

#### **City of Thornton**

COMMUNITY DEVELOPMENT BLOCK GRANT

# 2022 Consolidated Annual Performance and Evaluation Report

December 19, 2023

Prepared by Community Connections Division
Parks, Recreation & Community Programs Department
and Civitas, LLC

This is a Draft 2022 CAPER is not finalized. Late invoices from a subrecipient is being processed. The Final CAPER will be presented December 19, 2023, at a public hearing which is part of the City Council meeting. If you have any questions or need a special accommodation to review the materials, please contact <a href="CDBG@thorntonco.gov">CDBG@thorntonco.gov</a> or call 720-977-5812. Public comments on this document are welcome until December 18, 2023, at 5:00 pm.

#### **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 2022 Consolidated Annual Performance and Evaluation Report (CAPER) program year (PY) started on October 1, 2022 and ended on September 30, 2023.

The 2020-2024 Consolidated Plan (ConPlan) identifies the five highest priority needs in the community. At the start of 2022 PY, the city had 21 active subrecipients working on activities to address the identified high-priority needs. This number continues the previous year's unprecedented number of subrecipients due to the additional Coronavirus Aid, Relief, and Economic Security Act (CARES Act) funding.

The CARES Act allocated an additional \$977,876 in CDBG-CV funds to prevent, respond to, and prepare for the COVID-19 pandemic. Of the 21 active subrecipients, 6 of them are funded by the CDBG-CV funds. All of the CDBG-CV funds were incorporated into the 2019 Annual Action Plan (2019 AAP) and obligated during the 2020 and 2021 PYs. The city did not accept any of the allowed \$195,575 in CDBG-CV administration funds. Instead, all of these funds were assigned to fund urgent CDBG-CV public service activities.

The following high-priority needs were addressed with the following achievements:

#### **Affordable and Accessible Housing**

<u>Installation of Infrastructure for Affordable Housing Development</u>

New Affordable Apartment Construction (2020 AAP)— The City Council distributed CDBG and HOME funds towards the development of the second stage of the 142-unit Crossing Pointe South housing development. The city partnered with Maiker Housing Partners, Adams County's public housing authority, to complete the project. The development serves low-to-moderate income (LMI) residents. The first 40 apartments occupied now house 6 Very Low income, 14 Low income, and 20 moderate-income households. Twenty-five of the 40 apartments were rented by female heads of household. A total of \$747,628 in HOME funds and \$200,000 in CDBG funds were used for developer fees and infrastructure needs. The project is almost complete and should be fully occupied by December 2023.

#### <u>Improve Existing Owner-occupied Homes</u>

Help for Homes - The Minor Home Repair Program (2021 & 2022 AAP) provided free home repairs to 16 LMI households. Nine residents had a disability (56%), and 13 were female heads of households (81%). The Help for Homes program saw a dramatic increase in applications. Throughout 2022 PY, 82 applications were received and placed on the waiting list. At this time, the city has a one-year waiting list and has suspended taking new applications.

GRID Alternatives - Solar Panel Installation (2021 AAP, #133) occurred on the roofs of 2 homeowners. The program helps offset electricity costs and increase energy efficiency to ensure homes remain affordable for LMI families. One homeowner reported having a disability.

Paint-A-Thon -This program (2022 AAP #128) served four LMI households. All four households were female heads of household and three reported having a disability.

Code Compliance Assistance Program (CodeCAP) (2022 AAP) – Launched in August of 2023, CodeCAP has 11 applications and has sent four requests for qualifications to area contractors. The project should begin in December of 2023.

Rent, Mortgage, and/or Utility Assistance to Prevent Homelessness (Subsistence Payments)

Almost Home, Inc. - Emergency Rent, Mortgage, and Utility Assistance (2020 AAP, #126 with reallocated CDBG-CV funds in 2023) served six Thornton households. These income-eligible families were at risk of losing their homes due to issues such as unemployment, medical illness, or divorce. Of the six served in PY2022, 3 reported as female head of household and 2 as having a disability.

#### Emergency Housing Assistance for the Critically Ill

There With Care: Emergency Assistance for Critically (2020 AAP, #108 CDBG-CV) project was completed in PY 2022 and assisted 2 families with critically ill children through rent/mortgage, utility, and transportation assistance.

#### **Non-Housing Community Development**

#### Neighborhood Improvements with Public Facilities

The East 100th Avenue and Riverdale Road (2020 & 2021 AAPs) environmental review, design, engineering, right-of-way acquisition, utility coordination, and contractor acquisition are underway and mostly complete. The project will meet ADA compliance requirements for sidewalks and the needed sidewalk ramps. The project area consists of predominantly low-to-moderate income areas including several apartment complexes and two mobile home parks.

The Poze Boulevard Sidewalk and ADA Ramp Improvement Project (2020 AAP, #115) assisted an estimated 4,650 persons living in low/mod areas. It is located at the intersections of Poze Boulevard and Dichter Court, and Poze Boulevard and East 91st Avenue. The project met ADA compliance requirements for the sidewalks and six needed sidewalk ramps. The project area consists of residential streets, surrounding LMI neighborhoods, and an elementary school. The project is completed.

The East 120th Avenue and Madison Street sidewalk and ADA ramp improvement project (2020 AAP, #123) assisted an estimated 2,020 persons living in low/mod areas. The project area consists of residential streets, surrounding LMI neighborhoods. The project was completed during 2022PY.

For the Maiker Housing Partners' installation of infrastructure for development activity (2020 AAP, #117), CDBG funds were used to help install the infrastructure required to develop an affordable multifamily 142-unit apartment complex. Forty of the 140 units were completed and occupied in PY 2022. The remaining 98 units will be completed and occupied within months.

#### **Public Services – Special Needs Assistance & Increase Services**

#### **Homeless Supportive Services**

Homeless Outreach and Services (2021 AAP, #122) assisted 289 unique individuals. Of those served, 80 identified as female heads of household. None were reported as disabled. Please see CR-25 for detailed reports on the Homeless Outreach Team's impressive work.

