

Jefferson County, Missouri



Community Development Block Grant (CDBG) Program

2021 DRAFT CAPER

(Consolidated Annual Performance and Evaluation Report)

CR-05 - Goals and Outcomes

Progress the jurisdiction has made in carrying out its strategic plan and its action plan.

91.520(a)

During this program year (PY) of overall entitlement, January 1, 2021 through December 31, 2021, Jefferson County has continued its efforts to address the strategic and priority needs as identified in its current Consolidated Plan which include housing, infrastructure, economic development, public facilities/ services, and transportation. Activities funded during 2021 continued to focus on increasing the supply of safe, decent housing and improving both neighborhood and public facilities and their services in unincorporated Jefferson County and its participating municipalities. Accomplishments identified in this report include current year activities as well as activities initiated in prior program years but completed during PY2021.

Jefferson County fills budgeted activity slots with funds available cumulatively. Total disbursements during PY2021 included prior year projects that were completed during the year. Funds actually disbursed during PY2021 were as follows: Economic Development/Micro-Enterprise: 14 open/processed, \$126,739.47; Housing/ Rehab; 0 open; 9 activities completed, \$131,552.00; Parks/Recreation-ADA: 1 completed, \$11,670.92; Water/Sewer Improvements (Septic Replacement); 49 activities (32 open/maint, 17 completed/5 year), \$151,056.47; Administration, 1 completed, \$171,582.53; **Total Disbursements during PY2021, \$ 592,601.39.**

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	Affordable Housing Homeless Non-Homeless Special Needs Non-Housing Community Development	CDBG: \$245,555	Other	Other	5	1	0.00%	1	1	70%

Community Services Program	Affordable Housing Non-Homeless Special Needs Non-Housing Community Development	CDBG: \$0	Public service activities other than Low/Mod Income Housing Benefit	Persons Assisted	1	0	0.00%			
Fair Housing Program	Affordable Housing	CDBG: \$0	Other	Other	1	0	0.00%	0	0	0.00%
Handicap/ADA Public Facility Assistance Program	Non-Housing Community Development	CDBG: \$2,223	Public Facility or Infrastructure Activities other than Low/Mod Income Housing Benefit	Persons Assisted	5	1	0.00%	1	1	100%
Home Rehabilitation Program	Affordable Housing	CDBG: \$150,000	Homeowner Housing Rehabilitated	Household Housing Unit	50	10	10.0%	10	9	90.0%
Homelessness Prevention	Affordable Housing Homeless Non-Housing Community Development	CDBG: \$0	Homelessness Prevention	Persons Assisted	1	0	0.00%	10	2	20.00%
Private Sanitary Sewer System Replacement Program	Affordable Housing	CDBG: \$80,000	Homeowner Housing Rehabilitated	Household Housing Unit	50	17	34.0%	17	17	100%
Residential Public Sewer Tap-on Program	Affordable Housing Non-Housing Community Development	CDBG: \$1	Public Facility or Infrastructure Activities for Low/Mod Income Housing Benefit	Households Assisted	50	10	10.0%	10	0	0.00%

Sewer Infrastructure Program	Non-Housing Community Development	CDBG: \$250,000	Public Facility or Infrastructure Activities for Low/Mod Income Housing Benefit	Households Assisted	1000	250	25.0%	0	0	0.00%
Stormwater Infrastructure Program	Non-Housing Community Development	CDBG: \$500,000	Public Facility or Infrastructure Activities for Low/Mod Income Housing Benefit	Households Assisted	1000	9045	0.00%	0	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.

Jefferson County continues to meet and address the goals and objectives as identified by the Priority Needs identified during the process and input solicited from citizens during it’s Consolidated Plan process. The highest goals/needs identified were affordable housing needs (Home Owner Rehabilitation, Private Sanitary Sewer System Replacement, Sewer Tap-on & First time home buyer assistance), Non-Housing Community Development (Sewer & Storm Water Infrastructure, public facilities, Economic Development, Handicap/ADA Accessibility & Public Services) and Suitable Living Environments. During PY2020 Jefferson County was notified of additional funding under the CDBG-CV (CARES Act funding) allocation. During PY2021 Jefferson County began processing applications for the priority needs of economic development and public service with the CDBG-CV funds.

