



Community  
Development Block Grant Program  
(CDBG)

**DRAFT**  
2024 Consolidated Annual Performance  
and Evaluation Report (CAPER)

## CR-05 - Goals and Outcomes

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

#### 91.520(a)

The Consolidated Annual Performance and Evaluation Report (CAPER) for program year (PY) 2024 describes the activities undertaken by Jefferson County MO from January 1, through December 31, 2024. 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 2024 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 PY2024.

Jefferson County fills budgeted activity slots with funds available cumulatively. Funds disbursed during PY2024 were as follows: Housing/ Rehab; 15 activities completed, \$225,582.16; Sidewalk/curb cuts-ADA: 1 completed, \$249,350.00; Water/Sewer Improvements (Septic Replacement & Sewer Infrastructure); 34 activities (11 septic open/maintenance, 18 septic jobs completed, 5 sewer infrastructure completed), \$1,198,843.60; Administration, 1 completed, \$140,917.18; Total Disbursements during PY2024 were \$1,814,692.94.

### 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)

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: \$217,268	Other	Other	5	4	80%	1	1	100%
Handicap/ADA Public Facility Assistance Program	Non-Housing Community Development	CDBG: \$1	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	5	4	80%	1	4505	100%
Home Rehabilitation Program	Affordable Housing	CDBG: \$300,000	Homeowner Housing Rehabilitated	Household Housing Unit	50	43	86%	5	20	100%

Private Sanitary Sewer System Replacement Program	Affordable Housing	CDBG: \$ 200,000	Homeowner Housing Rehabilitated	House hold Housing Unit	50	32	64%	4	10	100%
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	House holds Assisted	50	10	20%	0	0	0%
Sewer Infrastructure Program	Non-Housing Community Development	CDBG: \$ 250,000	Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit	House holds Assisted	1000	22,084	2,208%	250	6,904	100%
Stormwater Infrastructure Program	Non-Housing Community Development	CDBG: \$ 119,073	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	1000	9045	905%	250	0	100%

**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 of its priority needs as identified during the process and input collected from citizens during its Consolidated Plan process. The highest goals/needs identified were affordable housing needs (Homeowner 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.

## 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	4,526
Black or African American	168
Asian	7
American Indian or American Native	64
Native Hawaiian or Other Pacific Islander	1
<b>Total</b>	<b>4,766</b>
Hispanic	23
Not Hispanic	4,743

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 through projects that were marked as completed during PY2024. IDIS CR-10 does not calculate the category of Other Multi-racial of which Jefferson County assisted 65 persons.

Additional demographic data requested by HUD for PY2024 beneficiaries:

Families' w/children: 2,308  
Person's w/disabilities: 2,597  
Elderly population: 2,124

## 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	1,086,343	1,814,692.94

Table 3 - Resources Made Available

### Narrative

Jefferson County fills budgeted activity slots with funds available cumulatively. Total disbursements during PY2024 included prior year projects that were worked on and/or completed during the program year. Jefferson County administers 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	100	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. No publicly owned land or property was used to address the needs identified in the plan.

### 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 PY2024 Jefferson County did not leverage or obtain any “other” public or private resources and there is no match requirement on any of the Jefferson County programs. Regarding 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 expenses, in-kind donations, and in-house labor by the applicant municipalities and entities. No publicly owned land or property was used to address the needs identified in the plan.

Regarding 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 with affordable housing units	0	0
Number of non-homeless households to be provided with affordable housing units	0	0
Number of Special-Needs households to be provided with 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	0	0
Number of households supported through Acquisition of Existing Units	0	0
<b>Total</b>	<b>0</b>	<b>0</b>

**Table 6 – Number of Households Supported**

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

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

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

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

**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	0	0
Moderate-income	0	0
<b>Total</b>	<b>0</b>	<b>0</b>

**Table 7 – Number of Households Served**

### Narrative Information

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 PY2024 Jefferson County Entitlement Program did not receive nor is eligible for dedicated homeless or homeless prevention funds.

