

HUD Narratives

2008 Annual Action Plan



Jefferson County Community Development

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Table of Contents
HUD Narratives
2008 Annual Action Plan

General Narratives	1
Housing Narratives.....	7
Homeless Narratives.....	14
Community Development Narratives	20
Non-Homeless Special Needs Narratives	21
Other Narrative	22



Fourth Program Year Action Plan

Narrative Responses

GENERAL

Executive Summary

Jefferson County is the second largest county in Colorado, according to the Denver Regional Council of Governments (DRCOG), with an estimated 535,837 residents who make their homes from the mountain tops to the plains of this 772 square-mile county, which includes three national forests and two state parks. The economic stability of Jefferson County relies heavily on the service industry, which claims 34% of jobs in the County. The diverse population, geographic location, and combination of industries equate to unique challenges and barriers to affordable living in the County. Affordable housing and economic stability remain two of the highest needs and priority goals of the Community Development Division.

Jefferson County Community Development strives to provide effective services and opportunities to those citizens in need. Through collaborative efforts with non-profits, developers, in-County departments, and other funding institutions, the County has been successful in laying the foundation to address the housing and economic needs of the County through the use of Community Development Block Grant (CDBG), Home Investment Partnerships Program funds (HOME), and other federal funds, including Community Services Block Grant (CSBG) and funds from the U. S. Department of Justice, Office for Violence Against Women (OVW).

Although Jefferson County appears to have fewer problems than the surrounding metro counties, because of the diverse nature of the landscape and population, unique challenges must be overcome. One of the challenges is finding the underserved populations and underserved communities. While the Census assists us in geographically locating tracks of poverty, there are smaller communities within those tracks that go unnoticed and experience a high level of needs that remain unaddressed. An additional challenge we face in this county is securing the trust of those underserved communities once we locate them. To overcome these two challenges, Jefferson County Community Development has implemented a Community Outreach Initiative and will continue to meet with small groups within each community throughout the year. We will also assess the service locations and identify gaps in availability throughout the communities housing the underserved populations.

Year Four will be used to assess current service locations and providers, as well as the need for additional or different services. CDBG funds will be used for public services, senior services, single-unit owner-occupied rehab, economic development and acquisition of rental units. HOME funds will be used for homeownership assistance, single-unit owner-occupied rehab, multi-unit rental rehab and construction of housing. Again, the funds have targeted and will continue to target specific projects that serve the Urban County residents. Agencies using Community Development funds are required to verify and certify that the residents served with CDBG and HOME funds are from the Urban County, which includes Unincorporated Jefferson County, Golden, Edgewater, Mountain View, and Wheat Ridge. While Jefferson County has funded projects in Arvada and Lakewood, we are mindful that these contiguous jurisdictions receive their own allocations of CDBG and our advisory board has increased efforts to ensure that Urban County residents are the target of all projects utilizing CDBG and HOME funds.

General Questions

1. CDBG and HOME funds are used primarily to provide services and programs for residents of unincorporated Jefferson County and the participating cities of Wheat Ridge, Edgewater, Golden, and the town of Mountain View (the Plan Area). Most service programs and some building projects, however, benefit residents on a countywide basis. Additionally, CDBG and HOME funds are targeted to areas with high concentrations of low/moderate income residents and/or minorities. Projects located in the formula CDBG Entitlement Cities of Arvada and Lakewood are being funded only in proportion to the benefit directly received by Urban County residents. Maps are included in the Additional Files folder of the Action Plan.
2. Jefferson County does not operate HOPWA grants but welcomes opportunities to serve the population in need when available.
3. The overwhelming obstacle to meeting the needs of the underserved in the Urban County remains funding. Local partners receive funding from private foundations, donations, Federal funds, and State grants. However, the economic recovery has been slow in Colorado and many services have been reduced as a result of diminished funding. The Community Development Division has undertaken a grant certification program to increase the division's capacity to assist community and in-County partners in accessing additional funding, thereby increasing the County's ability to identify and serve those populations experiencing barriers to service.
4. Jefferson County encourages and requires non-profit partners to seek out and obtain funding in addition to HOME and CDBG; we have successfully partnered with state funding, as well as local contributions in the form of Section 8 Housing Choice Vouchers, local fee reductions and deferrals, as well as Low-Income Housing Tax Credits and Private Activity Bonds for affordable housing acquisition and home ownership programs throughout the Urban County.

Managing the Process

1. Jefferson County Community Development will be the lead agency responsible for administering all programs covered by the Consolidated Plan.
2. The Plan was developed through a partnership of public citizens, community organizations, and county departments to assess and identify gaps in services and foreseeable needs. Upon completion of the Plan, a series of public outreach meetings were conducted during which the Plan was presented and discussed with public citizens.
3. Jefferson County maintains strong relationships with the area housing authorities, local community development and planning departments, as well as participating cities and the County Human Services Department and local service providers. Funding is awarded to these agencies in an effort to provide the highest level of services to the populations in need; this philosophy will continue to drive our programs throughout the next year.

Citizen Participation

1. Citizen participation is an important part of the County's planning process. To ensure that the public has an opportunity to take part in the process, the County and participating cities hold public meetings. This enables them to receive comments on housing and community development needs and where and how funds should be spent. A summary of public comments is included in this Plan.

Outreach continues to be an important component of Jefferson County's Community Development programs. The Community Development Division utilizes a website to provide community information, information on current projects and activities within Community Development, as well as links to service agencies. The website is updated regularly to reflect advisory board meetings, all of which are open to the public. It also provides information on all board members, staff, and solicits requests for information from the public. Our website is located at www.jeffco.us.

In planning for the County's 2005-2010 Consolidated Plan, a Consolidated Plan Steering Committee was developed and met on a monthly basis. This Committee provided technical feedback to the staff about the needs for affordable housing and community and economic development in the County. The Steering Committee reviewed the Analysis of Impediments to Fair Housing Choice, The Housing Needs Assessment, key indicators from the census, and other materials that discuss the housing and community development needs in the County. As a result of these efforts, the County will be able to clearly articulate a vision that includes attainable housing for residents and employees and craft a series of tools that support local efforts.

