

# Jefferson County, Missouri



## Community Development Block Grant (CDBG) Program

### DRAFT 2022 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)

This could be an overview that includes major initiatives and highlights that were proposed and executed throughout the program year.

During this program year (PY) of overall entitlement, January 1, 2022 through December 31, 2022, 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 2022 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 PY2022.

Jefferson County fills budgeted activity slots with funds available cumulatively. Total disbursements during PY2022 included prior year projects that were completed during the year. Funds actually disbursed during PY2022 were as follows: Economic Development/Micro-Enterprise CDBG-CV: 31 completed, \$162,090.20; Housing/ Rehab; 13 activities completed, \$175,942.40; Sidewalk/curbcuts-ADA: 1 completed, \$225,500.00; Water/Sewer Improvements (Septic Replacement & Sewer Infrastructure); 47 activities (28 septic open/maint, 16 septic completed, 3 infrastructure completed), \$740,224.28; Public Service/Food Pantry CDBG-CV: 6 completed, \$1,250,000.00 Administration, 1 completed, \$172,197.46; Total Disbursements during PY2022, \$ 2,725,954.34

### 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: \$231,158	Other	Other	5	2	20.00 %	1	1	100.00%

Community Services Program	Affordable Housing Non-Homeless Special Needs Non-Housing Community Development	CDBG-CV: \$1,250,000	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	1	1	0.00%	1	109,128	100.00%
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: \$225,500	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	5	2	20.00%	1	4,635	100.00%
Home Rehabilitation Program	Affordable Housing	CDBG: \$150,000	Homeowner Housing Rehabilitated	Household Housing Unit	50	15	30.00%	10	5	50.00%
Private Sanitary Sewer System Replacement Program	Affordable Housing	CDBG: \$49,129	Homeowner Housing Rehabilitated	Household Housing Unit	50	12	24.00%	7	7	100.00%
Residential Public Sewer Tap-on Program	Affordable Housing Non-Housing Community Development	CDBG: \$1	Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit	Households Assisted	50	10	20.00%	0	0	0.00%
Sewer Infrastructure Program	Non-Housing Community Development	CDBG: \$250,000	Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit	Households Assisted	1000	15,180	1,581%	0	15,180	100.00%
Stormwater Infrastructure Program	Non-Housing Community Development	CDBG: \$250,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	1000	9045	904%	250	9045	100.00%
Micro-Enterprise Program	Creating/sustaining Economic Opportunities	CDBG-CV:300,000	Economic Develop:Microenterprise Assistance	Businesses Assisted	1	1	100%	31	31	100.00%
Community Services Program	Affordable Housing Non-Homeless Special Needs Non-Housing Community Development	CDBG-CV: \$1,250,000	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	1	1	100%	1	109,128	100.00%

**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 PY2022 Jefferson County continued 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)**

	<b>CDBG</b>
White	42
Black or African American	10
Asian	0
American Indian or American Native	1
Native Hawaiian or Other Pacific Islander	0
Black/African American & White	2
Other Multi-racial	1
<b>Total</b>	<b>56</b>
Hispanic Persons Assisted	982
Not Hispanic Persons Assisted	113,831

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

**Narrative**

The table reflects only the number of families reported as assisted thru projects that were marked as completed during PY2022. Total Persons assisted are as follows: White: 101,913; Black/African American-4,657; Asian: 2,362; American Indian/Alaskan Native: 1,305; Native Hawaiian/Other Pacific Islander: 509; American Indian/Alaskan Native & White: 1; Asian & White: 1; Black/African American & White: 1; Other multi-racial: 3,083. Total Persons assisted during PY2022: 113,831 with a total of 982 being Hispanic.

## 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	1,155,788	1,141,667
CDBG-CV	Public – federal	1,554,155	1,538,830

Table 3 - Resources Made Available

### Narrative

Jefferson County fills budgeted activity slots with funds available cumulatively. Total disbursements during PY2022 included prior year projects that were worked on and/or completed during the program year as well as CDBG-CV funds. 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

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 PY2022 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
<b>Total</b>	<b>0</b>	<b>0</b>

**Table 5 – Number of Households**

	One-Year Goal	Actual
Number of households supported through Rental Assistance	0	0
Number of households supported through The Production of New Units	0	0
Number of households supported through Rehab of Existing Units	17	12
Number of households supported through Acquisition of Existing Units	0	0
<b>Total</b>	<b>17</b>	<b>12</b>

**Table 6 – Number of Households Supported**

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

PY2022 represents the second 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 that were significantly reduced as a result of the COVID-19 pandemic are slowly returning to normal but all programs are still experiencing significant delays in obtaining supplies needed to complete the activities.