CR-10 - Racial and Ethnic composition of families assisted

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

91.520(a)

	CDBG
White	49
Black or African American	7
Asian	0
American Indian or American Native	0
Native Hawaiian or Other Pacific Islander	0
Total	56
Hispanic	
Not Hispanic	

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

Narrative

The table reflects the number of families assisted thru projects that were marked as completed during PY2021.

CR-15 - Resources and Investments 91.520(a)

Identify the resources made available

Source of Funds	Source	Resources Made Available	Amount Expended During Program Year
CDBG	public - federal	1,227,779	592,601.39

Table 3 - Resources Made Available

Narrative

Jefferson County fills budgeted activity slots with funds available cumulatively. Total disbursements during PY2021 included prior year projects that were worked on and/or completed during the program year. Jefferson County administer's its CDBG program solely with funds received from HUD on a yearly basis, there are no additional public or private resources or funds injected or leveraged into its programs.

Identify the geographic distribution and location of investments

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description
Jefferson County	100	48.27	County

Table 4 – Identify the geographic distribution and location of investments

Narrative

Jefferson County is an Urban County Entitlement Grantee and receives its CDBG funds directly from HUD. 100% of funds are used within the geographical boundaries of the County and all programs are offered County-wide to qualified LMI residents.

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.

During PY2021 Jefferson County did not leverage or obtain any “other” public or private resources and there is no match requirement on any Jefferson County program. In regards to infrastructure and municipal generated programs, current applicants are encouraged to produce a match to its applied for CDBG funding. This match has been historically satisfied by mostly local funds that pay for non CDBG qualified expences, in-kind donations, and in-house labor by the applicant municipalities and entities.

In regards to Jefferson County HOME funds, the County is a member of the St. Louis HOME Consortium which satisfied the match requirement for that program and subsequently allowed for HOME funding to flow throughout Jefferson County.

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	0	0
Number of special-needs households to be provided affordable housing units	0	0
Total	0	0

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 the rehab of existing units	14	26
Number of households supported through the acquisition of existing units	0	0
Total		

Table 6 – Number of Households Supported

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

PY2021 represents the first year action plan of the current 2021-2026 Consolidated Plan period to be entered into IDIS. Actual outcomes of prior year activities are not represented in current reports under one-year goals as tracked by the current IDIS format. Numbers reported as actual include completion of previous 5 year forgivable activities under the home rehabilitation and on-site septic system programs. Outcomes/completed jobs were significantly reduced as a result of the COVID-19 pandemic.

Discuss how these outcomes will impact future annual action plans.

As prior year activities are completed and data reflects activities entered under the current IDIS format, actual one year goals will become better reported under new IDIS format.

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	0	0
Low-income	56	0
Moderate-income	0	0
Total	56	0

Table 7 – Number of Households Served

Narrative Information

Jefferson County’s CDBG actual numbers reported in this chart represent the activities that were completed during PY2021 utilizing both current and prior year funding. HUD IDIS current system does include household demographics from prior year/consolidated plan being completed during a different year. HOME numbers are reported under the St. Louis HOME consortium.

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

During PY2021 Jefferson County Entitlement Program did not receive dedicated homeless or homeless prevention funds. Jefferson County continues to be a member of the Missouri Balance of State Continuum of Care and the Jefferson County Homeless Coalition group. Comtreia is the designated leader of the county's participation in the annual Point in Time Count (PITC) of homeless persons held each January. The official homeless numbers for Jefferson County as stated in the 2020 (The 2021 SHELTERED PIT County was scheduled for January 27, 2021. No UNSHELTERED PIT was conducted in 2021 due to COVID-19, 2020 numbers were updated as of 3/18/21 to reflect information for 2021) Mo BoS CoC Point-In-Time count are as follows: Sheltered persons-37 and Unsheltered-4. Up from the 2019 count of Unsheltered- 0; Sheltered-10. While many individuals and organizations recognize that in reality this number is more than likely higher, the official PIT count is the only HUD recognized number of individuals.

