing gaps and deficiencies. The second provides current C3 data, current housing overviews, identifies barriers to affordable housing plus housing gaps and deficiencies. The City is endeavoring to implement the goals and initiatives in those studies.

Addressing the emergency shelter and transitional housing needs of homeless persons

The City's DVV program prevented homelessness for 24 households, totaling 92 residents. These residents had just reported domestic violence to the City PD and needed mortgage, rent or emergency hotel stays; electrical; gas; and/or water payment assistance to keep a roof over their heads and/or escape their abuser. This exceeded the goals set of 19 households (59 residents) in the 2018 AAP.

The 2018 AAP funded Access Housing, Inc. to increase in staff to expand the services provided for their family homeless shelter and transitional housing apartment residents. The expansion of services was to increase life skill services and educational opportunities to the shelter's residents. Unfortunately, Access Housing declined their grant award after their director, entire staff and most of their Board was replaced. Once they are better established and their new goals and missions are clearly delineated, they plan to reapply.

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

The 2016-2020 Consolidated Plan identifies the need for additional affordable housing for city residents. The City and the Commerce City Housing Authority (CCHA) regularly works with local partners to develop additional affordable housing units. The North Range Crossings 216-unit apartment development, near E. 104th Avenue and Sable Boulevard, became available to residents earning 60 percent of Area Median Income (AMI). This housing project was fully occupied and operational at the middle of the 2018 PY.

Additional outreach efforts were made with meetings between the CDBG Office and Cultivando, Adelante, both specialize in outreach to the Spanish speaking residents within the City.

The renovation completion of the SBRC and hiring the part-time contractor for its operation during the 2018 PY has assisted educating new and small businesses, increasing employment and other economic opportunities within the City. So far a total of 156 businesses, start-up businesses and individuals have partaken in activities offered by the SBRC.

The 2018 PY CDBG Office's outreach efforts to coordinate housing/homeless services and related opportunities included:

1. Access Housing
2. Adam County 14 School District
3. Adams County Aging Network
4. Adams County Community Development
5. Almost Home
6. Arapahoe County Weatherization
7. ARC of Adams County
8. Audio Information Network of Colorado
9. Aurora Community Connection
10. Aurora Network
11. Brother's Redevelopment
12. Center for People with Disabilities
13. City of Aurora Community Development
14. City of Thornton – Community Connections
15. City of Westminster
16. Colorado Access
17. Colorado Cross-Disability Coalition
18. Colorado Housing Connects
19. Commerce City Economic Development Department
20. Commerce City Housing Authority
21. Commerce City Neighborhood Services
22. Commerce City Police Department – YHOP and DVV
23. Commerce City Senior Center
24. Commerce City Senior Commission
25. Commerce City Senior Luncheon
26. Commerce City Seniors
27. Commerce City Youth Commission
28. Community Advocate Council
29. Community Choice Credit Union
30. Community First
31. Community Reach Center
32. Community Resource Gathering – Thornton
33. Community Resource Network – Connecting for a Better Community
34. Community Uplift Partnerships
35. Conservation Colorado
36. Denver Metro Fair Housing Center
37. Families First
38. Family Tree
39. Groundworks Denver

40. Growing Home
41. Habitat for Humanity
42. HLF – Elder Law and Estate Planning
43. Innovage
44. Kids First Health Care
45. Let Your Light Shine
46. Northern Denver Metro Small Business Development Center
47. Project Angel Heart
48. Quality Community Fund
49. Spectra Centers, Inc.
50. Star Girlz
51. The Senior Hub
52. Tri-County Health Department

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 CDBG Office will continue to meet with organizations assisting the homeless to encourage and educate them on CDBG funding opportunities (see previous list).

For some homeless people, obtaining a job and making a wage is key to transitioning out of homelessness. The 2018 AAP's funding of the SBRC assists residents seeking to start-up a business and those seeking jobs and job training. The SBRC is designed to help retain and increase jobs within the City.

The CDBG Office developed opportunities to support homelessness prevention efforts in conjunction with Adams County, Community Resource Network, and Adams 14 School District. Approximately 20 HRP applications/referrals were made to Adams County Community Development. Approximately 10 others were made to Denver, Aurora and Thornton. Two of those referrals resulted in completed LMI, single-family, owner-occupied home renovations.

The CDBG Office will continue to partner with local service agencies and governments to expand housing opportunities and services for homeless persons, including those making the transition to permanent housing.

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

Actions taken to address the needs of public housing

By definition, the City of Commerce City does not have any public housing units within its boundaries and therefore will not take any actions to address the needs of public housing specifically.

However, the Commerce City Housing Authority (CCHA) has owner interest in 242 affordable housing units. They also manage a Section 8 voucher program with 130 active vouchers, and with over 250 people on the Section 8 voucher waitlist.

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

The Commerce City Housing Authority (CCHA) provides a *Down Payment and Closing Cost Assistance* loan program for income qualified, first-time home buyers, for homes purchased in Commerce City. During the 2018 CDBG PY, no potential home buyers were assisted with this program, rather they are referred to Metro Mortgage Plus program. Additionally, on a daily basis, the CCHA and CDBG offices communicate with residents in need. Residents are provided with education and information on housing finance, maintenance, accessibility, and repairs.

