

Jefferson County HOME-ARP Allocation Plan

Introduction

With the passing of the American Rescue Plan Act of 2021, Congress appropriated \$5 billion in ARP funds to be administered through HOME to perform four activities that must primarily benefit qualifying individuals and families who are homeless, at-risk of homelessness, or in other vulnerable populations. Funds are allocated to HOME participating jurisdictions and Jefferson County's allocation totaled, \$3,584,662 to address the needs of people experiencing homelessness and other at-risk populations. Funding can be utilized in eligible activities proven to end homelessness and increase stabilization:

1. Supportive Services
2. Acquisition and Development of Non- Congregate Shelters
3. Tenant Based Rental Assistance (TBRA)
4. Development of Affordable Rental Housing

In addition to the activities listed above, Participating Jurisdictions (PJ) can provide support to new and expanding Non-Profits with:

1. Non-Profit Operating
2. Non-Profit Capacity Building

Lastly, PJ's were awarded Administrative Funding to properly assist, support and monitor eligible activities. Jefferson County and its local partners are appreciative of the funds allocated to increase assistance to our vulnerable households and ensure increased opportunity for housing stability for the residents of Jefferson County. Below is a summary of needs of the community, current efforts and initial plans for the allocated funds.

Consultation

Describe the consultation process including methods used and dates of consultation:

Jefferson County began to take a more active role in coordinating a homeless response in 2019, after a community initiative organized a Comprehensive Count to better determine the state of homelessness in Jefferson County. The Count was conducted during a week in August 2019 and showed higher numbers of persons experiencing homelessness (PEH) than our annual Point-In-Time (PIT). After the results of the count were published, the County hired a Homeless Coordinator to unify efforts between urban and rural communities and lead the County's Heading Home collaborative. Heading Home is a partnership of individuals, public service professionals, faith-based organizations, and community members, including those with lived experience, dedicated to creating a systematic response in Jefferson County that prevents and ends homelessness whenever possible and when it cannot be prevented, ensures it is a rare, brief, and one-time experience. Under the County's leadership, the group has undertaken extensive outreach to highlight the needs of community and conducted the following analyses of the County's homeless response system: Heading Home Action Plan 2021 – 2023; Sheltering and Gaps Analysis; and Permanent Supportive Housing Needs and Assessment. Congruently, two reputable organizations led consultations for our Community Needs Assessment in 2020, with an update due to COVID in 2021. The County also commissioned a Trauma Informed Design Assessment to better understand the needs of the community.

This previous work has helped paved the way for a targeted consultation process based on the Qualifying Populations and Eligible Activities within the HOME-ARP Notice. Jefferson County conducted two Focus Groups on 6/14/23 and 6/20/23. Both focus groups combined had about 50 participants, some deferring on requests for prioritization of eligible populations and

activities. In addition to the focus groups, a survey was sent to over 40 community partners to ensure ability to provide input on needs through July 7th, 2023. The survey asked organizations to rank the severity of need for qualifying populations and priorities of eligible activities, with options for comments. Below is a list of organizations consulted and a summary of feedback provided. The County, along with the partners' feedback, determined that innovative programming supporting all Qualifying Populations and Eligible Activities was necessary, as opposed to focusing on one Qualifying Population and one Eligible Activity. Funding will be dispersed either through a competitive process, with organizations bringing innovative ideas to serve qualifying populations or by supporting planned projects our community has already deemed necessary.

List the organizations consulted:

Agency/Org Consulted	Type of Agency /Org	Qualifying Populations Served	Method of Consultation	Feedback
Jefferson County Public Health	Public Health Agency	All QP's	Survey	Priorities: Plans support for people once they are linked to permanent housing due to it being a difficult transition. Also, support for NCS as this is needed in the community where there are no safe spaces and affords people privacy.
Colorado Poverty Law Project	Legal Organization and Fair Housing and Civil Rights Organization	All QP's	Survey	Greatest need identified: TBRA and Support for the At-Risk population.
City of Golden	Local Government	All QP's	Survey	Greatest need identified: Provision of Supportive Services and QP1 population.
City of Westminster	Local Government	All QP's	Survey	Greatest needs identified: Provision of Supportive Services, NCS and QP1 population. Additional feedback: lack of spaces for people experiencing homelessness and highlighted the need for services for singles, as families have been historically prioritized.
Metro Denver Homeless Initiative (MDHI)	Continuum of Care Lead	Primarily QP1, can serve QP2 and QP3	Survey	Greatest need identified: Development and Support of Affordable Housing and people identifying as homeless.
Veteran's Health Administration	Veteran's Group	All QP's	Survey	It would be very beneficial for Jefferson County to be able to acquire a congregate shelter for

				those who are experiencing homelessness and have supports in Jefferson County, as many of these people have to go to other cities and counties just to access emergency shelter, making it harder to have continuity of care in terms of rapidly moving towards a permanent housing solution. Greatest need identified: NCS and support for QP1 population.
Brother's Redevelopment	Homeless Service Provider	Primarily serves QP2, can serve other QP's	Survey and Focus Group	Greatest need identified: Development and Support of Affordable Housing and QP4. They report between 85% - 90% of calls on their housing counseling line are regarding rental assistance and affordable housing.
City of Wheat Ridge	Local Government	All QP's	Survey	Greatest need identified: NCS and QP1.
City of Arvada	Local Government/Public Housing Authority	All QP's	Survey and Focus Group	Greatest need identified: Provision of Supportive Services and QP1/QP2 population. For QP1 population, low barrier NCS is needed as there is no place for the community to go.
Colorado Safe Parking Initiative (CSPI)	Homeless Service Provider	Primarily QP1, can serve QP3	Survey and Focus Group	Greatest needs identified: Provision of Supportive Services, NCS and QP1 population. Additional feedback: highlighted the need for shelter – their lots are continually full, and they are forced to regularly turn people away.
Family Tree, Inc.	Homeless Service Provider/Domestic Violence Provider	All QP's, specializes in QP's 1 - 3	Survey and Focus Group	Greatest need identified: Development and Support of Affordable Housing and people identifying as homeless. Additional feedback: High need for rental (and utility) assistance and support services for all qualifying QP's. Also, sheltering options as there are no safe spaces and allows

				people privacy. This need has been brought to us by multiple PEH's. People of color are overrepresented in our systems and that needs to be addressed.
City of Lakewood	Local Government	All QP's	Focus Group	Greatest need identified: NCS, Provision of Supportive Services and QP1.
Recovery Works	Homeless Service Provider	All QP's, specializes in QP's 1 - 3	Focus Group	Greatest needs identified: NCS, Affordable Housing Development and QP1. Additional feedback: Housing Navigation for QP1 and options for financial assistance for QP2.
Action Center	Homeless Service Provider	All QP's, specializes in QP 2	Survey and Focus Group	Greatest need identified: Provision of Supportive Services or TBRA and QP2 population. Additional feedback: A increased need for housing navigation for all qualifying populations and mentioned seniors and households on fixed incomes being priced out. Mentioned the criminalization of QP1 population for experiencing homelessness and the lack of options for sheltering, space to sit, use the restroom.
Salvation Army	Homeless Service Provider	All QP's, specializes in QP's 1 - 3	Survey and Focus Group	Greatest need identified: Development and Support of Affordable Housing or TBRA and people identifying as homeless. Additional feedback: Difficulties in finding landlords for rental programs, would like to see an increased focus on landlords in the community. Recognizing the trauma of experiencing homelessness and some households may need supports for a longer period. Also discussed the increased concern of generational poverty as rents continue to rise and more households need to "double-up" to survive –

				specified concerns about older women and people with disabilities.
Foothills Regional Housing Authority	Public Housing Authority (PHA)	All QP's	Survey and Focus Group	Greatest need identified: Development of Affordable Housing and prioritized QP3 populations. Additional feedback: Need for mediation requirements and lengthier process for evictions, as well as landlord education. All interventions must include robust supportive services.
Colorado Coalition for the Homeless	Homeless Service Provider	All QP's, specializes in QP 1	Focus Group	Recognized the need for NCS for people experiencing homelessness and ability to create community within spaces.
Jefferson County Navigation Collaborative	Partnership of Local Governments/ Homeless Service Providers	All QP's, specializes in QP's 1 - 3	Survey and Focus Group	Greatest need identified: Development of Affordable Housing and prioritized QP1 population. Additional feedback: The need to prioritize families with disabilities and elderly population.
Arvada Rising	Homeless Service Provider	All QP's, specializes in QP 1	Survey	Greatest need identified: Provision of Supportive Services and QP1 population.
PorchLight	Domestic Violence Provider	QP3 (HH's can be in QP1 as well)	Survey	Greatest need identified: Provision of Supportive Services and QP3 population.
Jefferson County Prosperity Partners	Supportive and Homeless Service Provider	All QP's	Survey	Greatest need identified: TBRA and QP1 population. Additional feedback: for services to be individualized and provided based on the household's needs. All funding options are priorities.
Jefferson Center	Mental Health Provider	All QP's	Focus Group	Need for NCS and ability to support people with complex traumas. NCS should also have spaces for households to store personal items.
STRIDE Community Health Center	Health Organization	All QP's	Survey	Greatest need identified: Provision of Supportive Services and QP1 population.

Jefferson County Public Schools	School System	All QP's	Survey	Greatest need identified: TBRA and QP2 population.
Colorado Economic Defense Project	Homeless Service Provider/Legal Aid	All QP's	Survey	Greatest need identified: TBRA and QP1 population.

Summarize feedback received and results of upfront consultation with these entities:

The Consultation process underscored the multiple priorities for the County.