Jefferson County does not have a dedicated sole purpose homeless shelter. It is believed that many homeless persons may migrate to other areas with a more visible service structure and overnight services. Shared Blessings Homeless Shelter in Bonne Terre and New Life Evangelistic Center in Potosi report that they regularly serve applicants from Jefferson County. Mercy Hospital-Jefferson case managers also report self identified homeless persons being seen somewhat regularly at the hospital, but no official count of these individuals exists. Jefferson County food pantries also contribute information gathered from recipients self identifying as homeless but who may not be included in official PIT counts.

Jefferson Franklin Community Action and Comtreia, are the two largest agencies in the county performing the bulk of case management, housing and services. Mercy Hospital-Jefferson also seems to encounter the highest number of persons identifying as homeless and provides case management services for its patients. These agencies are the most visible point of contact for homeless assistance and main supportive services. Disability Resource Association (DRA) provides case management services and resources for disabled persons within the county. DRA is also the main resource for building and managing accessible housing for the disabled population in Jefferson County. St. Patrick Center, operating a satellite office in Jefferson County, performs case management, Rapid and Permanent Housing Services, and other resources for Jefferson County veterans.

Addressing the emergency shelter and transitional housing needs of homeless persons

Comtreia continues to work diligently with the Balance of State CoC to prepare and implement

HUD's Coordinated Entry program for Jefferson County and Region One of the BoS CoC. Comtrema also serves as one of two Coordinated Entry Doors for Region 1 BoS CoC.

Comtrema's Housing Program is the foremost provider of transitional housing in Jefferson County. Most of this programs' clientele are individuals currently receiving assistance from other existing programs who have a change in circumstances requiring emergency or transitional services or are referred from other service providers.

The only physical shelter in Jefferson County is Comtrema's domestic violence shelter, "A Safe Place." Clients are limited to women and children under 12. Services at this facility are confidential and include emergency shelter, quality counseling and transition services. The latest 2020 Impact of A Safe Place was as follows: received 1,123 hotline calls, served 1,069 clients, turned away 1,455, offered 3,729 nights of safety, educated 319 individuals about domestic violence, assisted with 110 orders of protection, provided 82.5 hours of court advocacy for survivors and provided 263 hours of professional therapy.

In 2017, Comtrema's partnership with Mary's House of Hope to build Transitional Housing for victims of domestic violence in Jefferson County was formalized and has progressed. At completion each house will offer four separate apartments for survivors and their families. The entire project is estimated to include three housing units with twelve apartments. Each house consists of four units (one 1-bedroom unit, two 2-bedroom units, and one 3-bedroom unit). When all three houses are completed, there will be three 1-bedroom units, six 2-bedroom units, and three 3-bedroom units (total of 12 units). In addition, there will be three multipurpose rooms. A playground is adjacent to the housing facilities. (When domestic violence victims leave "A Safe Place" crisis shelter, "Mary's House of Hope at A Safe Place" transitional housing will provide stability, structure and safety for the victim while they identify and set goals, access community resources, and transition to independent living. Residents may stay for one to two years during transition. Otherwise, most victims have no other option than to return to the home of the abuser or seek refuge at a family member's home that is known to the abuser and putting themselves and their other family members at further risk. The most recent project milestones are: Ground breaking ceremony was held on March 17, 2017; Public water and sewer installed; site preparation is complete; Funds raised utilizing NAP tax credits a year and a half early; \$1.5 million raised to build and furnish the first home; First four families moved into apartments Fall 2020 and Circle of Hope campaign has been created to cover operational expenses.