#### Assistance for Domestic Violence Survivors to Prevent Homelessness

Intervention, Inc. (2020 AAP, #119 CDBG-CV), a non-profit organization, provides emergency rent assistance to survivors of domestic violence. They assisted 3 additional survivors and their families during the program year.

Brighton Housing Authority (2020 AAP, #113 CDBG-CV) provided 35 LMI households with hotel vouchers to provide domestic violence survivors with immediate, safe, emergency shelter.

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### 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	Indicator	Unit of Measure	Expected Strategic Plan	Actual Strategic Plan	Percent Complete	Expected Program Year	Actual Program Year	Percent Complete
Expand homeownership opportunities	Affordable Housing	CDBG	Homeowner Housing Added	Household Housing Unit	20	0	0.00%			
Improve existing owner-occupied units	Affordable Housing	CDBG	Homeowner Housing Rehabilitated	Household Housing Unit	100	39	39.00%	97	22	22.68%
Increase and retain affordable units	Affordable Housing	CDBG	Rental units constructed	Household Housing Unit	200	0	0.00%	162	40	24.69%
Increase and retain affordable units	Affordable Housing	CDBG	Rental units rehabilitated	Household Housing Unit	50	0	0.00%			
Provide homeless prevention and supportive service	Homeless	CDBG	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	0	297	100.00%	512	297	58.01%
Provide homeless prevention and supportive service	Homeless	CDBG	Homelessness Prevention	Persons Assisted	250	565	226.00%	25	38	152.00%

Goal	Category	Source	Indicator	Unit of Measure	Expected Strategic Plan	Actual Strategic Plan	Percent Complete	Expected Program Year	Actual Program Year	Percent Complete
Provide improvements to public facilities	Non-Housing Community Development	CDBG	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	15,000	52,918	352.79%	0	6,710	100.00%
Provide increased public services	Non- Homeless Special Needs	CDBG	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	350	5,295	1,512.86%			

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 2022 Annual Action Plan is the third year of the five-year 2020-2024 Consolidated Plan (ConPlan). In this ConPlan, four high-priority **needs** were identified:

- 1. Affordable Housing
- 2. Non-Housing Community Development
- 3. Homeless Services
- 4. Non-Homeless Special Needs

All four high priorities were addressed in this year's accomplishments.

The ConPlan identified six high-priority **goals**:

- 1. Increase and retain affordable units
- 2. Improve existing owner-occupied units
- 3. Expand homeownership opportunities
- 4. Provide homeless prevention and supportive service
- 5. Provide improvements to public facilities
- 6. Provide increased public services

#### Regular CDBG Funding

During the 2022 PY, \$638,452.30 in regular CDBG funds were disbursed to help address all four high-priority community needs and four of the six high-priority goals.

#### Goal 1 -

The city coordinated with Maiker Housing Partners on affordable housing development and rehabilitation. CDBG funds were used to assist with a 142-unit Crossing Pointe South affordable housing development. Two consecutive Private Activity Bonds were awarded (2022 for \$7,855,899 and 2023 for \$8,575,452) for Maiker to completely rehabilitate a 160-unit affordable housing complex called The Overlook at Thornton.

#### Goal 2 -

Twenty-three homes were rehabilitated with CDBG funds in PY2022. The goal of improving 99 existing owner-occupied units utilizing five programs was not achieved in PY 2022. The causes for the shortfalls and improvements to accomplish the goal are described below.

The Colorado Visiting Nurses CAPABLE program removed themselves from receiving funding due to the complications of CDBG funding and their receipt of millions of dollars in other funding. They were projected to assist 15 homes. Their funding will be reallocated.

The Help for Homes program completed 16 homes and four more homes were 95% completed a month after the end of the PY 2022. The projected 33 homes have not yet been achieved largely due to an eight-month vacancy of the program's administrative staff. With the new administrative staff member in place and trained, we anticipate a strong PY2023 for the Help for Homes program.

GRID Alternatives solar program completed 2 of its projected 11 (reduced from the original 21 units due to the approved increase per unit cost) projects. Two more are underway. The 9-unit completion shortfall was due to several factors including GRID's change in leadership, delays, and shortages in supplies. GRID has new leadership installed, the solar supplies are easier to obtain, (although they are more expensive), and there is a waiting list of applicants for the program.

Paint-a-Thon (PAT) completed four homes, plus 95% of two others, during PY 2022. Thirteen were anticipated to be completed. The nine-month vacancy of the program's administrative staff mentioned previously contributed to this 8-unit completion shortfall. To remedy this, PAT's new subrecipient agreement empowers the application reviews, project tracking, reporting, and billing to be faster and simplified in PY 2023. With these changes and the new administrative staff member in place and trained, we anticipate a strong PY 2023 for this program.

Code Compliance Assistance Program (CodeCAP) made tremendous strides. The program was staffed and launched in 7 months. This new city-run program anticipated helping 25 homes. They currently have 11 applicants with eligible projects and sent four requests for quotes out to area contractors. However, finding federally eligible contractors to bid on the projects has delayed the progress. See section CR-40 for details on the progress the CodeCAP program has made to encourage contractors to become federally eligible.

#### Goal 3 -

During the 2022 PY, Community Connections Division staff partnered with Community Resources & Housing Development Corporation and Brothers Redevelopment Inc. to host 29 First-Time Homebuyer Courses, nine of which were in Spanish. During the 2022 PY, 590 individuals attended the six-hour course. This was an increase of seven seminars (32%) and 387 attendees (191%) compared to the previous year. CDBG funds were not used for these events to support home purchases.

Goal 4 -

Despite the staff shortages, HOT met with 289 unique individuals. HOT provided 1,201 direct referrals to programs and services such as housing and shelter, transportation, employment, food assistance, and obtaining vital documents. Three individuals, a mother and two children, were matched with a housing voucher which may be either a permanent supportive voucher or a transitional voucher. Also during this period, the HOTline received 1,857 calls for outreach/resources, complaints, concerns, reports of encampments, etc.