- For example, while shelters will not resolve a housing crisis, Jefferson County has no 24/7 options for singles and the majority of families are seeking a safe place to stay. Of the 26 respondents, 10 organizations advocated for Non-Congregate Shelter. Shelters can be an integral access point for households to determine their long-term housing plan and the pandemic reiterated that people experiencing homelessness feel most comfortable in private rooms and spaces, where they can their vital documents and possessions.
- Respondents (6 organizations) highlighted TBRA in our Community partially due to increasing rents and the need for programs to engage with households for a longer period than other funding sources allow (ex. CDBG funds). There is a minimal amount of RRH funds in the County and households that are moving into new units or recovering from an at-risk situation benefit from resources that meet their needs, such as increased financial options.
- Supportive Services was featured by 9 organizations responding to the survey. Housing navigation, landlord engagement and case management were spoken about at length in one of the focus groups. Households, especially with complex needs, are struggling to locate affordable housing and maintain housing stability.
- Organizations (7) advocated for Affordable Rental Housing Options. While Jefferson County has multiple low-income housing units, there are no fully subsidized units available to the general population. Creation of long-term housing, focusing on affordability, is a priority for the County.

With the eligible activities highlighted, organizations had differing opinions about which populations should be prioritized.

- 15 organizations identified QP1 as their priority for needs.
- 5 organizations identified QP2 as their priority for needs.
- 2 organizations identified QP3 as their priority for needs and one organization highlighted the needs of QP4.

This feedback will be utilized in determining new projects supported by HOME-ARP funds.

Public Participation

In accordance with Section V.B of the Notice (page 13), PJs must provide for and encourage citizen participation in the development of the HOME-ARP allocation plan. Before submission of the plan, PJs must provide residents with reasonable notice and an opportunity to comment on the proposed HOME-ARP allocation plan of no less than 15 calendar days. The PJ must follow its adopted requirements for “reasonable notice and an opportunity to comment” for plan amendments in its current citizen participation plan. In addition, PJs must hold at least one public hearing during the development of the HOME-ARP allocation plan and prior to submission.

PJs are required to make the following information available to the public:

- The amount of HOME-ARP the PJ will receive, and

- The range of activities the PJ may undertake.

Throughout the HOME-ARP allocation plan public participation process, the PJ must follow its applicable fair housing and civil rights requirements and procedures for effective communication, accessibility, and reasonable accommodation for persons with disabilities. The PJ must also provide meaningful access to participation by limited English proficient (LEP) residents, as outlined in its current citizen participation plan and required by 24 CFR 91.105 and 91.115.

Describe the public participation process, including information about and the dates of the public comment period and public hearing(s) held during the development of the plan:

- ***Date(s) of public notice:*** Jefferson County held three public hearings and three opportunities for public comment of the draft plan.
 - The first was a 30-day public notice first published on February 2nd, 2023,
 - The second notice was another was a 30-day public notice published on June 8th.
 - There was a 15-day public notice published on July 18th, 2023, in the Denver Post and a social media post on the County's Facebook page July 19th and July 27th, 2023, to increase likelihood of public engagement.
- ***Public comment period: start date – end date;***
 - 2/2/23; – 3/5/23
 - 6/8/23- 7/3/23
 - 7/18/23- 8/3/23
- ***Date(s) of public hearing:*** 3/1/23; 6/29/23; 7/25/23

Describe the public participation process:

Jefferson County held three public hearings. The first public hearing was held on March 1st, 2023, via Webex from 9-9:30am local time. No citizens participated and only Jefferson County employees were present. Jefferson County also held another public meeting via Webex on 6/29/23 from 9-10 am local time, no citizens attended. The third and final Webex was held on 7/25/23 from 9-10am, and no citizens attended. The HOME-ARP Allocation Plan was also published on our Community Development website, and a physical copy was available at Human Services secretary's desk.

Describe efforts to broaden public participation:

Jefferson County submitted the first public notice in the local newspaper the Golden Transcript. After the HOME-ARP allocation plan was disapproved by HUD a 2nd publication in the Golden Transcript was published in June to let the public know the plan was being updated. In July a new notice was published in the Denver Post. The Denver Post was selected for two reasons: 1) To accommodate a large change in the proposed budget and eligible activities. 2) The Denver Post has a much larger subscription base and this was an attempt to get more feedback from the community. The Denver Post publication included a sentence in Spanish in hopes of increased participation and for the first time ever, the Community Development department advocated for a post on the County's Facebook page! There was also a physical copy at the Human Services secretary's desk available to the public.

While the HOME-ARP allocation plan was in development, the County was congruently completing a Community Needs Assessment (CNA) for CSBG funds. This assessment was completed by Root Policy, a consultation organization, familiar with the community. Root Policy conducted 4 listening sessions with diverse groups, representing all four qualifying populations. The focus groups had representation of both our urban and rural communities. Common themes emerged from the feedback and housing/safe spaces were identified in all groups. Below is a summation of applicable input from focus

groups:

- Domestic Violence leads to instability in environment and makes households feel less safe.
- Trans households identified seeking shelter in a neighboring city and cited a lack of privacy and respect for preferred pronouns.
- Lack of 24/7 emergency shelter options within Jefferson County.
- Flexible housing options in recognition of affordability issues – i.e. roommate allowability.
- Shelter privacy with communal spaces to build community.
- High rent costs and unable to afford even when working full-time.
- Units are designated for Coordinated Entry and not for Jefferson County residents.
- Mountain communities highlighted issues with units being used for Airbnb.
- Need for Low Barrier/Accessible Housing.
- Lack of childcare options that meet the needs of working parents.
- Low vacancy rates in housing and competition.
- Lack of Housing Navigators and Landlord Engagement.

Summarize the comments and recommendations received through the public participation process either in writing, or orally at a public hearing:

Despite these efforts and the expansion of our community outreach, there was only one public comment on the Facebook post:

“Bravo for allocating more money. Qualifying income must be lowered. It’s unrealistic being based on some mean income level from the surrounding residential area. The folks making up the rules for qualifying don’t seem to have any experience being poor, homeless, or/and scraping by. Even the definition of poor is badly defined. Homes are vital. People making up the formulas for qualifying other people need to be people who understand what it is to be in need in the United States and specifically Jefferson County in Colorado.”

Summarize any comments or recommendations not accepted and state the reasons why:

The one public comment will be passed along to HUD as Jefferson County has no control over this recommendation. The Jefferson County Multi-Media Communications Department will be making a best effort to reach out to the individual to inform them their comment has been passed along to HUD. The feedback from the focus groups will be woven into the application processes for subgrantees of HOME-ARP and will be incorporated in the project monitoring.

Describe the size and demographic composition of qualifying populations within the PJ’s boundaries:

Homeless as defined in 24 CFR 91.5

Homelessness has increased in Jefferson County according to multiple data sources, and in recent years Jefferson County has

taken a leading role in identifying the number of people experiencing homelessness. Our Continuum of Care (CoC), Metro Denver Homeless Initiative (MDHI) first began coordinating Point in Time (PIT) efforts in 2017 and published data from that count reported 99 people in Jefferson County identified as literally homeless. By 2022, people identifying as literally homeless had increased by 89%. On January 24, 2022, the PIT collaboration located 6,884 people reported experiencing homelessness within our seven-county region. Key findings for Jefferson County from the count:

- 493 Persons Experiencing Homelessness (PEH) in Jefferson County.
- 200 households reported Chronic Homelessness.
- 189 households resided in an emergency shelter.
- 187 households experiencing unsheltered homelessness.
- 117 households residing in transitional housing.
- From 2020 to 2022, our Newly Homeless population increased from 66 households to 235 households and Chronic Homelessness (households with 12+ months of homelessness within a three-year period and a disability) had increased by 30%. In 2020, 154 households identified as chronically homeless. By 2022, 200 households identified as chronically homeless.

Below is the demographic breakdown of the 493 PEH from our PIT count:

- 341 households identified as single adults.
- Of the people surveyed, 133 identified as families with at least one adult and one child under 18.
- 19 people surveyed identified as a youth, aged 18 – 24.
- 58.3% of the population experiencing homelessness identified as male, while 41.7% of people surveyed identified as female.
- There were 21 individuals surveyed that acknowledged veteran status. All selected White as their race and were in the 55+ age range.
- 27% of those counted qualified as seniors at 55+ in age.
- 188 households reported suffering from mental health concerns and 146 adults responded “Yes” to the question regarding substance use concerns.

When comparing the 2022 PIT to the 2020 American Census Survey (ACS) for MDHI/Jefferson County, it is clear there is a large racial and ethnic disparity. Examples of this are:

- White people make up 91.1% of the population in Jefferson County but only account for 68.1% of the PEH.
- Black, African American, or African people make up 1.6% of the population but account for 8.3% of the PEH.
- American Indian, Alaska Native, or Indigenous make up 1.2% of the population but account for 6.9% of the PEH.
- Hispanic/Latinx make up 15.9% of the population but account for 27.2% of the PEH.

As with most communities, Jefferson County estimates an undercount during our 2022 PIT count specifically due to the weather and the vast areas to be covered. In recognition of the limitations of the PIT count, Jefferson County coordinated a Comprehensive Count in 2019, focused solely on PEH within county lines. This count was completed in August 2019 to eliminate the issues of weather and utilized teams from both government and non-profit organizations well versed in the area to complete a count over a longer period. The Comprehensive Count identified:

- 667 people meeting the HUD definition of homelessness and 209 households reporting chronic homelessness.
- 449 of the PEH population were single households and 49 of the respondents identified as a family.
- 203 PEH reported having a disability. Substance Use concerns, Mental Health concerns and Chronic Health conditions were the top three concerns reported by the population surveyed.