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

Comtrea provides a Substance Use Outpatient Program offering various support programs including the Serious and Repeat Offender Program (SROP) and collaborates with the DWI Court, Probation and Parole, Children's Division, Mercy Hospital-Jefferson & South (St. Anthony's Hospital) and the United Way. Comtrea offers Community Psychiatric Rehab (CPR) intensive services for a minimum of 350 individuals with significant mental illness, substance use, and chronic care conditions. Comtrea partners with the Department of Mental Health, Community Providers, Law Enforcement, Hospital Community Linkage, Emergency Room Enhancement, Adult Drug Court, Family Drug Court, and Veteran's Court. Comtrea participates in the Crisis Intervention Team (CIT) of Jefferson County to train officers to recognize a mental health emergency or need where intervention might be provided to prevent arrest. Jefferson County Sheriff's Department has recently added personell to work directly with mental health intervention. Without direct funding for homeless programs, the Jefferson County CDBG program relies on local resources. Organizations in Jefferson County utilize the following programs for their current housing assistance programs: MO Department of Mental Health Permanent Supportive Housing, Supportive Community Living Program, Rental Assistance Program, and Disease Management; MHDC; HUD Housing Choice Voucher; FEMA Rental Assistance; CDBG; HOME; Salvation Army vouchers; St. Vincent De Paul; St. Patrick Center Supportive Service for Veteran Families; "Back to School" resource fairs; and church programs.

In addition, Jefferson County's CDBG programs assist LMI residents with Home Rehabilitation and Private On-site Sanitary Sewer Replacements necessary to keep them in their homes and ultimately assist in the prevention of homelessness. Jefferson County also continues its participation in the St. Louis HOME Consortium, working with other municipalities and counties in the surrounding St. Louis area to promote homeownership. The Housing Partnership, Beyond Housing and Better Family Life provide housing counseling services to assist residents in the retention of homeownership and loss prevention in such situations.

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

Again, without direct funding for homeless programs, the Jefferson County CDBG program relies on other established local resources for this topic. Such resources include the following programs; housing and counseling assistance programs thru Comtrea; various disability related programs thru DRA; MO Department of Mental Health Permanent Supportive Housing, Supportive Community Living Program, Rental Assistance Program, and Disease Management; MHDC; HUD Housing Choice Voucher; FEMA Rental Assistance; CDBG; HOME; Salvation Army vouchers; St. Vincent De Paul; St. Patrick Center Supportive Service for Veteran Families; "Back to School" resource fairs; and church programs.

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

Actions taken to address the needs of public housing

The Jefferson County CDBG Program currently does not directly fund any public housing units nor does it have a county-wide public housing authority. The Festus Housing Authority (Rolling Green Subdivision) represents the only housing authority in Jefferson County and contains 56 single family housing units. County-wide housing assistance in the form of Section 8 vouchers is administered by the Jefferson /Franklin Community Action Corp, a separate legal entity who receives HUD funding separate from CDBG. During PY 2021 the CDBG staff member continued to serve on the Board of Directors of the Jefferson Franklin Community Action Corporation in order to better represent opportunities available thru the CDBG program to participants of this sister organization and in turn for better involvement with the public housing authority and any other affiliated programs offered to LMI residents thru the JFCAC.

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

No formal actions or activities were planned or estimated for this category during PY2021. While no direct housing authority program currently exists under the Jefferson County CDBG program, Entitlement staff stay in contact with the Jefferson/Franklin Community Action Corp. (HUD housing assistance org.) in regards to public housing including individual availability of housing vouchers, waiting lists and availability of units. The Festus Housing Authority remains the only public housing complex in Jefferson County and manages its own inventory and any associated programs. During PY2021 CDBG staff continued to make packets on available programs including home rehab and the First Time Home Buyer program (HOME) available to the housing authority for its residents.

Actions taken to provide assistance to troubled PHAs

Jefferson County only has one Public Housing Authority, The Festus Housing Authority and it is not designated as troubled.

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

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

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, therefore no actions were taken on this during PY2021.

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

During PY2021 Jefferson County continued to address the previously identified primary obstacle in meeting under-served needs of obtaining qualified applicants and confidence of ownership retention to meet the required 5-year forgivable loan period. The past declining and flat economy, especially as a result of the COVID pandemic, continues to take its toll on LMI applicants, primarily in the reduced current value of homes. As a result, this lower valuation has significantly reduced the amount of available equity (value of home minus current balance of mortgage) required to meet program guidelines. A large majority of applicants are “upside down” in their mortgages.