Two homeless prevention programs from previous CDBG Annual Action Plans were completed and closed. Utilizing the last of their funding, Brighton Housing Authority and Intervention, Inc. assisted 38 additional households. The city reallocated unused CDBG-CV funding to Almost Home, Inc. to continue the rent, mortgage, and utility program for residents negatively affected by COVID-19.

#### Goal 5 -

The Poze and Madison ADA sidewalk projects aided LMI neighborhoods benefiting 6,670 people. They were completed and closed in PY 2022. The McAllister Park design project will commence in PY 2023.

The Riverdale ADA sidewalk project's design and engineering phases were completed. All but one right-of-way access was obtained by the city. This phase of the Riverdale project remains seriously delayed mainly due to one property owner's refusal to cooperate on the easement or purchase of the needed right-of-way. The city is still working with this owner to obtain the right-of-way. If finishing this project is possible, its completion will move into the 2025 calendar year (2024 PY). The Riverdale project was funded during the 2020 and 2021 Annual Action Plans. Leaving CDBG funds unspent for two or more years hinders the goal and purpose of the program. It increases the likeliness of failing the annual Timeliness Test and removes the funding from benefiting the community for an inordinate amount of time. Therefore, multiple options are being examined to possibly reallocate the Riverdale project's remaining \$330,000 to more speedily assist the community.

#### Goal 6 -

There With Care utilized the remnants of their funding to finish assisting the last two households and then completed their CDBG-funded program.

The Homeless Outreach Team received 100% of the public services funding in PY 2022, see above for details.

#### CARES Act Funding (CDBG-CV)

In PY 2022, \$42,260.14 in CDBG-CV funds were spent bringing the total to 94% of the CARES Act funding directly assisting residents through the pandemic. The remaining 6%, which was reallocated to Almost Home for homelessness prevention in 2023, should be distributed by the end of PY 2023.

In PY 2022, the CDBG-CV funds accomplished the following to meet the high-priority needs and goals, plus meeting the CARES Act requirements of preventing, preparing for, and responding to the pandemic:

1. Assisted 46 LMI residents – which included 8 residents who regularly received subsistence payments for homeless prevention.

CR-10 - Racial and Ethnic composition of families assisted
Describe the families assisted (including the racial and ethnic status of families assisted). 91.520(a)

	CDBG	%
White	340	85.3%
Black or African-American	15	3.8%
Asian	3	0.8%
American Indian or American Native	14	3.6%
Native Hawaiian or Other Pacific Islander	2	0.5%
Other Multiracial	23	5.9%
Total	399	100.0%
Hispanic	166	41.6%
Not Hispanic	233	58.4%
Total	399	100.0%

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

#### **Narrative**

Residents receiving benefits from the 2022 PY identified as 8.7% minority race, 5.9% multi-racial, and 85.3% white. Persons receiving benefits by ethnicity were 41.6% Hispanic or Latino. Thornton's overall demographic makeup shows 41.8% of city residents are Hispanic or Latino, 72.5% are white, 8.1% are minority race and 19.4% are multi-racial (Source: 2021 ACS 5-Yr Estimates). The city and its subrecipients were successful in reaching and serving at-risk and marginalized city residents but will strive to better reach minority, multi-racial, and at-risk residents.

#### CR-15 - Resources and Investments 91.520(a)

Identify the resources made available

Source of Source Funds		Resources Made Available	Amount Expended During Program Year
CDBG	public - federal	1,064,249	638,452

**Table 3 - Resources Made Available** 

#### **Narrative**

As indicated in the table above, the 2022 PY available funding consisted of \$873,135 in 2022 AAP funding and previous Annual Action Plans' carryover funding of \$191,114. Of the available \$1,064,249, a total of \$638,452 was expended in the 2022 PY. (CDBG funds are calculated separately from CDBG-CV funds)

CARES Act funding of \$977,876 was sent to the City at the onset of the pandemic. This year another \$42,260.14 in CDBG-CV funds expended bringing total expenditures to \$917,809.10, leaving a remaining balance of \$60,066.90 (6%).

Note: A Substantial Amendment was made to the 2022 AAP to add \$35,359 in CDBG funding from PY 2021 reallocated metropolitan area entitlement funds under Section 106(c) of the Housing and Community Development Act of 1974. The PY 2022 annual allocation includes these additional funds from HUD.

Identify the geographic distribution and location of investments

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description
n/a			

Table 4 – Identify the geographic distribution and location of investments

#### **Narrative**

The City does not have a designated Target Area. CDBG regulations are followed to target CDBG-eligible areas for public facility projects where more than 51% of all households are LMI. Southern Thornton, the original heart of the city, is where most of the CDBG funds on infrastructure, public services, and existing housing rehabilitation occurred in PY 2022. This includes sidewalk ADA improvements and home rehabilitation.

#### 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.

The CDBG program does not require a match from other sources, however, the city encourages subrecipients to leverage other dollars so that CDBG funds have the most impact. Most of the subrecipients leverage their CDBG funds. Thornton continues to employ other resources to support non-CDBG-funded activities to benefit the LMI community and meet the goals identified in the Consolidated Plan.

#### 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	0	0
affordable housing units		
Number of non-homeless households to be provided	97	22
affordable housing units		
Number of special-needs households to be provided	0	0
affordable housing units		
Total	97	22

**Table 11 – Number of Households** 

	One-Year Goal	Actual
Number of households supported through rental	0	0
assistance		
Number of households supported through the	0	0
production of new units		
Number of households supported through the rehab of	97	22
existing units		
Number of households supported through the	0	0
acquisition of existing units		
Total	97	22

Table 12 – Number of Households Supported

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

#### Housing

Since 2010, the beginning of the city's CDBG program, 344 owner-occupied homes have been directly improved - an average of 26 homes annually. In PY 2022, CDBG set an ambitious goal of assisting 97 households through five programs. Twenty-two homes were assisted as explained previously. These activities are still planned and/or are already underway, except for the 15 homes in the defunct CAPABLE program.

