



PY 2021 Consolidated Annual Performance and Evaluation Report (CAPER)

DRAFT

Town of Castle Rock
100 N. Wilcox St.
Castle Rock, CO 80104

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CR-05 - Goals and Outcomes

Progress the jurisdiction has made in carrying out its strategic plan and its action plan. 91.520(a)

The Town of Castle Rock is an entitlement jurisdiction, receiving an annual allocation of federal Community Development Block Grant (CDBG) program funds for the first time through the U.S. Department of Housing and Urban Development (HUD). These funds help the Town address the housing and community development objectives outlined by HUD, which include, but are not limited to: public facilities and infrastructure improvements, and vital public services for special needs and low- to moderate-income (LMI) populations. Program Year (PY) 2021 was the first year of the 2021-2025 Consolidated Plan period, and the first annual allocation of CDBG funds for \$230,932. Through the rest of the Consolidated Planning period, the Town is expecting to receive similar amounts annually. The following accomplishments and the uses of these funds for the first program year are highlighted below.

Public Facilities and Infrastructure Improvements: The Town served 3,325 LMI persons with public park facility improvements in the program year. This activity was completed at Butterfield Park with the remodel of an existing restroom to be ADA accessible. Improved accessibility enhancements to the park will allow all residents to equally enjoy the park.

Supportive Services: The Town funded the Castle Rock Senior Activity Center's Home Delivery of Hot Meals program to assist 57 elderly persons during the program year. The program targeted the most socially isolated and those in the most economic need as all beneficiaries were low- to moderate- income (LMI).

Comparison of the proposed versus actual outcomes for each outcome measure submitted with the consolidated plan and explain, if applicable, why progress was not made toward meeting goals and objectives. 91.520(g)

Categories, priority levels, funding sources and amounts, outcomes/objectives, goal outcome indicators, units of measure, targets, actual outcomes/outputs, and percentage completed for each of the grantee’s program year goals.

Goal	Category	Source	Indicator	Unit of Measure	Expected – Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected – Program Year	Actual – Program Year	Percent Complete
1A Improve Access to Public Facilities (ADA)	Non-Housing Community Development	CDBG	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	14925	3325	22.28%	2985	3325	111.39%
1B Improve Capacity of Public Infrastructure LMI	Non-Housing Community Development	CDBG	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	14925	0	0.00%	2985	0	0.00%
2A Provide Supportive Services for Seniors	Non-Homeless Special Needs	CDBG	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	500	57	11.40%	100	57	57.00%
2B Provide Supportive Services LMI & Special Needs	Non-Homeless Special Needs	CDBG	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	500	0	0.00%	100	0	0.00%

Table 1 - Accomplishments – Program Year & Strategic Plan to Date

Assess how the jurisdiction’s use of funds, particularly CDBG, addresses the priorities and specific objectives identified in the plan, giving special attention to the highest priority activities identified.

PY 2021 is the first year of the 2021-2025 Consolidated Plan period, and the Town has identified as its priority needs for the community: Improvements to Public Facilities & Infrastructure and Supportive Services for LMI & Special Needs. CDBG-funded activities must address one of these needs as well as primarily benefit LMI persons or special needs populations, such as the elderly.

During the program year, the Town worked to address the needs of the community through public facility improvements and public services for the elderly. These funded activities were developed to address the identified priority needs in the Consolidated Plan. The following describes the use of CDBG funds in PY 2021:

Supportive Services for LMI & Special Needs: \$13,497.41 (6.8%)
Public Facilities & Infrastructure: \$150,106.00 (75.5%)
Administration of the CDBG Program: \$35,145.54 (17.7%)
Total: \$198,748.95

PR-23 and CR-05 Goals and Outcomes Table Comparison

Public Facilities & Infrastructure

1A Improve Access to Public Facilities (ADA): The Town had a goal to assist 2985 persons with activity, and exceeded this goal with 3325 LMI persons assisted. This goal was accomplished through the park facility improvements at Butterfield Park.