Jefferson County continues to be a member of the Missouri Balance of State Continuum of Care in its efforts to conduct outreach and assessment of the homeless in the Region One area. Additionally, CDBG staff continue to work with and support the known social service agencies who conduct outreach, assessment, and assistance in Jefferson County (Compass Health Network, Jefferson-Franklin Community Action Corporation and Disability Resource Association) and follows the Jefferson County Coalition for the Unhoused volunteer group, when possible.

Jefferson County does not have a homeless shelter. It is believed that many homeless people 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. Numerous church congregations/religious organizations provide varying assistance to individuals in need. Jefferson County food pantries also contribute information gathered from recipients self-identified as homeless but who may not be included in official PIT counts.

Jefferson Franklin Community Action and Compass Health (formerly Comtrea) are the two largest agencies in the county performing the bulk of case management, housing, and services to homeless or in danger of becoming homeless, additionally the Jefferson County Health Department-Public Health Outreach assists with coordination and referrals to resources. Mercy Hospital-Jefferson also seems to encounter a high number of people identified 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 performs case management and other resources for Jefferson County veterans and their families.

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

Jefferson County does not have a dedicated homeless shelter or a local Continuum of Care. Compass Health Network’s residential program represents the County’s only organized shelter services. It consists of one domestic violence shelter, “A Safe Place” and the adjacent “Mary’s House of Hope” transitional housing currently consisting of one house with four individual units. 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 data available was as follows: received 1,253

hotline calls, served 1,069 clients, turned away 1,455, offered 3,729 nights of safety, educated 319 individuals about domestic violence, provided 82.5 hours of court advocacy for survivors, and provided 263 hours of professional therapy. Individual motel vouchers are provided by various organizations, primarily faith related and Salvation Army, as funding allows, but are not dependably available.

Jefferson County CDBG does not directly offer any shelter or beds for individuals or families who are homeless. All concerns and/or calls received by the CDBG administrators' office regarding homelessness in Jefferson County are directed to known local resources that include, but are not limited to the MO Region One BoS CoC, Jefferson-Franklin Community Action Corp, Compass Health Network, Salvation Army, St. Vincent De Paul, St. Patrick Center, Jefferson County Health Department, local food pantries and 2-1-1. During months of extreme cold/heat, calls are also directed to the County's emergency management department so that individuals and families can find information/sites for warming/cooling centers set up within the County that can provide temporary shelter.

**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**

Jefferson County CDBG does not have a program specifically designed to address individuals or families that have the potential to become homeless after being discharged from publicly funded institutions or systems of care or are receiving assistance from public or private agencies.

The Jefferson County CDBG program does not directly serve individuals who are homeless, to address this, staff members make every effort to put individuals seeking assistance in touch with known local community resources that provide shelter, health and social services, employment, education, food, or other needs services.

All calls/inquiries received by the administrator for homeless related assistance are currently referred to the following known programs which include MO Department of Mental Health; MHDC; HUD Housing Section 8 Vouchers; Jefferson Co Health Dept; FEMA Rental Assistance for natural disasters; Salvation Army; St. Vincent De Paul; St. Patrick Center; local food pantries and local church programs.

Jefferson County's CDBG programs do 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 and assist in homeownership thru its Down Payment Assistance program. The Housing Partnership, Beyond Housing and Better Family Life provide HUD approved housing counseling services to assist residents in not only the retention of homeownership, but in loss prevention which could result in these individuals and families becoming homeless.



**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 homeless programs, the Jefferson County CDBG program relies on other established local resources for this topic. CDBG staff participate and attend as many gatherings and meetings as possible with the identified organizations/groups who do provide direct services to the homeless or those in danger of becoming homeless in Jefferson County and the surrounding area. Staff are very sensitive to the issue of homelessness and volunteer their personal time to many of the listed groups.

While not specific to homeless individuals and families, Jefferson County does assist LMI individuals with permanent housing thru its Down Payment Assistance Program offered thru the St. Louis HOME Consortium.

