

2020

Consolidated Annual Performance and Evaluation Report (CAPER)

1st Year of 2020-2024 Consolidated Plan

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Introduction

Note: The introduction is not part of the IDIS CAPER. Historically, it is provided to the public so that there can be a better understanding of the intent of the document.

The Consolidated Annual Performance and Evaluation Report (CAPER) is a step in the U. S. Department of Housing and Urban Development's (HUD's) Consolidated Plan process for use of the Community Development Block Grant (CDBG) and HOME Investment Partnership Program (HOME) grant funds. The Consolidated Plan provides a framework for formulation of a Five-Year Strategic Plan for the City to assess affordable housing and community development needs and market conditions, identify activities to address the needs and conditions, and then target federal funds to the identified needs. Annual Action Plans then describe activities that will implement goals identified in the Strategic Plan. The CAPER is the annual report on accomplishments and progress made toward the most current year's Action Plan goals following completion of the City's program year. This CAPER is for 2020 and is the first report on the Strategic Plan for 2020-2024. The CDBG and HOME grants may be used as follows:

- **Community Development Block Grant:** May be used for a wide range of community development needs that are to benefit low- moderate-income residents of the City through the provision of decent, affordable housing; suitable living environments; and expansion of economic opportunities; or for clearance of blight.
- **HOME Investment Partnership Program:** This grant is exclusively for the creation of affordable housing for low- moderate-income households.

The majority of the CDBG funds and all HOME funds must have beneficiaries that earn 80% or less of the Area Median Income (AMI) for the Greeley Metropolitan Statistical Area (MSA), which encompasses all of Weld County. The "beneficiary" may be a neighborhood, an individual, or a household. The AMI for the Greeley MSA, set annually by HUD, was \$84,312 for a family of four in 2020. By HUD definition, "moderate income" is between 51% and 80% of AMI; "low income" is 31%-50% of AMI; and "poverty level income" is 30% or less of AMI.

Grant awards from HUD in 2020 were \$838,398 (CDBG) and \$423,374 (HOME). Both awards were increases from the 2019 awards of \$824,255 (CDBG) and \$390,658 (HOME). There was also income generated through the Housing Rehabilitation Revolving Loan Program and from a closed revolving loan program (now treated under program income rules).

Reporting to HUD and draws against the grants are done online through the Integrated Disbursal and Information System (IDIS). (A "draw" is the City reimbursing itself for CDBG or HOME expenses by "drawing down" the grant funds from the U. S. Treasury through the IDIS system.) The City must respond to specific questions for each step of the Consolidated Planning process: Five-year Strategic Plan, Annual Action Plans, and the CAPER. Terminology may not be familiar to the public; definitions or further explanation of any information in the CAPER is available from the Greeley Urban Renewal Authority (970-350-9380) during the office hours of 9:00 a.m. to 4:00 p.m. The CAPER in a form other than written English may be provided upon request by contacting GURA.

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.

The activities noted below are those on which funds were drawn or which had significant progress in 2020. Each activity met a goal set in the 2020-2024 Consolidated Plan. Goals were set to meet priority needs identified.

Neighborhood Revitalization

- **Redevelopment District Infrastructure Phases 3 and 4-Central Greeley** – Curbs, gutters, sidewalks, and ramps issues were addressed. Phase 3 (2019), while complete, was waiting for advertisement of and final draw at the end of 2020. The city allocated additional funds to the multi-year activity for Phase 4 (CDBG 2020). The activity did not start in 2020, but will begin in spring 2021. The targeted area for both years was between 23rd and 11th Avenues and 11th and 13th Streets. The 2019 activity specifically targeted 21st Avenue in front of Maplewood Elementary School and addressed drainage issues in addition to the other infrastructure noted.
- **Parkway Tree Planting** –Twenty-nine properties received one or more trees, with 47 trees planted during 2020.
- **Alley Reconstruction** – Seventeen blocks of gravel alleys were reconstructed using asphalt millings. Reconstruction improves the appearance of neighborhoods, reduces dust, improves safety, and improves substandard infrastructure.
- **Clean-up Weekend** – The annual activity, usually held in spring, was held in October due to the COVID-19 pandemic.

Affordable Housing

- One low-moderate-income household received a housing rehab loan; one low-very low-income household received a housing rehab grant.
- The Greeley-Weld Habitat for Humanity (G-WHFH) sold four new construction, single-family houses in the Crestview Subdivision to low- moderate-income buyers. A HOME grant award to the G-WHFH provided assistance. These sales completed the Crestview Habitat development.

Public Services and Facilities that Assist Persons who are Homeless, Low-Moderate-Income, Underserved, or have Special Needs

- The **Greeley Transitional House (GTH-dba Greeley Family House) and Catholic Charities (Guadalupe Community Center)**, both of which provide shelter and services to the homeless, continued to receive CDBG to support staff who worked with homeless families (GTH) and single men and women (Guadalupe) on housing issues. The services also included working with landlords and providing tenant education. The goal for all participating is to be housed and achieve self-sufficiency.
- Staff of the Guadalupe Community Center was also supported at the **Cold Weather Shelter** during the January-March (pre-COVID-19) in 2020 and again in November and December 2020 as part of the 2020-2021 activity. United Way of Weld County was the CDBG applicant.

- **North Colorado Health Alliance** and a number of community partners continued the Community Action Collaborative, a service that helps connect 9-1-1 callers with non-emergency issues to services and housing.
- **Senior Resource Services** (dba 60+ Ride) provided transportation services for seniors. Destinations included medical appointments, grocery stores, financial and government institutions, social events, houses of worship, and personal grooming appointments. When COVID-19 hit, the service was expanded to include delivery of groceries, prescription, and other medical needs to seniors' homes.

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 /Amt.	Indicator	Unit of Measure	Expected – Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected – Program Year	Actual – Program Year	Percent Complete
SF, owner-occupied housing rehab emergency loans	Affordable Housing	CDBG: \$	Homeowner Housing Rehabilitated	Household Housing Unit	23	1	0.04%	5	1	0.20%
SF, owner-occupied housing rehab grants	Affordable Housing	CDBG: \$	Homeowner Housing Rehabilitated	Household Housing Unit	12	1	0.08%	4	1	25.00%
MF Housing Rehab loans/ grants	Affordable Housing	CDBG: \$	Multi-family units rehabilitated	Household Housing Unit	15	0	0.00%	5	0	0.00%
Acquisition or infrastructure support of new MF housing	Affordable housing	CDBG \$	Multi-family units added	Housing Household Unit	75	0	0.00%	40	0	0.00%
Non-profit public services		CDBG: \$	Public service activities with Low/ Moderate Income Housing Benefit	Persons Assisted	2,500	22	0.008%	500	22	0.04%
Public improvements (sidewalks, curb, gutter, drainage, etc.)	Non-Housing Community Development	CDBG: \$	Infrastructure Activities other than Low/ Moderate Income Housing Benefit	Persons Assisted	10,000	0	0.00%	2,000	0 activities	0.00%
Public improvements-Reconstruction of alleys	Non-Housing Community Development	CDBG: \$	Infrastructure Activities other than Low/ Moderate Income Housing Benefit	Persons Assisted	250	840	100.00%	50	840	100.00%

Public improvements-Parkways tree planting	Non-Housing Community Development	CDBG: \$	Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	1,500	9101	100%	300	9101	100%
Property conditions-Clean-up Weekend	Non-Housing Community Development	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	6,250	38,795	100%	1,250	38,795	100%
Public Facilities	Dependent on the type of facility	CDBG: \$	Public facility activity other than Low/Moderate income housing benefit	Persons Assisted	500	0	0.00%	0	0	NA
Public Service	Non-Housing Community Development	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	7,500	1,177	15.69%	1,500	1,177	78.47%
HOME Program-homeownership	Affordable Housing	HOME: \$	Homeowner Housing Added	Household Housing Unit	41	4	0.98%	7	4	57.14%
HOME Program-Rental housing	Affordable Housing	HOME: \$	Rental units constructed	Household Housing Unit	75	0	0.00%	40	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.

The City' addressed its high priorities in the following manner:

1. Neighborhood Revitalization (CDBG)

Several activities addressed the public improvements priority.

- a. Phase 3 of Redevelopment District infrastructure, started in 2019, continued and was completed in 2020. A final draw, however, is still pending. This 3rd phase placed a new storm sewer line, inlet, and one outlet into an area drainage pond and installed some new sidewalk on both sides of the 21st Avenue across from Maplewood Elementary School.
- b. Phase 4 (2020 activity) had activity delivery costs, but no project work.
- c. Also in the Redevelopment District (Maplewood neighborhood), 17 blocks of alleys were reconstructed, taking them from gravel to re-purposed asphalt.
- d. Tree planting in the parkways of the Redevelopment District also continued. Twenty-nine properties received one or more trees; 47 trees were planted.