1B Improve Capacity of Public Infrastructure LMI: The Town had a goal to assist 2985 persons with activity, however this goal was not met because of the Town’s focus on park facilities in PY 2021. The Town will continue to identify infrastructure needs in Castle Rock as this is still a need.

Supportive Services for LMI & Special Needs:

2A Provide Supportive Services for Seniors: The Town had a goal to assist 100 persons with activity, and assisted 57 LMI elderly persons in PY 2021 through the Castle Rock Senior Activity Center Home Delivery of Hot Meals program. Unfortunately, this goal was not met, however the need to assist the elderly population in Castle Rock remains high and the Town will continue to fund this activity.

2B Provide Supportive Services LMI & Special Needs: The Town had a goal to assist 100 persons with activity, however this goal was not met as the Town is working to start its supportive service programs.

CR-10 - Racial and Ethnic composition of families assisted

Describe the families assisted (including the racial and ethnic status of families assisted).
91.520(a)

	CDBG
White	3,122
Black or African American	119
Asian	4
American Indian or American Native	16
Native Hawaiian or Other Pacific Islander	41
Total	3,302
Hispanic	249
Not Hispanic	3,133

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

Narrative

DATA NOTE: Race/ethnicity data was drawn from the PR-23 summary of accomplishments for PY 2021. The table above does not include a category for people that identify as “other multi-racial”. Due to this, the racial/ethnic data in the above table does not necessarily match the number of persons actually served by the CDBG program as there were 80 “other multi-racial” person served that were not counted in the table above. The table above only shows 3,302 persons assisted (by race), when the actual number assisted was 3,382 persons assisted.

According to the most recent 2016-2020 American Community Survey 5-Year Estimates (DP-05), 81.0% of the population was white, followed by 0.8% for black and 1.4% for Asian. “Some other” race were 2.1% and “Two or more” races were 14.2% of the population. All other races were less than 1%. Persons who identified ethnically as Hispanic were 11.6% of the Town population.

For activities where the Town recorded race/ethnic information, 92.3% of CDBG funding went towards assisting white persons, 3.5% went towards assisting black or African American persons, 1.2% towards assisting Native Hawaiian or Other Pacific Islander persons and 3.6% went towards assisting “other multi-racial”. All other races were less than 1%. An estimated 7.4% of persons assisted with CDBG funding identified ethnically as Hispanic.

While the Town adequately assisted the black community in PY 2021, the Town recognizes the need to identify all minority groups such as Asians, Native American and Alaskan Natives, Native Hawaiian or Pacific Islanders and Hispanic households for assistance with CDBG programs even if their population is small.

CR-15 - Resources and Investments 91.520(a)

Identify the resources made available

Source of Funds	Source	Resources Made Available	Amount Expended During Program Year
CDBG	public - federal	230,932	198,749

Table 3 - Resources Made Available

Narrative

In PY 2021 the Town had resources made available with \$230,932 in CDBG funds from the annual allocation. According to the PR-07, in the program year the Town expended \$198,749 on public facility improvements, public services for elderly persons, and admin of the CDBG program. The following are expenditures by priority need:

Supportive Services for LMI & Special Needs: \$13,497.41 (6.8%)

Public Facilities & Infrastructure: \$150,106.00 (75.5%)

Administration of the CDBG Program: \$35,145.54 (17.7%)

Total: \$198,748.95

Unspent funds have already been programmed towards other eligible uses and will be expended as activities are completed.

Identify the geographic distribution and location of investments

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description
NA	NA	NA	NA

Table 4 – Identify the geographic distribution and location of investments

Narrative

Castle Rock does not allocate funding based solely on geographic requirements. When the planned activities are intended to serve individuals or households directly, those individuals or households must meet income qualifications as well as residency requirements in order to receive assistance from the CDBG program. In these instances, Town staff and/or one of its partner agencies complete an in-take and conduct an eligibility status review of the applicant individual or household, before the project/activity is initiated.