During 2004, Community Development staff held public meetings to discuss the needs and strategies that would be presented in the 2005-2010 Consolidated Plan and hosted a housing summit to provide further information to community agencies and existing partners. Public outreach meetings were as follows:

Friday through Sunday August 13-15, 2004
Edgewater Heritage Festival
24th Avenue and Sheridan

Tuesday August 17, 2004 from 5pm-7pm
Seniors' Resource Center
3227 Chase Street
Denver, CO 80212

Thursday August 19, 2004 from 10am-2pm
Jeffco Action Center
8755 W. 14th Ave.
Lakewood, CO 80215

2. There were no comments or feedback specifically related to the Consolidated Plan during the process from citizens, although the above-listed meetings were held specifically for this purpose.
3. In addition to the Citizen Participation Plan, Jefferson County Community Development has launched a Neighborhood Meeting program, in which the division coordinates with local non-profit organizations to meet with citizens served on a monthly basis, to gather information regarding barriers to self-sufficiency and gaps in services. Additionally the division participates in a community Latino Task Force, whereby local service providers link to the Latino community to provide services and bridge gaps.

The PY 2008 Action Plan draft was available for public comment and a public hearing for comments specific to the plan was held on March 14, 2008 at the Jefferson County Courts and Administration Building.

4. There were no comments rejected during the process.

Institutional Structure

1. Actions:

- Collaborate with Planning and Zoning to map all needs, specific pockets of poverty, and currently provided services through non-profits;
- Automating all contracts into a project management tool for improved efficiencies and improved internal controls;
- Increase capacity of Community Development staff to increase public outreach efforts to increase customer service to both agency partners and the community.

Monitoring

1. Types of Monitoring Jefferson County will conduct throughout the Program Year:

Informal - Projects, especially those in the high-risk categories, are monitored on an ongoing basis. Regular contacts, as often as weekly or monthly, may be

required to deter potential problems and assure compliance with regulations. Documentation of these contacts is in the form of correspondence as well as notes in each file.

Drawdown Requests - To assure the validity of all requests to draw down funds, back up documentation is required with each such request. The Project Manager and the Department Director will review this information. The request must clearly describe the expenditure and is reviewed for eligibility, consistency with approved project expenses, verification of remaining balance, proof of expense (i.e., bill) and proof of payment (i.e., check).

Davis-Bacon - Projects requiring compliance with the Davis-Bacon Act will be monitored to assure payment of prevailing wage rates. Monitoring will involve onsite employee interviews using form HUD-11. All contractors and subcontractors will submit employee payroll forms per HUD requirements, which will be reviewed by the Project Manager. Labor relations compliance is also included in the Formal Monitoring Tool.

Site Visit - Certain situations require a site visit with the subrecipient to discuss issues between formal monitoring visits. Documentation of these visits and their outcome will be maintained in each project file.

Formal - Each subrecipient will be monitored at a minimum of once every two years. However, to minimize the negative impact of compliance issues, subrecipients may be targeted for formal monitoring annually. Frequency of monitoring will be based on the following risk factors:

Risk Factors:

- Rate of Project Expenditures
- Financial Stability of Subrecipient
- Recently Completed Projects
- Projects that have received complaints or have identified problems
- Projects recommended for monitoring by HUD
- Projects of a complex nature

Scheduling of Monitoring:

Each Project Manager will be responsible for scheduling monitoring visits with his/her assigned subrecipients approximately two weeks to one month in advance.

Monitoring Process:

When possible, a minimum of two weeks notice will be given to a subrecipient prior to a monitoring visit and a copy of the monitoring tool will also be provided to them. The subrecipient will also be informed of the particular projects to be monitored. The monitoring visit will consist of interviews with key personnel as well as a review of pertinent records. The Monitoring Tool will be completed and a copy maintained in each file. A letter regarding the results of the monitoring will be sent to the Chief Official within 45 days. If the subrecipient disagrees with the results of the monitoring, they will have 30 days to respond in writing.

Lead-based Paint

1. Lead-based paint poisoning is a rising concern for all federally funded agencies, as new requirements affect not only rental housing, but new development as well. All applicants to the Jefferson County Housing Authority's Housing Rehabilitation Program receive a notification and brochure entitled "Lead-Based Paint – A Threat to Your Children" either upon or prior to the initial property inspection. New, stronger regulations require more stringent assessment and removal practices. As always, if risk factors, such as young children in the home, a home constructed pre-1978 or known lead hazard appear, remedial work is performed. New regulations also require certified risk assessors, removal/abatement workers and inspectors conduct all phases of work. Jefferson County Housing Authority has certified their Rehab Specialist and many of the contractors with whom they work have been or are being certified in all phases of rehabilitation work. Through combined efforts of the Housing Authority, area cities, Jefferson County, and the State, as well as training offered and sponsored through HUD, more contractors can become certified and working with lead-based paint is becoming a safer practice. Contract documents continue to contain the following clause:

Lead-Based Paint and Hazardous Products: Contractor certifies that only lead-free paint will be used. If it is determined that lead-based paint or other hazardous materials exists in a hazardous form or location and will be encountered in the course of the work, the Contractor shall take the precautions as specified in the Description of Work. If the Contractor or any workers knowingly encounters any hazardous materials during the performance of the work, they shall cease any work that may be injurious and immediately contact the Jefferson County Housing Authority. If precautions were not addressed in the Description of Work at the initiation of the contract and additional work or time is required to deal with hazards, then the Jefferson County Housing Authority will issue a change order giving direction as to how to respond to the condition based on federal regulations and guidelines. This change order may include additional compensation and/or time extension to the Contractor as negotiated and agreed upon by the Contractor, Owner, and Jefferson County Housing Authority.

Compliance with the Lead-Based Paint Poisoning Prevention Act (42 USC 4821, et seq.) and the Residential Lead-Based Paint Hazard Reduction Act of 1992, prohibiting the use of lead-based paint in residential structures constructed or rehabilitated with federal assistance; requiring notification to purchasers and tenants of such housing of the hazards of lead-based paint and the symptoms and elimination of any lead-based paint hazards in such housing that is to be rehabilitated, modernized, or improved are listed in the Additional Requirements of any contract Jefferson County enters into with any agency for either CDBG or HOME funds.

Based on the Housing Needs Assessment, which was conducted by McCormick, and based on the 2000 Census data, about 1/3 of the owner-occupied houses in Jefferson County appear to be low and moderate-income households. Only 17%

of the homes built in Jefferson County were done so during or before 1950. At the time of the current Consolidated Plan, it is estimated that approximately 20,000 homes may be affected by lead-based paint in Jefferson County.