2. Affordable housing

- a. Maintaining affordable housing was addressed with CDBG through the continuation of the Single-family Housing Rehabilitation programs (loans and grants). One loan and one grant were provided in 2020.
- b. Greeley-Weld Habitat for Humanity (HOME-homeownership) sold four houses to qualified buyers, addressing the need for additional units of affordable housing. Two additional houses received Certificates of Occupancy, but had not sold at year-end. (One had a sales contract and was ready to close; the other family decided against purchase, and a new family will be found.)
- c. Two housing-related public services received CDBG awards: Greeley Transitional House to partially fund a housing case manager, and for the Coordinated Assessment and Housing Placement System (CAHPS) activity.

Priorities that the City ranked low included the following:

1. Support public facilities that serve the homeless, low-moderate-income, underserved, and/or special needs residents or neighborhoods
 - a. There were no 2020 activities under this priority.
2. Support public services that aren't specifically tied to housing, but assist the homeless, low-moderate-income, underserved, and special needs populations.
 - a. CDBG funds supported public service activities of the North Colorado Health Alliance, Catholic Charities (shelter and service homeless persons), United Way Cold Weather Shelter (two activities: (1) Jan-mid-March and (2) November and December 2020); and Senior Resource Services (transportation for seniors). North Colorado Health Alliance provides services to persons calling 911 with non-emergency needs.

The City allocated a majority percentage (approximately 92%) of its non-administrative 2020 grant for activities that included infrastructure improvements and support of affordable housing, the highest priorities of the 2020-2024 Consolidated Plan.

Draws in 2020 included \$139,695.06 for 2019 expenses (\$56,083.82 grant draws; \$83,611.24 program income draws). Additionally, there will be final draws of 2020 expenses in 2021 in the amount of \$5,310.56. (All figures subject to finalization of the City audit).

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)

Direct Benefit Activities: The City tracked demographics for households directly benefiting from the CDBG and HOME grant programs, including race, ethnicity, family size, and (in most cases), which had female heads of households and/or a disability. The information is used for IDIS reporting and also (in the case of housing activities) for fair housing statistics. Direct benefit activities utilizing CDBG funds included:

- Housing activities (rehab loans and grants)
- Public services (case manager support at two shelters, Community Action Collaborative; Senior Resource Services; Cold Weather Shelter)

Demographic data is also collected for Habitat for Humanity-produced housing (HOME funds) and during the monitoring of developments with HOME units.

Direct Benefit Activities	CDBG	HOME	HOME rental units monitored
White	991	3	Due to COVID-19 and health/safety concerns of residents and staff, HOME rental units were not monitored in 2020. The City requested the waiver for inspections and was granted same.
Black or African American	59		
Asian	10		
American Indian or American Native	61		
Native Hawaiian or Other Pacific Islander	9		
Other multi-race	78	1	
Total	1208	4	
Hispanic	415	3	
Non-Hispanic	793	1	

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

In-direct Benefit Activities: Activities with in-direct benefits are those that benefit an area, rather than an individual. LM Universe is total population; LM Area is population having low-moderate-income.

CDBG Indirect Benefit Activities	LM Universe	LM Area	% LMI	% Hispanic
Phase 3 Infrastructure (2020 completion)	3,362	1,304	60.94%	38.79%
Redevelopment District Infrastructure Ph 4-Central Greeley (2020 didn't get started)				
Alley reconstruction	1,511	699	51.22%	46.26%
Trees in Parkways	12,200	9,101	73.85%	35.60%
Clean-up Weekend	70,460	38,795	55.06%	39.10%

Table 2b – Table of assistance to racial and ethnic populations by source of funds – CDBG area benefit activities

Narrative

As a recipient of the federal grants, the City is required to make reasonable efforts to provide language assistance to ensure meaningful access for Limited English Proficient (LEP) persons who want to access programs and activities. “Reasonable effort” includes conducting a Four-Factor Analysis to identify minorities with a high incidence of limited English proficiency and then development of a written Language Assistance Plan.

The City’s Four Factor Analysis identified the Hispanic ethnicity as the only minority group with a large percentage of persons in Greeley. The Analysis data is supported by the U. S. Census Bureau’s Quick Facts for Greeley (based on populations estimates on July 1, 2019), which shows the White, Non-Hispanic population in Greeley at 60.1% and the Hispanic population at 39.1%. The Black/African American race, per Quick Facts, accounts for 13.4% of Greeley population on the date noted; however, there isn’t one language or dialect associated with this race in Greeley. All other races are represented by a percentage of less than 2% per race, according to the ACS data.

CR-15 - Resources and Investments 91.520(a)

Identify the resources made available

Source of Funds	Resources Made Available	Amount Expended During Program Year
CDBG	\$1,718,808	\$711,868
HOME	\$1,628,333	\$139,455
OTHER	\$493,277	\$15,001

Table 3 - Resources Made Available

Narrative

Refer to table above. Expenses were balanced to IDIS Report PR05-Drawdown Report by Project and Activity for what were listed in that report as 2020 draws. The City’s Comprehensive Annual Financial Report (CAFR) has not been completed for 2020. There may be minor changes to above numbers. Also, note the following:

- Expenditures in 2020 included \$59,875.21⁽¹⁾ in Entitlement funds and \$86,926.24 in Revolving Loan Funds from a closed activity⁽²⁾ that were drawn in 2020 but for 2019 expenses.
- The remaining \$565,066.43⁽³⁾ was 2020 expenses drawn in 2020 (\$555,397.77 in Entitlement Funds, \$618.58 in Program Income, and \$9,050.08 in Revolving Loan Funds.)

- There is \$5,310.56 in 2020 expenses that will be drawn with the first 2021 draw after the CAFR is complete.
- Total expended in 2020 was \$711,867.88; \$167,679.60 of that was on grant administration costs.
- HOME draws in 2020 included \$818.32 in 2019 expenses not drawn until 2020. Final 2020 draw of administrative expenses (\$2,827.26) will occur with the first 2021 draw.

Resources available to the City during 2020 included unallocated grant funds from prior years, 2020 grant funds, CDBG program income, Revolving Loan Fund payments (housing rehab) and HOME program income. Because the City's fiscal year may not be completely closed out when the CAPER is due for submittal, there may be adjustments needed.

Identify the geographic distribution and location of investments

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description
Redevelopment District- Comprehensive	85%	51%	The percentage includes only those activities that were located only in the Redevelopment District. Public service activities are available to residents and homeless without regard to location. That brings the percentage down.

Table 4 – Identify the geographic distribution and location of investments

Narrative

There are 38 census tracts within Greeley boundaries. Thirteen have a percentage of low-moderate-income residents that exceeds 51% (1, 2, 4.02, 5.01, 5.02, 7.01, 7.03, 8, 10.3, 10.5, 2.01, 13, and 14.05), thirteen if CT 6 is counted (far NE corner; very few residents). Additionally, there are block groups with more than 51% of the residents earning low-moderate-incomes (if looked at alone and not as a part of the entire census tract): Block Groups 1 and 4 in Census Tract 4.01; Block Groups 3 and 4 in Census Tract 11, and Block Group 2 in Census Tract 14.17.

Greeley's low-moderate-income census tracts are east of 35th Avenue and are included in the Redevelopment District. The only Census Tract west of 35th Avenue that has a greater than 51% LMI percentage is 14.05, which is predominantly commercial. Most of the residential is apartments, which includes some developments specifically for LMI residents. Census Tract 14.05 is not a part of the Redevelopment District.

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.

CDBG – Non-profit agencies applying for CDBG funds are expected to have the majority of their funding come from sources other than CDBG. Those funds are generally from agency fund raising events and

include private, corporate, and foundation donations. When available, the City matches its in-house activities with General Funds, Quality of Life funds, or Sales Tax Dollars (local programs).

HOME – By waiver, HUD reduced the matching requirement for Participating Jurisdictions in areas covered by a major disaster declaration (which included the City of Greeley) by 100 percent for FY 2020 and FY 2021. This was meant to ease the economic burden on Participating Jurisdictions and eliminate the need for them to identify other sources of match for HOME activities during the COVID-19 pandemic. The City was able to meet its normal match requirement of 25%, however, with the increase to available HOME match during 2020 coming from the Greeley-Weld Habitat for Humanity. Match was provided via donated goods, private funds, donations from corporations and foundations, etc. At this time, Greeley does not count volunteer hours, although they are eligible as match.