Town has also identified infrastructure and public facility improvement activities. These activities serve low/mod income neighborhoods, and are said to have an “area-wide” benefit. Per HUD requirements, these areas must be within an eligible Census Block Group Tract, as defined by HUD-CDBG regulations. HUD determines Low/Mod block groups tracts as those with 51% LMI population; however,

the Town of Castle Rock is an exception grantee with the LMI block group threshold lowered to 32.73%. In 2021, eight block groups qualify as Low/Mod in Castle Rock and are as follows:

0140121, 0141232, 0144033, 0145031, 0145041, 0145042, 0145052, and 0145053

HUD CDBG Low/Mod Income Summary Data (LMISD), which have defined the eligible Low/Mod block group tracts within the jurisdiction can be found on the HUD Exchange website at: <https://www.hudexchange.info/programs/acs-low-mod-summary-data/>

Leveraging

Explain how federal funds leveraged additional resources (private, state and local funds), including a description of how matching requirements were satisfied, as well as how any publicly owned land or property located within the jurisdiction that were used to address the needs identified in the plan.

CDBG funding leverages in-kind resources and program activities for Castle Rock seniors from the Castle Rock Senior Activity Center, the State of Colorado property tax exemption and deferral program, the Denver Regional Council of Governments and the Aging Resources of Douglas County. HUD CDBG program funds do not require a dollar-for-dollar match. As funds are limited, the Town seeks to leverage additional resources with its federal CDBG funds.

Publicly owned land/property used to address the needs in the plan

The Town has a priority to improve public facilities and infrastructure in LMI areas of Castle Rock. The public improvements identified are sidewalks, streets, Town Parks and Town-owned facilities. This priority was identified through the citizen participation process and community and stakeholder surveys during the development of the plan. The Town has not identified specific streets/sidewalks yet, but will target Town-owned streets and sidewalks in low/mod block group tracts and with an area wide benefit in Castle Rock.

The Castle Rock Senior Activity Center is used to deliver supportive services to elderly residents in the Town. The Town funded the Center's Home Delivery of Hot Meals program to assist 57 LMI elderly persons during the program year.

CR-20 - Affordable Housing 91.520(b)

Evaluation of the jurisdiction's progress in providing affordable housing, including the number and types of families served, the number of extremely low-income, low-income, moderate-income, and middle-income persons served.

	One-Year Goal	Actual
Number of Homeless households to be provided affordable housing units	0	0
Number of Non-Homeless households to be provided affordable housing units	0	0
Number of Special-Needs households to be provided affordable housing units	0	0
Total	0	0

Table 5 – Number of Households

	One-Year Goal	Actual
Number of households supported through Rental Assistance	0	0
Number of households supported through The Production of New Units	0	0
Number of households supported through Rehab of Existing Units	0	0
Number of households supported through Acquisition of Existing Units	0	0
Total	0	0

Table 6 – Number of Households Supported

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

The Town of Castle Rock does not directly fund affordable housing projects with CDBG funding. As funds are limited, the Town has targeted available resources towards the priorities of public services and public facilities and infrastructure improvements in this 5-year ConPlan period. The Town anticipates that improvements to public infrastructure such as streets and sidewalks will help to draw housing investments to Low/Mod areas.

Discuss how these outcomes will impact future annual action plans.

At this time, the Town does not anticipate any changes to the needs and goals identified in the 5-year ConPlan and there are no plans to add affordable housing development or preservation to future annual action plans. If within the 5-year planning period the need for affordable housing programs arise, the Town will document this need and take the necessary steps to include new priorities and goals to the plan, both through the required citizen participation process and the plan amendment process.

Include the number of extremely low-income, low-income, and moderate-income persons served by each activity where information on income by family size is required to determine the eligibility of the activity.