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

Per unit cost estimates for the home rehabilitation programs will be adjusted to reflect the increases in costs and the city will utilize more conservative accomplishment estimates for future AAPs. The city collaborated with the subrecipients to encourage them to increase their project outreach to help ensure there will not be delays because of insufficient applications from residents. Staffing has been backfilled and in some cases expanded to complete the past and future CDBG goals. The city also decided that in the future, public facility projects will not be funded. This will reduce the likeliness of large amounts of funding being appropriated and then tied up for years.

Include the number of extremely low-income, low-income, and moderateincome 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
Extremely Low-income	8
Low-income	10
Moderate-income	4
Total	22

Table 13 – Number of Households Served

#### **Narrative Information**

Thornton continually works to support the lowest-income earners in our community and those who are housing cost-burdened (spending more than 30% of their income on housing). Thornton strategically spreads its resources across income levels to increase the overall wealth of the community. The accomplishment data in the table above represents beneficiaries of CDBG public service programs, including emergency rent/mortgage and utility assistance, assistance to survivors of domestic violence, and numerous food support programs.

See also CR-40 for additional activities to strategically distribute its resources across income levels to increase the overall wealth of the city's residents.

# CR-58 - Section 3 Identify the number of individuals assisted and the types of assistance provided [Final numbers are being prepared]

Total Labor Hours	CDBG
Total Number of Activities	1
Total Labor Hours	0
Total Section 3 Worker Hours	0
Total Targeted Section 3 Worker Hours	0

Table 15 – Total Labor Hours

Qualitative Efforts - Number of Activities by Program	CDBG
Outreach efforts to generate job applicants who are Public Housing Targeted Workers	0
Outreach efforts to generate job applicants who are Other Funding Targeted Workers.	
Direct, on-the-job training (including apprenticeships).	0
Indirect training such as arranging for, contracting for, or paying tuition for, off-site training.	0
Technical assistance to help Section 3 workers compete for jobs (e.g., resume assistance, coaching).	0
Outreach efforts to identify and secure bids from Section 3 business concerns.	
Technical assistance to help Section 3 business concerns understand and bid on contracts.	
Division of contracts into smaller jobs to facilitate participation by Section 3 business concerns.	
Provided or connected residents with assistance in seeking employment including: drafting resumes, preparing for interviews, finding job opportunities, and connecting residents to job placement services.	

Held one or more job fairs.	
Provided or connected residents with supportive services that can provide direct services or referrals.	
Provided or connected residents with supportive services that provide one or more of the following: work readiness health screenings, interview clothing, uniforms, test fees, and transportation.	0
Assisted residents with finding childcare.	0
Assisted residents to apply for, or attend community college or a four-year educational institution.	
Assisted residents to apply for, or attend vocational/technical training.	0
Assisted residents in obtaining financial literacy training and/or coaching.	0
Bonding assistance, guarantees, or other efforts to support viable bids from Section 3 business concerns.	0
Provided or connected residents with training on computer use or online technologies.	
Promoting the use of a business registry designed to create opportunities for disadvantaged and small businesses.	1 [see CR-40 ]
Outreach, engagement, or referrals with the state one-stop system, as designed in Section 121(e)(2) of the Workforce Innovation and Opportunity Act.	0
Other. See CR-40	

Table 16 – Qualitative Efforts - Number of Activities by Program

#### **Narrative**

Activity #123 COT-ADA Improvements at Madison and 120<sup>th</sup> Street was funded for \$57,262.40 and did not report any Section 3 worker hours.

Please refer to CR-40 for a detailed description of promoting the use of a business registry designed to create opportunities for disadvantaged and small businesses within the CDBG Housing Rehabilitation Programs.

### 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 city continues to assist the homeless utilizing CDBG Public Services funds. From October 1, 2022, through September 30, 2023, staffing difficulties occurred. The 1.5 FTE Homeless Outreach Team (HOT) started the 2022 PY down by one part-time staff member. The remaining staff person, the HOT Coordinator, was then responsible for all HOT activities including outreach, attending to walk-in traffic, responding to HOTline calls, administering Severe Weather Activation Plan (SWAP) motel vouchers, attending homeless organization meetings, record keeping, completing HMIS entries, general community outreach, hiring, and training.

In November 2022, a part-time staff person was hired to fill the vacant position. This person departed the city in July of 2023. This position was then filled with a full-time person in September of 2023 bringing the HOT team up to 2 FTE.

Despite the staff vacancies, HOT met with 289 unique individuals. HOT provided 1,201 direct referrals to programs and services such as housing and shelter, transportation, employment, food assistance, and obtaining vital documents. Three individuals, a mother and two children, were matched with a housing voucher which may be either a permanent supportive voucher or a transitional voucher. Also during this period, the HOTline received 1,857 calls for outreach/resources, complaints, concerns, reports of encampments, etc.

The 2023 Point-in-Time (PIT) homeless count had 627 individuals reported to be sheltered and 321 reported to be unsheltered. Adams County reported of the 948 homeless individuals counted, 50 identified as veterans, 27 were unaccompanied youth, and 13% were fleeing incidents of domestic violence. The county's homeless population showed a dramatic increase from the previous year – 105%. The City's homeless population showed an even larger increase of 129%.

Community Connections achieved the following staff increases during the 2022 PY to increase HOT's ability to reach out to the homeless:

1. National Opioid Settlement funds were awarded to bring the existing Homeless Outreach Specialist from a part-time position to full-time in September of 2023.

