

Jefferson County, Missouri



Community Development Block Grant (CDBG) Program

DRAFT 2022 ACTION PLAN

Executive Summary

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

1. Introduction

The Jefferson County, Missouri Consolidated Plan is a strategic planning instrument prepared in accordance with and required by the U.S. Department of Housing and Urban Development (HUD) that guides the investment of federal housing and community development funds. The Consolidated Plan helps the County of Jefferson identify key community issues and the resources to address those identified issues. The Annual Action Plan process requires that the grantee outline an action plan which addresses the priority needs and local objectives of the community for a one-year period.

Jefferson County, as part of the St. Louis HOME Consortium, operates on a current five-year Consolidated Plan cycle which covers the years of 2021 through 2025. This Annual Action Plan document outlines the intended use of our Community Development Block Grant (CDBG) funds for the 2022 program year of January 1, 2022, to December 31, 2022, and represents Year 2 of the current Consolidated Plan cycle.

2. Summarize the objectives and outcomes identified in the Plan

Programs and activities outlined in this plan are intended to primarily benefit low-to moderate-income residents of Jefferson County, neighborhoods with high concentrations of low to moderate-income residents, and the County as a whole.

Jefferson County with this plan and its identified programs will continue to address the stated objectives of providing

1. Decent Housing
2. A Suitable Living Environment
3. Expanded Economic Opportunities

Specific program goals, objectives and outcomes for the Five-Year Consolidated Plan are as follows:

- Maintain homeownership opportunities and prevent homelessness for low-to-moderate income residents through the established sustainability program of the Homeowner Rehabilitation forgivable loan program: Objective- Decent Housing/Outcome-Sustainability
- Maintain homeownership opportunities and prevent homelessness for low-to-moderate income residents through the established sustainability program of the Private Sanitary Sewer System Replacement forgivable loan program: Objective-Suitable Living Environment/Outcome-Sustainability
- Expand homeownership opportunities to low-to-moderate income residents through the existing HOME Down Payment Assistance 5-year forgivable loan program: Objective- Decent housing/ Outcome-Affordability
- Expand homeownership opportunities to low-to-moderate income and disabled residents through support of Habitat for Humanity and the Disability Resource Association: Objective- Decent Housing/ Outcome-Affordability

- Expand local services, available affordable housing, accessibility, and prevent homelessness by providing funding to the CHDO in Jefferson County via HOME funds: Objective-Decent Housing/Outcome-Availability/Accessibility
- Expand education on fair housing to residents of Jefferson County through structured activities, delivered either in-house or in cooperation with outside agencies to address and reduce discrimination issues: Objective-Suitable Living Environment/Outcome-Accessibility
- Expand homelessness prevention efforts through coordination with the Missouri Balance of State Continuum of Care: Objective-Suitable Living Environments/Outcome-Sustainability
- Partner with both for-profit and not-for profit organizations to assist in delivering services to low-to-moderate income residents: Objective-Suitable Living Environments /Outcome-Sustainability
- Make needed public infrastructure improvements that benefit low-to-moderate income residents within the participating municipalities and unincorporated Jefferson County: Objective-Suitable Living Environments/Outcome-Availability/Accessibility
- Use available funding and local resources to help stabilize the local community and create job opportunities: Objective-Economic Opportunities/Outcome-Sustainability

3. Evaluation of past performance

Jefferson County has a consistently acceptable performance record and as of the end of 2021, is on track to meet all performance goals for its identified active programs.

Jefferson County will continue to strive to meet its yearly expenditure ratio and continue its consultation with the general public, affiliate organizations and entities to continue to identify and address issues of our low-to-moderate income residents.

4. Summary of Citizen Participation Process and consultation process

The Jefferson County Citizens Participation Plan is constructed in a manner developed in accordance with Sections 104 (a) (2) and (3) of the Housing and Community Development Act of 1974 as amended, and 24 CFR Part 91, et al. The plan process consists of public meetings/hearings, public comment periods of not less than 30 days for public viewing of documents (or required days per plan/document, or as requirements are amended by HUD), acceptance of public comment, needs assessment surveys and final adoption of all plans by the governing body of Jefferson County.

Jefferson County continues to make the Citizens Participation Plan available to the public at various public facilities located throughout the County which are available to all citizens including persons with disabilities, minorities, and any non-English speaking citizens. All plans and public notices are posted on the administrator's web site in addition to hard copies being distributed to better provide the information to all citizens.

In addition to providing public notice and copies of all written plans to the participating municipalities and all public libraries, to encourage public participation, Public Notices are also sent to the following public service agencies representing special interest groups, citizens with disabilities and low-to-moderate income individuals: Developmental Services of Jefferson County, Disability Resource Association, Catholic Community Services, Comtre, Family Resource Center, Festus Housing Authority, Habitat for Humanity, Jefferson County Community

Partnership, Jefferson County Family Services, Jefferson County Rescue Mission, Jefferson-Franklin Community Action Corporation, St. Vincent De Paul Society, Jefferson County Health Department and the Salvation Army. Additional organizations are added as identified.