HOUSING

Specific Housing Objectives

1. Through partnerships with private and non-profit developers, Jefferson County will continue to address both the affordability of housing in Jefferson County and the need to preserve the livable conditions of owner-occupied homes throughout the Urban County. The County will work in five specific areas of affordable housing: acquisition and/or rehab of rental property; homeowner-occupied rehabilitation; first-time home buyer downpayment program; new construction homeownership; and acquisition-rehab conversion into homeownership units. In Year Four, Jefferson County plans to assist 18 renters and 53 owners with housing problems according to the Housing Needs Table in the Needs.xls workbook.

ACQUISITION AND/OR REHABILITATION OF AFFORDABLE RENTAL UNITS

Jefferson County will work with the City of Golden to acquire and rehabilitate two rental units for occupancy by Urban County eligible residents. The City of Golden wants to preserve affordable housing and improve the integrity of the community. Units acquired and rehabilitated by similar programs are typically not 100% occupied, which more easily facilitates rehabilitation. The County will also work with Family Tree, Inc. to rehabilitate 16 units at their Brookview Apartments complex, which provides transitional housing for homeless individuals and families. All URA requirements are followed to ensure minimal relocation. The County continues to work with all partnering agencies to acquire and/or rehabilitate rental units throughout the Urban County to ensure preservation of affordable rental units.

HOMEOWNER-OCCUPIED REHABILITATION

Jefferson County currently funds the homeowner rehab program operated through Jefferson County Housing Authority. This program provides rehabilitation for much-needed improvements throughout the County. Typical projects include roof repairs, emergency repairs, including electrical and water lines, and septic system installations for those mountain homes that have nothing but an outhouse. With CDBG and HOME funds, Jefferson County plans to assist 27 homeowners. This program continues to be one in demand and, although it generates program income through deferred loans, that money is reinvested in the program to assist more homeowners.

FIRST-TIME HOME BUYER DOWNPAYMENT PROGRAM

The County continues to partner with the Colorado Housing Assistance Corporation (CHAC) to provide first-time home buyer downpayment assistance to those eligible residents of Jefferson County. While finding affordable housing in Jefferson County is challenging, CHAC has been successful in assisting Jefferson County residents through both our HOME program and the ADDI set-aside program. In Year Four, Jefferson County plans to provide this kind of assistance to 16 new homeowners.

NEW CONSTRUCTION HOMEOWNERSHIP

Affordable housing in Jefferson County is a challenge. Thus, Jefferson County has set aside CHDO Reserve and HOME funds to develop three new construction units, should an opportunity arise throughout the program year.

ACQUISITION-REHAB TO OWNERSHIP

Jefferson County will partner with the Wheat Ridge Housing Authority to acquire property, rehabilitate and improve it, and make it available for homeownership. In year Four, the Wheat Ridge Housing Authority plans to acquire a vacant school, rehab the building and create seven units for homeownership. This type of activity is in its fifth year and continues to be effective in addressing the need for permanent affordable housing in Wheat Ridge.

2. Jefferson County partners with local non-profits and developers to produce and preserve affordable housing for Urban County residents on a number of levels. Project approvals are contingent upon fund leveraging and outside funding partners, including the State Division of Housing, Colorado Housing Finance Authority through its Low-Income Housing Tax Credit (LIHTC) Program, Private Activity Bond allocations, tax-exempt financing, foundation funding, and other local jurisdictional funding. Upon receipt of project applications, Jefferson County requests confirmation and support letters from other funding sources and in-kind partners, such as Home Aide Colorado; these partnerships are confirmed and included in the development of each project with which Jefferson County partners.

Needs of Public Housing

1. It has long been the mission of the Jefferson County Housing Authority (JCHA) to provide affordable housing throughout Jefferson County to the greatest number of eligible people in the most efficient and cost-effective manner. The agency's goals over the next five-year period include:
 - Reduce the waiting list for housing assistance to approach zero for eligible Jefferson County residents;
 - Help people become economically self-sufficient to reduce the need for Section 8 assistance;
 - Provide more affordable housing units for those Jefferson County residents eligible for housing assistance;
 - Provide affordable housing ownership opportunities for existing clients and first-time homebuyers eligible for down payment assistance when current

housing supply within required price ranges in Jefferson County is inadequate to meet demonstrated demand.

The Housing Authority carries out its asset management functions with respect to its public housing inventory through annual inspection of each individual unit, tenant meetings, resident surveys, and other methods through which it manages its properties.

Through these methods, the JCHA plans for long-term operating, capital investment, rehabilitation, modernization, disposition, and other needs for such inventory. JCHA deploys its reserves as necessary and budgets for capital improvement to its properties after reviews, surveys, and meetings based on areas of greatest need or areas that will insure the long-term viability of the properties has taken place. JCHA manages its assets with respect to tenant-based assistance in the same manner. It utilizes all resources at its disposal in order to maintain its properties in safe, decent, and sanitary condition.

This agency works closely with resident councils on management and maintenance issues, conducting annual inspections of all units, and soliciting resident input on implementing the Comprehensive Improvement Assistance Program (CIAP). It hires residents to work on the CIAP and other JCHA projects. JCHA is working to educate residents about home ownership programs, and is contacting tenants who may qualify for first-time homebuyer programs.

JCHA tenants are provided an annual forum through meetings at different sites. One purpose of the meetings is to solicit comments on JCHA's proposed capital improvement programs for the forthcoming year. Through these meetings, tenants are given an opportunity to comment on the need for programs at their sites or to provide alternative for JCHA to consider. For those tenants unable to attend, JCHA provides an annual survey to receive comments on its services, maintenance needs, and property improvements.

JCHA takes pride in good management of its properties. One way this is accomplished is through an Access, Coordination, and Empowerment (ACE) Coordinator. The most significant role of the coordinator is to determine the most cost-effective way of obtaining services for elderly residents living in the apartment units. The ACE Coordinator conducts in-house assessments and identifies services that would support independent living for the elderly. On-site service coordination fosters independence, quality of life, and a sense of community for residents and enables building management to focus on the property issues. Improved stability results through reduced resident turnover and avoidance of crisis management.

2. Jefferson County Housing Authority is not considered a "troubled" agency as defined by HUD.

Barriers to Affordable Housing

1. Jefferson County is renewing the Analysis to Housing Impediments, which was originally completed in November 2003; the County continues to address those issues cited in that report:

Identify what types of programs would be needed to encourage Jefferson County employees to live in the area as well as recruiting and retaining businesses in the County.