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 required by our programs. It is the opinion of staff that these stated obstacles continue to reduce the number of applicants overall for all programs currently offered. During PY2021 program requirements were adjusted to overcome this need by removing the recorded lien previously placed against applicant homes and reducing the the required time frame from 5 years to 2 years. Staff will continue to monitor outcomes to identify if this change results in additional applicants. Additional underserveds needs will be addressed as identified.

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

During PY2021, Jefferson County continued to require all homes built prior to 1978 and receiving rehabilitation to undergo a full lead risk assessment including remedies for reduction of lead-based paint hazards prior to any action in addition to continued education of our contractors. All participants receive the required printed information on lead hazards and require signatures of recipients to ensure compliance. Lead Certified contractors are used when the risk assessment indicates “hot spots”. Administrative staff continues to educate themselves on the subject of lead in light of several identified possible high risk areas located within Jefferson County. Staff and contractors will explore and participate in additional training as it becomes available.

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

Jefferson County does not have any direct programs or policies with regards to reducing the number of poverty-level families but supports other local social service agencies that assist LMI residents by coordinating services and utilizes referrals when possible. The Jefferson County CDBG program helps to preserve affordable housing through its home owner rehabilitation, on-site septic system replacement and sewer tap-on programs by providing funds to LMI persons to provide sustainable, decent housing without being forced to invest their own limited resources. CDBG staff also serve on the Jefferson Franklin Community Action Corp Board of Directors, who administer several self-sufficiency programs which assist in reducing the number of poverty-level families in the County. Additionally the Economic Development Corp (CDBG Administrator) and Industrial Development Authority continues to attract new and expanding businesses to Jefferson County which will increase the number of available jobs within the County allowing for additional employment opportunities for its residents. During PY2020 Jefferson County received notice of additional funding under the CDBG-CV funds. During PY2021 Jefferson County began processing applications for the priority needs of economic development and public service with the CDBG-CV funds.

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

During PY2021, Entitlement staff continued its efforts to attempt to identify existing organizations providing services LMI residents. Jefferson County continued its association with the Balance of State Continuum of Care, St. Louis HOME Consortium, various volunteer groups when identified and available and continued to attempt to expand its public notice procedures in hopes of reaching more public input to not only reports but program design and future needs. The program administrator (EDC) dedicates a page solely to the Entitlement Programs on its web site in addition to links provided on the Jefferson County web site. It allows for posting of public notices, public meetings regarding the CDBG program, applications and information on available programs as well as fair housing information for residents. The administrator has noted a continual referencing from persons stating that they utilized the web site to obtain program forms. Additionally, during

PY2021 the CDBG staff continued to set on the Board of Directors of the Jefferson Franklin Community Action Corporation in order to better represent opportunities available thru the CDBG program to participants of this sister organization and in turn for better involvement with the public housing authority and any other affiliated programs offered to LMI residents thru the JFCAC. Jefferson County will continue to identify “missing” components and/or outlets to overcome identified gaps in existing structures. While the overall coordination of both services and program awareness continues to improve, there will always remain areas that will need further enhancement in the coming years.

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

During PY2021 Jefferson County entitlement staff participated in meetings with the Balance of State Continuum of Care, St. Louis HOME Consortium, County Departments and Jefferson Franklin Community Action to ensure coordination and availability of services.

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

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 new 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.

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 LIHTC 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 will begin to develop a strategy to remove or ameliorate as many of the identified impediments to the best of its ability. During PY2021 Jefferson County began assessment of the identified barriers.

CR-40 - Monitoring 91.220 and 91.230

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

All Jefferson County Entitlement programs have been designed in compliance with all regulations. Individual activities are checked for compliance throughout the processes with clarification from our designated field representative and environmental representative in the event of any questionable compliance issues. Administrative staff is in continual contact with the St. Louis Missouri HUD Field Office and utilizes HUD sanctioned training as it becomes available. Administrative staff also reports, on a quarterly minimum, to the Jefferson County Contracts and Grants Department to assure full compliance on a local level.