Comparable to Point in Time data, the Comprehensive Count identified significant racial and ethnic disparities in comparison to the Jefferson County General Population:

- American Indian/Alaskan Native identifying households make up 1% of the population of Jefferson County but 5% of the people experiencing homelessness.
- Of the respondents, Black people accounted for 2% of the population, but 8% of people experiencing homelessness.
- People identifying as Multi Racial completing the survey proved the significant gap for this population. They accounted for 11% of the PEH but are only 3% of the general population.

- Hispanic/Latinx (28%:16%) community experienced the largest overrepresentation.

At Risk of Homelessness as defined in 24 CFR 91.5

Per the Jefferson County Navigation Collaborative (JCNC) HMIS data, 110 households accessed Homeless Prevention services. Homeless Prevention funds were either from General Funds through the City and/or County, ESG, or ERAP. This can include supportive services, rehousing resources, financial assistance, or a combination of support. Demographic data shows:

- Of the participants engaged, 41 identified as male, and 69 participants identified as female.
- The composition of households served was 8 single households and 102 families with 44 adults and 66 children.
- Additionally, of the households, 74 participants selected White as their race, 27 households selected Black as their race, 5 participants identified as Asian or Asian-American, 1 household selected the Multi Racial option and 3 participants opted not to identify.

With expanded COVID regulations, Jefferson County had the ability to utilize more funds for Homeless Prevention from the CDBG public service funds. With this funding, Jefferson County was able to better identify and serve the At-Risk population, the breakdown of household composition is below:

CDBG and CDBG-CV fund demographics:

- Households Served: 737*
- Cities served: 4**
- Total Households in Cities: 208
- Unincorporated Residents Served: 70
- White – Hispanic: 161
- White - Non-Hispanic: 565
- Black/African American – Hispanic: 5
- Black/African American - Non-Hispanic: 80
- Asian – Hispanic: 0
- Asian - Non-Hispanic: 3
- American Indian/Alaskan Native – Hispanic: 11
- American Indian/Alaskan Native - Non-Hispanic - 32
- Native Hawaiian/Other Pacific Islander – Hispanic - 5
- Native Hawaiian/Other Pacific Islander - Non-Hispanic - 3
- American Indian/Alaskan Native & White - Hispanic - 1
- American Indian/Alaskan Native & White - Non-Hispanic - 0
- Asian & White – Hispanic - 0
- Asian & White - Non-Hispanic - 0
- Black/African American & White – Hispanic - 1
- Black/African American & White - Non-Hispanic - 1
- Am. Indian/Alaskan Native & Black/African American – Hispanic - 0
- Am. Indian/Alaskan Native & Black/African American - Non-Hispanic - 0
- Other Multi-Racial – Hispanic - 10
- Other Multi-Racial - Non-Hispanic - 34
- Number of Extremely Low-Income persons assisted (<30% AMI) - 847
- Number of Low-Income persons assisted (30%-50% AMI)- 94

*Demographic data is slightly off as 50 households had income between 50% - 80% AMI and inability to pull these households out of report.

**Arvada and Lakewood receive their own allotment of CDBG funds, and County funds are not able to serve these cities.

There is most likely duplication of households between the HMIS, ERAP (within the Q4 data) and CDBG data.

Utilizing the public-school definition of homelessness from McKinney-Vento shows an even greater need for long-term programming and housing options for our community. In addition to the households experiencing literal homelessness, the Colorado Department of Education identified 1229 students as doubled-up due to economic hardship and 186 households residing in hotels/motels. Unfortunately, the demographic data is for the entire state and the County does not have specific Race and Ethnicity Data.

Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking, as defined by HUD in the Notice

The 2022 data from the Point-In-Time (PIT) count indicated there were 73 persons displaced by domestic violence, accounting for approximately 14.8% of persons experiencing homelessness. According to the data, 49 identified as single headed households, 19 identified as families and 5 were children. Locations varied for the DV population: 35 households were in an emergency shelter, 21 households surveyed were unsheltered and 17 households were in transitional housing. The Hispanic/Latinx community made up 26% of this population but account for just 15.9% of the population.

In the 2019 Comprehensive Homeless Count Data, they found 997 people experiencing homelessness or lack of stable housing, and of these 997 people 15% were fleeing domestic violence.

According to Jefferson County Navigation Collaborative HMIS data, of the 484 households served during the 2022 year, 164 households (177 individuals) reported experiencing Domestic Violence, with data on 54 households not collected meaning over 1/3 of our households engaging with our homeless response systems are reporting a form of domestic violence. Demographics for households stating they had experienced Domestic Violence:

- 124 households identified as White.
- 16 households identified as Black.
- 16 households identified as American Indian/Alaskan Native.
- 1 household identified as Native Hawaiian/Pacific Islander.
- 1 household identified as Asian/Asian-American.
- 7 households refused to answer.
- 52 households identified as Hispanic/Latino.
- 116 households identified as Female.
- 47 households identified as Male.
- 1 household identified as Trans.

PorchLight, a family justice center serving the Domestic Violence population, reports 1,328 individual navigations and 3,338 individual visits to their center. PorchLight is currently going through organizational changes and was unable to provide demographic information.

Unfortunately, this data is incomplete. Our coordinated entry system has not yet prioritized this population, convening of victim service providers and a comparable HMIS database. Jefferson County's does have one Domestic Violence shelter, Roots of Courage. A local nonprofit, Family Tree, Inc., operates the shelter with 38 year-round beds available serving all types

of households and in recent years, they have expanded gender inclusivity.

Additional Data regarding the survivor population:

- The 2022 impact report from Violence Free Colorado, the state's domestic violence coalition, reviewed how the pandemic was especially difficult for the survivor population, highlighting the inequities in services for BIPOC and LGBTQIA+ communities. This organization provides technical assistance and training for organizations within the state.
- With funding from the Colorado Domestic Abuse Fund (CDAF), the CDHS Domestic Violence Program (DVP) provided funding to local domestic violence programs in Colorado that answered 62,080 crisis calls and served 23,758 adults and children in 2018.
- Rose Andom Center, an organization located in Denver reports serving 1140 households in 2020.
- The National Human Trafficking Hotline, 137 cases were reported in 2021 in Colorado
- the blue bench, a Colorado based organization focused on ending sexual assault through prevention and care, 1 in 3 women and 1 in 6 men will experience an attempted or completed sexual assault within their lifetime.
- Demographic and location data (to determine survivor population in Jefferson County) is not available for this population. Furthermore, the organizations listed highlight the underreporting of survivors and the necessity of safe, accessible, affordable housing for this population.

Other populations requiring services or housing assistance to prevent homelessness and other populations at greatest risk of housing instability, as defined by HUD in the Notice

With 34% of households identifying as renters in the Continuum (according to the Annual State of Homelessness), anyone earning 30% of AMI or less is at-risk of homelessness and those earning 30% AMI account for 22% of all renters. Factoring in HMIS data from the annual report, our Continuum shows 4,818 single households, 2,266 families and 285 youth were enrolled in a CoC funded housing project (RRH, PSH and PH with service) for 2021-2022 year. Due to data system limitations, the County is unable to determine both how many households are connected to Jefferson County and the demographic breakdown, as this was not included in the report and our system access is limited.

Within the HMIS data for the JCNC, 117 households exited to permanent destinations, with 90 households exiting with a support or subsidy attached to their household and only 27 households exiting with no ongoing subsidy. Following is the breakdown of households that exited to permanent destinations:

- 2 households exited to ownership with an ongoing subsidy.
 - 1 household identified as Black and Non-Hispanic. 1 household identified as White and Hispanic/Latino.
- 1 household exited to a rental unit with a VASH housing subsidy.
 - The household identified as White and Non-Hispanic.
- 10 households exited to a rental unit with an ongoing, unspecified subsidy.
 - 9 of these households identified as White; 1 household identified as Black. Of the households, 3 reported identifying as Hispanic/Latino.
- 4 households exited to a permanent housing option for formerly homeless individuals.
 - 3 households identified as White; 1 household stated they did not know their race. 2 of the households identified as Hispanic/Latino.
- 7 households exited to permanently living with family members.
 - All 7 households were individuals, 3 individuals identified as White, 2 individuals identified as Black, one individual did not know, and another refused to identify during the survey.

Additionally, only one person identified as Hispanic/Latino.

- 2 households exited to permanent living with friends.
 - Both households were individuals, and both identified as White and Non-Hispanic.
- 20 households exited to an RRH or equivalent subsidy.
 - 11 households identified as White, 3 households identified as American Indian/Alaskan Native, 4 households identified as Black, 2 households did not answer and of the 20 households, 7 identified as Hispanic/Latino.
- 46 households exited to a rental unit with an HCV voucher.
 - 38 households identified as White, 3 households identified as Black, 3 households identified as American Indian/Alaskan Native, 2 households refused and 10 of the households surveyed stated they identified as Hispanic/Latino.
- 2 households exited to a public housing unit.
 - Both households identified as White and Non-Hispanic.

According to the 2020 5-year ACS and Root Policy Research, an agency Jefferson County contracted with for our Community Needs Assessment (CNA), in 2020 Jefferson County had 69,129 rental units. Of those 13,327 or 21% fell in the <30% AMI range which meets the definition of “at-risk of homelessness.” If you expand the 30%-49%, it will equate to an additional 10,040 or 15% renters that would be struggling to pay basic bills. Demographic data was not available for this survey. Even before the pandemic, Jefferson County renters were reporting significant costs burdening, according to data from the CHAS 2015 – 2019 survey. Close to 35,000 households under 30% AMI and over 16,500 households between 30% - 50% AMI reported severe cost burdens. With the significant rental increases (over 20%) in our community, this number has increased. Demographic data was not available for either survey.