The Director of Community Development has a place at both the Jefferson Economic Council board table and the Workforce Board table, through which partnerships are fostered and opportunities for development and business retention are solicited. These are new collaborative efforts initiated by Jefferson County Community Development and will remain a priority for the division.

Work with local lenders to expand and implement Reverse Annuity Mortgage Programs for seniors whom own their homes.

Jefferson County Community Development continues to partner with Brothers Redevelopment, Inc. for such a program in high-need areas of Jefferson County.

Continue supporting rehabilitation loan programs to make needed health and safety improvements to owner-occupied housing, particularly for seniors and lower income households.

Jefferson County Community Development partners with the Jefferson County Housing Authority to provide rehab services throughout the County.

Consider mixed-use zoning that would support both residential and non-residential development.

As part of the economic development efforts throughout the County, mixed-use zoning is being explored. Community Development has also been transferred from the Human Services Department to the Development and Transportation Department, which will provide increased opportunity to effect positive zoning changes that will accommodate these types of projects.

Addressing the “not in my backyard” (NIMBY) issues.

Jefferson County Community Development works with communities to provide education and information regarding the reality of affordable housing in the County, including eligibility and uses. The Community Outreach Initiative has proven somewhat successful in meeting the needs of the citizens; the next phase of the initiative includes partnering with agencies throughout the County to address and overcome such challenges. The division is of the opinion that such successes will only come with the support of the community as a whole; citizens and businesses.

Reduce development costs, growth management systems, and impact fees.

Jefferson County Community Development has partnered with the Planning and Zoning Division through the inclusion of a Planner on the Community Development Advisory Board, which meets monthly September through May. This liaison provides feedback and concerns to Planning and Zoning and communicates the same to the Office and includes areas such as development costs.

Work with area housing agencies and local lenders to distribute information about affordable housing mortgage programs in the area targeting low and very low-income households, large families with children, seniors, and persons with disabilities.

Jefferson County Community Development has a comprehensive website that provides information on both the programs administered with Urban County funds and the partners providing the services, including links. The division is in the process of increasing outreach efforts via the website and email blasts to local agencies serving the populations in need. The division also regularly provides information and referrals to the general public via office visits and phone calls. The website is located at <http://jeffco.us>. The division also uses its Community Outreach Initiative as an opportunity to educate citizens and non-profits about the programs available through the division.

The Urban County supports fair housing workshops, forums, and seminars on a regular basis.

Jefferson County Community Development participates in several initiatives to provide information and education to citizens and other agencies regularly, including participating on the Homeless Networking Committee, having a place at the Jefferson Economic Council board and the Workforce Board, meeting with Housing Colorado! to address housing and related issues for advocacy efforts, meeting with area community development agencies monthly through the CDBG User's Group and our Community Outreach Initiative, which provides the opportunity for one-on-one and small group discussions with Urban County residents to discuss challenges and successes of those programs funded through CDBG, HOME, and CSBG.

Jefferson County strives to increase the availability of resources for those who need assistance with language barriers by contracting with three vendors to provide interpretation and translation services to all Human Services staff and clients, which includes those populations served with Community Development funds:

CHERRY CREEK LANGUAGE CENTER 104 Broadway, 6th Floor Denver, CO 80203 303-756-2520 phone www.TranslationLinks.com	RAQUEL FERSZT & ASSOCIATES 2413 Oakland Circle Aurora, CO 80014 303-752-2640 phone	A & A LANGUAGES 3882 S. Idalia St. Aurora, CO 80013 303-960-6543 phone
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Identification of Obstacles to Meet Underserved Populations

The overwhelming obstacle to meeting the needs of the underserved in the Urban County remains funding. Local partners receive funding from private foundations, donations, Federal funds, and State grants. However, the economic recovery has been slow in Colorado and many services have been reduced as a result of diminished funding. The Community Development Division has undertaken a grant certification program to increase the division's capacity to

assist community and in-County partners in accessing additional funding, thereby increasing the County's ability to identify and serve those populations experiencing barriers to service. Additionally, Jefferson County continues the Community Outreach Initiative, which identifies small groups of citizens at any one time and brings them together for "neighborhood" meetings; this type of setting is more conducive to receiving constructive feedback regarding challenges and successes experienced by the underserved populations. The Director of Community Development also sits on and participates in the Latino Task Force, which was developed by Seniors' Resource Center, and strives to find the underserved populations and provide increased opportunities for access to needed services. During PY 2006, the division submitted an application and was awarded funds to implement Project Safe Havens Safe Exchange Program with Family Tree through the U. S. Department of Justice, Office for Violence Against Women. This two-year \$357,000 grant was one of only a few awarded in the United States and Jefferson County is pleased to be among those receiving funding that will ensure the safe exchange of children between parents and provide a safe environment for parenting time for those families affected by domestic violence.

HOME/ American Dream Down payment Initiative (ADDI)

1. Jefferson County does not intend to use other forms of investment other than described in 92.205(b).
2. Jefferson County will ensure affordability by imposing either a resale or recapture provision on HOME assisted housing in accordance with 24 CFR 92.254. Resale or recapture will be decided on a project by project basis and will be specified in the agreement between Jefferson County and its subgrantee.

Resale provisions will ensure that if the housing does not continue to be the principal residence of the family for the duration of the period of affordability then the housing is made available for subsequent purchase only to a qualified low-income family. The resale provision will also:

- Provide the owner with a fair return on investment including any capital improvements; and
- Assure that the property will remain affordable using deed restrictions or similar mechanisms to ensure affordability to a range of low-income homebuyers.

Recapture provisions will ensure that Jefferson County recoups all or a portion of the HOME assistance to the homebuyers if the housing does not continue to be the principal resident of the family for the duration of the period of affordability. Jefferson County will use one of the following options in determining the recapture amount:

- Recapture the entire amount of the HOME investment from the homeowner.

- Reduce the HOME investment amount to be recaptured on a prorata basis for the time the homeowner has owned and occupied the housing measured against the affordability period.
- Share the net proceeds (defined as sales price minus loan repayment). If the entire amount cannot be recaptured plus enable the owner to recoup their down payment and capital investments in the property, the proceeds may be shared based on a formula.
- The HOME investment that is subject to recapture is the HOME assistance that enabled the homebuyer to buy the dwelling unit. This includes any HOME assistance, whether a direct subsidy to the home buyer or a construction or development subsidy, that reduced the purchase price from fair market value to an affordable price or any down payment or subordinate financing provided on behalf of the purchase.