- 5. Summary of public comments**
- 6. Summary of comments or views not accepted and the reasons for not accepting them**
- 7. Summary**

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

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

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

Agency Role	Name	Department/Agency
CDBG Administrator	Jefferson County	Economic Development Corp of Jefferson County

Table 1 – Responsible Agencies

Narrative

The Economic Development Corporation of Jefferson County, a public not-for-profit corporation is contracted by the County of Jefferson and is responsible for administration of the yearly allocation of Community Development Block Grant (CDBG) and Home Investment Partnership (HOME) funds. The EDC directly administers the CDBG funding in house. The HOME funds are administered through the St. Louis HOME Consortium of which Jefferson County is a participating member.

Consolidated Plan Public Contact Information

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

1. Introduction

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

Jefferson County takes a County-wide approach to issues affecting our low-to-moderate income populations and engages in ongoing coordination between all providers of service whether public or private, at all given opportunities.

Jefferson County continues makes all plans and documents available to the public at various public facilities located throughout the County which are available to all citizens including persons with disabilities, minorities, and any non-English speaking citizens. Jefferson County, thru its administrator, posts all plans and documents on its web site in addition to hard copies being distributed at numerous locations to better provide the information to all citizens.

In addition to providing public notice and copies of all written plans to the participating municipalities and all public libraries, to encourage public participation, Public Notices are also sent to the following public service agencies representing special interest groups, citizens with disabilities and low-to-moderate income individuals: Developmental Services of Jefferson County, Disability Resource Association, Catholic Community Services, Comtre, Family Resource Center, Festus Housing Authority, Habitat for Humanity, Jefferson County Community Partnership, Jefferson County Family Services, Jefferson County Rescue Mission, Jefferson-Franklin Community Action Corporation, St. Vincent De Paul Society, Jefferson County Health Department, the Salvation Army and any additional organization or facility as identified.

Additionally, to enhance continued coordination, Jefferson County participates in meetings of the Jefferson County Homeless Coalition when held, a group comprised of individuals and organizations from various low-to-moderate income housing and service providers within the County, attends St. Louis HOME Consortium meetings, participates in Balance of State Continuum of Care meetings, sets on the Board of Directors of Jefferson/Franklin Community Action Corp and meets with other County Departments regularly to ensure coordination and availability of services to LMI clientele.

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

Jefferson County is a member of the Balance of State Continuum of Care (CoC) but does not receive direct homeless funding itself from either the CoC or HUD considering the significantly small numbers of homeless persons as reported during the past several year’s official homeless counts conducted by HUD/CoC. Entitlement staff participate in the regional meetings of the CoC.

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

N/A as Jefferson County does not receive ESG funds.

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

1	Agency/Group/Organization	Jefferson County Homeless Coalition member consultation
	Agency/Group/Organization Type	Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-Victims of Domestic Violence Services-homeless Services-Health Services-Education Services-Employment Services - Victims Health Agency Child Welfare Agency Business Leaders Civic Leaders Business and Civic Leaders community volunteers

	What section of the Plan was addressed by Consultation?	<p>Housing Need Assessment Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs Anti-poverty Strategy</p>
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	<p>Jefferson County participates in meetings of the Jefferson County Homeless Coalition a local group of individuals and organizations from various low-to-moderate income housing and service providers located within Jefferson County. This group meets as schedules allow. Input from the meetings/members is used to help create Con Plans and subsequent Action Plans. Organizations/ individuals in this group involved in the preparation of plans include Disability Resource Association, Comtrea, Jefferson Franklin Community Action Corp, Jefferson County Community Partnership, Jefferson County Health Department, Salvation Army, various food pantries, churches, and community volunteer groups.</p>
2	Agency/Group/Organization	Missouri Department of Economic Development, local governmental representatives and public citizens
	Agency/Group/Organization Type	<p>Services – Housing, Services-Children Services-Elderly Persons, Services-Persons with Disabilities, Services-Persons with HIV/AIDS Services-Victims of Domestic Violence Services-homeless, Services-Health, Services-Education, Services-Employment, Services - Victims Health Agency, Child Welfare Agency, Business and Civic Leaders, community volunteers-State office leading broadband access initiative</p>
	What section of the Plan was addressed by Consultation?	Broadband services

<p>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</p>	<p>Plan was made available, and data collected by State was analyzed by staff. Further discussions will be encouraged by CDBG staff.</p>
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Identify any Agency Types not consulted and provide rationale for not consulting

N/A there were no agencies that were not consulted

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

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Balance of State Continuum of Care	Missouri Housing Development Commission (MHDC)	In line but not directly related

Table 2 - Other local / regional / federal planning efforts

Narrative

Jefferson County participates in the Balance of State Continuum of Care, is a member of the St. Louis HOME Consortium and cooperates and coordinates with all Jefferson County and municipal local government offices on an on-going basis.

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

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

The Jefferson County Citizens Participation Plan and its processes are constructed in a manner developed in accordance with Sections 104 (a) (2) and (3) of the Housing and Community Development Act of 1974 as amended, and 24 CFR Part 91, etal. The plan process consists of public meetings, public comment periods of not less than 30 days for public viewing of documents (or required days per plan/document, or as requirements are amended by HUD), acceptance of public comment, public hearings, needs assessment surveys and final adoption by the governing body of Jefferson County. (See Citizen Participation Plan in attachments)

Jefferson County continues to make all plans and documents available to the public at various public facilities located throughout the County which are available to all citizens including persons with disabilities, minorities and any non-English speaking citizens. All plans and public notices are posted on the administrator's web site in addition to hard copies being distributed to better provide the information to all citizens.