Additionally, data from our Emergency Rent Assistance Program (ERAP) shows 1884 households were supported and about 11M was spent to support households with a COVID impact through the 2022 year. Households identified as:

- White: 1361
- American Indian or Alaskan Native: 48
- Asian: 19
- Native Hawaiian or Other Pacific Islander: 13
- Multi Racial: 294
- Black: 149
- Hispanic/Latino: 665
- Non-Hispanic/Latino: 1218
- Male: 662
- Female: 1207
- Gender Non-Conforming: 9
- Trans identifying: 6

321 of these households identified income as between 50% - 80%.

Identify and consider the current resources available to assist qualifying populations, including congregate and non-congregate shelter units, supportive services, TBRA, and affordable and permanent supportive rental housing (Optional):

To identify the Needs and Gaps in our community, Jefferson County utilized our Housing Inventory Count (HIC), the CoC's Grant Inventory Worksheet and the Census data, as well as a Sheltering Gaps Analysis, Permanent Supportive Housing Needs Assessment, and the Community Needs Assessment. The latter three sources were created by our community, through our local collaborative, Heading Home, and a consulting team at Root Policy Research.

For shelter services, the County relies on the NCS model at the White Swan Motel for up to 20 families, a 23-bed shelter through the non-profit, Evergreen Christian Outreach (ECHO), primarily serving the mountain communities, Family Tree's Roots of Courage shelter for survivors, and the Severe Weather Shelter Network (SWSN) that sets up on the coldest nights.

Supportive Services are primarily funded with CDBG dollars, TANF dollars and ERAP dollars. Prioritized populations are people experiencing literal homeless and At-Risk households. Vouchered households have limited supports unless they reside in a PHA with Service Coordinators.

The County does not directly provide any TBRA services but contracts CDBG funds to community partners to provide support under an RRH model. These services are only provided up to 6 months due to funding restrictions.

The affordable housing options within the County are not overseen by the County. There are three Public Housing Authorities: Arvada Housing Authority; solely providing Housing Choice Vouchers (HCV), Foothills Regional Housing; providing federally subsidized units and HCV's, and MetroWest Housing Solutions, also providing affordable units and HCV's for households and seniors.

Describe the unmet housing and service needs of qualifying populations:

Needs Assessment and Gaps Analysis

This dataset is taken from our Continuum of Care's Point-In-Time Count 2022 and the Housing Inventory 2022 worksheet.

Homeless													
	Current Inventory					Homeless Population				Gap Analysis			
	Family		Adults Only		Vets	Family HH (at least 1 child)	Adult HH (w/o child)	Vets	Victims of DV	Family		Adults Only	
	# of Beds	# of Units	# of Beds	# of Units	# of Beds					# of Beds	# of Units	# of Beds	# of Units
Emergency Shelter	609	1,621	2,467	n/a	258								
Transitional Housing	367	1,245	714	n/a	220								
Permanent Supportive Housing	427	1,035	3,510	n/a	1,436								
Other Permanent Housing	894	1,261	1,240	n/a	20								
Sheltered Homeless						1,165	3,303	312	872				
Unsheltered Homeless						42	2,014	120	231				
<i>Current Gap</i>										668	n/a	2,765	n/a

Homeless as defined in 24 CFR 91.5

Jefferson County has also done extensive work to coordinate efforts throughout the cities and counties, supporting the Jefferson County Navigation Collaborative (JCNC) and usage of the HMIS system. The Navigation Team has three Jefferson County navigators focused on families experiencing homelessness throughout the County and the cities have 9 navigators focused on single headed households. While the HMIS data is not complete, during the 2022 program year, 320 PEH households were served. Engaging the vast team to utilize HMIS has been a challenge due to extremely limited training opportunities for HMIS access and some cities having concerns about the system.

Regarding our current Emergency Shelter options, the inventory total is approximately 4,157 beds for Emergency Shelter and Transitional Housing in our Continuum with 6,884 people experiencing homelessness. A better representation of availability in Jefferson County is the Sheltering and Gaps analysis, created by our Heading Home workgroup. Until 2021 there were no year-round emergency shelter locations within County lines. In 2021, Jefferson County created a unique partnership with a for-profit company to lease 20 motel rooms for families experiencing homelessness. This motel is operating as a low barrier Non-Congregate Shelter with supportive services onsite. The other sheltering options within the County include:

1. A mountain community organization, Echo, operates a 23-bed shelter from October to May, 6p – 6a. This shelter is in the basement of a church. It has 7 private rooms with a shared bathroom.
2. The Severe Weather Shelter Network is a group of volunteers that partner with local churches to utilize space during cold weather nights. Depending on volunteer availability and church capacity, this option can shelter up to 40 individuals on average when cold weather response is activated.
3. The County contracts with the Jefferson Navigation Collaborative and Family Tree to provide vouchers when cold weather response is activated. These vouchers are limited due to funds and availability in contract motels. Families and medically fragile individuals can access when available. In 2022, there were 18 days where motel vouchers were activated, serving 153 households, with a cost of \$29,000 for the program.
4. To respond to the need and limited options, Jefferson County worked with the Colorado Safe Parking Initiative (CSPI) to develop creative sheltering options for households with a vehicle in 2021, serving up to 17 households a night. This option is lower barrier than the Echo and Severe Weather Shelter Network options but limited to households with a working vehicle.

Most of the County's sheltering is Transitional Housing. There are three transitional programs within the County, serving up to 206 households. These three programs have high barrier eligibility criteria and are limited to households with children. All three are centrally located, providing limited services to the rural population of Jefferson County and none of the transitional options prioritize Jefferson County residents.

At Risk of Homelessness as defined in 24 CFR 91.5

Jefferson County provides a 211 service which helps with various services such as rental assistance, food/meals, utility services, healthcare, and such. By far the largest category of requested assistance during the 2021 calendar year was for housing assistance with the following results, ranked in order:

- Rental assistance with 1,487 or 17.66% of all calls.
- General housing assistance with 1,249 or 14.83% of all calls.
- Utility services with 1,001 or 11.89% of all calls.
- Shelter/transitional housing with 796 or 9.45% of all calls.

The top 3 of 4 calls centered on housing and accounted for 41.94% of all calls.

With the end of ERAP, CBDG-CV and CSBG CARES funding, Jefferson County has little to no options for Homeless Prevention. While ERAP served 1266 during the 2022 year, there were over 4000 Incomplete Applications, 339 Applications Submitted that did not receive support due to limited funding and 747 households Denied for Non-Response. The program was originally designed to support households via online database and many households have limited or no access/familiarity with online systems.

Without ERAP, the options for Homelessness Prevention are limited to a portion of the County's CDBG funds and ESG HP funds. During the 2022, no agency within the County received ESG HP funds, making it more difficult for households to get local/walk-in access. The ESG HP funds are dispersed through the entire Continuum and our CoC uses most of the ESG funds for RRH programming.

As Colorado is a suppression state, our Eviction Data is limited, and therefore are unable to determine household composition, reason for filing and zip codes for households receiving an eviction. From viewing the Colorado Judicial – Eviction Filings report, 3,942 evictions were filed during the 2022 calendar year. This data does not include illegal evictions or forced move outs due to rental increases and refusals to renew the lease with tenants. Linking the number of evictions to the estimate of renter occupied units according to the ACS data totals 70,474 meaning that 1 in 18 households have an eviction filing.

Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking, as defined by HUD in the Notice

Housing for survivors is incredibly limited. While survivors can access all housing options available, survivor status has not been identified as a prioritization and survivors may have lower lengths of homelessness than other populations. Family Tree, within the County's jurisdiction, operates a shelter for survivors and is the only CoC funded program for the entire seven-county area. Roots of Courage, the DV shelter, holds 38 beds in a congregate setting. The shelter can serve anyone in the Continuum and 15% of respondents in the 2022 PIT reported experiencing DV, meaning there are close to 1,000 survivors unable to access DV specific shelter on any given night. The CoC program for survivors is a Rapid Rehousing program and able to serve up to 25 households on average with \$600,000, however it is shared throughout CoC allowing no prioritization for County residents. Denver County has provided funding for this specific population, but they typically require households to have ties within Denver County.

The data below is from the Jefferson County Community Needs Assessment data from 2020 and was comparable to the CHAS data.

Non-Homeless			
	Current Inventory	Level of Need	Gap Analysis
	# of Units	# of Households	# of Households
Total Rental Units	69,129		
Rental Units Affordable to HH at 30% AMI (At-Risk of Homelessness)	3,018		
Rental Units Affordable to HH at 50% AMI (Other Populations)	8,902		
0%-30% AMI Renter HH w/ 1 or more severe housing problems (At-Risk of Homelessness)		13,327	
30%-50% AMI Renter HH w/ 1 or more severe housing problems (Other Populations)		10,040	
Current Gaps			11,447

Other populations requiring services or housing assistance to prevent homelessness and other populations at greatest risk of housing instability as defined by HUD in the Notice)

Housing is the solution to homelessness, and there is an issue of affordability within the Continuum. MDHI's Annual State of Homelessness 2022-2023 report proves that maintaining stable housing has become increasingly difficult. The report says Colorado has the 7th highest housing shortage in the nation. The report also details that the Denver Metro area ranks 16th out of 300+ metropolitan areas with an estimated shortage of nearly 70,000 units. With an average Fair Market Rent (FMR) of \$1,671 for a 2-bedroom and a median home price of \$599,000, renting or owning a home in the metro Denver area is becoming more and more out of reach. Compounding this issue, is data from Apartmentlist.com, showing that rent has increased in Jefferson County and surrounding areas by 20% from 2021 to 2023. Within Jefferson County, a gap of 11,447 units was tallied for our lowest income residents.