All recaptured funds will be used for HOME eligible activities. If HOME assistance is only used for the development subsidy, and therefore not subject to recapture, the resale option will be used.

3. Jefferson County HOME funds are not currently used to restructure existing debt.
4.
 - a. ADDI funds will be used to provide homeownership opportunities through a collaborative partnership with the Colorado Housing Assistance Corporation (CHAC) through the following approach:

Colorado Housing Assistance Corporation (CHAC) will provide downpayment and closing cost assistance to low-income families to become first-time homebuyers. The total amount of funds awarded to Jefferson County for 2008 is \$5,184. CHAC will originate flexible, low interest loans to low and moderate income (less than 80% AMI) first time homebuyers purchasing homes in Jefferson County. ADDI Program income in the form of loan repayments, principal, and interest will be returned to the program for sustainability.
 - b. Public outreach will be an important component for the ADDI program. The County will work with CHAC, participating cities, and the Jefferson County Housing Authority, to educate residents about ADDI and how it can benefit them. Partnering agencies will target tenants of public and manufactured homes and to families assisted by public housing agencies.
 - c. Jefferson County, through a partnership with CHAC, will require first-time homebuyer education courses for all recipients of ADDI funding. Recipients will be required to attend a CHFA approved class. These classes are provided by approved non-profits or housing authorities. Recipients are also required to attend a "borrowers' class" where they will discuss the assistance loan, term, and repayment process. Funds will be available on a first come, first served basis.

Specific Homeless Prevention Elements

While Jefferson County Community Development receives no funds directly from any agency, it works with agencies which do, including the Metro Denver Homeless Initiative (MDHI), the Colorado Coalition for the Homeless (CCH), Jeffco Action Center and Stride, through a networking coalition. This coalition is developing a replicable presentation on the face of homelessness in Jefferson County in the hopes of serving as the catalyst for a ten-year plan to end homelessness. While there is no such plan in Jefferson County, there is certainly potential for such a plan and the agencies involved in the coalition are dedicated to addressing those needs of the homeless population within the Urban County.

2. The Five-Year Consolidated Plan includes three priorities, including Housing, Special Needs Populations, and Public Facilities, Infrastructure, and Economic Development; all of these priorities will affect the homeless population in Jefferson County. Through the 2006 annual Point-In-Time survey, we found that the majority of homeless in Jefferson County are families with children; this is alarming because studies have shown that a homeless child does not perform well in school and the number of jail beds is determined by the number of second grade children who can read at grade level (Strausberg, 2000). As such, the division is looking at the overall needs of the population and working with agencies who serve those diverse needs. The 15% set-aside funds for special needs population will be used for projects that address the service needs of the homeless and seniors, including supportive services, direct services, and educational training services. Additionally, funds set aside for infrastructure and economic development needs will provide opportunities to partner with those agencies who provide direct training and services to the homeless, including the local family shelter, Jeffco Action Center, Family Tree, Inc. and Seniors' Resource Center, as projects arise. The division also continues to be an active member in the networking group seeking to present the homeless issues in Jefferson County throughout 2008, serving as a catalyst for a ten-year plan to end homelessness in the Urban County.
3. Chronic homelessness represents 10% of all those experiencing homelessness throughout the State of Colorado (PIT, 2006); Jefferson County, as noted earlier, has seen an increase in family homelessness and, although chronic homelessness does not appear to be a crisis in Jefferson County, the number of those families experiencing episodic homelessness or who are chronically under-housed remains a priority for the County. The County will partner with those agencies who provide crucial supportive services to these populations, including training, counseling, rental assistance, and child care services.

4. Homelessness prevention is a high priority for Jefferson County; providing supportive services and programs that assist people in becoming and maintaining financial security is the most effective way to end episodic homelessness. With increased funding cuts in all areas, those populations living just above the at-risk level will soon experience crisis and, as their needs increase, services will be more difficult to find. Jefferson County will partner with agencies who provide educational, job training, and supportive services to those who are at-risk of homelessness or may be soon be at-risk.
5. Because Jefferson County does not directly administer homeless programs, it does not have a discharge coordination policy. It does, however, work in partnership with Jefferson Center for Mental Health, Jeffco Action Center, MDHI, and CCH to ensure services are provided in an effective manner, including the discharge of those persons in need of mental health services. Additionally, the following initiatives are underway and operational in Jefferson County:

Juvenile Justice Behavioral Healthcare Advisory Committee

The JJBHAC helps families to navigate the juvenile justice system, access and maximize community resources and to utilize one another for support and mentoring. The committee is comprised of parents, youth, advocates and community organizations including the Federation of Families, Division of Youth Corrections, 1st Judicial District Probation, Juvenile Assessment Center, Jefferson Center for Mental Health, Jeffco Family Support Network and Mount View Youth Services Center.

The Committee meets monthly, disseminates educational and resource information and conducts semi-annual community workshops each year on various issues pertinent to juvenile justice.

Juvenile Assessment Center (JAC)

The mission of the Juvenile Assessment Center is to provide and maintain a single point of entry utilizing a centralized facility for individualized processing, assessing, screening and referring of at-risk juveniles and juvenile offenders.

The Jefferson county Juvenile Assessment Center is a dynamic program that provides a wide range of services through a collective effort between Juvenile Assessment Center Staff, JCMH, DHS, the First Judicial District's Attorney's office and the R-1 School District. There are three basic categories of services: at-risk youth in contact with the criminal justice system, Jefferson County Law Enforcement Agencies and the Jefferson County Court System.

Jefferson Center for Mental Health partners with the JAC and provides emergency mental health evaluations and case management for youth consumers aged 0-17 years. A Jefferson Center clinician is housed on-site, and provides support, consultation and training to JAC staff on mental health treatment, diagnosis and Jefferson Center services. Once a youth has been identified as in need of assistance, the clinician provides case management as needed, evaluates for level of care, accessing hospitalization or other services as needed and develops crisis plans as needed.

Crossroads

In August of 2004, Jefferson Mental Health Center was awarded a two year grant from SAMHSA under a new initiative, "Addressing the Mental Health Needs of Adjudicated Youth." Named *Crossroads*, the program provides mental health, substance abuse and wrap-around services to youth (ages 15-18) who are on Probation in the 1st Judicial District and have mental health needs. The program goals as follows:

- Create systemic cost savings by diverting emotionally disturbed adjudicated youth on probation away from institutional settings, restrictive out-of-home placements and hospitalizations;
- Provide a therapeutic environment to enhance youth mental health functioning and reduce recidivism;
- Build a model that can be implemented by other communities serving emotionally disturbed adjudicated youth on probation by implementing a Pilot Program to serve 35-40 youth a year.
- Increase awareness and understanding of issues related to youth violence in the community by enhancing an existing collaboration of stakeholders.