Fiscal Year Summary – HOME Match	
1. Excess match from prior Federal fiscal year	\$5,543,836
2. Match contributed during current Federal fiscal year	\$627,420
3. Total match available for current Federal fiscal year (Line 1 plus Line 2)	\$6,171,256
4. Match liability for current Federal fiscal year	\$0.00
5. Excess match carried over to next Federal fiscal year (Line 3 minus Line 4)	\$6,171,256

Table 5 – Fiscal Year Summary - HOME Match Report

Match Contribution for the Federal Fiscal Year				
Project No. or Other ID	Date of Contribution	Cash (non-Federal sources)	Site Preparation, Construction Materials, Donated labor	Total Match
10 th Crestview (1338)	2/14/20	149,110	10,917	160,027
12 th Crestview (1334)	3/30/20	159,060	16,863	175,923
13 th Crestview (1342)	5/19/20	102,500	13,652	116,152
14 th Crestview (1346)	6/2/20	155,510	19,808	175,318
Total Match		566,180	61,240	627,420

Table 6 – Match Contribution for the Federal Fiscal Year

HOME MBE/WBE report

Program Income – Enter the program amounts for the reporting period				
Balance on hand at beginning of reporting period \$	Amount received during reporting period \$	Total amount expended during reporting period \$	Amount expended for TBRA \$	Balance on hand at end of reporting period \$
\$248,823	\$16,642	\$123,164	\$0.00	\$142,361

Table 7 – Program Income

Minority Business Enterprises and Women Business Enterprises – Indicate the number and dollar value of contracts for HOME projects completed during the reporting period						
	Total	Minority Business Enterprises				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
Contracts – (based on properties closed in 2019 = 1334, 1338, 1342, 1346 29 th Street Road)						
Number	1	0	0	0	0	0
Dollar Amount	\$123,164	0	0	0	0	0
Sub-Contracts						
Number	0	0	0	0	0	0
Dollar Amount	0	0	0	0	0	0
	Total		Women Business Enterprises		Male	
Contracts						
Number	1		0		0	
Dollar Amount	\$123,164		0		0	
Sub-Contracts						
Number	0		0		0	
Dollar Amount	0		0		0	

Table 8 - Minority Business and Women Business Enterprises

Relocation and Real Property Acquisition – Indicate the number of persons displaced, the cost of relocation payments, the number of parcels acquired, and the cost of acquisition	
Parcels Acquired	0
Businesses Displaced	0
Nonprofit Organizations Displaced	0
Households Temporarily Relocated, not Displaced	0

Table 9 – Relocation and Real Property Acquisition

Minority Owners of Rental Property – Indicate the number of HOME assisted rental property owners and the total amount of HOME funds in these rental properties assisted						
	Total	Minority Property Owners				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
Number	0	0	0	0	0	0
Dollar Amount	0	0	0	0	0	0

Table 10 – Minority Owners of Rental Property

Households Displaced	Total	Minority Property Enterprises				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
Number	0	0	0	0	0	0
Cost	0	0	0	0	0	0

Table 11 – Relocation and Real Property Acquisition

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	47	4
Number of special-needs households to be provided affordable housing units	0	0
Total	47	4

Table 12 – 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	47	4
Number of households supported through the rehab of existing units	15	2
Number of households supported through the acquisition of existing units	0	0
Total	62	6

Table 13 – Number of Households Supported

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

The City made affordable housing a priority of the 2020-2024 Strategic Plan and expects to have a budget item for affordable housing annually. A number of developers expressed an interest in the available funds and the City continues to work with them, but with the complications of the COVID pandemic and challenges of putting together Low-Income Tax Credit proposals, no new developments materialized in 2020. Additionally, only two single-family rehabs were completed: one for a new furnace (loan) and one for a ramp (grant). City staff also believes the COVID pandemic affected the number of rehabs during 2020.

The Greeley-Weld Habitat for Humanity continued to produce new for-sale housing and sold four, which completed sales of 14 units in the Crestview Subdivision. They also began a new development, Clover Meadows, and completed two houses in that new subdivision. The sale of one house is expected to occur shortly after the start of 2021; the family who contracted for the other home decided not to purchase. Habitat is in the process of identifying a family to purchase that home.

Discuss how these outcomes will impact future annual action plans.

The City expects to continue working with developers of affordable housing throughout the 2020-2024 Consolidated Plan years and identify a budget for same annually. While it is hoped that funds can begin to be committed to specific developments in 2021, much is dependent on tax credits, which would provide the bulk of financing.

The City is supportive of the work done by Greeley-Weld Habitat for Humanity, as it produces homeownership units that can be truly affordable to the buyers. In addition to participating in the Clover Meadows development, Greeley-Weld Habitat for Humanity has identified its next development of for-sale housing and plans to partner with a multi-family affordable developer on the same site. It is expected that HOME funds will continue to provide assistance to this home buyer program.

As in 2019, the Housing Rehab Programs continued to be modestly utilized by low-moderate-income homeowners. The programs were under review due to (1) a lack of contractors interested in dealing with federal regulations, (2) a lack of applications, and (3) environmental concerns (such as lead paint, asbestos, radon, etc.). Costs to test for toxic substances often exceed the limits of the Rehab Programs and what low-moderate-income homeowners can afford and do not allow for the requested work to be done. Staff expected to have conversations internally and with HUD on whether or not the Rehab Programs, particularly for larger activities done under the loan program, continue to be viable during 2020, but put any decision on hold during the COVID pandemic.

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	1	
Low-income	1	4
Moderate-income		
Non-LMI		
Total	2	4

Table 14 – Number of Households Served

Narrative Information

The table numbers represent households served by an affordable housing activity only. However, the majority of CDBG beneficiaries (outside of affordable housing activities) were persons with extremely low income (702 Cold Weather Shelter and 336 Community Action Collaborative). Additionally, the Senior Resource Services activity that expanded from just providing free transportation for seniors to including delivery of groceries, medical supplies, and prescriptions during the COVID pandemic, served 90 of the low-income beneficiaries. Other activities with extremely-low-income clientele included the Greeley Transitional Housing public service activity for a housing case manager and the Guadalupe Community Center case manager support. All 2020 activities served LMI population residents.

In 2019, the City adopted its Strategic Housing Plan to address housing needs at all income levels. In support of this, the GURA Board recommended and City Council approved affordable housing as a high priority for using CDBG funds during 2020-2024. As noted, CDBG funds will be set aside annually and be made available to developers or owners of affordable housing.

Multiple agencies in Greeley work with homeless individuals and families, and in 2020 CDBG awards were given in support of the Coordinated Housing Assessment and Placement System (CAHPS), which specifically helps people experiencing homelessness find and maintain housing. CAHPS did not have a 2020 draw, but will draw in January 2021. There have been no new developments of housing specifically for persons with disabilities. The City follows ADA guidelines for new construction of housing.

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

- The annual Homeless Point-in-Time (PIT) Count surveyed sheltered and unsheltered people experiencing homelessness on January 28, 2020, prior to the COVID-19 outbreak.
- Due to COVID-19, the annual Weld Project Connect event was spread out over a week in October. Monday-Thursday there were free services to those in need due to housing instability, job loss, age, health problems, or other issues; Friday there were onsite deliverables, including flu shots, food boxes, hygiene kits, and diapers.
- The Housing Navigation Center served the homeless with services including lockers, an address for mail, computer access, assessment through the Vulnerability Index - Service Prioritization Decision Assistance Tool (VI-SPDAT), assistance with birth certificates and Colorado identification cards, etc.
- The Housing Navigation Center doubled as the Cold Weather Shelter until March when COVID-19 started spreading. The Center is a great network and allows for collaboration among the agencies that serve the homeless population in Greeley, with many of those agencies providing staffing on a part-time basis.
- VI-SPDAT assessment was also done at the Greeley Transitional House and the Guadalupe Community Center.
- A network of agencies called Connections, which began as a way to assist persons exiting the corrections system, provided for general community interaction that focused on some of the most vulnerable populations, including the homeless.
- The North Colorado Health Alliance (NCHA) had a team of Care Managers with two designated specifically to reach out to the homeless relative to their healthcare needs. NCHA also continued the Community Action Collaborative, which reroutes non-emergent 911 calls to the Collaborative of trained mental health professionals and City emergency responders. The Collaborative helped connect homeless persons to services, as opposed to the justice or medical systems.

- Catholic Charities and/or NCHA do outreach and assessment of homeless to the extent feasible at the cold weather shelter. (Additional information on this shelter is provided below under “emergency shelter”.)

Addressing the emergency shelter and transitional housing needs of homeless persons

In addition to overnight stay, extended stay is offered at the Guadalupe Community Center, the Greeley Transitional House, and A Woman’s Place. All provide significant support that focuses on self-sustainability. Shelters stayed operational during COVID-19, but at significantly reduced capacity. On the Point-in-Time Count night, there were 176 persons receiving emergency shelter and 64 in transitional housing.