According to our County's Permanent Housing Needs and Gaps Assessment, while the 222 units of PSH within Jefferson County, only 17 are dedicated for Jefferson County residents, the Jefferson Center Yarrow Gardens Project, and the Family Tree Eaton St. Project. All housing opportunities are available to anyone eligible within the Continuum of Care. The CoC and the County only received about \$764,000 according to the Grant Inventory Worksheet. Additionally, these units are most often fully occupied with little to no turnover. On average nationally, approximately 15% of permanent supportive housing units turnover annually. Because of this low turnover rate and lack of dedicated units the current inventory does not meet the needs of our current homeless community. The current inventory only keeps those who have previously experienced homelessness from becoming homeless again.

For households unstably housed or households needing additional supports, there is limited data. While the JCNC connected 20 households to RRH programs according to HMIS data, our Continuum does not have a cohesive way to track the number of units with RRH funds and serving Jefferson County residents. Our Continuum funds about 105 units of RRH with 58 of the units prioritized for Denver, Aurora, and Boulder residents. The additional 47 units are for households 18 – 24, meaning there is a significant gap in CoC funds for Jefferson County residents. Lastly in response to the COVID pandemic, the County received 42 Emergency Housing Vouchers specifically for residents of the County. All vouchers were dispersed in record time due to the severity of need reported.

Most specific data on number of units and need are presented in the chart above.

Identify any gaps within the current shelter and housing inventory as well as the service delivery system:

As mentioned, and shown in detail above, the resources are minimal and do not sufficiently meet the needs of the community. For example, while there were 3,334 shelter beds available, these beds are for a seven-county Continuum and 6,884 people experiencing homelessness. The number of shelter beds available is less than half of the need in our community and there are no year-round shelters for single individuals in Jefferson County. Also, year-round shelter for families is limited to 20 NCS units, with over 130 families experiencing literal homelessness. For households experiencing homeless with vouchers, there is no coordinated landlord engagement or housing navigation. High functioning systems (Houston, TX) report a network of landlords providing open units directly into the community and navigators assigned to each household exiting homelessness, ready to assist with the navigating the complex systems of rental applications. Support services for unstably housed households is severely limited and supports are focused on families within the Jefferson County Public School system. Jefferson County has one McKinney-Vento liaison for 1,637 students (this is including students experiencing literal homelessness.) The JCNC has relied on ERA, CDBG-CV, and CARES funds to support the community during the COVID pandemic, however all these funding sources are either ending or fully spent. There are no TBRA funds in Jefferson County, and only households connected to Coordinated Entry can be referred to TBRA or RRH.

There are approximately around 2,600 voucher available in the County, however, applicants do not need to have residency in Jefferson County to qualify. There are three Housing Authorities: Foothills Regional Housing (FRH), formerly Jefferson County Housing Authority, Metro West Housing Solutions (MWHS) and Arvada Housing Authority. and combined they report a waitlist of 3,085 names. FRH serves the entire Consortium region with the administration of Housing Choice Vouchers (about 1400) and provision of affordable housing. FRH no longer owns public housing and instead owns and operates approximately 20 affordable housing properties in Jefferson County: five are in Arvada, two in Evergreen, three in Golden, two in Lakewood, seven in Wheat Ridge and one in Westminster. FRH also supports many units through project-based vouchers including 320 units in tax credit properties and 185 senior and family units within new construction projects. FRH does not maintain a wait list for Housing Choice Vouchers and instead uses a lottery system. FRH reports the rental market continues to present challenges for voucher holders as there are few vacant units and moderate- and higher-income renters are willing to pay more than the allowable voucher payment standards. MWHS serves as the housing authority for the City of Lakewood. MWHS does not currently own and operate public housing but instead administers the Housing Choice Voucher program and operates as an affordable housing and service provider throughout the City of Lakewood. MWHS currently owns and operates eight apartment communities and four senior living communities. MWHS administers approximately 1,200 Housing Choice Vouchers and the wait list is typically 1,500 - 2,000. MWHS staff continue to report that the tightening of the rental market has reduced the supply of apartments available to voucher holders and forced clients to locate in lower income, more central communities within the city. Staff report that it is much harder for clients to find affordable rentals in high opportunity areas than it has been in the past. Little is known about Arvada's housing authority as it has opted not to participate in the Consortium and is not required to share data.

The issues listed above are compounded by households with non-English speaking residents, LGBTQIA households, youth and other households representing a specific demographic. The County does not currently have any peer programs, a vital component of successful housing programs.

In addition to the gaps in service and inventory, are gaps with our system usage. Our second largest city and many of our rural communities do not utilize HMIS. They have concerns about privacy and are not yet convinced that it is the best access point for their community members experiencing homelessness. Like many residents, they are concerned that enough supports are not being matched to Jefferson County residents.

Under Section IV.4.2.ii.G of the HOME-ARP Notice, a PJ may provide additional characteristics associated with instability and increased risk of homelessness in their

HOME-

ARP allocation plan. These characteristics will further refine the definition of “other populations” that are “At Greatest Risk of Housing Instability,” as established in the HOME- ARP Notice. If including these characteristics, identify them here:

Jefferson County has chosen not to further identify “other populations” within the qualifying populations already identified by HUD.

Identify priority needs for qualifying populations:

As shown in the Consultation, the community has identified multiple priorities and the County has determined, with community support, to support several projects. There are little to no supports or spaces for single individuals and most families to rest. In September 2022, Jefferson County contracted with the University of Denver’s Center for Housing and Homelessness Research and Shopworks Architecture, for a research project on Trauma-Informed Design. Over 1,000 participants were interviewed on the following projects: Housing, Shelter, and Navigation Center. Regarding shelter, a participant with lived expertise succinctly stated the need:

“I’m exposed to the world. The whole world is constantly watching me. You feel like all eyes are watching all the time. It wears on your soul.”

This statement has been and will continue to be the guiding light, as the County continues to scout locations for a Non-Congregate Shelter. On extremely cold and unreasonably hot days, there need to be spaces for households to remain comfortable, safe places for valuables and vital docs and an access point for people to move along the housing continuum. This continues to be the consensus of the County’s Public Health Department, the VA, multiple city partners and four non-profit partners.

The County also recognizes the need to increase support services and TBRA for the community. When households are unhoused or unstably housed, both resources lead to increased housing stability. A key component of the Housing First model is the ability to provide support services. Experiencing homelessness is traumatic and support and connections to the community increase the likelihood of remaining housed. A multitude of providers reiterated the need for both services, highlighting the increased costs of housing in the County. The need for affordable rental housing has also become more apparent in recent years. As rents have spiked over 20% in two years and more developers have focused on high-end housing, the demand for affordability is consistently highlighted in our community through our partners and residents.

Explain how the PJ determined the level of need and gaps in the PJ’s shelter and housing inventory and service delivery systems based on the data presented in the plan:

The County utilized multiple tools to determine level of need and gaps. Datasets were taken from:

- Point in Time Count (2019 – 2022)
- American Census Survey (ACS)
- Housing Inventory Count (2022)
- Grant Inventory Worksheet (2022)
- Sheltering and Gaps Analysis
- Permanent Housing Needs and Gaps Assessment
- Colorado Department of Education
- Comprehensive Housing Affordability Survey
- Jefferson County Comprehensive Count (2019)

Under the leadership of the Homeless Coordinator, Heading Home expanded and developed workgroups to better identify

the specific needs and gaps within the County. Being part of a coordinated response to homelessness is relatively new for our County and the County is still in the process of determining more extensive needs and priorities. The Heading Home group meets quarterly and provides training and/or information sessions on the County's response, partner updates and determining what is next in the fight to end homelessness.

HOME-ARP Activities

Describe the method(s) that will be used for soliciting applications for funding and/or selecting developers, service providers, subrecipients and/or contractors:

Jefferson County will utilize an online application process for all HOME-ARP funds. Organizations able to demonstrate understanding in homelessness and housing stability, highlighting knowledge of equity, will be prioritized. The County has taken the comments from the focus groups under advisement and will ensure these recommendations are within the scope of work of awarded contracts.

For Rental Housing, Jefferson County will be supporting a development with RecoveryWorks. RecoveryWorks' created the sole, low-barrier, non-religion affiliated day shelter in the County in 2021, during the height of the pandemic when there were no safe spaces in Jefferson County. RecoveryWorks located Mountain View Flats as a potential investment and submitted an online application for acquisition of this site. The application was approved, and the organization is planning to convert the current space into 33 permanent housing units. The total cost is \$4.5 Million, of which Jefferson County is awarding \$1 Million, the State of Colorado awarding \$3.3 Million, and the remainder is coming from RecoveryWorks. Supporting RecoveryWorks in this endeavor has been championed by multiple non-profit partners, participating cities, and elected officials.

Describe whether the PJ will administer eligible activities directly:

Jefferson County will serve as the administrator.

If any portion of the PJ's HOME-ARP administrative funds are provided to a subrecipient or contractor prior to HUD's acceptance of the HOME-ARP allocation plan because the subrecipient or contractor is responsible for the administration of the PJ's entire HOME-ARP grant, identify the subrecipient or contractor and describe its role and responsibilities in administering all of the PJ's HOME-ARP program:

No administrative funds will be used for this.

In accordance with Section V.C.2. of the Notice (page 4), PJs must indicate the amount of HOME-ARP funding that is planned for each eligible HOME-ARP activity type and demonstrate that any planned funding for nonprofit organization operating assistance, nonprofit capacity building, and administrative costs is within HOME-ARP limits.