### 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.**

<b>Number of Households Served</b>	<b>CDBG Actual</b>	<b>HOME Actual</b>
Extremely Low-income	0	0
Low-income	12	0
Moderate-income	0	0
<b>Total</b>	<b>12</b>	<b>0</b>

**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 PY2022 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.

Jefferson County has no activities that meet the regulatory definition of this category.

## **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 PY2022 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 2021 Sheltered PIT Count was scheduled for January 27, 2021. No Unsheltered PIT was conducted in 2021 due to COVID-19, Numbers were updated as of 3/18/21 to reflect information for 2021 but no Jefferson County specific numbers were reported.

The official homeless numbers for Jefferson County as stated in the 2022 Mo BoS CoC Point-In-Time count for Jefferson County MO is as follows: Sheltered persons-26, Safe Haven persons-3, Transitional Housing persons-15 and Unsheltered-44. Up from the 2020 count of Unsheltered- 4; but down for Sheltered-37. 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**



Comtrea 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. Comtrea also serves as one of two Coordinated Entry Doors for Region 1 BoS CoC. Comtrea'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 Comtrea'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 2021 Impact of A Safe Place was as follows: received 1,226 hotline calls, served 1,916 clients, turned away 1,022, offered 6,194 nights of safety, educated 263 individuals about domestic violence, assisted with 109 orders of protection, provided 101.25 hours of court advocacy for survivors, provided 541 hours of professional therapy and provided 357 hours of crisis intervention services.

In 2017, Comtrea'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 created to cover operational expenses and Legacy of Hope Society created 2021.

**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 2022 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.

Additional clarification, the MO205 PHA is the Franklin County PHA; they receive Housing Choice Vouchers for Jefferson and Franklin Counties. Their jurisdiction is both counties. The PHA is called the Franklin County PHA, but it serves as Jefferson County's PHA as well. It is a legal entity under Missouri state law. It is administered by the Jefferson/Franklin Community Action Agency – but the community action agency only administers the PHA's program. The PHA is a separate legal entity from the community action agency and Franklin County PHA receives funding directly from HUD for the voucher program. The Franklin County PHA MO205 legitimately operates within the Jefferson County jurisdiction with its own Executive Director. Therefore there are legally two public housing authorities (PHAs) operating in Jefferson County.

### **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 PY2022. 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 as a public housing complex in Jefferson County and manages its own inventory and any associated programs. During PY2022 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 does not have any Public Housing Authority 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 develop a strategy to address such policies, therefore no actions were taken on this during PY2022.

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

During PY2022 Jefferson County continued to address the previously identified primary obstacle in meeting under-served needs of obtaining qualified applicants. The PY2021 program adjustment of the removal of recorded lien and a new 2 year program participation period has shown a positive effect on new qualified application submissions. Staff will continue to monitor and make additional adjustments if needed to maintain applications. 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 still “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 participation period 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 forgiveness period required by our programs. It is the opinion of staff that these stated obstacles may still continue to reduce the number of applicants overall for all programs currently offered. Staff will continue to monitor outcomes to identify if this change results in additional applicants. Additional underserved needs will be addressed as identified.

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

During PY2022, 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 PY2022 Jefferson County continued 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 PY2022, 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 PY2022 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 PY2022 Jefferson County entitlement staff participated in meetings with the Balance of State Continuum of Care, St. Louis HOME Consortium, County Departments, Jefferson-Franklin Community Action and the Jefferson County Homelessness Coalition group 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. See Additioanl Text for Individual Barriers & Strategies.

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 PY2022 Jefferson County continued assessment of the identified barriers.

**Barriers and Strategies**

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 Countys 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 regions diversity and encourage interaction among diverse participants in neighborhoods throughout the region.