- 2. An additional full-time Homeless Outreach Specialist was funded by the City of Thornton. This position will be filled in the first quarter of 2024.
- 3. Adams County Workforce Center funded a paid part-time intern. This Homeless Outreach Support Specialist will start by the end of 2023 and work for 4 5 months with an option for contract renewal. This person in this position will inventory and stock supplies, order resources, produce reports and directories, and assist with outreach as needed.
- 4. HOT organized and managed medical students from the University of Colorado's Anschutz Campus to provide 6 8 volunteers per month to partner with HOT staff for in-person outreach.
- 5. Over the summer Community Connections researched and attended training on Colorado's Proposition 123 grant funding. In October of 2023, HOT applied for Prop 123 funding for another full-time HOT staff member, plus supplies and administrative costs. Grant awards will be announced by the Colorado Department of Local Affairs by the end of 2023.

For intra-organizational, intergovernmental, and regional homeless outreach and reduction coordination, HOT and/or the city participates in the following eight organizations:

- An intergovernmental committee led by Adams County called the CORE Team.
   This committee has streamlined data collection to help inform strategies to align policy and resources so that collectively we can better serve those without homes.
- A city interdepartmental homeless task force, called HOMES to address homelessness through housing, outreach, metrics, engagement, and strategy. Representatives from Legal, Parks, Code Enforcement, Infrastructure, Police, and Community Connections meet to coordinate and make quarterly reports.
- 3. Build For Zero meetings discuss homeless veterans on the sub-region's By Name List.
- 4. Denver's Department of Housing Stability (HOST) Homeless Service Coordination meets regularly for homeless service coordination within the Denver Metro Region.
- 5. The Severe Weather Activation Program (SWAP) meets to plan, prepare for, and coordinate the hotel/motel voucher program in Adams County.

- 6. Point-in-Time (PIT) Planning Committee that coordinates and plans the annual PIT homeless count and data gathering. Volunteers are recruited by HOT and the City.
- 7. Metro Denver Homeless Initiative (MDHI) Coordinating Committee to learn and share the homeless resources and solutions in the Denver Metro region.
- 8. Rocky Mountain Partnership Adams County Opioid Abatement Grant HOT received needed overdose prevention medication (Narcan) and staff training in administering the drug, drug testing strips, and locking pill containers for the public.

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

During the 2022-2023 cold weather season (November 22<sup>nd</sup> – January 23<sup>rd</sup>) HOT participated in Almost Home's Severe Weather Activation Program (SWAP). The program was activated for 100 nights and the city provided 259 unhoused residents with severe weather emergency shelter using hotel/motel payment vouchers.

Almost Home, Inc. in Brighton, Brighton Housing Authority, and Access Housing, Inc. in Commerce City provide the closest transitional housing facilities. The city-funded these organizations with 2020 CDBG, CDBG-CV, and the city's Thornton Assistance Grant funds.

The city is a member of the Adams County HOME Consortium. This consortium, led by Adams County, is exploring a combined and coordinated effort to provide a large regional emergency shelter and/or transitional shelter facility with COVID-19-based funding.

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

According to the 2023 PIT survey, 13% of the respondents reported they were currently fleeing a domestic violence situation. The loss of housing is a major obstacle

when leaving an abusive situation. Housing security is often controlled by the abuser. To address emergency rent, mortgage, and utility assistance, an additional \$74,422 in CDBG funds were reallocated during the 2022 PY to Almost Home - a steadfast housing assistance partner to the city.

Community Connections referred clients to and interacted with Intervention, Inc., Growing Home, Inc., Brighton Housing Authority, and Thornton Police Department Victim Advocates. These programs provide survivors with stable short-term housing and supplies so the survivors and their dependents may reach safety, receive medical and other assistance, and formulate a safety plan. During the 2022 PY, Intervention, Inc. and Brighton Housing Authority activities spent their remaining CDBG funds, and their projects were successfully closed. This reduced the risk of 38 survivors from becoming homeless.

The need for non-domestic violence emergency mortgage, rent, or utility assistance declined somewhat during the 2022 PY. From previous CDBG program years, Almost Home, Inc. and There With Care came to a close in PY 2022. They spent their last bit of remaining funds and assisted a combined 8 households. Almost Home, Inc. did start distributing their additional reallocation of CDBG-CV funds during the 2022 PY.

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 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

In addition to all of the homelessness prevention and support work previously described, Community Connections' staff provided over 27,000 person-to-person resource referrals, information, assistance applications, and other programs to our residents, especially to lower-income residents who are marginalized, vulnerable, or at risk. (2022 calendar year)

Community Connections also offers its facility for free to non-profit partners to provide educational classes, seminars, resource fairs, meeting spaces, and special events. A requirement is that the event is free (or the cost is deeply discounted) to the attendees. This facility is located within a large LMI area of the city. An example of this service is

the First-time Homebuyer Seminars described below.

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

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

The City of Thornton does not have any public housing units within the city boundaries and therefore does not take any actions to specifically address the need for public housing.

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

Since the city does not have any public housing units, it has not taken any actions to encourage public housing residents to become more involved in management.

During the 2022 PY, Community Connection Division staff hosted 29 First-Time Homebuyer Courses, nine of which were in Spanish. During these Saturdays, Community Connection's staff came in on their day off to open the building to host the six-hour courses and make a housing resources presentation. During the 2022 PY, 590 individuals attended the 29 courses. This is an increase of seven seminars (32%) and 387 attendees (191%).

Since 2007, the city's Private Activity Bond (PAB) allocation was awarded 8 times to the Colorado Housing and Finance Authority (CHFA) for first-time homebuyer assistance and to finance mortgage credit certificates. As of PY 2022, these funds have assisted 419 households that received the city's PAB financial assistance through the Department of Local Affairs (DOLA) for home purchases.

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

Maiker Housing Partners, the local housing authority serving Thornton and Adams County is not troubled; therefore, this section does not apply.

#### 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)

A comprehensive update of the city's land use regulations, known as the Development Code, was postponed from starting in 2022 to starting in 2023. The city allocated additional staffing toward this effort and hired a consultant to spearhead the update. The update is anticipated to be completed in 2025. Elements of the planned update include the evaluation of options for existing and future land use developments and related special review criteria, reducing land use regulation barriers for affordable and attainable housing, home accessibility, aging in place, and streamlining processes, among many others. Staff from Community Connections are participating in this substantial effort to advocate and provide solutions for affordable housing, accessibility, and streamlining the development review processes.