Crossroads is staffed by a Coordinator and a Mental Health Clinician. Youth are referred to the program by the 1st Judicial District Probation Department. Probation officers refer youth based on self-report on the MAYSI-2. Criteria for referral include, at a minimum, a score that meets "Caution" on two of the scales or meets "Warning" on one scale. The Juvenile Justice Behavioral Healthcare Advisory Committee also serves as the Advisory Committee to Crossroads.

Crisis Intervention Training (CIT)

Created by the Memphis, Tennessee Police Department in 1988, CIT has been replicated in over 40 major cities across the country. The core components of the CIT program include selective recruitment of officers with capacity or interest to enhance their ability to communicate with individuals with mental illness. A primary goal of the program is to reduce the burden on the criminal justice system by providing officers with the skills and training they need to de-escalate a person in crisis and identify signs of mental illness so that consumers can be connected with community mental health services.

The training component is 40 hours in length and is extremely intensive, including role-plays conducted by professional actors. It also includes improved partnerships between stake-holding agencies and increased access to mental health services.

Unique among the CIT initiatives nationwide, Colorado's effort is not limited to one law enforcement agency. Rather, from the beginning CIT in Colorado has been a multi-jurisdictional initiative. This widespread focus for CIT is the result of the Legislative Task Force on the Mentally Ill in the Justice System prioritizing CIT programming. To date, the Colorado CIT initiative has trained nearly 1500 officers.

In Jefferson County, approximately 30% of the law enforcement officers in seven jurisdictions in Jefferson County have completed CIT training. The results thus far have been quite positive. As an example, one law enforcement jurisdiction

(Lakewood) reports that the rate of injury to either the officer or citizen on mental health calls subsequent to CIT training dramatically decreased - dropping from 12% to 1%.

Criminal Justice/Mental Health Integrated Case Management Project

With support from the Colorado Health Foundation, Jefferson Center for Mental Health started the Criminal Justice/Mental Health Integrated Case Management Project. The project will increase access to appropriate mental health services and reduce criminal recidivism for persons with mental illness that are involved with the justice system. Annually, the project serves an estimated 100 people who have serious and persistent mental illness, including those with co-occurring mental health and substance abuse issues who are referred through the criminal justice system in the first Judicial District (Jefferson and Gilpin Counties).

Jefferson Center hired two Criminal Justice Case Managers and .25 Peer Specialist to provide adults with mental illness who are in the justice system with the necessary treatment and support for them to become stabilized, and create linkages with human services that will help reduce criminal recidivism. The Case Managers will also help to redirect individuals in need that are identified by Crisis Intervention Team (CIT) officers from the criminal justice system into mental health treatment. Individuals will be referred to the program by CIT officers, Probation, pre-trial and other aspects of the justice system.

Through a contract with Tri-West, Jefferson Center will conduct an extensive evaluation of the impact of these services. The project will result in increased access to mental health services, systems change and eventual costs-savings for the criminal justice system in Jefferson County.

Jefferson County Integrated Parole Treatment Demonstration Project

Jefferson County Integrated Parole Treatment Demonstration Project (also known as the John Eachon Re-Entry Project or JERP), is a collaborative project to increase public safety and reduce recidivism by providing wrap-around services to prison inmates who suffer from serious and persistent mental illnesses and who are placed in community corrections or paroled to Jefferson County. The project is supported by funding from the Bureau of Justice Assistance, U.S. Department of Justice.

The program provides residential transition housing (a halfway house for offenders) and wrap-around mental health and substance abuse treatment, along with correctional supervision services. The project will serve from 30-45 inmates with serious and persistent mental illness that meet the program's eligibility criteria per year. Offenders are assessed, evaluated and programmed for services at a centralized location (the halfway house) by a multidisciplinary team consisting of a case manager, parole officer and mental health professional. Staff from Jefferson Center for Mental Health, the Colorado Department of Corrections Division of Community/Parole and Intervention Community Corrections Services each collaborate to provide individualized, comprehensive interventions that improve individuals' functioning and stability in the community. Continuity of treatment and access to medication during the transition out of prison and into the community combined with team case management efforts to ensure

appropriate structure help to enhance opportunities for success in the re-entry process.

Mental Health Court

Mental Health Courts originated with a specialized court docket developed in Broward County, Florida in 1997 which was "created to stop the revolving door that causes mentally ill people to spin in and out of the criminal justice system." Today there are 25 to 30 mental health courts around the country and more are being planned. In Colorado, there is a juvenile mental health court in Jefferson County.

There is no single "model" of a mental health court. Each court operates under its own rules and procedures and has its own way of addressing service issues. All jurisdictions have some ability to divert offenders from the criminal justice system, either by exercising discretion not to arrest or prosecute, or by providing formal diversion programs or alternative sentencing.

The benefits of a mental health court include:

- Holds youth accountable for their behavior while matching them to appropriate diagnostic, therapeutic, and aftercare interventions.
- Provides an alternative to traditional probation and diversion programs.
- Diminishes restrictions and stigma of criminal justice involvement
- Provides early identification of youth with serious mental illness, which results in more effective and humane treatment of these children.
- Families are full partners in decision making after agreeing voluntarily to participate in the juvenile mental health court.

Criminal Justice Liaison/Forensic Coordinator

Jefferson Center for Mental Health employs a Forensic Coordinator, as do all community mental health centers, to provide services to people who have been arrested for a crime but found guilty by reasons of insanity (NGRI). These individuals have typically been arrested for a serious crime (such as murder), but because of their NGRI have been hospitalized at the state hospital in Pueblo rather than serving time in prison. Upon their release, the Forensic Coordinator manages their care and assists with community reintegration. The Coordinator ensures compliance with all Conditional Release Policy requirements, and oversees the referral and admission of Parole consumers.

Pending - Mental Health Case Manager to work with detainees who are about to be released from the County Jail.

The Criminal Justice and Mental Health Subcommittee in Jefferson County has submitted a proposal to the Jefferson County Sheriff's Department to secure a portion of the booking fees from persons processed through the jail to support a case manager to work with inmates who are ready to be released from jail.