In addition to providing public notice and copies of all written plans to the participating municipalities and all public libraries, to encourage public participation, Public Notice was also sent to the following public service agencies representing special interest groups, citizens with disabilities and low-to-moderate income individuals: Developmental Services of Jefferson County, Disability Resource Association, Catholic Community Services, Comtre, Family Resource Center, Festus Housing Authority, Habitat for Humanity, Jefferson County Community Partnership, Jefferson County Family Services, Jefferson County Rescue Mission, Jefferson-Franklin Community Action Corporation, St. Vincent De Paul Society, Jefferson County Health Department and the Salvation Army. Additional organizations are added as identified.

Jefferson County also continues to use its previously developed needs assessment survey to gather ongoing public input and citizen participation for its development of annual goals, needs and programs. Copies of these surveys are distributed to all municipalities, libraries and school districts, member organizations, Board members of the EDC, as well as included in mailings of requested applications and handed out to the general public as they come to the administrator's office for services.

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Public Comment Period	Non-targeted/ broad community	Notice of comment period (March 1, 2022, to March 30, 2022) was posted at all participating municipalities, public libraries, various housing & social service agencies and ad run in newspaper.			www.jeffcountymo.org
2	Public Hearing	Non-targeted/ broad community	Public hearing held at Administrators office on February 28, 2022			www.jeffcountymo.org
3	Public Comment Period	Non-targeted/ broad community	Copies of Draft Plans were provided to all participating municipalities, government offices and public libraries.			www.jeffcountymo.org

Table 3 – Citizen Participation Outreach

Expected Resources

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

Introduction

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 2				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation : \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	1,227,779	0	0	1,227,779	6,138,895	Resources anticipated based upon 2021 funding allocation.

Table 4 - Expected Resources – Priority Table

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

While Jefferson County does not require matching funds on infrastructure projects, it is highly encouraged, and past projects have shown a significant amount of “in-kind” labor injected into projects by the entities receiving funds.

Regarding leveraging, both the Homeowner Rehabilitation and Private Sanitary Sewer Replacement programs provide funds for needed home repairs to LMI residents, who could not otherwise afford them, allowing them to sustain the value of their individual homes. The Public Sewer and Storm Water Infrastructure programs provide funding to allow municipalities to make needed infrastructure improvements that typically may not be carried out as a result of budgetary constraints. By funding these activities, the municipalities can either reduce or maintain the current overall operating costs of such systems resulting in a reduction of required cost increases which significantly burden LMI households.

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

At this point in time, the Jefferson County CDBG program does not have any programs that purchases or directly uses publicly owned land or property. If a need is identified in future years this option may be considered.

Discussion

The Jefferson County CDBG program utilizes partnerships with other programs when possible (i.e., weatherization, volunteer groups, local churches, etc.) to assist our LMI households in obtaining the maximum needed repairs available to them. The infrastructure programs by not requiring “matching funds” have resulted in a higher number of public improvements being completed as projects of this magnitude, especially in predominately LMI areas are often not funded by municipalities due to budgetary constraints or other higher priority needs.

Annual Goals and Objectives

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

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Home Rehabilitation Program	2022	2022	Affordable Housing	Jefferson County	Affordable Housing	CDBG: \$150,000	Homeowner Housing Rehabilitated: 10 Household Housing Unit
2	Private Sanitary Sewer System Replacement Program	2022	2022	Affordable Housing	Jefferson County	Affordable Housing	CDBG: \$80,000	Homeowner Housing Rehabilitated: 10 Household Housing Unit
3	Handicap/ADA Public Facility Assistance Program	2022	2022	Non-Housing Community Development	Jefferson County	Suitable Living Environments Non-Housing Community Development	CDBG: \$250,000	Public Facility Removal of Architectural Barriers: 1 facility/barrier
4	Residential Sewer Tap-on Program	2022	2022	Affordable Housing Non-Housing Community Development	Jefferson County	Affordable Housing Non-Housing Community Development	CDBG: \$2,223	Public Infrastructure Activities for Low/Moderate Income Housing Benefit: 10 Households Assisted
5	Sewer Infrastructure Program	2022	2022	Non-Housing Community Development	Jefferson County	Non-Housing Community Development	CDBG: \$250,000	Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit: 250 Households Assisted
6	Storm Water Infrastructure Program	2022	2022	Non-Housing Community Development	Jefferson County	Non-Housing Community Development	CDBG: \$250,000	Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit: 250 Households Assisted
7	Administration	2022	2022	Administration	Jefferson County	Affordable Housing Suitable Living Environments Non-Housing Community Development	CDBG: \$245,556	Other: 1 Other