Emergency Shelter

- The Guadalupe Community Center (Guadalupe), with 24 beds for men, six beds for women, and six separate family rooms, provided 8,756 nights of shelter during 2020. COVID-19 presented challenges to operations, reducing capacity and requiring some motel stays for some single women and families. Providing a congregate setting with minimal COVID-19 exposure became priority, with Hospital-to-Housing patients the first to be accepted. Test results turnaround times delayed new residents entering for two months. No emergency shelter services were provided in the Community Room after April. Services continued to be provided by case managers.
 - Six single women received emergency short-term triage care at a local motel. Until the end of April, they sheltered at the Cold Weather Shelter.
 - At risk and homeless families were served on an emergency basis in the Community Room during the first 10 weeks of 2020. Fourteen families, four of whom were two-parent families, and a total of 42 children were served.
 - A community team, the Emergency Family Coordination Team, comprised of the Greeley Transitional House, A Women’s Place, Weld Department of Human Services, Hope at Miracle House, Almost Home, Weld County School District Six, and Catholic Charities worked with case managers at the Guadalupe Community Center and families to develop housing plans and resolutions of other emergency needs. In 2020, 18 families were served at the Guadalupe Shelter with a total of 50 children. Additionally, six families received emergency assistance at a motel. Three were two-parent families; a total of 13 children were served.
- The Greeley Transitional House provided emergency shelter (5,989 individual nights) and supportive services to 48 families (71 adults and 120 children). Supportive services included case management, housing navigation and stabilization, and management of rapid rehousing and transitional housing grants. Numbers were down significantly due to COVID-19 restrictions.
- A Woman's Place provided emergency shelter for survivors of domestic violence. In 2020, 4,364 nights of shelter were provided to 228 survivors, 93 of which were youth under 18 (41%). The average nights per stay was 20.2.
- The Cold Weather Shelter provided shelter to 511 people January-mid-March 2020 and 191 in November and December 2020, including 176 women and 526 men; 153 reported having a

disability of some type. Shelter information is available on the United Way 2-1-1 website in multiple languages.

Transitional Housing

- The Greeley Transitional House provided three post-shelter housing programs for families: a Rapid Re-housing (ESG-RRH) program, Camfield Corner Apartments (16 units of transitional housing), and the North Front Range Rapid RE-Housing (NFR-RRH) program, which partners with private landlords throughout Weld County. Forty-eight families were served.
- The Guadalupe Community Center operated a Transitional Living Extended Stay Shelter program focused on moving the residents to sustainability through income acquisition, employment, and affordable housing as quickly as possible.

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

In 2020, Weld and Larimer Counties formed the Northern Colorado Continuum of Care, and no longer were part of the Balance of State Continuum. The Continuum's goal is for homelessness in Weld and Larimer Counties to be rare, brief, and non-recurring. Greeley has found a good, consistent network system the best way to help the categories of people noted in the question, and GURA staff frequently received email blasts from the Connections group previously referenced stating, "I have someone who is..." or "I have someone who needs", followed with specific requests to the large community of non-profit and governmental agencies that might be able to help.

The Hospital-to-Housing Program at the Guadalupe Center cared for 22 NCMC patients who were with a total of 1,162 days/nights of shelter and service. Program intent is to avoid a return to the emergency room or hospital readmission and ultimately a program outcome of housing. Support services continue for up to six months after the patient is housed.

Other services to help individuals and families avoid homelessness are highlighted below (not all-inclusive of what is available in Greeley):

General Emergency Assistance

- In 2020, The Homeless Prevention Program administered by Catholic Charities assisted in the following ways: Rent assistance-113 households, \$108,333.94; utility assistance-411 households, \$209,756.71; LEAP applications-50 households; and 115 households who were provided with diapers pre-COVID. Total served: 851 adults; 811 children.
- The Greeley Transitional House and Weld County School Districts administered a Rapid Re-Housing Grant (NS2G) to identify families via McKinney-Vento. Fifty-four months of rent and/or security deposit assistance provided.

- A number of churches and other charitable organizations provided emergency funds for rent and utility assistance.
- United Way of Weld County's 2-1-1 Resource and Referral had 9,757 northeastern Colorado contacts, a 19% increase from 2019, presumably due to the impact of COVID. Rent assistance was inquired about most often.

Assistance for Persons with a Criminal Record

- Jobs of Hope provides men exiting incarceration and/or with gang involvement. Forty-one men were enrolled in 2020 (28 Hispanic), 30 were homeless, and all had incomes below poverty level.
- The Guadalupe Community Center provided shelter and support services to those coming out of community correction system (excluding those on the Sexual Registry or who committed a recent violent crime).

Assistance for Veterans

- Weld County Veterans Services offer no-cost assistance to veterans and their families.
- The Guadalupe Shelter contracts with the VA to serve homeless veterans and help them with healing and self-sufficiency goals.
- Through its Veteran Peer Support Navigation, Northern Colorado Veteran Resource Center assisted veterans and their families in receiving services, benefits, and resources.

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

- United Way of Weld County continued to implement "Weld's Way Home" – the local strategic plan to address and prevent homelessness. The plan continued to operate using a Housing First model, even as the majority of activities shifted to COVID-19 response in three major ways: shifting to a 24/7, socially distanced congregate shelter for the end of the 2019-2020 cold weather shelter season; providing day center/shelter activities at the local Housing Navigation Center, which includes active symptom monitoring for COVID-19 and connection to critical health care resources; and shifting all other focus to securing additional permanent housing for people experiencing homelessness, which is the safest place for people to be during a global pandemic. These activities will continue into 2021 and until there is a vaccine for COVID readily available and accessible.
- The City of Greeley provided \$62,076 rent for the lease of the building that housed the cold weather shelter and \$20,000 for operations. The shelter is in its fourth cold weather season (2020-2021). The community has worked to decompress the congregate cold weather shelter to abide by CDC Social Distancing requirements and as such makes use of motel rooms for nightly overflow and also opened a non-congregate shelter for those most vulnerable to COVID-19 because of age

or underlying health condition. The City of Greeley paid for roughly \$205,000 of operational expenses related to the non-congregate shelter through its Coronavirus Relief Fund allotment.

- Northern Colorado (Larimer and Weld counties) was formally recognized by HUD as a Continuum of Care (CO-505, Fort Collins, Loveland, Greeley/Larimer and Weld Counties) in January 2020. As such, a new governing board and governance charter were adopted. The City of Greeley has a seat on the governing board, and all annual CoC-mandated activities (such as the Point in Time and Housing Inventory Counts) are now facilitated locally by the CoC Collaborative Applicant (United Way of Weld County) and CoC HMIS Lead (Homeward Alliance).
- Part of the continued emphasis of the newly founded NoCO CoC is getting people permanently housed through the local Coordinated Entry System. As of December 31, 2020 the following number of people experiencing homelessness had been assessed/housed:
 - Veterans Assessed since 2016 – 523; Veterans Housed since 2016 – 436
 - Single Adults Assessed since 2017 – 851; Single Adults Housed since 2017 – 265
 - Families Assessed since 2018 – 412; Families Housed since 2018 – 281
 - Youth Assessed since 2019 – 54; Youth housed since 2019 - 18
- Weld County received \$30,000 in Emergency Solutions Grant (ESG) Rapid Re-housing funding to address the need to shorten or prevent homelessness for individuals and families through direct financial services for rent, security deposits, and utilities. The Greeley Transitional House administered the funds on behalf of the County.
- Case management is provided at all shelters in Greeley, with a focus on deterring homelessness or shortening the length of stay when possible. A continuing trend is for shelter residents to be employed, but not able to find affordable housing. The COVID-19 pandemic presented challenges to social distancing and in-person meetings.

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

Actions taken to address the needs of public housing

During 2020, decking and shingles were replaced on eight multi-family buildings and an on-site maintenance shop. The Public Housing Manager was moved to an office in a 42-unit housing complex to make that office more available to tenants. Sanitization equipment was purchased and used to treat empty units prior to new tenants (for COVID).

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

The Housing Authority has a disabled public housing tenant who serves as a Commissioner on the Housing Authority Board. Due to COVID-19, the goal of having a Tenant Advisory Board with monthly meetings was delayed. This goal will be relooked at once health conditions improve. Higher income tenants are still encouraged to consider the purchase of a home.

Actions taken to provide assistance to troubled PHAs

Not applicable. The Greeley PHA is not 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)

The City's most impactful action to address negative effects of public policy serving as barriers to affordable housing was the adoption of the Strategic Housing Plan in 2019. It includes strategies and actions that involve public policies, such as

- Amend the development code to promote housing choice
- Develop financial strategies that minimize development costs
- Address the impact of raw water on housing affordability
- Facilitate development of manufactured communities

The City continued work to implement the action steps in 2020. While it will take some time to implement the steps, the Plan provides a blueprint *for* ameliorating or removing some of the negative effects of public policy.