## **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.**

No program changes took place in PY 2022. 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. During PY2020 and 21 the COVID-19 pandemic 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 continue to 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

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

## CR-58 – Section 3

Identify the number of individuals assisted and the types of assistance provided

Total Labor Hours	CDBG	HOME	ESG	HOP WA	HTF
Total Number of Activities	0	0	0	0	0
Total Labor Hours	0				
Total Section 3 Worker Hours	0				
Total Targeted Section 3 Worker Hours	0				

**Table 8 – Total Labor Hours**

Qualitative Efforts - Number of Activities by Program	CDBG	HOME	ESG	HOP WA	HTF
Outreach efforts to generate job applicants who are Public Housing Targeted Workers	0				
Outreach efforts to generate job applicants who are Other Funding Targeted Workers.	0				
Direct, on-the job training (including apprenticeships).	0				
Indirect training such as arranging for, contracting for, or paying tuition for, off-site training.	0				
Technical assistance to help Section 3 workers compete for jobs (e.g., resume assistance, coaching).	0				
Outreach efforts to identify and secure bids from Section 3 business concerns.	26				
Technical assistance to help Section 3 business concerns understand and bid on contracts.	0				
Division of contracts into smaller jobs to facilitate participation by Section 3 business concerns.	0				
Provided or connected residents with assistance in seeking employment including: drafting resumes, preparing for interviews, finding job opportunities, connecting residents to job placement services.	0				
Held one or more job fairs.	0				
Provided or connected residents with supportive services that can provide direct services or referrals.	0				
Provided or connected residents with supportive services that provide one or more of the following: work readiness health screenings, interview clothing, uniforms, test fees, transportation.	0				
Assisted residents with finding child care.	0				
Assisted residents to apply for, or attend community college or a four year educational institution.	0				
Assisted residents to apply for, or attend vocational/technical training.	0				
Assisted residents to obtain financial literacy training and/or coaching.	0				
Bonding assistance, guaranties, or other efforts to support viable bids from Section 3 business concerns.	0				
Provided or connected residents with training on computer use or online technologies.	0				
Promoting the use of a business registry designed to create opportunities for disadvantaged and small businesses.	0				
Outreach, engagement, or referrals with the state one-stop system, as designed in Section 121(e)(2) of the Workforce Innovation and Opportunity Act.	0				
Other.	0				

**Table 9 – Qualitative Efforts - Number of Activities by Program**

### Narrative

Jefferson County makes all bid opportunities available to all qualified contractors including any and all known Section 3 business concerns.

Jefferson County Missouri Program Year 2022 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 PY2022 this activity continued to accept applications and successfully filled all remaining funding slots from PY2021 (5/5) and (7/7 budgeted) for PY2022. 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.

Homeowner Rehabilitation Program: During PY2022 this activity continued to accept applications and successfully filled and completed all remaining funding slots from PY2022 (10/10) and (5/10) for PY2022. Applications accepted and are in various stages of construction.

Handicap/ADA Public Facility Assistance Program: One application for ADA/Sidewalk Infrastructure improvements was completed during PY2022.

Sewer Infrastructure Program: During PY2022 One new applications was received and one completed from participating municipalities.

Storm Water Infrastructure Program: During PY2022 One new application was received and one completed from participating municipalities.

Residential Sewer Tap-On Fee Program: During PY2022 no new applications were received. CDBG staff are working with the Jefferson County Public Sewer District on a 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 PY2022 Fifty-two applications for this new program designed to meet economic development needs resulting from the COVID pandemic were received. 31 were accepted and funding; 6 were incomplete and 15 were declined for failing to meet the program guidelines. To meet HUD expenditure guidelines, CDBG-CV funding for this program was expended and closed out during PY2022.

CDBG-CV Food Pantry Assistance Grant Program: During PY2022 this new program was implemented to meet increased public service needs resulting from the COVID pandemic. Remaining unapplied for CDBG-CV funds were reprogramed and distributed evenly to the five existing standalone unaffiliated food pantries located in Jefferson County. To meet HUD expenditure guidelines, CDBG-CV funding for this program was expended and closed out during PY2022.