Table 5 – Goals Summary

Goal Descriptions

1	Goal Name	Home Rehabilitation Program
	Goal Description	This is a two-year forgivable loan of up to \$15,000 available to LMI owner occupied residents' that are at or below 80% of median income for the repair of health and safety issues to their existing owner-occupied home. Homes must be located in either unincorporated Jefferson County or within a participating municipality
2	Goal Name	Private Sanitary Sewer System Replacement Program
	Goal Description	This is a two-year forgivable loan of up to \$20,000 available to LMI owner occupied residents' that are at or below 80% of median income for the repair or total replacement of failing private on-site sanitary sewer systems of owner-occupied homes. Failing Status must be able to be verified through the Jefferson County Building Department or by licensed sewer inspectors. All repairs, replacements, and associated engineering work must be completed by a licensed professional verified on file with the Jefferson County Building Department. Homes must be located within unincorporated Jefferson County or within a participating municipality
3	Goal Name	Handicap/ADA Public Facility Assistance Program
	Goal Description	This program is designed to assist Jefferson County and its participating municipalities in handicap accessing its public facilities and public service areas, primarily parks, sidewalks including curb cuts and other areas of public egress. Funds to offset costs will be made available for application in the amount of up to \$20,000 per barrier removed. Projects in predominately LMI areas will receive a higher priority rating.
4	Goal Name	Residential Sewer Tap-on Program
	Goal Description	This is a onetime grant equal to the amount of the sewer tap-on fee charged by the public sewer district available to LMI owner occupied residents' that are at or below 80% of median income for the fees/costs associated with residential new service hook-up to a centralized sewer collection service. Homes must be located within unincorporated Jefferson County or within a participating municipality.
5	Goal Name	Sewer Infrastructure Program
	Goal Description	This program is available to participating municipalities and all public sewer districts/departments located within unincorporated Jefferson County and participating municipalities. The program is designed to offset costs incurred by such districts/departments for the replacement or upgrading of public sewer service to a predominately low- to moderate-income areas. Eligible costs include but are not limited to installation or renovation of existing "main" sewer lines. These funds are awarded on a competitive basis yearly. Application amount divided by \$5,000 per LMI home/overall project, maximum of \$250,000 per project.

6	Goal Name	Storm Water Infrastructure Program
	Goal Description	This program is available to all participating municipalities and public sewer districts/departments located within unincorporated Jefferson County and participating municipalities. The program is designed to offset costs incurred by such districts/departments for the replacement or upgrading of public storm water service to a predominately low- to moderate-income areas. Eligible costs include but are not limited to installation or renovation of existing “main” retention-elimination system lines and for repairs needed to eliminate storm water erosion in predominately low- to moderate-income areas. These funds are awarded on a competitive basis yearly. Application amount divided by \$5,000 per LMI home/overall project, maximum of \$250,000 per project.
7	Goal Name	Administration
	Goal Description	These funds will pay the expenses for the general administration of the CDBG programs described in this application (i.e. salaries, benefits, operating costs, etc.) These administration funds are reimbursed to the contracted CDBG administrator, the EDC of Jefferson County.

AP-35 Projects - 91.420, 91.220(d)

Introduction

The table below lists the projects that Jefferson County will undertake in 2022 in order to address the needs identified through its consolidated Plan Process.

#	Project Name
1	2022 HOMEOWNER REHABILITATION PROGRAM
2	2022 PRIVATE SANITARY SEWER SYSTEM REPLACEMENT PROGRAM
3	2022 HANDICAP/ADA PUBLIC FACILITY ASSISTANCE PROGRAM
4	2022 Residential Sewer Tap-on Program
5	2022 SEWER INFRASTRUCTURE PROGRAM
6	2022 Storm Water Infrastructure Program
7	2022 CDBG Grant Administration

Table 6 – Project Information

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

The primary national objective of the Consolidated Plan is to assist and benefit low-income and moderate-income residents, Jefferson County’s grant program funds will be targeted to low-income and moderate-income residents, neighborhoods and activities that benefit these residents as a whole.

The Jefferson County Entitlement program is comprised of County-wide programs which include, but are not limited to housing rehabilitation, sanitary sewer infrastructure (both individual residential and municipal), storm water infrastructure (municipal), removal of architectural barriers/Americans with Disabilities Act and any similar, low-to-moderate-income activities deemed a priority in the community needs identification portion of the program planning process. 100% of the Entitlement funds are available to residents of all unincorporated areas of the County as well as within the jurisdictions of the participating municipalities.

During 2020/21 the primary obstacles in meeting under-served needs were the lasting negative effects of the COVID pandemic and an unprecedented difficulty in carrying out day-to-day activities. Reduced availability of supplies resulting from supply chain delays and the continued increased price of construction supplies/components has resulted in a significant impact to the Jefferson County CDBG programs. While no services have been cut or reduced, longer delivery times (windows, HVAC systems, siding, etc.) and increased material costs are estimated to affect our program for the foreseeable future. Job completion dates have been significantly delayed as a result of decreased material availability or extended delivery timeframes.

While overall unemployment does continue to decline in Jefferson County, it has been identified in typical LMI applicants, that a commitment to retain an owner-occupied home for the five years of participation in any given program is a commitment that many are not comfortable in making seeing the unstable financial situation of this sector of the population. Typically, LMI applicants have represented a high percentage of the unemployed, if such applicant has successfully gained employment; they are very skeptical as to the longevity of the employment and therefore also very skeptical about making a legal commitment for the five-year forgiveness period previously required by our programs. It was the opinion of staff that these stated obstacles continued to reduce the number of applicants overall for all programs currently offered. During program year 2021 these requirements were adjusted to two-years with no lien being placed on the applicant home to overcome this need. Data will be analyzed over the next program year by staff to ascertain if this adjustment has resulted in a positive outcome for the program.