The Jefferson County Jail identifies and treats detainees who are identified as having a mental illness. The counseling and mental health services in place at the jail are effective in early identification of mental health issues and in initiating

treatment including the provision of medications effective in treating the symptoms of mental illness.

A major gap in the treatment system occurs when these individuals are bonded out or released from jail. Consumers who have been receiving mental health services have no follow-up plan in place for receiving ongoing mental health services. They are typically discharged with only a few days supply of medication. These individuals often fall between the cracks after release from jail, and most often experience a recurrence of mental health symptoms and an increased likelihood of re-offending and ending up back in jail.

The proposed mental health case manager would connect with these individuals prior to release from jail and work to provide referrals and linkages to ongoing services. The Criminal Justice/Mental Health Subcommittee envisions that this case manager would work closely with the two case managers funded by the Health One grant, closing the gaps and ensuring appropriate follow-up and treatment.

Leaders in the criminal justice and mental health communities have long recognized the need for this kind of case management service. Unfortunately until now, we have been unable to generate the dollars needed to support this kind of position. Using a portion of the booking fee for this service promises to provide a stable funding basis for the case manager position, enabling us to move ahead with this plan.

Currently, the following agencies provide services and shelter to the homeless population and subpopulation:

<p>Family Tree, Women In Crisis – Battered Women and Children’s Shelter</p> <p>Family Tree, Housing and Family Services – Transitional Housing And Supportive Services</p> <p>Jeffco Action Center – Homeless Shelter for Families and Individuals – Emergency Food and Supplies – School Supplies – Medical Care – Clothing, including Work Clothes Clothing Bank</p> <p>Church on the Rock – Transportation for Homeless Students</p> <p>Colorado Homeless Families – Transitional Housing and Supportive Services</p> <p>Evergreen Christian Outreach – Food Bank, Emergency Services</p>	<p>Helping Hearts and Hands – Financial Assistance</p> <p>Mountain Resource Center – Emergency Assistance</p> <p>Interfaith Hospitality Network – Church-based Shelter for Homeless</p> <p>Jeffco Schools and Medicaid Program – Services for homeless families and students</p> <p>Jefferson Center for Mental Health – Transitional Homeless Program for Mentally Ill</p> <p>Stride – Transitional Housing for Families through Supportive Housing</p>
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The above agencies also serve those who are not homeless, but may be at risk of becoming homeless. The Jefferson Center for Mental Health provides a variety of services to those suffering from mental illness, including job skills, education, counseling and other supportive services.

Emergency Shelter Grants (ESG)

Jefferson County is not an ESG recipient.

COMMUNITY DEVELOPMENT

Community Development

1. Jefferson County's non-housing community development needs continue to include public facilities' improvements, public services, and economic development. Year Four will include providing funding for services to special needs populations, primarily seniors, and for the homeless populations. Jefferson County has the highest number of seniors and nearing-seniors in the State and demands for service steadily increase each year. Services for this population funded through Jefferson County have primarily included assisting in the purchase of vehicles for community senior transportation; the diverse geographic nature of the County demands such services for our senior populations. Other services include temporary assistance to the homeless population experiencing mental illness receiving services through one of the local mental health facilities.

Additionally, economic development continues to be a desired direction of the County. With new partnerships existing between Community Development, the Workforce Board, and the Jefferson Economic Council, opportunities exist for appropriate and functional investment of funds. Specific projects for the economic development set-aside funds will be identified throughout the year, as opportunities arise.

	Accomplishment Goal	CDBG Funds
Public Services		
Brothers Redevelopment	315	\$30,000
Seniors' Resource Center	250	\$30,000
Economic Development		
City of Edgewater	1,000	\$61,986
City of Wheat Ridge	100	\$319,871
Set-Aside	500	\$175,967

2.
 - a. More jobs are created for the County's residents: The County will work with participating jurisdictions and economic councils to provide employment opportunities with growth and stability potential for those low to moderate-income populations in the Urban County. Time period – years three through five. Outcome – promoting livable or viable communities, accessibility for the purpose of creating suitable living environments.

- b. Distressed neighborhoods are improved: The County will work with participating jurisdictions to improve areas of slum and blight or those areas identified as at-risk by local jurisdictions, thereby attracting more economic opportunities to the low and moderate-income populations, through both the improvement process and the resultant economic establishments locating afterward. Time period – years three through five. Outcome – sustainability; promoting livable or viable communities by improving the accessibility for the purpose of creating suitable living environments.

Antipoverty Strategy

1. Jefferson County continues committed efforts to provide housing and community development and community service programs that help reduce the number of persons living in poverty. The diversified mix of non-profit agencies that receive CDBG, HOME and Community Services Block Grant (CSBG) ensures the availability of programs that aid in the prevention of poverty. The County continues to fund programs that aid those living in poverty and fit within the CDBG, HOME, and CSBG guidelines.

NON-HOMELESS SPECIAL NEEDS HOUSING

Non-homeless Special Needs (91.220 (c) and (e))

1. Jefferson County has five objectives for the non-homeless special needs population:
 - a. The special needs populations have housing options, especially those earning less than 40% AMI. The County will work with community partners, such as Jeffco Housing Corp and the Jefferson County Housing Authority to ensure that those earning less than 40% AMI have viable housing options through acquisition and rehab and the rehab of existing affordable units owned by these agencies.
 - b. Services for at-risk seniors with care giving responsibilities are available. The County will solicit specific opportunities to ensure that at-risk seniors in need of care receive services through local agencies.
 - c. The special needs population is educated about housing and service options. The County will solicit specific educational projects that provide housing, economic stability, and homeownership courses locally.
 - d. Transit options near housing and support services for special needs populations are enhanced. The County will work with local partners, including Seniors' Resource Center, to ensure that transit options are available for seniors and other special needs populations.
 - e. The special needs populations are integrated into the community. The County will continue efforts with local non-profit service agencies which integrate and

support stability among the special needs populations in the Urban County, including Jefferson Center for Mental Health, Family Tree and Seniors' Resource Center.

- f. The number of medical clinics near senior and physically disabled populations has increased. Although the County has experienced challenges in its attempts to increase medical facilities, it has been successful in partnering with agencies, including Metro Community Provider Network (MCPN), to ensure that more than 7,000 at-risk seniors and frail citizens receive medical care annually. The County will continue to partner with these agencies and will solicit projects based on need.

Housing Opportunities for People with AIDS

Jefferson County is not a HOPWA recipient.

Specific HOPWA Objectives

Jefferson County is not a HOPWA recipient.