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

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

The Jefferson County CDBG funds are not directly used to address the needs of public housing, nor any public housing units. There are two legal public housing authorities (PHAs) operating within the County. The Festus Housing Authority (Rolling Green Subdivision) contains 56 single family housing units. The Jefferson County Section 8 voucher program funds are received directly from HUD by MO205 the Franklin County PHA; they operate in and receive Housing Choice Vouchers for both Jefferson and Franklin Counties. Jefferson-Franklin Community Action Corporation maintains the waiting list and administers the program. The community action agency only administers the PHA's program. The PHA is a separate legal entity from the community action agency.

During PY2024 the CDBG staff continued to serve on the Board of Directors of the Jefferson-Franklin Community Action Corporation to better represent opportunities available through 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 including the enforcement and promoting of fair housing.

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

Jefferson-Franklin Community Action Corporation (JFCAC) administers the Section 8 Housing Voucher program and the Festus Housing Authority manages the Rolling Green Subdivision. Jefferson County CDBG staff support these agencies by promoting the Homeownership Down Payment Assistance (DPA) program funding with its HOME funds thru the St. Louis HOME Consortium to encourage homeownership for clients utilizing Section 8 housing vouchers. JFCAC participates in the Consolidated Plan process and all recipients of the vouchers as well as residents of Rolling Green Subdivision are invited to attend all public hearings, encouraged to provide input and participate in public comment periods. During PY2024 CDBG staff continued to make packets and information on available programs including the home rehab and the First Time Home Buyer/Down payment assistance program (HOME) available to all residents of both housing authorities. Per the direction of HUD, CDBG staff will work with the PHA to encourage public housing residents to participate in management.

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

Jefferson County is not aware of 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. Jefferson County CDBG staff does not believe that any local policy or regulation, tax policy affecting land, zoning ordinance, building code, fees charges, growth limitation or policy affecting the return on residential investment exists to create a significant barrier to the development, maintenance, or improvement of any affordable housing within its jurisdiction. Therefore, no actions were taken and no development of a strategy to address such policies was taken on this issue during PY2024.

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

During PY2024 Jefferson County continued to address the previously identified primary obstacle in meeting underserved needs of obtaining qualified applicants. The prior program adjustment of removal of the required lien recorded against the property and a new 2-year program participation period has again shown a positive effect on new qualified application submissions. Staff will continue to monitor and make additional adjustments if needed to maintain applications. The current economy, especially lingering results of the COVID pandemic, continues to take its toll on LMI applicants, primarily in the current mortgage balance of homes (most seen situation of additional funds received by owners from new lines-of-credit taken on their existing mortgage) and non-current status of mortgage payments. As a result, these situations have 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. Additionally, during PR2024 staff continued to increase outreach to participating municipalities and public utility districts to actively encourage more participation in the programs’ existing sewer and stormwater infrastructure programs. By increasing participation in these activities, the staff is more confident in being able to meet the required expenditure ratios overall. This is vital for programming years in which reduced applications are received within the home rehabilitation and septic system replacement programs which serve only individual homes. Additional underserved needs will be addressed as identified.

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

During PY2024, Jefferson County continued to require all homes built prior to 1978 and receiving rehabilitation which could possibly disrupt painted surfaces, 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 EPA printed information pamphlets “Protecting Yourself from Lead in Your Home” and “Renovate Right” 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 continue to educate themselves about lead considering several identified possible higher-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 homeowner 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 continue to actively 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.

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

During PY2024, to maintain and develop the institutional structure of the Jefferson County CDBG program, staff continued their efforts to identify existing or new organizations providing services to 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 staff continued to work closely with the building, code enforcement and planning department of not only the County government by also the participating jurisdictions as well as social service organizations that exist within the County.

EDC staff attend and make presentations that include CDBG program information at chambers of commerce, businesses, banking institutions and various committees throughout the year to maintain working relationships and spur involvement that could help to identify new partnerships that may strengthen our institutional structure. Like many programs, the Jefferson County CDBG program relies heavily on word of mouth and applicant referrals from other organizations.