Additionally, historic State of Missouri budget cuts which affect local agencies that traditionally deliver services to low-moderate income individuals and families (Dept. of Mental Health, Medicaid, Dept. of Health and Senior Services) have had an equally significant impact on Jefferson County LMI residents. In addition, some needs are not met because of choices to fund one set of priority needs over another. Jefferson County will continue to seek out additional areas of funding and investigate leveraging opportunities if available.

AP-38 Project Summary

Project Summary Information

1	Project Name	2022 HOMEOWNER REHABILITATION PROGRAM
	Target Area	Jefferson County
	Goals Supported	Home Rehabilitation Program
	Needs Addressed	Affordable Housing
	Funding	CDBG: \$150,000
	Description	THIS PROJECT IS A TWO-YEAR FORGIVABLE LOAN FOR UP TO A MAXIMUM OF \$15,000 PER LMI, OWNER OCCUPIED, SINGLE FAMILY RESIDENCES TO REPAIR OR RE PLACE HEALTH AND SAFETY ISSUES.
	Target Date	12/31/2022
	Estimate the number and type of families that will benefit from the proposed activities	It is estimated that 10 LMI owner occupied homes will be assisted
	Location Description	Entire County of Jefferson
	Planned Activities	Rehabilitation of health and safety items of existing owner-occupied single-family units
2	Project Name	2022 PRIVATE SANITARY SEWER SYSTEM REPLACEMENT PROGRAM
	Target Area	Jefferson County
	Goals Supported	Private Sanitary Sewer System Replacement Program
	Needs Addressed	Affordable Housing
	Funding	CDBG: \$80,000
	Description	THIS PROJECT IS A TWO-YEAR FORGIVABLE LOAN FOR UP TO A MAXIMUM OF \$20,000 PER LMI, OWNER OCCUPIED, SINGLE FAMILY RESIDENCE TO REPLACE AN EX ISTING FAILING ON-SITE PRIVATE SANITARY SEWER SYSTEM
	Target Date	12/31/2022
	Estimate the number and type of families that will benefit from the proposed activities	It is estimated that 4 owner occupied homes will be assisted.
Location Description	Entire County of Jefferson	

	Planned Activities	Replace existing failing on-site septic systems to LMI owner occupied homes
3	Project Name	2022 HANDICAP/ADA PUBLIC FACILITY ASSISTANCE PROGRAM
	Target Area	Jefferson County
	Goals Supported	Handicap/ADA Public Facility Assistance Program
	Needs Addressed	Non-Housing Community Development Suitable Living Environments
	Funding	CDBG: \$250,000
	Description	THIS PROJECT IS DESIGNED TO ASSIST JEFFERSON COUNTY AND ITS PARTICIPATING MUNICIPALITIES IN HANDICAP ACCESSING ITS PUBLIC FACILITIES AND PUBLIC SERVICE AREAS. PROJECT WILL REMOVE ARCHITECTURAL BARRIERS IN PARKS, PUBLIC FACILITIES AND OTHER AREAS AS DESIGNATED ACCEPTABLE.
	Target Date	12/31/2022
	Estimate the number and type of families that will benefit from the proposed activities	Estimated that at least one public facility will receive ADA improvements to architectural barriers.
	Location Description	Entire County of Jefferson
Planned Activities	To remove architectural barriers from public facilities (parks, sidewalks, etc.)	
4	Project Name	2022 Residential Sewer Tap-on Program
	Target Area	Jefferson County
	Goals Supported	Residential Sewer Tap-on Program
	Needs Addressed	Affordable Housing Non-Housing Community Development
	Funding	CDBG: \$2,223
	Description	This is a onetime grant equal to the current tap-on fee charged by the identified public entity, available to LMI owner occupied residents' that are at or below 80% of median income for the fees/costs associated with residential hook-up to a centralized sewer collection service. Eligible costs include tap-on fee charged by public or municipal sewer district as required by the regulating entity for new service hook-on.

	Target Date	12/31/2022
	Estimate the number and type of families that will benefit from the proposed activities	Estimated 50 LMI owner-occupied single-family homes will be assisted utilizing prior year funding still available
	Location Description	Entire County of Jefferson
	Planned Activities	To pay for tap-on fees and may install lateral lines for new connection to public sewer service for LMI owner-occupied single-family homes
5	Project Name	2022 SEWER INFRASTRUCTURE PROGRAM
	Target Area	Jefferson County
	Goals Supported	Sewer Infrastructure Program
	Needs Addressed	No-Housing Community Development
	Funding	CDBG: \$250,000
	Description	THIS PROJECT WILL PROVIDE UP TO A MAXIMUM OF \$5,000 PER LMI, SINGLE-FAMILY RESIDENCES TO OFF SET THE INFRASTRUCTURE COSTS INVOLVED IN PROVIDING OR IMPROVING EXISTING SUBSTANDARD PUBLIC SANITARY SEWER SERVICE TO AN APPLICANT AREA
	Target Date	12/31/2022
	Estimate the number and type of families that will benefit from the proposed activities	Estimated minimum of 250 LMI homes assisted-1 project
	Location Description	Entire County of Jefferson
	Planned Activities	Replace or repair public sewer lines to LMI owner-occupied single-family homes
6	Project Name	2022 Storm Water Infrastructure Program
	Target Area	Jefferson County
	Goals Supported	Storm Water Infrastructure Program
	Needs Addressed	Non-Housing Community Development
	Funding	CDBG: \$250,000
	Description	THIS PROJECT WILL PROVIDE UP TO A MAXIMUM OF \$5,000 PER LMI, SINGLE-FAMILY RESIDENCES TO OFF SET THE INFRASTRUCTURE COSTS INVOLVED IN PROVIDING OR IMPROVING EXISTING SUBSTANDARD PUBLIC STORM WATER SEWER SERVICE TO AN APPLICANT AREA