In addition to these efforts, the city submitted its Letter of Intent to apply for Colorado's Proposition 123 affordable housing funds. Prop 123 funds 5 affordable housing programs and one homelessness support program. Part of the Letter of Intent's submittal was the commitment to provide an additional 268 affordable housing units by the end of 2026. Per the City Council's direction staff will pursue projects utilizing the six programs for affordable housing including land banking, project financing, home purchases, and homelessness support.

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

According to FindHelp.org, there are over 2,500 resource programs available to Thornton residents. A major obstacle to our residents is knowing the programs exist and what they can do. Another obstacle is providing easy access to resources. The city took the following actions to address these and other obstacles to meeting the needs of the underserved populations:

- > The city participated in numerous regional meetings and conferences to learn about changes to existing services and new programs available to city residents and initiatives to address homelessness.
- > Thornton continued to offer direct services, printed outreach materials, online outreach materials, and other outreach methods to serve the Spanish-speaking residents of our city (9,434 per ACS 2017-2021).
- Non-English language speaking residents (3,598 per ASC 2017-2021), not including Spanish, are accommodated upon request at events and meetings using

- third-party translators and interpreters.
- Special accommodations are provided upon request to assist with accessibility to meetings and events.
- Community Connections partners with Metro State University to host English as a Second Language (ESL) classes.
- Community Connections partners with Mile High United Way to provide parenting classes.
- CDBG funded and continues to coordinate with Audio Information Network to provide online verbal information access to residents who are unable to read due to a visual impairment or other cause.
- The Community Connections division of the city is solely dedicated to providing referrals and resources to residents. This is where the CDBG and HOME Consortium staff work. Information on available services, resources, and programs is provided by Community Connections staff to residents through numerous methods:
  - Website Information is posted on the Community Connections website, which is accessible 24 hours a day, seven days a week. The website provides contact information for social service providers and community organizations, such as food banks, health providers, and agencies that assist with substance use, transportation, water assistance, or housing. The webpages can be translated on demand into dozens of other languages.

Downloadable materials are offered in Spanish. Community Connections' goal is 100% of its written resources available in Spanish.

To comply with Colorado's Accessibility Law for State and Local Governments (HB21-1110) the city has incorporated accessibility software called *SiteImprove* and related training resources. The 2021 law requires compliance in the creation and publishing of any online content and materials including but not limited to text, links, images, forms, PDFs, documents, and embedded third-party applications by July 1, 2024.

SiteImprove conducts a custom audit of the city's entire website and then sends a monthly report of the website's health. The report provides scores in three areas: content quality, digital accessibility, and search engine optimization. The city receives its audit score breakdowns, an overview of issues as they appear on the website, and free tips on how to fix critical issues.

- Eighty percent of the Community Connections staff are bilingual providing our Spanish-speaking clients with referral services by phone, email, and in-person
- Community Connections creates, updates, posts, and prints resource informational brochures, flyers, and booklets on transportation, senior living, home rehabilitation programs, food resources, medical assistance, mental health assistance, Thornton Assistance Programs, city facilities, HOT, community gardens, city farmers markets, free computer access, and more. These regularly updated materials are available on-site, by mail or email, and online at: https://www.thorntonco.gov/communityconnections/Pages/default.aspx.
- Community Connections regularly organizes and executes special and annual events, drives, and giveaways. These include back-to-school supply giveaways, holiday giving campaigns, food drives, and resource fairs.
- Community Connections staffed booths/tables at dozens of community festivals and events to provide printed resource materials to attendees.

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

The city partners with Brother Redevelopment, Inc. (BRI) to conduct the city's Help for Homes minor home repair and Paint-a-Thon programs. Both programs evaluate, test, and utilize third-party specialists to mitigate lead-based paint (LBP). Due to the limited scope of work for these programs, paint is tested for lead, and mitigation measures are taken as required. If lead-based paint is identified, the third-party LBP consultant is engaged, and lead-safe work practices are conducted. CDBG and housing staff reviewed the actions taken for these projects and ensured supporting documentation was in place to comply with the Lead-Safe Housing Rule Requirements, as identified in 24 Code of Federal Regulations Part 35.

The first-time homebuyer classes hosted by the city also include information on home inspections and the laws regarding lead-based paint. By supporting these programs, the city is helping to educate citizens, reduce lead-based paint hazards for current homeowners, and increase the inventory of safe and affordable housing.

The federal booklet *Protect Your Family From Lead in Your Home* is continuously available in English and Spanish at Community Connections, online, and by request.

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

Assisting residents with these basic needs alleviated some of the financial burdens on LMI families and individuals. Thornton successfully sought and often funded public service partners, city departments, and/or residents to assist with:

- 1. Home repairs
- 2. Home purchases
- 3. Emergency rent, mortgage, and utility payments
- 4. Free goods and services
- 5. A twice-weekly farmers market located in two LMI neighborhoods from June to September. LMI and senior residents are assisted with WIC and SNAP vouchers.
- 6. Food access
- 7. Community garden water discounts
- 8. Specialized services for unique populations
- 9. Specialized services for seniors
- 10. Specialized services for youths
- 11. Free tax preparation for lower-income residents
- 12. City infrastructure installed in LMI areas
- 13. City parks designed and installed in LMI areas
- 14. City services in LMI areas
- 15. Helping at-risk behaviors or vulnerable mental and physical conditions
- 16. Removal from domestic violence situations and support
- 17. Developing or renovating new affordable apartments
- 18. City's Water Assistance Program
- 19. Residential junk and debris removal programs
- 20. City recreation cost reduction (50%) with the Park Pass
- 21. Food and property tax rebates for LMI seniors
- 22. Utility cost reduction through weatherization, Energy Star appliance rebates, solar panel system installations, and free residential sprinkler system evaluations.