Some of the public policies noted in the question do not affect affordable housing in Greeley:

Tax policies affecting land: There are no tax policies that create an affordable housing barrier.

Building codes: The City adopted the 2018 International Residential Codes, to which all residential construction is subject. Building codes do not inhibit the provision and/or maintenance of affordable housing, but are necessary to providing housing standards for safety and habitability (which HUD also expects).

Growth limitations: There are no policies regarding growth limitations in Greeley. Growth is restricted by jurisdictional boundaries, which directs much of the growth west.

Policies affecting the return on residential investment: There are no public policies other than those imposed on properties that received assistance from HUD (CDBG and/or HOME) that affect the return on residential investment.

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

See information throughout the CAPER, such as support for the Guadalupe Community Center (homeless), Greeley Transitional House (homeless families), Community Action Collaborative (persons in need that call 911 with non-emergencies), Senior Resource Services (seniors needing transportation), and Habitat for Humanity (for-sale housing to low-income households).

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

No new actions were taken in 2019 to reduce lead-based paint hazards; however, the City continued to address lead paint hazard issues through the following:

- GURA policy requires that testing for lead-based paint be done by a certified lead-based paint inspector on any house constructed prior to 1978. This policy is applicable when the proposed

rehab includes work that would disturb any existing painted surface, such as replacement of windows or doors or exterior painting.

- GURA policy also requires that all rehab work that disturbs a painted surface be performed by an Environmental Protection Agency (EPA) certified Renovation, Repair, and Painting (RRP) Program contractor who has been properly trained in setup, disposal, and clearance of affected areas. Safe handling of all lead-based paint is part of the rehab contract.
- The GURA Manager holds two lead-based paint certifications from the Colorado Department of Public Health and Environment, Air Pollution Control Division. The certifications are Lead-Based Paint Inspector and Lead-Based Paint Assessor. GURA's Manager attends lead-based paint training when available.
- Applicants for all housing rehab activities are provided information packets about the dangers of lead-based paint when applying for assistance. Both English and Spanish versions of the information are available.

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

Actions are not always specific to poverty-level families, but are meant to help anyone in need. CDBG and HOME activities noted throughout the CAPER provided assistance to agencies working with people looking for help and/or to better their lives. Additionally, the City's Economic Health and Housing Department worked to expand the business structure in Greeley and provide more housing opportunities.

Some of the agencies that might help reduce the number of poverty-level families are listed below. The 2015-2019 American Community Survey estimated that 16.2% of Greeley families lived in poverty.

- Women2Women provided emergency financial assistance to women by women.
- Right-to-Read and the Global Refugee Center merged in 2017. Now the Immigrant and Refugee Center of Northern Colorado, it provides English language training and community navigation to refugees and immigrants.
- Sunrise Community Health provided health and dental care at seven locations in Greeley with payment based on the ability to pay.
- Connections for Independent Living served persons with disabilities needing to access services and programs. A number of core services are offered: information and referral, peer support, independent living skills training, and assistance in finding and retaining employment.
- North Range Behavioral Health provided a comprehensive set of programs and services for persons with mental illness; addiction; in need of counseling, peer assistance, or crisis support; etc., without regard to someone's ability to pay, and added a program to support people affected by COVID-19. North Range also provided a continuum of residential services, from staffed homes to supported housing and independent living.
- Weld Food Bank administered a number of programs to help alleviate hunger and poverty by providing food and food services to people in need. The COVID-19 pandemic substantially increased the number of persons who are food-insecure.
- The Greeley Interfaith Association and many churches within the faith community provided assistance to those in need, including clothing and meals.

- The Weld County Faith Partnership Council facilitates information sharing between the faith community and county government, with focus on foster care, veterans, housing stability, and youth development.

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

A strong institutional structure is evident in Greeley in part through the number of agencies and representatives that participate in the Northern Colorado Continuum of Care and the Connections network; the collaboration among agencies providing shelter to working toward housing the homeless; the faith community which provide meals and clothing to those in need; and in the Community Action Collaborative, a partnership with the City and agencies serving those in need. The strong institutional structure was definitely visible in 2020 during the COVID pandemic, as collaborations to assist residents was more important than ever. The City does not feel there is need for immediate actions to further develop the local institutional structure.

Efforts to improve the regional (Weld and Larimer Counties) institutional structure specific to working on issues of homelessness came to fruition in early 2020 with HUD's announcement of the fourth Continuum of Care in the State: Northern Colorado Continuum of Care (NoCOCO). As 2020 was ending, the Continuum was conducting a search for a Continuum Director. The Continuum was able to secure ESG funding late in 2020 and a grant from the El Pomar Foundation.

As noted elsewhere, the Housing Navigation Center opened to centralize efforts to get people into housing as quickly as possible and provide lockers, mailing address, computers, etc. to homeless persons. Additionally, the Coordinated Assessment and Housing Placement System (CAHPS) operates from United Way of Weld County. The Navigation Center facility housed the cold weather shelter January-March 2020 pre-COVID-19 social distancing requirements, and again in November and December 2020 with reduced numbers to continue to allow for social distancing. The City currently pays the lease for this facility.

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

Coordination between public and private housing and social services agencies has been detailed in a number of places in the CAPER. Rather than restating, please refer to areas with discussions on the Community Action Collaborative, the Connections network, Weld's Way Home, and the City's implementation of a Strategic Housing Plan. To the extent possible and appropriate, the City and the Greeley Housing Authority have staff that participate in many of the meetings/ groups and help with programs. Additionally, Weld County United Way heads the Emergency Food and Shelter Program committee.

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

With each of the impediments noted below, there were goals and actions. The full Analysis of Impediments to Fair Housing for 2020-2024 is available on request.

Impediment: Housing Discrimination

- Fair housing information and sample brochures are available to CDBG and HOME subrecipients on request.
- An Analysis of Impediments to Fair Housing report was adopted in March for the 2020-2024 Consolidated Plan years.

Impediment: Language and Culture

- The City has “Limited English Four-Factor Analysis” and Americans with Disabilities Act/Section 504 Effective Communications Policies and Procedures.
- Ads associated with the Action Plan and CAPER in 2020 were published in English and Spanish.
- The City Greeley subscribes to a language interpretation service for employee use when communicating with customers who speak a language other than English.

Impediment: Transportation

- The City gave United Way of Weld County 2,920 adult bus passes via a Memorandum of Understanding, each providing for unlimited rides in a 24-hour period, and 6,470 two-ride passes. They also received 310 Paratransit trip tickets. Twenty-four-hour passes had a value of \$4.50; two-ride passes were each valued at \$3.00. Additionally, United Way was given 440 paratransit trip tickets. Non-profit agencies may request passes for their clientele from United Way.
- Greeley Evans Transit (GET) continued to offer a number of free/discount programs, including free rides to School District 6 students with identification (to school, activities, and back home), discounted fares for seniors and individuals with disabilities, and discount pass booklets further reduce costs for seniors and persons with disabilities.

Impediment: Lack of affordable housing units disproportionately affecting some protected classes

- The Single-family Housing Rehab grant program was available for elderly/disabled persons needing an accessibility ramp. This helps keep people in their home, which may be the most affordable option available to them. The Retired Seniors Volunteer Program constructs the ramps at a materials-only cost.
- The following continued to provide support for families in transitional housing:
 - Sixteen townhouse-type units for families exiting the Greeley Transitional House shelter.
 - The City Council-approved 2020 grants to the Greeley Transitional House and Guadalupe Community Center for public services that support the homeless as they move toward finding permanent housing.
 - See Section CR-25 for additional information on transitional housing at the Guadalupe Community Center.
- Four Habitat for Humanity houses sold in 2020 in the Crestview Subdivision.

Impediment: Higher mortgage loan denial rates for Hispanic/Latino households

- Aggregate reports from the Housing and Mortgage Disclosure Act (HMDA) for the Greeley MSA were reviewed. The reports showed people of non-White races, with the exception of people of the Asian race, had significantly higher mortgage loan denial percentages than did people of the White race. Those of Hispanic ethnicity were denied loans at a rate of 20.89% v. non-Hispanic people at 12.47%. There is no information on why loans were denied, and it could certainly be for

a reason other than housing discrimination. While the City has no control over loan originations, the data will continue to be monitored.