	Target Date	12/31/2022
	Estimate the number and type of families that will benefit from the proposed activities	Estimated minimum of 250 LMI homes assisted 1 project
	Location Description	Entire County of Jefferson
	Planned Activities	Replace or repair public storm water sewer lines to LMI owner-occupied single-family homes
7	Project Name	2022 CDBG Grant Administration
	Target Area	Jefferson County
	Goals Supported	Administration
	Needs Addressed	All
	Funding	CDBG: \$245,556
	Description	General program administration 20% of total funding
	Target Date	12/31/2022
	Estimate the number and type of families that will benefit from the proposed activities	N/A Administration of program
	Location Description	Entire County of Jefferson
	Planned Activities	Administration of the program

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

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

Because Jefferson County qualifies as an Urban County as defined by the U.S. Department of Housing and Urban Development (HUD), the size of its entitlement (CDBG and HOME funding) is determined by both unincorporated residents and residents of the participating municipalities. Currently 13 out of 15 municipalities have joined Jefferson County in meeting the requirements necessary to receive funding.

The primary national objective of the Consolidated Plan is to assist and benefit low-income and moderate-income residents, Jefferson County's grant program funds are available to all qualified low-income and moderate-income residents, neighborhoods and activities that benefit such qualifying residents and are not limited to a specific area.

Geographic Distribution

Target Area	Percentage of Funds
Jefferson County	100%

Table 7 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

The Jefferson County Entitlement program is comprised of County-wide programs which include but are not limited to housing rehabilitation, sanitary sewer infrastructure (both individual residential and municipal), storm water infrastructure (municipal), removal of architectural barriers/Americans with Disabilities Act and any similar, low-to-moderate-income activities deemed a priority in the community needs surveys received by the Entitlement program during the planning process. 100% of the Entitlement funds are available to residents of all unincorporated areas of the County as well as within the jurisdictions of the participating municipalities

Discussion

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

Introduction

The Analysis of Impediments to Fair Housing Choice (AI) is a comprehensive review of a jurisdiction's laws, regulations, and administrative policies, procedures and practices affecting the location, availability, and accessibility of housing, as well as an assessment of conditions, both public and private, affecting fair housing choice. Impediments to fair housing choice are any actions, omissions, or decisions taken because of race, color, religion, sex, disability, familial status, or national origin. Policies, practices, or procedures that appear neutral on their face, but which operate to deny or adversely the provision of housing to persons of a particular race, color, religion, sex, disability, familial status, or national origin may constitute such impediments.

Jefferson County, along with the other members of the St. Louis HOME Consortium (St. Louis County, St. Charles County, City of Florissant and the City of O'Fallon) and the Housing Authority of St. Louis County during 2020 retained Mosaic Community Planning, LLC to conduct and prepare a Regional Analysis of Impediments to Fair Housing Choice study. This study, while regional, has specific recommendations for each of the consortium members. Jefferson County will address any and all barriers identified within its jurisdiction and act accordingly.

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

Many of the Impediments to Fair Housing that have been identified in the 2020 Analysis of Impediments to Fair Housing report prepared by Mosaic as being applicable to Jefferson County are also Barriers to Affordable Housing. These barriers are largely systemic and will require effort from both private and public sectors across the entire regional area to correct. Jefferson County will strive to undertake the stated strategies recommended in the report. Specific action items will be dependent upon future community and governmental engagement, planning, coordination, and available funding. The Impediments/Barriers that were identified as applicable to Jefferson County include:

Barrier: Low labor market engagement and limited incomes restrict housing choice and access to opportunity among protected classes

Strategies:

- Increase access to workforce development and employment opportunities

Barrier: Lack of access to transportation services in some areas of the region limits housing choices and access to employment, services, and resources

Strategies:

- Expand transportation services and connections to other areas of the region

Barrier: Insufficient housing for people with disabilities

Strategies:

- Consider opportunities to encourage or incentivize the construction of new accessible housing units for people with disabilities.
- County staff should continue to partner with agencies such as Disability Resource Association, identifying areas where such agencies can provide input on the County's design and construction requirements related to improving accessibility.