Use of HOME-ARP Funding

	Funding Amount	Percent of the Grant	Statutory Limit
Supportive Services	\$ 470,000		
Acquisition and Development of Non-Congregate Shelters	\$ 999,950		
Tenant Based Rental Assistance (TBRA)	\$ 470,000		
Development of Affordable Rental Housing	\$ 999,950		
Non-Profit Operating	\$ 55,000	1.5 %	5%
Non-Profit Capacity Building	\$ 52,063	1.45 %	5%
Administration and Planning	\$ 537,699	15 %	15%
Total HOME ARP Allocation	\$ 3,584,662		

Describe how the PJ will distribute HOME-ARP funds in accordance with its priority needs identified in its needs assessment and gap analysis:

This allocation plan reflects the following priorities received from stakeholder engagement:

1. Commit funds to systemic solutions to increase housing inventory through development of rental housing and TBRA.
2. Commit funds to supportive services to assist persons currently experiencing homelessness and to prevent those precariously housed from becoming homeless.
3. Commit funds to the shelter needs for persons experiencing homelessness.
4. Commit funds to help our non-profit partners with their operations and expanding their capacity.

Describe how the characteristics of the shelter and housing inventory, service delivery system, and the needs identified in the gap analysis provided a rationale for the plan to fund eligible activities:

Through the Consultation process and Focus Groups under our Public Participation, clear gaps in services were identified. As a response to input from residents and providers, the County made the determination to update the HOME-ARP plan to better serve our community. With no 24/7 year-round shelter (except for the White Swan Motel pilot) and stakeholders requesting private spaces, the County is planning to allocate funds to a non-Congregate shelter. A location has not yet been identified and the County will work with partners to ensure accessibility for the community. NCS spaces are a vital access point in well-functioning homeless response systems. With a dedicated shelter site, Jefferson County residents will have safe spaces to go, receive services that meet their needs, and staff available to ensure connections to housing resources and coordinated entry systems.

Housing first has never meant housing only and the County recognizes the need to provide supportive services to households in all four qualifying populations. For households experiencing homelessness, housing navigation and landlord engagement are key components. Focus Groups repeatedly identified that when vouchers are available, there continues to be a lack of knowledge on available locations. Developing networks of landlords and navigators skilled in locating housing meeting residents' specific needs will increase the likelihood of housing stability and reduce the length of time a household experiences homelessness. For survivors and households at-risk, case management and/or advocates trained in best practices are crucial to housing stability. Households experiencing a housing crisis or households moving into a new unit after experiencing homelessness require options for supportive services to promote connections to resources and the community. Support Services, based off input from the household, can lead to increased stability, increased income and/or benefits, etc.

Many households under 50% AMI in Jefferson County are one crisis away from experiencing housing instability and current landlord requirements demand up to 3 months' rent to secure a unit. According to American Census Data, 27% (156k) of households in the County are defined as low-income and experiencing severe housing burdens. These households are unable to meet the income requirements due to living paycheck-to-paycheck. Missing a day of work in a labor market without benefits can lead to the inability to pay rent and eviction filings have increased to pre-pandemic levels. The County will be allocating a portion of HOME-ARP funds to TBRA. As pandemic era funding is ending and rents have increased drastically, partners and participants have indicated that rental assistance is necessary for residents of Jefferson County.

The long-term solution to addressing the housing needs of all qualifying populations must include an increase in the housing inventory. To the maximum extent feasible, the county will invest in these units as part of larger development projects that increase not only the inventory of 30% units but add additional low-income units to the housing stock.

It is the intention that the investment of HOME-ARP funds will not only result in creating housing opportunity for some of our most vulnerable community members, but the funds will also support long-term stability to prevent them from becoming homeless after being housed.

HOME-ARP Production Housing Goals

Estimate the number of affordable rental housing units for qualifying populations that the PJ will produce or support with its HOME-ARP allocation:

In examining the consultation feedback, it is very clear that most of the agencies reported housing as the greatest need. Supporting this need in its complexity will require a combination of NCS, Rental Housing, Supportive Services, and TBRA. Jefferson County's planned investment of \$1,000,000 into RecoveryWorks' purchase of Mountain View Flats aligns with this community feedback. This purchase will provide 33 units and will have a permanent impact on qualified populations.

Describe the specific affordable rental housing production goal that the PJ hopes to achieve and describe how the production goal will address the PJ's priority needs:

Jefferson County's consultation process has identified that there is a serious need for housing and housing assistance. If the County can leverage RecoveryWorks' purchase of Mountain View Flats to show the County's investment it may spur additional investment and development by other agencies, such as the State of Colorado. Data shows that the County can leverage our investment dollars by about 4-1. If this process is repeated three or four more times, there is the possibility to produce additional units up to 120, that would serve households below 50% AMI.

Preferences

A preference provides a priority for the selection of applicants who fall into a specific QP or category (e.g., elderly or persons with disabilities) within a QP (i.e., subpopulation) to receive assistance. A *preference* permits an eligible applicant that qualifies for a PJ-adopted preference to be selected for HOME-ARP assistance before another eligible applicant that does not qualify for a preference. A *method of prioritization* is the process by which a PJ determines how two or more eligible applicants qualifying for the same or different preferences are selected for HOME-ARP assistance. For example, in a project with a preference for chronically homeless, all eligible QP applicants are selected in chronological order for a HOME-ARP rental project except that eligible QP applicants that qualify for the preference of chronically homeless are selected for occupancy based on length of time they have been homeless before eligible QP applicants who do not qualify for the preference of chronically homeless.

Please note that HUD has also described a method of prioritization in other HUD guidance. Section I.C.4 of Notice CPD-17-01 describes Prioritization in CoC CE as follows:

“Prioritization. In the context of the coordinated entry process, HUD uses the term “Prioritization” to refer to the coordinated entry-specific process by which all persons in need of assistance who use coordinated entry are ranked in order of priority. The coordinated entry prioritization policies are established by the CoC with input from all community stakeholders and must ensure that ESG projects are able to serve clients in accordance with written standards that are established under 24 CFR 576.400(e). In addition, the coordinated entry process must, to the maximum extent feasible, ensure that people with more severe service needs and levels of vulnerability are prioritized for housing and homeless assistance before those with less severe service needs and lower levels of vulnerability. Regardless of how prioritization decisions are implemented, the prioritization process must follow the requirements in Section II.B.3. and Section I.D. of this Notice.”

If a PJ is using a CE that has a method of prioritization described in CPD-17-01, then a PJ has preferences and a method of prioritizing those preferences. These must be described in the HOME-ARP allocation plan in order to comply with the requirements of Section IV.C.2 (page 10) of the HOME-ARP Notice.

In accordance with Section V.C.4 of the Notice (page 15), the HOME-ARP allocation plan must identify whether the PJ intends to give a preference to one or more qualifying populations or a subpopulation within one or more qualifying populations for any eligible activity or project.

- Preferences cannot violate any applicable fair housing, civil rights, and nondiscrimination requirements, including but not limited to those requirements listed in 24 CFR 5.105(a).

- The PJ must comply with all applicable nondiscrimination and equal opportunity laws and requirements listed in 24 CFR 5.105(a) and any other applicable fair housing and civil rights laws and requirements when establishing preferences or methods of prioritization.

While PJs are not required to describe specific projects in its HOME-ARP allocation plan to which the preferences will apply, the PJ must describe the planned use of any preferences in its HOME-ARP allocation plan. This requirement also applies if the PJ intends to commit HOME-ARP funds to projects that will utilize preferences or limitations to comply with restrictive eligibility requirements of another project funding source. If a PJ fails to describe preferences or limitations in its plan, it cannot commit HOME-ARP funds to a project that will implement a preference or limitation until the PJ amends its HOME-ARP allocation plan. For HOME-ARP rental housing projects, Section VI.B.20.a.iii of the HOME-ARP Notice (page 36) states that owners may only limit eligibility or give a preference to a particular qualifying population or segment of the qualifying population if the limitation or preference is described in the PJ's HOME-ARP allocation plan. Adding a preference or limitation not previously described in the plan requires a substantial amendment and a public comment period in accordance with Section V.C.6 of the Notice (page 16).

Identify whether the PJ intends to give preference to one or more qualifying populations or a subpopulation within one or more qualifying populations for any eligible activity or project:

In Consultation with our partners in the Community, Jefferson County will not give preference for any of the qualifying populations.

If a preference was identified, explain how the use of a preference or method of prioritization will address the unmet need or gap in benefits and services received by individuals and families in the qualifying population or subpopulation of qualifying population, consistent with the PJ's needs assessment and gap analysis:

No preference has been identified.

Referral Methods

PJs are not required to describe referral methods in the plan. However, if a PJ intends to use a coordinated entry (CE) process for referrals to a HOME-ARP project or activity, the PJ must ensure compliance with Section IV.C.2 of the Notice (page10).

A PJ may use only the CE for direct referrals to HOME-ARP projects and activities (as opposed to CE and other referral agencies or a waitlist) if the CE expands to accept all HOME-ARP qualifying populations and implements the preferences and prioritization established by the PJ in its HOME-ARP allocation plan. A direct referral is where the CE provides the eligible applicant directly to the PJ, subrecipient, or owner to receive HOME-ARP TBRA, supportive services, admittance to a HOME-ARP rental unit, or occupancy of a NCS unit. In comparison, an indirect referral is where a CE (or other referral source) refers an eligible applicant for placement to a project or activity waitlist. Eligible applicants are then selected for a HOME-ARP project or activity from the waitlist.

The PJ must require a project or activity to use CE along with other referral methods (as provided in Section IV.C.2.ii) or to use only a project/activity waiting list (as provided in Section IV.C.2.iii) if:

1. the CE does not have a sufficient number of qualifying individuals and families to refer to the PJ for the project or activity;
2. the CE does not include all HOME-ARP qualifying populations; or,
3. the CE fails to provide access and implement uniform referral processes in situations where a project's geographic area(s) is broader than the geographic area(s) covered by the CE

If a PJ uses a CE that prioritizes one or more qualifying populations or segments of qualifying populations (e.g., prioritizing assistance or units for chronically homeless individuals first, then prioritizing homeless youth second, followed by any other individuals qualifying as homeless, etc.) then this constitutes the use of preferences and a method of prioritization. To implement a CE with these preferences and priorities, the PJ must include the preferences and method of prioritization that the CE will use in the preferences section of their HOME-ARP allocation plan. Use of a CE with embedded preferences or methods of prioritization that are not contained in the PJ's HOME-ARP allocation does not comply with Section IV.C.2 of the Notice (page10).