Actions taken to provide assistance to troubled PHAs

There are no troubled PHAs in Commerce City.

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)

The City's Neighborhood Services (NS) leadership and staff took an active role in helping residents live safer and healthier. In the fourth quarter of the 2018 PY, NS collaborated with the CDBG Office and went door-to-door to 50 homes exhibiting possible repair needs and delivered bags containing valuable information on the HRPs and other service programs for city residents. Already, two HRP applications were received as a result of this outreach. Increased communication between NS and the residents is improving and the program's goal is to see the code enforcement violations reduced.

The City completed their Housing Need Assessment and Housing Plan during the 2018 PY. This 2 year project revealed steps the City could pursue to alleviate affordable housing barriers. The City continues to support mixed use housing and has been working with developers on three separate sites to provide affordable housing.

And as previously described in detail, the City continues to support the HRP programs to finance the correction of building code violations and the rehabilitation's related permit and fee costs.

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

During the 2018 PY, the City completed two housing studies: the *City of Commerce City Housing Needs Assessment* and the *Commerce City Balanced Housing Plan & CCHA Affordable Housing Implementation Plan*. The first provides current C3 data, current housing overviews, identifies barriers to affordable housing plus housing gaps and deficiencies. The second provides current C3 data, current housing overviews, identifies barriers to affordable housing plus housing gaps and deficiencies.

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

Each HRP applicant receives a *Protect Your Family from Lead in Your Home* booklet. Over 80 residents received the booklet. It is also available on the CDBG page of the City's website.

In accordance with 24 CFR 570.608 regulations, each of the 29 rehabilitated homes complied with lead-based paint regulations. No lead-based paint was detected to date.

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

Start-up & Small Business Support

The SBRC Renovation Project was 75% completed at the end of the 2018 PY. As described in the 2018 AAP, this project is designed to support business growth, which increases jobs, wages and benefits opportunities to Commerce City residents. This will help reduce the families below the poverty level. SBRC partners with other organizations (listed below) to provide free facilities and inexpensive services, courses and one-one-one training for small businesses and budding entrepreneurs. The majority of these services are offered in English and Spanish.

- Colorado Enterprise Fund focusing on small businesses getting access to loans and lines of credit and providing business counseling.
- North Denver Metro Small Business Development Center focusing on business startups, expansions and sustainability through one-on-one training and workshops.
- Colorado Minority Business Office focusing on educating minorities, veterans, and women owned businesses on certifications available. Plus an Open House held in February 2019.
- Adelante Community Development focusing on Latino small business ownership, employment and education.
- City of Commerce City's Business Tax Seminar to offer the seminar in Spanish.
- Commerce City Chamber of Commerce to expand their network and resources available to their members.
- Area technical colleges and specialty schools - to offer job fairs, job training, and additional educational resources for City residents and businesses.

Community-wide Referral System

The CDBG Office and CCHA serve as part of the community referral system for services to City residents (housing, health care, food, transportation, victim services, legal services, utilities, recreation, education, yard care, pet assistance, senior care, etc.). By procuring and preparing information materials, meeting with walk-ins, fielding phone calls, attending meetings, joining organizations and participating in events, these offices assist residents in alleviating their poverty or dire circumstance.

The CDBG Office hosts and co-facilitates the Community Resource Network - Connecting for a Better Community (CRN). The CRN is comprised of area non-profit, governments and some private-side service providers. The CRN holds meetings to network and learn about other area service providers. The CRN meets six times a year, providing two speakers at each meeting. This group brings together provides institutional knowledge and networking, overcomes gaps in services, and reduce unnecessary service duplications. The CDBG Office regularly attends these meetings to promote the City's CDBG programs and other City resources.

The MHRP and sidewalk construction contractors are owned by minority run/owned organizations. Brothers Redevelopment is a Section 3 organization and they are or have been under contract for approximately \$340,000 in MHRP work.

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

The CDBG Team was established to review and rank all CDBG applications; and make recommendations for funding to the City Council. The CDBG Team is comprised of the following Commerce City Departments and Divisions:

1. City Attorney
 2. City Manager
 3. City Planning
 4. Communications
 5. Community Development
 6. Economic Development
 7. Finance
 8. Information Technology
 9. Neighborhood Services
 10. Parks and Recreation
 11. Police Department
 12. Public Works
 13. Commerce City Housing Authority
- The CDBG Team provides comprehensive interdepartmental input into each year's funding award process and the formation of the Annual Action Plan. The CDBG Team works to avoid internal institutional gaps while providing citywide interdepartmental cooperation and guidance. This compilation of talent, community knowledge and professional expertise streamlines the flow of information from the City departments into the CDBG Program. Cooperation and referrals between the HUD staff, Dept. of Labor, and the National Community Development Association (NCDA), Adams County, Arapahoe County, Jefferson County, CDBG User Group, and neighboring cities were all actively pursued by the CDBG Office. Attendance in training, seminars, meetings, group e-mails, and other personal interactions was accomplished with each organization mentioned above.