Barrier: Limited access to quality schools disproportionately impacts residents of color

Strategies:

- Support development of workforce housing in areas with high-performing school districts to reduce affordability barriers to accessing these districts

Barrier: Lack of affordable housing supply prevents members of protected classes from living in areas of opportunity

Strategies:

- Identify opportunities to attract LIHTC developments by reviewing the Qualified Allocation Plans under the LIGTC program to identify local government policies or actions that may positively impact the competitiveness of developers' applications
- Consider and adopt zoning codes amendments that could increase possibilities for the development of affordable multifamily housing

Barrier: Ongoing need for fair housing outreach, education, and enforcement

Strategies:

- Continued education regarding fair housing rights, recognizing discrimination, and how and where to file a housing discrimination complaint.
- Housing industry professionals continued education regarding their fair housing obligations and strategies for recognizing and dismantling implicit biases
- Continued funding commitment to fair housing enforcement measures
- Make fair housing advocates more visible and recognized in rural areas

Barrier: NIMBYism and prejudice reduce housing choice for protected classes

Strategies:

- Develop and deliver community education around the need for affordable housing and its cultural and economic value to the community
- Explore and promote community events and programming such as cultural celebrations and food fairs that celebrate the region's diversity and encourage interaction among diverse participants in neighborhoods throughout the region

While all of these barriers affect Jefferson County, many are regional issues as well that Jefferson County cannot address on its own. Jefferson County is sensitive to the effects that public policies have on the cost (including development, maintenance, rehabilitation, or management) of affordable housing within its jurisdiction. In the AI Study, none of the impediments listed were related to public policies that would or could hinder the development, maintenance or

rehabilitation of affordable housing or add to the cost of existing affordable units within Jefferson County. Since Jefferson County does not believe that any local policy or regulation exists to create a significant barrier to the development, maintenance or improvement of any affordable housing within its jurisdiction, there is no need at this time to development a strategy to address such policies. Over the next five-years, Jefferson County will develop a strategy to remove or ameliorate the identified impediments to the best of its ability.

Discussion

As a member of the St. Louis HOME Consortium, Jefferson County is served by several local fair housing, affordable housing, and homeless service organizations (EHOC-Equal Housing Opportunity Council, Beyond Housing, Legal Services of Eastern Missouri, Jefferson-Franklin Community Action Corp, Better Family Life, The Housing Partnership, and Catholic Charities). Activities include fair housing testing, complaint investigation, fair housing education, transitional housing, rent and mortgage assistance, and other housing-related assistance.

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

Introduction

Actions planned to address obstacles to meeting underserved needs

Regarding the COVID pandemic related obstacles, Jefferson County, like the remainder of the world, currently has no solution. For the foreseeable future, the Jefferson County CDBG program has chosen to continue to bare the increased cost burden of supplies resulting from the pandemic verses reducing the quantity of work to applicant homes under our programs. Applicants are made aware of longer wait times for supplies. Regarding funding, Jefferson County will continue to investigate creative leveraging strategies and additional funding sources.

Actions planned to foster and maintain affordable housing

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not believe that any local policy or regulation exists to create a significant barrier to the development, maintenance or improvement of any affordable housing within its jurisdiction, there is no need at this time to development a strategy to address such policies. Over the next five-years, Jefferson County will develop a strategy to remove or ameliorate the identified impediments to the best of its ability.

Actions planned to reduce lead-based paint hazards

Jefferson County will continue its existing efforts to reduce the Lead Paint Hazards in the County. This goal is achieved through the County’s Home Rehabilitation Programs in which contractors comply with all applicable Federal and State regulations. Jefferson County administration staff and contractors utilized are trained in Lead Safe Work Practices as required by our current funding levels per housing unit.

Jefferson County follows Federal and State of Missouri regulations in testing for lead and mitigating its affects. All housing units that are assisted with CDBG or HOME funding are inspected for deteriorated paint. Further, Jefferson County utilizes the services of Herlacher Angleton Associates, LLC, Barnhart, MO to execute lead-based paint risk assessments/lead testing for all homes constructed prior to 1978. All surfaces are treated using lead safe work practices and activity clearance is obtained, if necessary, from the assessment authorities. Jefferson County does not receive any additional funding for direct lead remediation.

Actions planned to reduce the number of poverty-level families

A number of governmental agencies and private organizations operate programs within Jefferson County to reduce public funding dependency and poverty among its residents. Primarily among those agencies are the Missouri Division of Family Services and the Jefferson/Franklin Community Action Corporation, both of which are state and federally funded. They offer broad based assistance to primarily federal/state assistance recipients and the extremely low to low-income residents. Assistance includes but is not limited to food stamps, Medicaid health insurance, aid to dependent children, Section 8 housing vouchers, WIC, counseling, family self-sufficiency programs and several other programs which provide direct assistance to our low-income residents. Jefferson County seeks to reduce the number of poverty level families by investing its CDBG and HOME funds into programs and projects that support affordable housing overall and foster self-sufficiency and sustainability.

Jefferson County, like many other sister communities has seen high unemployment rates and continuing negative lasting effects of the COVID pandemic over the past two years. Existing small “Starter” type housing units that tend to be more affordable for LMI families are typically not readily available in all areas of Jefferson County. New housing tends to be of larger size and in a higher price range. Units of this size and price range coming “online” in the past couple of years remains limited. These trends put an additional burden on individuals and families at and below the poverty level. In many cases, low-income families are forced to pay a disproportionate amount

of their incomes for safe and affordable housing which in turn affects all aspects of an individual or family's success in life.

To address this, the Jefferson County Entitlement program, in an effort to enhance but not duplicate service, utilizes referrals (in addition to its own outside applicants) from all local agencies to help provide additional services in order to assist these individuals on their track from dependency to independency. This is achieved through several programs/activities.