Identify the referral methods that the PJ intends to use for its HOME-ARP projects and activities. PJ's may use multiple referral methods in its HOME-ARP program. (Optional):

Referral methods will vary based on project and our goal is that we will work with the CE system and other referrals, with projects assuming responsibility for an internal waitlist. Our Coordinated Entry system does not have the capacity to provide referrals for NCS entry, methods for prioritizing At-Risk populations and other households needing support, unless the household is receiving CoC or ESG RRH. Currently, the CoC has not coordinated a response or provided a comparable database for Domestic Violence survivors. The CoC funded project for Survivors does not utilize coordinated entry. All HOME-ARP funded projects will utilize a "first come, first serve" approach with agencies contracted for funding keeping waitlists.

If the PJ intends to use the coordinated entry (CE) process established by the CoC, describe whether all qualifying populations eligible for a project or activity will be included in the CE process, or the method by which all qualifying populations eligible for the project or activity will be covered. (Optional):

With the limitations of the Coordinated Entry System, our community will utilize a waiting list for funded projects and will look to align priorities whenever possible with the CoC.

If the PJ intends to use the CE process established by the CoC, describe the method of prioritization to be used by the CE. (Optional):

Our CoC does not have a Coordinated Entry process for shelter prioritization, At-Risk populations, Survivors populations and most of the other populations as defined in HOME-ARP. The County will look to align with best practices whenever possible and will continue to support the CoC in expanding populations served.

If the PJ intends to use both a CE process established by the CoC and another referral method for a project or activity, describe any method of prioritization between the two referral methods, if any. (Optional):

Please see plan above.

Limitations in a HOME-ARP rental housing or NCS project

Template

Describe whether the PJ intends to limit eligibility for a HOME-ARP rental housing or NCS project to a particular qualifying population or specific subpopulation of a qualifying population identified in section IV.A of the Notice:

The County will not be implementing limitations on access to services or housing for special populations.

If a PJ intends to implement a limitation, explain why the use of a limitation is necessary to address the unmet need or gap in benefits and services received by individuals and families in the qualifying population or subpopulation of qualifying population, consistent with the PJ's needs assessment and gap analysis:

NA

If a limitation was identified, describe how the PJ will address the unmet needs or gaps in benefits and services of the other qualifying populations that are not included in the limitation through the use of HOME-ARP funds (i.e., through another of the PJ's HOME-ARP projects or activities):

NA

HOME-ARP Refinancing Guidelines

If the PJ intends to use HOME-ARP funds to refinance existing debt secured by multifamily rental housing that is being rehabilitated with HOME-ARP funds, the PJ must state its HOME-ARP refinancing guidelines in accordance with [24 CFR 92.206\(b\)](#). The guidelines must describe the conditions under which the PJ will refinance existing debt for a HOME-ARP rental project, including:

Jefferson County will not be using HOME-ARP funds to refinance existing debt.

Supporting Documentation

- There are five documents below, each having at least one page.
 - Documents one through three are the affidavits for each of the public notice.
 - First public notice, pages 29-30.
 - Second public notice, pages 31-32.
 - Third public notice, pages 33-35.
 - Document four is a screenshot of the HOME-ARP Facebook post on the Counties Facebook page, page 36.
 - Document five is a screenshot from the Community Development page showing the HOME-ARP draft, page 37.

JEFFERSON COUNTY PUBLIC NOTICE
PUBLICATION DATE: February 2, 2023

Substantial Amendments to the Jefferson
County Community Development Block
Grant and Home Investment Partnerships
2021 and 2022 Annual Action Plans

Jefferson County's Community Development Block Grant (CDBG) and Home Investment Partnerships Program (HOME) 2021 One-Year Action Plan was approved by the U.S. Department of Housing and Urban Development (HUD) in November 2021 and the 2022 One-Year Action Plan was approved in November 2022. Communities applying for CDBG and HOME funding must submit an Annual Action Plan in order to receive these grant funds.

There are two purposes to these amendments:

1. To add the FY 2021 allocation of the HOME Investment Partnerships Program – American Rescue Plan (HOME-ARP) funding in the amount of \$3,584,662 to the 2021 Action Plan. The American Rescue Plan appropriated \$5 billion to help communities provide housing, shelter and services for people experiencing homelessness and other qualifying populations. These grant funds will be used for two separate projects: Approximately \$1 million will be used for the purchase and/or rehabilitation of a motel to provide permanent supportive housing and temporary non-congregate shelter; and, the remaining funds will be used for the acquisition, rehabilitation and/or construction of a non-congregate shelter. Both locations will serve all qualifying populations under the HOME-ARP regulations.

2. To increase the total 2022 CDBG allocation from the amount originally submitted in the 2022 Action Plan of \$1,087,949 to include an additional \$45,918 allocated through the Fiscal Year (FY) 2021 reallocated metropolitan area entitlement funds under Section 106(c) of the Housing and Community Development Act of 1974. The total amended allocation for the 2022 CDBG program year is \$1,133,867. The additional grant funds will be allocated to assist with the acquisition of a site in the Evergreen area, for the development of for-sale affordable housing.

The Substantial amendments to the 2021 Action Plan and the 2022 Action Plan will be submitted to HUD on or after March 6, 2023, following a 30-day public comment period and public meeting.

The county invites public review of the 2021 and 2022 Action Plan Amendments February 2 – March 5, 2023. The plan can be accessed on the County's website at <https://www.jeffco.us/2667/Planning> or by contacting Emily Sander, Community Development Manager, at 303-248-6318 or esander@jeffco.us.

Jefferson County Community Development will hold a virtual public meeting on March 1, 2023, at 9:00AM, accessed at: <https://jeffco.webex.com/meet/esander>. The purpose of the meeting will be for the public to ask questions regarding the Substantial Amendments.

Interpretive services for persons with hearing impairments or persons of limited English proficiency will be provided upon request. Please contact Emily Sander at 303-248-6318 or esander@jeffco.us at least 72 hours in advance of the event if interpretive services or special accommodations are needed. The Action Plan Amendments may be made available in Spanish upon request.

Legal Notice No. 415622
First Publication: February 2, 2023
Last Publication: February 2, 2023
Publisher: Golden Transcript


Colorado Community Media
750 W. Hampden Ave. Suite 225
Englewood, CO 80110

Jefferson County Human Services (Housing Econ) **
attn: Cheryl-Kaye Barker
100 Jefferson County Parkway Golden
CO 80401

AFFIDAVIT OF PUBLICATION

State of Colorado }
County of Jefferson } ss

This Affidavit of Publication for the Golden Transcript, a weekly newspaper, printed and published for the County of Jefferson, State of Colorado, hereby certifies that the attached legal notice was published in said newspaper once in each week, for 1 successive week(s), the last of which publication was made 2/2/2023, and that copies of each number of said paper in which said Public Notice was published were delivered by carriers or transmitted by mail to each of the subscribers of said paper, according to their accustomed mode of business in this office.



For the Golden Transcript

State of Colorado }
County of Jefferson } ss

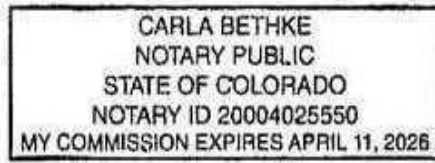
The above Affidavit and Certificate of Publication was subscribed and sworn to before me by the above named Linda Shapley, publisher of said newspaper who is personally known to me to be the identical person in the above certificate on 2/2/2023. Linda Shapley has verified to me that she has adopted an electronic signature to function as her signature on this document.

20004025550-371299

Carla Bethke

Notary Public

My commission ends April 11, 2026




Colorado Community Media
750 W. Hampden Ave. Suite 225
Englewood, CO 80110

Jefferson County Human Services (Housing Econ) **
attn: Cheryl-Kaye Barker
100 Jefferson County Parkway Golden
CO 80401

AFFIDAVIT OF PUBLICATION

State of Colorado }
County of Jefferson } ss

This Affidavit of Publication for the Golden Transcript, a weekly newspaper, printed and published for the County of Jefferson, State of Colorado, hereby certifies that the attached legal notice was published in said newspaper once in each week, for 1 successive week(s), the last of which publication was made 6/8/2023, and that copies of each number of said paper in which said Public Notice was published were delivered by carriers or transmitted by mail to each of the subscribers of said paper, according to their accustomed mode of business in this office.



For the Golden Transcript

State of Colorado }
County of Jefferson } ss

The above Affidavit and Certificate of Publication was subscribed and sworn to before me by the above named Linda Shapley, publisher of said newspaper who is personally known to me to be the identical person in the above certificate on 6/8/2023. Linda Shapley has verified to me that she has adopted an electronic signature to function as her signature on this document.

Substantial Amendments to the Jefferson County Community Development Block Grant and Home Investment Partnerships 2021 and 2022 Annual Action Plans

Jefferson County's Community Development Block Grant (CDBG) and Home Investment Partnerships Program (HOME) 2021 One-Year Action Plan was approved by the U.S. Department of Housing and Urban Development (HUD) in November 2021 and the 2022 One-Year Action Plan was approved in November 2022. Communities applying for CDBG and HOME funding must submit an Annual Action Plan in order to receive these grant funds.