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

The CDBG Office co-facilitates the CRN - a service provider networking group servicing the Denver Metro Area. The CRN is comprised hundreds of area non-profits, governmental agencies, faith-based, financial, business, and volunteer organizations working in Commerce City and Metro Denver areas.

During the 2018 PY, City's CDBG Office also participated in regional events, fairs, festivals, health fairs, and meetings with public and private housing, educational entities, economic development organizations, social service agencies, and other governments.

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

Please see the FHEO attachment describing the City's CDBG actions to overcome the effects of any impediments identified in the City's Analysis of Impediments to Fair Housing Choice

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

The day-to-day monitoring activities are performed by the CDBG Coordinator. The general oversight of the City's CDBG Program is performed by the Director of the Community Development Department (CD). During 2018 PY, the CD Director for the past 18 years left, and a search for a new Director was conducted. The new Director should start by the end of 2019. Meeting weekly, the oversight of the CDBG Program fell upon the CDBG Coordinator and the Housing Authority Manager. They will brief and incorporate the new CD Director when he or she is hired.

Financial oversight is performed by the City's Finance Department. Previous difficulties in accurately tracking project expenses were remedied with the construction and adoption of a *Master Financial Tracking Spreadsheet*. Additional improvements are being sought in coordination with FD, to track administrative spending and accurately request drawdowns in IDIS.

As the City continues implementing its 2016 - 2019 CDBG projects, the CDBG Office will ensure the compliance by/with:

1. Continuing professional training for the CDBG Coordinator, CCHA Manager, and the FD representative. To learn alternative accounting and tracking methods the CDBG Coordinator and FD will meet with neighboring CDBG communities.
2. Continuing to cross train City staff on CDBG administrative responsibilities.
3. Exploring the possibility of procuring additional CDBG staff time
4. Continuing technical training and personal attention given to Subrecipients.
5. Providing desktop monitoring visits for Subrecipients with each reimbursement request and/or quarterly report submitted. This includes all cross-cutting regulations such as labor, relocation, environmental, and fair housing and equal opportunity.
6. Continuing to performing informal on-site visits to review files and procedures, listen to the Subrecipient's ideas and concerns, and amend/accommodate the project as needed.
7. Performing formal on-site monitoring visits with each Subrecipient. Provide advanced notice, checklists and if needed a pre-visit for proper advanced preparation. Then interview key personnel, review records, and prepare a written summary of the results. All of the needed 2018 PY monitoring visits were scheduled and noticed. However, due to a family emergency the CDBG Coordinator had to take FMLA and Bereavement Leave. As a result, the 2018 PY monitoring schedule is two months behind.
8. Providing follow-up, as needed, to all Subrecipients in either written or verbal format, as

appropriate and required.

9. Utilizing HUD provided checklists and reporting documents and encourage the same from all of the Subrecipients.

10. Continuing to work with the City's Legal Department on the procurement and hiring of consultants and contractors.

11. Projects requiring Section 3, Minority or Women Owned Businesses (MBE/WBE) compliance will be provided with outreach, procurement, contractor and sub-contractor support.

12. Entering project information on a regular basis into the Integrated Information Disbursement System (IDIS).

13. Increasing the CDBG rate of expenditure and frequency of drawdowns early in the project year to easily comply with HUD's annual Timeliness Test.

14. Meeting with organizations that plans to apply for funding, to encourage a wise approach to the project and reduce application, administrative and cross-cutting requirements.

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 City's Citizen Participation Plan outlines the CAPER and related performance reports shall be posted for public comment for a period of not less than 15 days before the Public Hearing of the CAPER for adaption by the City Council on January 6, 2020. The public notice was placed in the Sentinel on December 17, 2019. Please see the attached affidavit of publication for the Commerce City Sentinel. No public comments were received during the public comment period.

The 2018 Draft CAPER was posted on the City's website: <http://www.c3gov.com/cdbg> from December 18, 2019 through January 6, 2020. Printed copies were also made available at Commerce City Civic Center, the City's Anythink Library, and the Eagle Pointe Recreation Center. All locations are within the CDBG Target Area.

A formal public notice of the CAPER's public hearing with the City Council was published the City's official newspaper, the Sentinel and in Spanish in La Prensa. Notice of the CAPER was in English and Spanish in the Commerce City *Connected* newsletter which is mailed to every household in the City.

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.

No changes to program objectives were made during the 2018 PY. Individual project changes occurred with the discontinuation of the 2016 and 2017 Bus Stop Projects, the one-year extension of the 2017 Recreational Scholarship Program and the resulting funding increases for the DVV and SBRC Staffing programs.

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

No

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

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.

No changes to program objectives were made during the 2018 PY. Individual project changes occurred with the discontinuation of the 2016 and 2017 Bus Stop Projects, the one-year extension of the 2017 Recreational Scholarship Program and the resulting funding increases for the DVV and SBRC Staffing programs.

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

No

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