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

- A monthly Community Connections newsletter is emailed to 400+ organizations including non-profits, faith-based organizations, area governments, and key community navigators. The newsletter relays new programs, services, upcoming events, and available funding opportunities from Thornton and in the Thornton area.
- > Thornton prevents gaps in the institutional structure by organizing, hosting, and participating in regional task forces and resource meetings to continue dialog

with other agencies and stay aware of updates affecting affordable housing and special needs populations. Thornton continues to make deliberate efforts to coordinate with Adams County HOME Consortium members to identify collaborative opportunities, needs in the community, current services, and ways in which the agencies can be strategic in assigning funds.

In addition to the eight homeless-focused organizations mentioned previously, Community Connections staff members joined several city committees and meet regularly with different departments and divisions to provide outreach and coordination with programs and services including Affordable Housing Development, Code Compliance, City Development, Long-term Planning, Fire, Police, Legal, IT, and departmental leadership.

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

The city worked with housing and social service agencies to enhance communication and coordination in the following ways:

- Community Connections offers free use of its facilities to non-profit and intergovernmental partners to host events, seminars, classes, meetings, and direct resident services like tax preparations and legal services. All of these are free to the attendees.
- Coordination with Maiker Housing Partners on affordable housing development and rehabilitation. The results of these efforts include the 206-unit Crossing Pointe affordable housing developments discussed previously, and the two consecutive Private Activity Bonds awards (2022 for \$7,855,899 and 2023 for \$8,575,452) to Maiker to completely rehabilitate the 160-unit affordable housing complex called The Overlook at Thornton.
- New in the 2022 PY, the formation of the Proposition 123 Task Force to help produce 268 affordable housing units within the city through private-public partnerships. (Discussed previously)
- Assisting interested affordable housing developers and redevelopers to find desirable locations and begin to navigate the city's development process.
- Provided technical assistance to agencies and city departments to discuss the available sources of funding, associated timelines for applying for funds, and the most impactful uses of funds. This includes CDBG, PAB, and TAF funds.

Participated in and/or served as an officer in regional organizations and meetings with public and private housing, social service agencies, and other entitlement communities including the CDBG User's Group meeting, and the Community Resource Network.

# 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)

The 2019 City of Thornton Housing Needs Assessment and Analysis of Impediments to Fair Housing provided recommendations for addressing impediments and assigned priority levels to each. Among the highest-priority impediments identified were:

- 1. Resource access in poverty areas
- 2. Insufficient affordable housing in a range of unit sizes
- 3. Insufficient accessible affordable housing
- 4. Insufficient fair housing education

To address these impediments, the city continued to provide residents with access to information about fair housing laws and resources, and supported projects aimed at increasing accessibility, availability, and education:

- The formation of the Proposition 123 Task Force to coordinate and help fund affordable housing units. (Discussed previously)
- In April of 2023, Community Connections partnered with the Denver Metro Fair Housing Center to celebrate the 55<sup>th</sup> anniversary of the Fair Housing Act by hosting a free seminar called *"Fair Housing: Know Your Rights & Responsibilities"*. The targeted audience was housing consumers, housing providers, community service & healthcare professionals, government officials, and consumer advocates.
- During the 2022 PY the city promoted Colorado Poverty Law Project's virtual Free Legal Clinic and Colorado Legal Services Eviction Prevention Webinar through all of its social media avenues, event calendars, and Channel 8.
- HUD Fair Housing brochures, posters, and flyers are available at both the Community Connections facility and the division website. These include "Are You a Victim of Housing Discrimination" (English and Spanish), HUD Fair Housing Equal Opportunity for All, Colorado Civil Rights Division Housing Discrimination

- (English and Spanish), and Fair Housing Rights of Persons with Disabilities.
- Community Connections and the Police Department continue to coordinate regular meetings for the apartment and manufactured home park managers. Attendees represent multi-family rental properties, multi-family homeownership associations, and manufactured home parks located in the city. Discussions include fair housing, property owner and tenant rights and issues, crime and safety, resource navigation, and other pertinent topics.
- Community Connections partnered with Community Resources and Housing Development Corporation and Brothers Redevelopment, Inc. to host 29 homebuyer workshops. (Described previously)

See also Attachment A, the Fair Housing and Equal Opportunity (FHEO) Activities table attached to this document.

#### 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

Minority Business Outreach

Starting in May of 2023, Community Connections and CodeCAP launched a major campaign to assist contractors in becoming federally qualified to bid on Home Rehabilitation Projects (HRPs). The goals of the campaign are to:

- 1. Have multiple contractors in multiple fields available to send Requests for Quotes, thereby meeting the city's and HUD's procurement requirements.
- Notify and encourage small, local, minority, and women-owned businesses to seek contracts from the city to increase area income levels, economic development opportunities, local employment, and provide business education opportunities.

The campaign has a five-step approach. Each step will emphasize assisting locally-owned, small, women-owned, minority-owned, and/or Section 3 certified contractors. These types of businesses are in short supply or no supply.

- 1. Find business education partners to assist contractors in registering in SAM.
- The City and the education partners directly assist businesses with all of the steps required to be registered in SAM and qualified to bid on federally funded projects.
- 3. Find contractors interested in working on federally funded projects.
- 4. Provide businesses the contacts and education necessary to become federally qualified contractors.
- 5. Produce a directory of federally qualified contractors, indicating if the contractor is locally owned, small business, women-owned, minority-owned, and/or Section 3 certified.