CR-40 - Monitoring 91.220 and 91.230

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

The City developed a CDBG monitoring plan that includes several layers of activity review; it is unchanged from last year, however, during a monitoring by the City's Community Planning and Development Representative at HUD Denver, several areas of increased monitoring needs were identified. The City is working to implement some stronger monitoring systems, particularly for in-house infrastructure projects. Briefly, the monitoring plan is as follows:

- At receipt of applications, all proposed activities are reviewed to ensure they further the priorities of the Consolidated Plan, meet a National Objective, and are eligible CDBG activities. Submitting agencies are required to certify they are in compliance with federal requirements as part of the application. The City strives to ensure applicants are informed with respect to the federal obligations by offering two optional-but-encouraged technical assistance meetings to discuss federal obligations prior to the applicant accepting CDBG funds and also makes staff available for consultation upon an applicant's request.
- Throughout the activity, GURA staff maintains close contact with the subrecipients of CDBG funds. Staff is involved in procurement, bidding language (Section 3; Minority and Women Owned Business statements), and contracting (when applicable); meets individually with the awardees to review the City agreements; and makes great effort to notify agencies that staff is available for technical assistance upon request.
- There is also a limited desk review at the time draw requests are received: Draw requests and invoices are reviewed, beneficiaries are counted, and it is verified that the draw is consistent with the City's agreement.
- By policy, annual on-site monitoring is conducted on a minimum of 10% of the agencies that received funding during that fiscal year with the goal of on-site monitoring of no fewer than three subrecipients, subject to staff modification based on activities and subrecipients. No on-site monitorings were conducted during 2020 due to the COVID-19 pandemic and concerns for health and safety of staff and subrecipients.

Minority-and Women-Owned Business Outreach

- The City does not discriminate against minority or women-owned businesses during the bidding process and has awarded bids to a number of contracts to minority- and women-owned businesses over the years. Greeley is not a large community and has a small pool of contractors willing to bid on work that involves Federal funds. No bidder is discouraged.

When advertising an Invitation to Bid, both the City and GURA include a statement encouraging minority- and women-owned businesses to apply. (They also include a Section 3 statement.) A

sample bid invitation by GURA follows: *“Bids are being solicited for (insert job) by Greeley Urban Renewal Authority (GURA). Bids will be accepted until (time) on (date). Bidders must meet qualifications set by GURA. Women- and minority-owned businesses are encouraged to participate. Section 3 requirements for opportunities for low- moderate-income residents and businesses may apply. For more information call (GURA office phone number).”*

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.

Tentative dates/information is noted below. Information will be confirmed and/or added as event each takes place.

The 2020 CAPER was available for public comment as follows:

- Meeting of the Citizens Committee for Community Development – March 2, 2021; four members attended. The Citizens Committee was given the option of meeting via Zoom or receiving the CAPER for comment by mail.
- Public Comment period from March 5 – March 22, 2021.
- Available for review on City’s website.
- Non-profit agency partners with the City received notice of the availability of the CAPER and were encouraged to provide comments and share it with their clientele.
- Check into other medias with Communications
- The GURA Board of Commissioners’ public hearing to recommend that City Council accept the report – February 10, 2021. One member of the public attended the meeting, who commended the Board on the accomplishments of the past year and continued support for the agencies who work with low- moderate income residents.
- The City Council accepted the report with no further comment on March 23, 2021.

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.

The Federal code noted (24 CFR 91.520(c) states the CAPER must evaluate the City’s progress in meeting its specific objectives for reducing and ending homelessness. The questions in CR-25 mirror what is required under 24 CFR 91.520(c). To avoid duplication, please refer to CR-25 for specifics on how the City is progressing with the issue of homelessness.

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

No

CR-50 - HOME 91.520(d)

Include the results of on-site inspections of affordable rental housing assisted under the program to determine compliance with housing codes and other applicable regulations

Please list those projects that should have been inspected on-site this program year based upon the schedule in §92.504(d). Indicate which of these were inspected and a summary of issues that were detected during the inspection. For those that were not inspected, please indicate the reason and how you will remedy the situation.

The City has 11 multi-family developments that include HOME units. City policy is a rental monitoring schedule that follows old HOME regulations (every year for projects with 26 or more units, every other year for projects with five to 25 units, and every three years for projects with one to four units). In a typical year, monitoring is conducted annually in July/August; however, due to the COVID-19 pandemic, the City requested and received a waiver of the monitoring requirement. Per the waiver, the City should conduct on-site monitoring of HOME units within 120 days of the waiver's expiration on September 30, 2020. Assuming it is safe to conduct on-site monitorings in 2021, the City will abide by the terms of the waiver. The HOME units were monitored for rent compliance, as usual.

The eleven developments with HOME units are: Chinook Wind, Fox Run, Twin Rivers, Plaza del Milagro and Plaza del Sol, Stephens Farm Phases I and II, Camfield Corner, Stagecoach Gardens, La Casa Rosa, and Camelot. All should have had an on-site monitoring in 2020, which will occur when it is safe to do so.

Provide an assessment of the jurisdiction's affirmative marketing actions for HOME units. 92.351(b)

Because there was no onsite monitoring in 2020, demographic information on monitored units is not available. The City generally sees a high percentage of minority tenants when monitoring.

Other:

- Owners of the HOME units advertise with the Fair Housing symbol
- Resident Selection Criteria and/or leases include a non-discrimination statement
- The City received no complaints of discrimination in 2020

Refer to IDIS reports to describe the amount and use of program income for projects, including the number of projects and owner and tenant characteristics

The four sold Habitat houses were funded with HOME program income: IDIS activity #339-\$31,276.60; IDIS activity #324-\$31,246.93; IDIS activity #340-\$30,026.34; and IDIS activity #343-\$30,614.28. (Figures were taken from IDIS Report PR09.) The activities were new construction of for-sale housing, and all houses are owner-occupied. All four owner families identify with the White race/Hispanic ethnicity and have incomes 30-50% of AMI. Two were two-parent households; two were single-parent households.

Describe other actions taken to foster and maintain affordable housing. 91.220(k)

Discussions occurred with a number of developers of affordable housing. A developer with plans to construct affordable housing near the Greeley Mall was awarded Private Activity Bonds from both the City and Weld County. No federal funds are expected to be requested for the development. Additionally, a developer worked with GURA staff on adding to an existing development of senior housing in the

downtown area, which would expand the number of units that currently exists and rehab the existing units. It is expected this will result an application for CDBG/HOME affordable housing funds.

The City continued to partner with Habitat for Humanity on construction of ownership housing. (Habitat accomplishments were discussed elsewhere in the CAPER.) Ongoing conversations on a large Habitat development, expected to include a developer of multi-family units, have also continued. It is expected this will result in a CDBG/HOME affordable housing application late 2021 or early 2022.

The City plans to retain its Private Activity Bonds in 2020 and continuing into 2021, partnering with the Colorado Housing and Finance Authority (CHFA), to assist developers of affordable housing.

To continue engaging with alternative housing providers, the City started identification of more than 70 sites city-wide as good locations for housing projects of all types. Staff has engaged with more than 24 housing developers since 2019 to promote the Greeley market for housing. Staff also visited with several alternative housing construction providers about the possibility of Greeley as a location for alternative housing types (such as modular units). Additionally, additional manufactured home sites are encouraged where it makes market sense; there is currently a 120-unit project in the planning stages.

Other actions with regard to addressing obstacles to meeting underserved needs, foster and maintain affordable housing, evaluate and reduce lead-based paint hazards, reduce the number of poverty-level families, develop institutional structure, and enhance coordination between public and private housing and social service agencies were discussed in CR-35. See responses in that Section.