Other Narrative

Leveraging Federal, Private, and Non-Federal Public Resources

Through various partners, Jefferson County has been able to accomplish many activities that would not have been possible without outside funding. An example of these efforts is shown in our four participating cities' examples of combining CDBG funds with local resources to achieve public infrastructure goals. Additionally, non-profit agencies have multiple funding sources that are being combined with CDBG funds to expand capacity and increase the number of clients served.

The same efforts can clearly be seen within the HOME program, as participants continue to be successful in attracting funding sources to leverage federal resources. Down payment and closing cost assistance programs are still one of the most successful results of the efforts, as well as Habitat for Humanity builder programs, which use donations of cash, materials and labor to build homes on lots acquired with HOME dollars. The Jefferson County Housing Authority continues to expand affordable housing in the County using HOME funds. This agency uses double tax exempt financing with various banks and offers below market rate loans to low income families.

Participation in HUD Programs by Faith-Based Organizations

Jefferson County will follow HUD's regulations for Participation in HUD Programs by Faith-Based Organizations; providing for Equal Treatment of all HUD Program Participants; Final Rule published September 30, 2003 at 68 Fed. Reg. 56395-56408. The objectives of HUD's New Faith-Based Regulations are as follows:

Objective 1: Make clear that organizations are eligible to participate in the listed HUD programs without regard to their religious character or affiliation.

Objective 2: Make clear that an organization participating in any of the listed HUD programs may not use direct HUD funds to support inherently religious activities.

Objective 3: Make clear that a religious organization that participates in any of the listed HUD programs will retain its independence.

Regulatory Provision: CDBG funds may not be used for the acquisition, construction, or rehabilitation of structures to the extent those structures are used for inherently religious activities.

CDBG funds may be used for the acquisition, construction, or rehabilitation of structures only to the extent that those structures are used for conducting eligible activities under this part. Where a structure is used for both eligible and inherently religious activities, CDBG funds may not exceed the cost of those portions of the acquisition, construction, or rehabilitation that are attributable to eligible activities in accordance with the cost accounting requirements applicable to CDBG funds in this part. Sanctuaries, chapels, or other rooms that a CDBG-funded religious congregation uses as its principal place of worship, however, are ineligible for CDBG-funded improvements.

Minority and Women Business Enterprise Outreach

Jefferson County Community Development, through the economic development initiative and existing partnerships, will work with local chambers of commerce and economic development agencies to ensure that MWBE are notified of funding availability, potential requests for proposals, and other opportunities to partner with the County through the CDBG and HOME programs. The County Division website is also used for this purpose and efforts will remain to encourage MWBE's to partner with the County and participating cities.

Ethnic/Racial Housing Needs Disparity

Although the minority population in Jefferson County has risen 9% over the last ten years, there is not a disproportionately greater housing need for minorities in the Urban County.

Affirmative Marketing

Jefferson County's affirmative marketing procedures for HOME-assisted housing are guided by the following policies:

- The County has a commitment to affirmatively further fair housing;
- Eligible persons from all racial, ethnic, religious, age and gender groups in the housing market area should be adequately informed and otherwise attracted to the available HOME-assisted housing; and
- The success of the affirmative marketing program will be assessed annually and improvements will be implemented.

The County will require all subgrantees being awarded HOME funds and all owners of HOME assisted projects of five units or more, to commit to affirmative marketing as part of the formal agreement between the County and the subgrantee, and the subgrantee and the owner. Also, the County will implement the above policies through the following activities:

1. The County will inform the general public, owners, and potential clients about Federal fair housing laws and about the County's affirmative marketing policy:
 - a. The County will make the general public aware of these activities by submitting news releases to The Evergreen Papers.
 - b. Local groups which specialize in providing affordable housing as well as non-profit organizations which provide assistance to low-income, ethnic minorities and other disadvantaged households will be advised of the availability of applicable housing provided under the HOME program.
 - c. News releases, advertisements, flyers and other printed material will include the use of the Equal Opportunity logo and/or slogan.
 - d. The County will make available to the public federal pamphlets such as the "Fair Housing - It's Your Right".
 - e. County staff will periodically attend public meetings and forums, particularly meetings in neighborhoods where residents do not respond to the customary information pathways, to inform them of available housing opportunities.
2. For HOME-assisted housing containing five or more units, the County will work with the non-profit subgrantees and the owners of the units to carry out the County's affirmative marketing policies by requiring both owners and subgrantees to comply with the following:
 - a. Inform potential tenants about federal fair housing laws;
 - b. Make use of the Equal Housing Opportunity logo and slogan, and display the fair housing poster;
 - c. Make available the pamphlet "Fair Housing - It's Your Right", and the Housing Discrimination Complaint form HUD-903 and assistance in filling out this form, when necessary; and
 - d. Inform and solicit applications from persons in the housing market area who are not likely to apply for the housing without special outreach, particularly Hispanics, Blacks, Asians and Native Americans.
3. The County will keep records including dated copies of all press releases, informational flyers, newspaper advertisements and any other notices or mailings. The County will also keep records of its outreach efforts and communication with subgrantees related to affirmative marketing.
4. The success of affirmative marketing actions on the part of required owners or subgrantees will be measured as follows:

- a. If required actions have been carried out as specified, the County will assume that owners have made a good faith effort to carry out the procedures.
 - b. If persons from the racial and ethnic groups in the County have applied and/or become tenants in the subject housing, the County will assume that owners have carried out the procedures satisfactorily.
5. Corrective actions will be taken if the County finds an owner failing to carry out the procedures as required or fails to keep adequate records. Initially, the County will discuss with the owner ways to improve efforts toward affirmatively furthering fair housing. Owners who continue to discriminate or who fail to comply with the requirements of this Affirmative Marketing program may be found in breach of contract or in default on their grant agreement and the County may take action to recover all HOME funds made available to the owner by the County.
6. The County will review on an annual basis the above affirmative marketing procedures to determine what improvements, if any, might be made to make the affirmative marketing efforts more effective in notifying persons in all groups about HOME housing opportunities.

Certificates of Consistency

The County is responsible for granting certification of consistency to other entities for housing projects. Jefferson County will support applications from other entities (e.g. public housing authorities, non-profit housing groups, etc.) unless there is a compelling reason to withhold certification. Projects will be required to show consistency with priorities developed in the Consolidated Plan and the Action Plan and will be evaluated based on size or type of project; capacity of those requesting certification; location of project; or category of household being served.