The first-time home buyer program operated through the County's HOME funds provides financial assistance to LMI residents wishing to achieve their goal of home ownership. The homeowner rehabilitation program provides funds to alleviate health and safety issues to existing housing units (most Jefferson County LMI residents locate in older homes needing repairs due to their affordability). Job training/economic development is provided through the County's various business funding programs offered primarily through the EDC and local banks (direct micro-enterprise program when funding is available) and through support of the County's workforce development program which utilizes Jefferson College's extensive workforce development programs and the Missouri Career Center System which serves as a labor exchange for both businesses and job seekers.

Unfortunately, Jefferson County has little to no identifiable transitional housing. While the need seems to exist, insufficient funding levels and low developer interest in this specific sector of housing have played a major factor in meeting this need. The county will continue to search for additional funding and/or partner organizations to help meet this need, but the County is doubtful that it will be satisfied within this 5-year consolidated plan period.

Actions planned to develop institutional structure

During 2022 the institutional structure through which Jefferson County will carry out its housing and community development activities will continue to be through its contracted administrator, The Economic Development Corporation of Jefferson County with final adoption/approval of the Jefferson County Council. The EDC is a not-for-profit organization funded by the County of Jefferson and its participating municipalities to carry out general economic development programs including but not limited to programs available through the Small Business Administration (SBA), State of Missouri (DED), Economic Development Administration (EDA), Industrial Development Authority (IDA), and various other economic incentive programs as available. As a result of the range of tools and diversity that the EDC has available to it, the County of Jefferson relies upon the EDC for in-house administration of its countywide CDBG programs and activities, which benefit low-to-moderate income residents, eliminate slum and blighted conditions or, address an urgent need.

Additional needs of the participating municipalities and non-profit organizations are determined at a local level and reported to the administrator for execution if deemed a priority need and funded. This organizational structure for delivery has been chosen because each municipal

government can focus on the needs within its area of the County and the non-profit organizations can specialize on specific areas of service within all communities.

Jefferson County receives yearly HOME funding through its participation with the St. Louis HOME Consortium. St. Louis County Office of Community Development (OCD) is the administrator of these funds. Members of the St. Louis HOME Consortium meet on a quarterly basis to oversee project activity and annually to create policy, develop housing strategy and implement activities directed under the HOME program. Each member holds public hearings to make the public aware of their proposed use of HOME funds.

Actions planned to enhance coordination between public and private housing and social service agencies

Jefferson County takes a County-wide approach to issues affecting our low-to-moderate populations and engages in ongoing coordination between all providers of service whether public or private, at all given opportunities.

Jefferson County utilizes several avenues to provide access to and engage participation from the residents of the County as well as the general public. All reports including the Consolidated Plan, Annual Action Plan and Annual CAPER are posted in electronic form on the administrator's website as well as provided in hard copy to all participating municipalities, public & municipal libraries within the County. Notices of all public hearings, public comment periods and availability of documents are posted at the above noted facilities along with the administrator's office and County Administration Building as well as notices are placed in local newspapers of general circulation and posted in electronic form on the Administrator's website.

To encourage public participation, Public Notices are also sent to the following identified public service agencies and organizations representing special interest groups, citizens with disabilities and low-to-moderate income individuals: Developmental Services of Jefferson County, Disability Resource Association, Catholic Community Services, Comtrea, Family Resource Center, Festus Housing Authority, Habitat for Humanity, Jefferson County Community Partnership, Jefferson County Family Services, Jefferson County Rescue Mission, Jefferson-Franklin Community Action Corporation, St. Vincent De Paul Society, Jefferson County Health Department and the Salvation Army.

Additionally, to enhance continued coordination, Jefferson County participates in meetings of the Jefferson County Homeless Coalition, when held, a group comprised of individuals and organizations from various low-to-moderate income housing and service providers within the County, attends St. Louis HOME Consortium meetings, participates in Balance of State Continuum of Care meetings, sets on the Board of Directors of Jefferson/Franklin Community Action Corp and meets with other County Departments regularly to ensure coordination and availability of services to LMI clientele.

Discussion

Program Specific Requirements

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

Introduction

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

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

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

Other CDBG Requirements

1. The amount of urgent need activities	0
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Discussion

SOURCE OF FUNDS
2022 BUDGET

(Actual 2021 CDBG Allocation Amounts)

***All proposed activities' budgets will be proportionally increased or decreased from the estimated funding levels to match actual 2022 allocation amounts when announced by HUD**

CDBG Formula Grant Award	\$ 1,227,779.00
20% HUD Approved Administration	<\$ 245,556.00>
Sub-Total	\$ 982,223.00

Home Owner Rehabilitation (10 homes @ \$15,000 each)	\$ 150,000.00
Private Sanitary Sewer System Replacement (4 homes @ \$20,000 each)	\$ 80,000.00
Handicap/ADA Public Facility Assistance (1 project)	\$ 250,000.00
Residential Sewer Tap-On Fee	\$ 2,223.00
Sewer Infrastructure (Public) (1 project)	\$ 250,000.00
Storm Water Infrastructure (Public) (1 project)	\$ 250,000.00

Total CDBG Funds utilized	<u>\$ 1,227,779.00</u>
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