Number of Households Served	CDBG Actual
Extremely Low-income	0
Low-income	0
Moderate-income	0
Total	0

Table 7 – Number of Households Served

Narrative Information

The Town of Castle Rock does not directly fund affordable housing projects with CDBG funding. There were no affordable housing activities completed by the Town in PY 2021.

Worst Case Needs

Worst case needs are extremely low-income or special needs households that are at imminent risk of homelessness and are in need of affordable housing or emergency assistance. The Town does not directly fund assistance to homeless households or extremely low-income households with affordable housing programs, but will support the community through funding supportive programs that impact the Town’s most vulnerable communities. This includes funding supportive services for the elderly population as these service help this group age in place, and ultimately leads to less homelessness in Castle Rock.

The Town did not specifically report any persons with a disability in its CDBG program, however if a household with a disability is identified for assistance in one of its programs, the Town will make all necessary accommodations within reason to meet the needs of the household.

CR-25 - Homeless and Other Special Needs 91.220(d, e); 91.320(d, e); 91.520(c)

Evaluate the jurisdiction's progress in meeting its specific objectives for reducing and ending homelessness through:

Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs

The Town of Castle Rock relies on Douglas County and its partnership with the Metro Denver Homeless Initiative Continuum of Care (MDHI) to reach the homeless population and also to meet and assess their needs. The Town also relies on its many local services agencies to reach and provided services for the homeless population and meet their unique needs.

The MDHI is responsible for coordinating with all seven counties and various local providers to ensure that the needs of the homeless in the area are met. Activities include supportive services, emergency shelter, transitional housing and permanent-supportive housing to prevent homelessness. HMIS is the system used for tracking data on local homeless populations and administering MDHI services and program funding. While the Town of Castle Rock lacks these resources locally, it maintains a close relationship with the MDHI and refers for services as needed.

The Town of Castle Rock is a new entitlement community, and is not yet set up to assess individual needs of homeless persons and report specific HMIS data for the Town. The Town will continue to engage with the Metro Denver Homeless Initiative to reach out to and refer individuals to necessary services. Several service providers that are located near or within the Town currently reach out to homeless populations, including Catholic Charities, Help and Hope Center, Parker Task Force, SECOR Cares, and the Winter Shelter Network.

Addressing the emergency shelter and transitional housing needs of homeless persons

The Town refers to the MDHI for the emergency housing and transitional housing needs of homeless persons in Caste Rock. Unfortunately, identifying persons experiencing homelessness and directly addressing their needs is difficult within the Town. For a picture of the homeless population, the 2022 PIT Count for the entire county was 78 homeless persons.

Current programs that reach out and support the homeless in Castle Rock and Douglas County include the Winter Weather Care shelter program, which provides options in winter months. Persons experiencing homelessness can also apply for hotel vouchers with the following agencies: Catholic Charities, Help and Hope Center, Parker Task Force, SECOR Cares, and the Winter Shelter Network. Women and children may obtain shelter through the Winter Shelter Network offered by local churches.

Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: likely to become homeless after being

discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); and, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs

The Town refers to the MDHI and does not specifically target extremely low- and low-income households to avoid becoming homeless, including those that are being discharged from public institutions and systems of care or receiving other assistance. The Town's efforts are focused on prevention through its public service activities. These activities are primarily targeted towards the elderly as described below.

Within Castle Rock, the Town used CDBG funds to work directly to benefit LMI individuals and households in the community and address homelessness by providing services that directly or indirectly work to prevent poverty or conditions that may lead to homelessness. In the 2021 program year, the Town used CDBG funds for a Senior Center Home meal Delivery program and ADA accessibility updates to restrooms at Butterfield Park. Both programs targeted elderly and disabled populations.