Individual activities are monitored continually by "hands on" staff involvement which includes home visits, in-office and virtual meetings, phone calls and written correspondence via U.S. postal service and email/internet when available. Physical activity progress is managed by standardized contracts, check lists and individual activity forms checked by staff and processed on an as-completed basis throughout the work progression. Financial activity (payments for services) are monitored via a standardized draw down procedure set forth by the County. Reimbursements are only processed after work completion and are subject to a multi-step review/approval process prior to actual disbursement (invoice submittal by contactor, staff created draw downs, approval by County Executive, final approval and processing by Treasurer's Office, payment generation by County Accounts Payable, disbursement of check to contractor).

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.

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 and identified public service agencies and organizations 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.

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.

In analyzing past years data, primarily the number of viable applications being received by the Administrator for individual home owner programs, it has been noted that a decrease in overall applications has been trending. While staff feels that an appropriate number of properties "needing" rehabilitation services exists, but an overall feeling of "distrust or weariness of government programs" is being expressed by a higher than previously experienced number of individuals making contact with program staff. Additionally, during PY2020 and 2021 the COVID-19 pandemic has had a significant impact on the overall Jefferson County program. High job loss and continued social distancing regulations have been identified as major deterrents on qualifying applicants, primarily due to home mortgages being in arrears and an increasing number of homes having to be sold prior to the 5 year forgiveness period as a result of the typical LMI household employment/prolonged stability situations. CDBG staff do not recommend discontinuing any existing programs, but did re-evaluate and adjusted local program parameters during PY2021 (length of forgiveness period, required available equity and its subsequent lien position, included components of individual programs, possibility of additional program sub-sets, possibility of additional programs not currently offered, etc.) Jefferson County recognizes that it must meet spending ratios as set forth by the U.S. Department of Housing and Urban Development, despite program adjustments. To accomplish this, Jefferson County will increase focus on existing regional infrastructure programs during the analysis period to meet such requirements and make individual program adjustments that meet HUD CDBG guidelines while still providing quality programs to the LMI population of Jefferson County.

Does this Jurisdiction have any open Brownfields Economic Development Initiative (BEDI) grants? NO

Describe accomplishments and program outcomes during the last year.

Jefferson County Missouri Program Year 2021 accomplishments and program outcomes are as follows:

**Funds not applied for in other programs are utilized to completed additional applications received under the active programs during the current year while awaiting funding. This action can result in more applications being processed than budgeted for any given year.*

Private Sanitary Sewer System Replacement Program: During PY2021 this activity continued to accept applications and successfully filled all remaining funding slots from PY2019 (10/10) and (6/4 budgeted) for PY2021. No additional slots were budgeted for PY2020 as prior year funding

remained available and is exhausted before new funds/slots are budgeted. Applications accepted and are in various stages of construction. Physical project progress within this program is regulated by local building department deeming conditions suitable for installation.

Home Owner Rehabilitation Program: During PY2021 this activity continued to accept applications and successfully filled and completed all remaining funding slots from PY2020 (10/10) and (6/10) for PY2021. Applications accepted and are in various stages of construction.

Handicap/ADA Public Facility Assistance Program: One application consisting of five phases was completed during PY2021.

Sewer Infrastructure Program: During PY2021 Two new applications were received from participating municipalities. One of new application was received and approved but subsequently cancelled prior to funding as a result of bids received were significantly increased (over available funding) due to cost inflation resulting from the COVID pandemic. Applicant will re-evaluate the project at a later date.

Storm Water Infrastructure Program: During PY2021 One new application was received.

Residential Sewer Tap-On Fee Program: During PY2021 Two new application were received; one completed. CDBG staff are working with the Jefferson County Public Sewer District on a new project to bring new public sewer service to two subdivisions in northwest area of the County. The Administrator has been notified that there are approximately 150 housing units within this project that could potentially qualify for this program. Funds will be adjusted as/if new tap-on applications are received.

CDBG-CV Microenterprise Business Grant Program: During PY2021 Forty-three applications for this new program designed to meet economic development needs resulting from the COVID pandemic were received. 18 were accepted and funding; 16 were incomplete and 9 were declined for failing to meet the program guidelines. Additional programs will be added as need is identified until CDBG-CV funding is exhausted.