Attachments

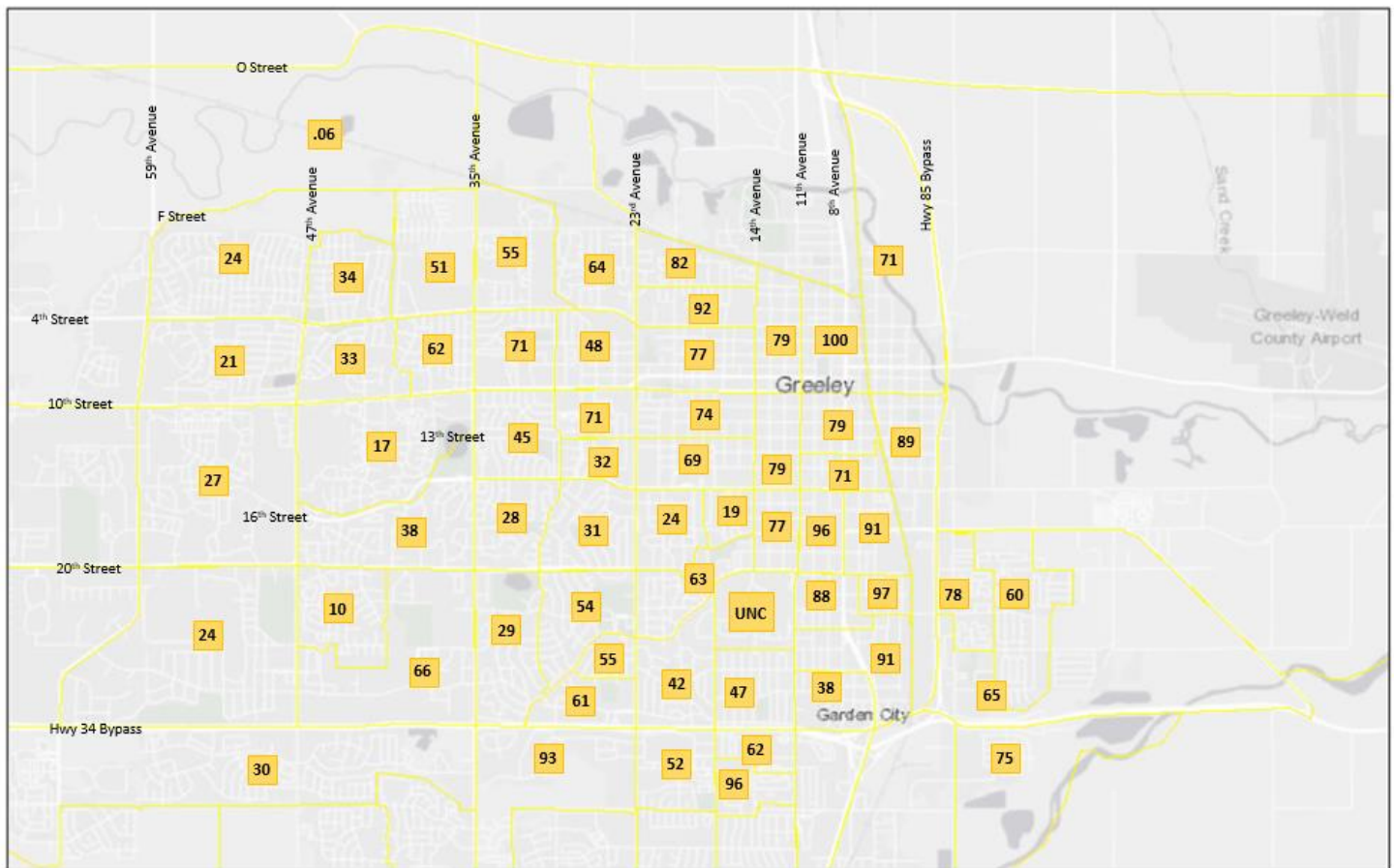
- [Map – Redevelopment District](#)
- [Map – Census Tracts with low-income percentages](#)
- [HOME Recapture Policy](#)
- [CAPER Ad – English](#)
- [CAPER Ad – Spanish](#)

REDEVELOPMENT DISTRICT



Attachment 2 – Census Tract Map (With Percentage of Low- Moderate-Income Residents)

CPD's 2014 Updated LMISD



February 28, 2018

% of Block Group that is LMI

1:72,224
0 0.5 1 2 mi
0 0.5 1 2 km

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STANDARD OPERATING POLICIES & PROCEDURES



HOME INVESTMENT PARTNERSHIP PROGRAM SUBSIDY, SALES PRICE, AFFORDABILITY, and RECAPTURE of FUNDS FOR NEW CONSTRUCTION OF OWNERSHIP UNITS

Reference HOME Investment Partnership Program (HOME) regulations at 24 CFR 92, particularly 24 CFR 92.254 ("Qualification as affordable housing: Homeownership") and 24 CFR 92.503 ("Program income, repayments, and recaptured funds") with respects to HOME funds assisting the development of homeownership units.

5/17/19 – These policies, as stated below, were Attachment 5 – HOME Affordability/Recapture Policy for Home-ownership for the 2019 Action Plan

These Policies and Procedures are to comply with the HOME regulations noted above and are for the Crestview Subdivision being developed by the Greeley Area Habitat for Humanity (the Developer).

POLICIES

I. Sales Price and Subsidy

- A. The Developer can submit a HOME application and request HOME funds on behalf of their buyers that is the lesser of
 1. The gap in buyer purchase financing
 2. The total of City fees for water and sewer taps plus building permit fees

The GURA Board of Commissioners has determined this is the maximum direct subsidy to be offered to buyers in the Crestview Subdivision. Buyers must meet all qualifications of the HOME and Developer's homeownership programs.

- B. The intent of the HOME investment is to reduce the price of the home and is hereinafter called the "direct subsidy" or "HOME investment".
- C. The sales price of the HOME to be acquired using a HOME investment cannot exceed the New Homes HOME/HTF Purchase Price Limit (also known as the HOME Affordable Homeownership Limits) as set by the U. S. Department of Housing and Urban Development (HUD) on an annual basis. Further restriction on the sales price may be determined by the Developer to comply with its own homeownership program, but at no time can the sales price exceed the amount provided by HUD.

II. Affordability

HUD expects HOME funds to be utilized for affordable housing for households earning 80% or less of the Area Median Income (AMI) and for the home to remain affordable. To keep the housing affordable, regulations impose affordability requirements that stay with the property for a time period, called the "affordability period".

- A. **Affordability Period.** The length of the affordability period is based on the amount of the HOME investment in the home to be purchased and is the period during which the property must remain affordable or the homebuyer is subject to the return of the HOME investment. The table below shows HUD's minimum affordability periods by HOME investment. The City has chosen to utilize the periods defined in the table and will not impose a longer period of affordability. Subrecipients, Owners, Developers, and Community Development Housing Organizations (CHDOs) cannot opt out of applying these policies to its homebuyer program and, further, must assist the City in enforcing the City's Affordability and Recapture policy.

HOME Funds in Project	Affordability Period
<\$15,000	5 years
\$15,000 - \$40,000	10 years
>\$40,000	15 years

- B. **Enforcement of the Affordability Period.** There are two means by which the HOME investment is protected during the period of affordability and which will restrict the way in which the home can be used and sold, as outlined in these policies and protected by recorded legal documents. The diagram below provides a visual of the enforcement means, both of which are described by policy following the diagram.

Purpose: Maintain Affordability and Protect the HOME Investment	
Repayment	Recapture
100% of the HOME investment is subject to repayment if the home does not retain affordability throughout the affordability period. Affordability is defined by regulation and is stated in the policies for repayment below.	All or part of the HOME investment is subject to recapture if the home is sold, either voluntarily or involuntarily, during the period of affordability.
See III. Section A below for policy.	See Section B below for policy.

- C. **Affordability Term.** The affordability period begins after project completion. ("Completion" is defined as the date the activity is closed in IDIS.) Legal documents will designate the affordability term as 5 years, 10 years, or 15 years depending on HOME investment plus three months to allow the City time to draw the funds and close the activity.

III. Policies to Retain Affordability

- A. **Repayment.** The HOME regulation at 24 CFR 92.503(b)(1) states, "Any HOME funds invested in housing that does not meet the **affordability** requirements for the period specified in 24 CFR 92.254 (Qualification as affordable housing: Homeownership) must be repaid by the participating jurisdiction."

HUD defines **affordable** under the HOME program as meeting the following:

1. The housing must be single-family housing.
2. The housing must be modest, as follows:

- a. Utilization of the HOME Affordable Homeownership Limits provided by HUD (annually) ensure this requirement.
3. The housing must be acquired by a homebuyer whose family qualifies as a low-income family, i.e. earning no more than 80% of AMI. (The Developer may further restrict income through its program policies.)
4. The housing must be the principal residence throughout the period of affordability.

To enforce the affordability regulation, the City will require prompt repayment of **all of the HOME investment** in the following instances:

1. The home is no longer the principal residence of the homebuyer. The homebuyer must occupy the home at all times and provide an annual residency certification to remain in compliance with affordability. Non-return of the annual residency certification is considered being out of compliance. Under the residency requirement, the following are not allowed:
 - a. Anything that causes the homeowner to not reside in the home, including leasing the unit to another household or transferring title to another household (for example through a Quit-Claim Deed).
2. Reconstruction of the home to accommodate multiple families (it must remain a **single-family** residence).
2. Misrepresentation of homebuyer's information (for example, it comes to light that family size or income were reported falsely).
3. The first mortgage is refinanced.

The City will secure the affordability period by a Beneficiary Use Covenant/Homeowner Agreement.