With Step One completed, the primary educational partner for the city is the Colorado Procurement Technical Assistance Center (PTAC). Other educational partners and contacts include:

- 1. North Denver Metro Small Business Development Center
- 2. Adelante Community Development
- 3. Several City and County CDBG Administrators in the region
- 4. Colorado Hispanic Contractors Association
- 5. Area Chambers of Commerce (COC)
- 6. Specialized COCs
  - a. Colorado Hispanic Chamber of Commerce
  - b. Asian Chamber of Commerce
  - c. Colorado Black Chamber of Commerce
  - d. Colorado Women's Chamber of Commerce
  - e. LGBTQ Chamber of Commerce
  - f. CO Chamber of Commerce Owners with Disabilities
- 7. Denver Economic Development & Opportunity (DEDO)
- 8. Adams County Regional Economic Partnership (ACREP)
- 9. Alianza Business Assistance Center
- 10. Mi Casa Resource Center

- 11. Minority Business Office Business Directory (in OEDIT)
- 12. Area Economic Development Offices

Scheduled for December of 2023, the city and PTAC are hosting an organizational meeting to involve CDBG administrators, economic development, and other business-focused organizations so they may assist businesses in entering the directory. Committed attendees will invite their area contractors and sign them up for the next step. This will complete Step Two.

Step Three is already underway by the city and PTAC. The city is searching for local businesses to encourage them to become qualified. Actions started include taking pictures of work trucks and cold-calling them, receiving referrals from staff members and other businesses, approaching contractors when on-site, attending local business networking events, Googling businesses and cold-calling them, and recruitment social media posts. After four months of work, the city and PTAC assisted PACA Enterprises landscaping contractors in Brighton, CO in obtaining their SAM registration. They are a local, small, minority, and women co-owned.

Step Four - in January 2024, the city, PTAC, and other educational partners will conduct a free, training seminar for contractors on how to qualify to work on federally funded contracts. Step Four will be ongoing and as contractors are qualified, they will be entered into the directory (Step Five).

#### Monitoring

Community Connections staff monitors subrecipients on an ongoing basis. Active projects, regardless of the year funded, received at least three types of monitoring from the list below.

- Risk Assessment during the application process, before awarding funds a Risk Assessment is completed to identify the risk level of each agency. If an agency is considered low-risk they may not need an on-site monitoring visit, if an agency is considered high-risk they would require additional monitoring options as described below and an on-site monitoring visit at some point during the project or at the end.
- Ongoing Technical Assistance This monitoring includes ongoing contact with subrecipients to provide guidance, prevent potential project issues, and ensure compliance with federal regulations. Individual meetings with sub-recipients

- discuss the CDBG program, processes, reporting requirements, identify concerns, and provide technical assistance as needed.
- Desktop This monitoring is completed when sub-recipients submit quarterly or annual reports, and weekly when Davis-Bacon applies to a project. This type of monitoring enables the city to analyze information such as accomplishments and expenditures and compliance with Davis-Bacon, which helps determine the need for additional technical assistance or future on-site visits. This monitoring also helps confirm that previously funded projects continue to be used for the same purpose and continue to benefit eligible populations. The review of reports is completed every quarter for current projects, and annually for previously funded projects that are required to continue to benefit low and moderate-income populations. When Davis-Bacon applies to a project, the payrolls are reviewed on a weekly basis.
- On-site Onsite monitoring visits are conducted at several stages throughout the subrecipient's participation. The first onsite or virtual meeting is conducted prior to drawing down funds or initiating a project. It often occurs right before or just after the contract is executed with subrecipients. This meeting most often occurs with organizations that haven't received funds previously or are taking on a project unlike those they have previously administered. CDBG staff will review the template forms including Outcome Performance Reports, Section 3 Forms, and WBE/MBE Forms (if applicable).
- Drawdown Requests Community Connections staff review the monthly drawdown requests and all of the required supporting documents for compliance and verify the subrecipient is following the subrecipient agreement or interdepartmental agreement memorandum.
- Financial Annual financial audits are collected by the city and reviewed by the Finance Department for all who received CDBG funds.
- Subrecipient Funding Applications at the time of application submission, and for the duration of the project annual financial, organizational, and government business standing documentation is required and reviewed.

In addition to the above-mentioned monitoring techniques, if a project is subject to Section 3 of the Housing and Urban Development Act (Section 3) or required to report on Minority or Women-Owned Businesses (MBE/WBE) utilized, the city provides additional information and support. The city discussed the requirements applicable to the regulations with both the subrecipient and subcontractors and provided the

appropriate documents. The city also reached out and obtained information from subcontractors during the bidding process. During the 2022 PY, the city accomplished this as outlined below:

- As necessary, the city assisted subrecipients in reaching out to contractors and will provide information on resources such as the National Section 3 website and the Colorado Small Business Development Center's Minority Business database;
- > Subcontractors were provided with technical assistance and the pertinent forms to determine if they qualify as MBE/WBE or Section 3 contractors.
- On-site monitoring is also utilized to help all subrecipients meet federal regulatory requirements.

#### 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.

The public notice regarding the availability of the draft 2022 CAPER and the request for comments was advertised in the Northglenn-Thornton Sentinel on November 30, 2023. Notice was also posted on the city's Community Connections CDBG webpage on November 29, 2023. On November 29, 2023, the notice was posted at four public locations around the city. The notice included contact information for Spanish-speaking individuals and individuals with hearing impairments to obtain more information on the CAPER and the related public comment period. \_\_\_\_\_ public comments were received on the 2022 CAPER.

An 18-day comment period was conducted between November 30, 2023, and December 18, 2023. A draft version of the 2022 CAPER was placed on the City's Community Connections website (www.gocot.net/connections) at the beginning of the public comment period and made available at the Community Connections office. Residents also had the opportunity to speak at a public hearing, which was held in an in-person and hybrid manner at the December 19, 2023, City Council meeting. Reasonable accommodations and translation services were available for residents to attend the public hearing.

The city was prepared to take comments from non-English speaking and hearingimpaired residents. The interpretation was available through a translation service and by staff members if a person were to call or come into the city who did not speak English. Individuals with hearing impairments have access to teletypewriter (TTY) relay service through phone companies. Should a non-English speaking person or individual with hearing impairments want to attend the public hearing, a staff member will arrange the necessary accommodations, if given enough advanced notice.

#### 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.

There were no changes to Thornton's program objectives.

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

No

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

N/A