There are two purposes to these amendments:

1. To add the FY 2021 allocation of the HOME Investment Partnerships Program – American Rescue Plan (HOME-ARP) funding in the amount of \$3,584,662 to the 2021 Action Plan. The American Rescue Plan appropriated \$5 billion to help communities provide housing, shelter and services for people experiencing homelessness and other qualifying populations. These grant funds will be used for two separate projects: Approximately \$1 million will be used for the purchase and/or rehabilitation of a motel to provide permanent supportive housing and temporary non-congregate shelter; and, the remaining funds will be used for the acquisition, rehabilitation and/or construction of a non-congregate shelter. Both locations will serve all qualifying populations under the HOME-ARP regulations.

2. To increase the total 2022 CDBG allocation from the amount originally submitted in the 2022 Action Plan of \$1,087,949 to include an additional \$45,918 allocated through the Fiscal Year (FY) 2021 reallocated metropolitan area entitlement funds under Section 106(c) of the Housing and Community Development Act of 1974. The total amended allocation for the 2022 CDBG program year is \$1,133,867. The additional grant funds will be allocated to assist with the acquisition of a site in the Evergreen area, for the development of for-sale affordable housing.

The Substantial amendments to the 2021 Action Plan and the 2022 Action Plan will be submitted to HUD on or after July 12, 2023, following a 30-day public comment period and public meeting.

The county invites public review of the 2021 and 2022 Action Plan Amendments June 8 – July 10, 2023. The plan can be accessed on the County's website at: <https://www.jeffco.us/2667/Planning> or by contacting Emily Sander, Community Development Manager, at 303-248-6318 or esander@jeffco.us.

Jefferson County Community Development will hold a virtual public meeting for the 2021 and 2022 Action Plan amendments on June 29, 2023, at 9:00AM, accessed at: <https://jeffco.webex.com/meet/esander>. The purpose of the meeting will be for the public to ask questions regarding the 2021-2022 Substantial Amendments.

In accordance with the Americans with Disabilities Act of 1990 ("ADA"), Interpretive services for persons with hearing impairments or persons of limited English proficiency (LEP) will be provided upon request. Please contact Emily Sander at 303-248-6318 or esander@jeffco.us at least 72 hours in advance of the event if interpretive services or special accommodations are needed. You can also use the TTY line at 303-980-7335. The Action Plan Amendments may be made available in Spanish upon request. If a citizen wishes to receive a digital copy of the Action Plan Amendments, please email Emily Sander. Hard copies can be obtained by visiting the Larimer building located at 3500 Illinois Street, Golden, CO 80401.

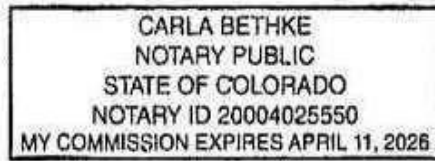
Legal Notice No. 416383
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Publisher: Golden Transcript

20004025550-823864

Carla Bethke

Notary Public

My commission ends April 11, 2026



The Denver Post, LLC

PUBLISHER'S AFFIDAVIT

City and County of Denver State of
Colorado

The undersigned Nicole Maestas
being first duly sworn under oath, states and
affirms as follows:

1. He/she is the legal Advertising Reviewer of
The Denver Post, LLC, publisher
of The Denver Post and Your Hub.
2. The Denver Post and Your Hub are
newspapers of general circulation that have
been published continuously and without
interruption for at least
fifty-two weeks in Denver County
and meet the legal requisites for a legal newspaper
under Colo. Rev. Stat. 24-70-103.
3. The notice that is attached hereto
is a true copy, published in The Denver Post on the
following date(s):

July 18, 2023 _____

Signature

sd > L

Subscribed and sworn to before me this 19
day of July, 2023.

sd > L
Notary Public

(SEAL)

KAY C DAPICE
NOTARY PUBLIC
STATE OF COLORADO
NOTARY ID 19944012554
MY COMMISSION EXPIRES AUGUST 19, 2026

JEFFERSON COUNTY PUBLIC NOTICE
PUBLICATION DATE: July 18, 2023

Substantial Amendments to the Jefferson County
Community Development Block Grant and
Home Investment Partnerships 2021 and 2022
Annual Action Plans

Jefferson County's community Development
Block Grant (CDBG) and Home Investment
Partnerships Program (HOME) 2021 One-Year
Action Plan was approved by the U.S. De-
partment of Housing and Urban Development
(HUD) in November 2021 and the 2022 One-
Year Action Plan was approved in November
2022. Communities applying for CDBG and

HOME funding must submit an Annual Action Plan in order to receive these grant funds.

There are two purposes to these amendments:

1. To add the FY 2021 allocation of the HOME Investment Partnerships Program - American Rescue Plan (HOME-ARP) funding in the amount of \$3,584,662 to the 2021 Action Plan. The American Rescue Plan appropriated \$5 billion to help communities provide housing, shelter, tenant based rental assistance, and services for people experiencing homelessness and other qualifying populations. These grant funds will be used for several separate projects: Approximately \$1 million to provide permanent housing. The housing will be accessible to all qualified populations. Additionally, \$1 million will be used for the acquisition, rehabilitation and/or construction of a non-congregate shelter. This will support qualified populations 1 & 3. Also \$475,000 of the grant will be used for TBIA which will serve qualified populations 1, 2 & 3. As Jcfcfco looks to partner with our community and diversify our partnerships we are budgeting \$475,000 for supportive services, \$60,000 non-profit operating, \$60,000 non-profit capacity building which will cover all qualified populations. Finally, \$14,662 administrative and planning.

2. To increase the total 2022 CDBG allocation from the amount originally submitted in the 2022 Action Plan of \$1,087,949 to include an additional \$45,918 allocated through the Fiscal Year (FY) 2021 reallocated metropolitan area entitlement funds under section IOG(c) of the Housing and Community Development Act of 1974. The total amended allocation for the 2022 CDBG program year is \$1,133,667. The additional grant funds will be allocated to assist with the acquisition of a site in the Evergreen area for the development of for-sale affordable housing.

The Substantial amendments to the 2021 Action Plan and the 2022 Action Plan will be submitted to HUD on or after August 3, 2023, following a 15-day public comment period and public meeting.

The county invites public review of the 2021 and 2022 Action Plan Amendments July 18 - August 3, 2023. The plan can be accessed on the county's website at: <https://jeffco.us/667/PlanAmendments>

or by contacting Emily Sander, Community Development Manager, at 303-248-6318 or esander@jeffco.us.

Jellerson County Community Development will hold a virtual public meeting for the 2021 and 2022 Action Plan amendments on July 25, 2023, at 9:00AM. accessed at: <https://jeffco.wcbcx.com/mccVesander>. The purpose of the meeting will be for the public to ask questions regarding the 2021-2022 Substantial Amendments.

In accordance with the Americans with Disabilities Act of 1990 ("ADA"). Interpretive services for persons with hearing impairments or persons of limited English proficiency (LEP) will be provided upon request. Please contact Emily Sander at 303-248-6318 or esander@jeffco.us at least 72 hours in advance of the event if interpretive services or special accommodations are needed. You can also use the TTY line at 303-980-7335. The Action Plan Amendments may be made available in Spanish upon request. Las Enmiendas al Plan de Acción pueden estar disponibles en español previa solicitud, envíe un correo electrónico a Emily Sander a esander@jeffco.us - If a citizen wishes to receive a digital copy of the Action Plan Amendments, please email Emily Sander. Hard copies can be obtained by visiting the Larimer building located at 3500 Illinois Street. Golden, CO 80401.

Please note: The Denver Post will no longer be issuing paper tears. They will only be a digital copy.

2:06

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Jefferson County Colorado Government ✓



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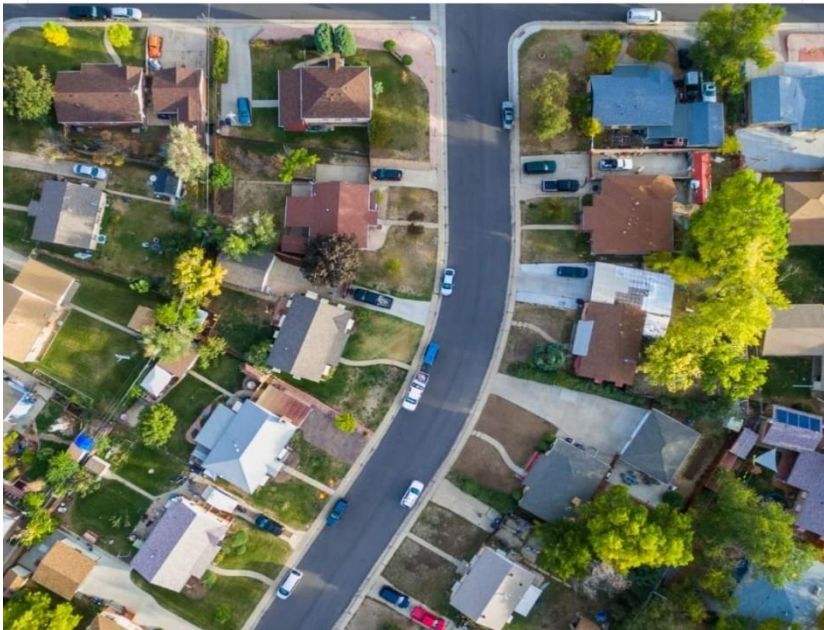
Provide your input on the HOME-ARP HUD program ⬇



Jefferson County Human Services · Follow

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HOME-ARP is a HUD program initiated by Congress as part of the American Rescue Plan Act of 2021. The county is currently seeking public commen... See more



2

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Additional Community Development Planning Documents

[2021 Action Plan HOME-ARP Amendments Draft](#)