Additionally, during PY2024 the CDBG staff continued to not only hold a seat but actively participate on the Board of Directors of the Jefferson Franklin Community Action Corporation to better represent opportunities available through 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 PHA. 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 PY2024 Jefferson County CDBG staff participated in meetings with the Balance of State Continuum of Care, St. Louis HOME Consortium, County Departments, Jefferson-Franklin Community Action Corp, and the Jefferson County Coalition for the Unhoused volunteer group, when able, 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 retained Mosaic Community Planning, LLC to conduct and prepare the Regional Analysis of Impediments to Fair Housing Choice study (AI). This study, while regional, has specific recommendations for each of the consortium members. The AI is available on the administrator's website for public viewing. The public can also request a hard copy of the study from the administrator.

Many of the Impediments to Fair Housing that have been identified in the report are largely systemic and require effort from both private and public sectors across the entire regional area to correct. Jefferson County will strive to address all impediments identified within its jurisdiction and 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.

While all impediments could affect Jefferson County, many are regional issues 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 PY2024 Jefferson County addressed the following impediments:

**Impediments and Strategies Identified as applicable to Jefferson County:**

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

2024 Action: Jefferson County EDC staff (in its capacity other than the CDBG administrator) continued to work to increase access to workforce development & employment opportunities through its affiliations with Jefferson College, SBA, SBDC, Workforce Development Board-Jefferson/Franklin County Employment Consortium & regional site developers to bring new industry which will offer more employment opportunities. New/expanding businesses in the County that the EDC directly/indirectly assisted during the year are expected to produce an estimated 100-200 new job opportunities within the next 1-2 years. Not tied to a specific CDBG activity-Gen Admin.

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

2024 Action: There is not a county-wide daily public transportation system in Jefferson County. Oats (formerly Jeff Co Express) operates a limited area/limited day schedule mini-bus service. JFCAC (LMI) and DRA (Disability) operate car-van transportation services to individuals for essential medical,

resource and specialist services. CDBG staff hopes to establish a “bus pass” program for LMI residents. While plans still exist to create and fund this program, it has yet to be successfully coordinated with the providers in a manner that will meet CDBG requirements. A new CDBG specific activity will be created and funded when established, Gen Admin.

Impediment: Insufficient housing for people with disabilities

2024 Actions: Jefferson County continues to provide funding opportunities to encourage/incentivize the construction of new accessible housing units for people with disabilities through its HOME allocation. Staff continued to partner with the Disability Resource Association to help identify areas where additional handicap accessible housing units can be implemented. Staff also assisted JFCAC as a second CHDO in Jefferson County. This will allow the organization to begin to build more affordable housing, which is proposed to include ADA accessible housing units that may be able to be combined with existing Section 8 Housing vouchers. During 2024 HOME-ARPA funding was awarded to JFCAC for Blair Estates, an MHDC affordable housing project in De Soto MO. No other new funding requests were received in 2024. HOME funding/DPA-Gen Admin.

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

2024 Action: CDBG staff increased their education on fair housing by taking advantage of the HUD Exchange, FHEO and the National Fair Housing Training Academy resource library available information. Staff also increased their participation with the JCAC PHA in its fair housing practices of outreach and education for its various housing-public assistance recipients. Jefferson County continued to provide information via its website regarding fair housing rights, recognizing discrimination, & how & where to file a housing discrimination complaint. No specific CDBG activity-Gen Admin.

Additional Regional Impediments and Strategies: 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.

Impediment: 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.

Impediment: 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.

## **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 submit all CDBG reports, as completed, 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) is 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, CDBG 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 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. Under the recommendation of HUD in late December 2023, Jefferson County will attempt to increase outreach to non-English speaking persons. All documents posted on the administrator's website are available for translation utilizing google translator, or equivalent, and individual personal translator services will be located if requested.

## **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 PY2024. In analyzing past years’ data, primarily the number of viable applications being received by the Administrator for individual homeowner 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 still being expressed by a higher than previously experienced number of individuals contacting program staff. During PY2020-22 the COVID-19 pandemic had a significant impact on the overall Jefferson County CDBG program. Effects of the pandemic are still being felt by all programs, primarily in the continuing significant increase in building material costs and contractor staff shortages. CDBG staff do not recommend discontinuing any existing programs but did re-evaluate and adjusted its local program parameters during PY2022 (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.) 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	HOPWA	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	HOPWA	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 all known Section 3 businesses.