The City will exercise due diligence and make every effort, in conjunction with the Developer, to work with the homeowner to return the home to affordability compliance and avoid repayment of the HOME funds. Due diligence steps will include the following:

1. Through the Developer Agreement, the Developer shall be responsible for initially contacting the homeowner, reminding them of their obligations to Beneficiary Use Covenant/Homeowner Agreement, and will attempt to facilitate returning the unit into affordability compliance.
 - a. The Developer will send annual certification letters to the homeowners, which must be signed, dated, and return acknowledging continuation of principal residency.
2. If the homebuyer does not respond to the Developer, contact with the homeowner will be initiated by and for the City through the City Attorney's Office.
3. The Developer and City will work with the homeowner to return the property to compliance through the following:
 - a. Allowing a lease term to expire and continuing with the affordability after expiration (in the case where a home has been rented and a tenant has a lease). The affordability period will be extended past the affordability term by the length of any lease.
 - b. Providing reasonable time (determined by the City and the homeowner) to return the home to single-family status.
 - c. Allowing the homebuyer to sell the property under the recapture provisions below.

Misrepresentation or refinancing require repayment without a means to remedy.

4. **Remedy.** If the Developer and/or the City, through working with the homeowner, are not able to return the home to affordability compliance, the City will contact HUD with regard to the repayment of HOME funds to determine how they should be handled. Additionally, the City will take the following steps:
 - a. Per the terms of the Beneficiary Use Covenant/Homeowner Agreement, the City will pursue collection by whatever means are allowable under the law, the costs of which will be the responsibility of the homeowner(s).
 - If the homeowner is unable to repay the any or all of the HOME funds immediately, the City will allow for the homeowner to enter into a loan agreement for repayment of the funds. In this case, the City will repay HOME from its General Fund and set up loan for repayment of the HOME investment with a term not to exceed the original term of the Beneficiary Use Covenant/Homeowner Agreement.
 - b. Per the terms of the Developer Agreement, secondary collection will be pursued by the City from the Developer in any amount uncollectable from the homeowner.
 - c. Right of Legal Remedy in Pursuing Satisfaction of Affordability Period. In the event the homeowner does not satisfy the full terms of affordability and make repayment of HOME funds, the City of Greeley reserves the right to pursue any remedy allowable under HUD regulations and the law for full payment by any legal means necessary. Payment of legal or any other fees will be the responsibility of the homeowner.
- B. **Recapture.** A homeowner cannot **sell** the home during the period of affordability without triggering requirements that some or all of the HOME investment be returned. The HOME regulations at 24 CFR 92.524-Qualification as affordable housing: Homeownership govern instances where a homeowner wants to sell the property during the period of affordability. By policy, the City has chosen the **recapture** of funds (24 CFR 92.524(a)(5)(ii)-Recapture) as the means it will use to enforce regulations in case of a sale. "Sale" includes voluntary or involuntary (foreclosure) sales. Voluntary sales include a short sale or deed-in-lieu of foreclosure.
 - A short sale is a voluntary sale in a situation where the bank that holds the mortgage agrees to take less than the full payoff for the mortgage in full satisfaction of the mortgage. This is commonly sought by a homeowner who wants to sell but whose house is "upside down" or where the mortgage balance exceeds the fair market value of the property. The homeowner is voluntarily selling for less than the fair market due to the homeowner's current situation.
 - The City has further determined that foreclosed upon homeowners will follow the recapture provision outlined below. (The City will contact HUD in the case of foreclosure and any direction for HUD that deviates from this must be followed.)
1. **First Right of Refusal.** The Developer shall have a First Right of Refusal Clause in their legal documents (per the Developer Agreement). Should they Developer choose to exercise that Right, the following apply:
 - a. The Developer can resell the property to a new buyer who meets income and all other qualifications of the HOME Program.

- b. The remaining time on the Beneficiary Use Covenant/Homeowner Agreement can be transferred to the new buyer, provided the new buyer agrees to accept that sale condition and they meet all HOME requirements.
2. HUD offers options to enforce the recapture provisions; the City has chosen to **recapture the full amount** [(see regulation 92.254(a)(4)(ii)(A)(1)], (option one in the cited regulation). “Full amount” is defined as the net proceeds of the sale (sales price minus non-HOME loans on the property and any closing costs associated with the sale). At no time will the City attempt to recapture more funds than are available from net proceeds. The net proceeds provision includes voluntary and involuntary (foreclosure) sales.

The following scenarios further describe how the City will recapture funds. To clarify policy, an example is provided following each situation, in red. These are examples only and do not reflect true amounts.

- a. **If there are net proceeds greater** than the loan for HOME funds, the full HOME subsidy is recaptured, and the remaining proceeds belong to the homeowner entirely and are considered to be the fair return on the homeowner’s investment.

EXAMPLE: The homeowner decides to voluntarily sell the property, and it subsequently sells for \$200,000. The homeowner repays all loans and closing costs (not including the HOME direct subsidy), which total \$150,000. The homeowner thus has net proceeds of \$50,000. The HOME direct subsidy was \$30,000. From the net proceeds of \$50,000, the City will recapture the HOME \$30,000 direct subsidy and the homeowner retains \$20,000.

- b. If a sale results in **less proceeds available than are required** to meet the demands of all liens, including the HOME direct subsidy, any amount available from net proceeds up to the amount of the remaining affordability loan. That amount will be considered full payment of obligations under the affordability/recapture agreement for the homebuyer.

EXAMPLE: The homeowner decides to voluntarily sell the property, and it subsequently sells for \$200,000. The homeowner repays all loans and closing costs (not including the HOME direct subsidy), which total \$175,000. The homeowner thus has net proceeds of \$25,000. The HOME direct subsidy was \$30,000. The entire \$25,000 will be recaptured from the homeowner to satisfy the HOME requirements; the homeowner will keep none of the net proceeds.

- c. **If there are no net proceeds** from the sale, repayment will not be required from the homeowner and the affordability period will be considered satisfied for that party.

EXAMPLE: The homeowner decides to voluntarily sell the property, and it subsequently sells for \$200,000. The homeowner repays all loans and closing costs (not including the HOME direct subsidy), which total \$200,000. The homeowner thus has \$0.00 net proceeds. The HOME direct subsidy was \$30,000, of which \$0.00 will be recaptured. Likewise, there will be not be net proceeds left for the homeowner.

- d. In the case of a short sale, the City (or the Developer, as applicable) has the option of whether or not to approve the short sale. Recapture will be based on net proceeds only, and follow the applicable provisions set forth above.
- e. Foreclosure.

- When the City and/or Developer are made aware of a pending foreclosure, they will to the greatest extent feasible provide the homeowner with resources, including counseling options, the Colorado Foreclosure Hotline information, and other guidance as is available.
 - Recapture, in the case of foreclosure, is based on net proceeds alone. If there are no net proceeds, the affordability restriction is terminated and there is no further obligation to the homeowner or the City. (Subject to HUD approval, as noted above.)
3. Subject to HUD approval, the City will use any recaptured funds for other HOME-eligible activities.
 4. The HOME Investment and recapture provisions will be secured through a Deed of Trust and Promissory Note. This is in addition to the Beneficiary Use Covenant/Homeowner Agreement that secures affordability and the repayment required if a homeowner is not in compliance with the affordability requirements.
 - a. If the homeowner resides in the property for the full affordability period and meets all of the terms of the Deed of Trust, Promissory Note, and Beneficiary Use Covenant/Homeowner Agreement, the City will release all documents at its expense at the expiration of the legal documents.

PROCEDURES

It is recommended that the City and the Developer use the Procedures below as a checklist during the construction and subsequent sale of housing units. These procedures are only for implementing the recapture policies. Other procedures are noted in the Developer Agreement.

Applications for HOME funds are available from the City year-round, as funds are available. Procedures below begin once an application has been approved for funding by the GURA Board of Commissioners.

1. Developer – Provide a written preliminary buyer financing worksheet that identifies a gap in available financing for the homebuyer.
 - a. City –Based on numbers, provide a preliminary, written HOME funds commitment to the Developer at which time HOME funds will be committed.
2. Developer - Articulate affordability requirements (repayment of funds) and recapture provisions to potential purchasers at various stages in the process.
 - a. City - Meet with the potential buyer(s) to review the Beneficiary Use Covenant/Homeowner Agreement, Deed of Trust, and Promissory Note to provide additional assurance that the buyer is aware of the affordability period and instances by which the HOME investment may have to be returned (repayment) or recaptured (sale) and the considerations and requirements of each scenario.
3. Developer – As construction completion nears, provide the City with closing information (per the Developer Agreement).
4. Developer – Finalize the buyer financing worksheet with final figures to determine the exact amount of HOME funds to be involved in the property.
5. City – Prepare the Beneficiary Use Covenant/Homeowner Agreement, Deed of Trust, and Promissory Note to secure the affordability period. Ensure the document is recorded following closing. The expense of recordation is the City's with regard to its legal document (HOME program expense).

6. City – At its expense, release the Beneficiary Use Covenant, Deed of Trust, and Promissory Note when the affordability period expires.

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Attachment 4 – Public Hearing and Public Comment Ads

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