The Town has access to the Douglas County Cares program, which is comprised of County and local partner agencies, which work in partnership for the benefit of homeless and vulnerable residents. This program involves case management and other supportive services to increase the client's chances of obtaining and maintaining self-sufficiency. A variety of assistance, services, and tools are made available to participants to overcome barriers to achieving stability, capacity, capability and opportunity.

Other Special Needs Activities:

Elderly & Persons With a Disability: As mentioned above, the Town is focused on improving the quality of lives of its elderly and disabled residents. These other supportive activities for the elderly include planned ADA improvements to public facilities and infrastructure and planned supportive services such as senior service activities, elderly health services, transportation and recreation programs. In the first year Annual Action Plan, the Town targeted an estimated 200 LMI and special needs persons through these public service activities.

The Town makes an effort to provide equal access to the elderly and persons with a disability at all Town operated community facilities. This includes the Castle Rock Recreational Center, which provides health and wellness activities for all families including the elderly and persons with a disability. There is also a senior fitness program and a schedule dedicated for the elderly. The center provides a discount for seniors ages 62 years and older.

The Castle Rock Senior Activity Center organizes a wide variety of special events. These may be on-site or off-site and designed for a variety of purposes including fundraising, giving back to the community, socializing or learning something new. Transportation services is also available at the center.

The Butterfield Crossing Park is an ADA accessible recreational center with a pool including a lift for

individuals with a disability and a zero depth entry wading pool. A new playground is under construction for children ages 5-12 including inclusive features for children with disabilities.

Persons living with HIV/AIDS and their families: At this time there are very few service providers for this special needs group in Castle Rock; however, persons can be referred to the CO Department of Public Health & Environment's HIV Care Core and Support Services program. The program provides an expansive program with multiple care and support options, both non-medical and medical (by referral). There is intensive case management and also emergency assistance provided. More information on the program can be found at website: <https://cdphe.colorado.gov/hiv-care-core-and-support-services>

Public Housing Residents: The Town is served by the Douglas County Housing Partnership (DCHP), which is a multi-jurisdictional housing authority that was formed as a cooperative effort between businesses, and local and county governments to address the lack of affordable housing for people who work in the area. The DCHP does not operate any public housing in the Town; however, they offer other kinds of affordable housing and HCV vouchers to eligible individuals and families. For more information see: <https://douglascountyhousingpartnership.org>

Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again

Currently, the Town does not specifically address facilitation of the transition of homeless persons to permanent and independent living, shortening periods of homelessness, access for the homeless to affordable units and preventing returns to homelessness. With limited CDBG funds, the Town's efforts are focused on prevention through its public service activities.

The Town refers its homeless needs to Douglas County and the MDHI, the Continuum of Care (CoC) in the wider region. MDHI has a wide array of services and programs that meet the needs of the homeless and their unique situations.

Within Castle Rock, the Town continues to use CDBG funds to work directly to benefit LMI individuals and households in the community and address homelessness by providing services that directly or indirectly work to prevent poverty or conditions that may lead to homelessness. In the 2021 program year, the Town used CDBG funds for a Senior Center Home Meal Delivery program and ADA accessibility updates to restrooms at Butterfield Park. Both programs targeted elderly and disabled populations.

The Town has access to the Douglas County Cares program, which is comprised of County and local partner agencies, which work in partnership for the benefit of homeless and vulnerable residents. This program involves case management as well as other supportive services to increase the client's chances of

obtaining and maintaining self-sufficiency. A variety of assistance, services, and tools are made available to participants to overcome barriers to achieving stability, capacity, capability and opportunity.

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

Actions taken to address the needs of public housing

N/A. There are no public housing developments.

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

N/A. There are no public housing developments.

Actions taken to provide assistance to troubled PHAs

N/A. There are no troubled PHAs in the Town of Castle Rock

CR-35 - Other Actions 91.220(j)-(k); 91.320(i)-(j)

Actions taken to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment. 91.220 (j); 91.320 (i)

The Town of Castle Rock is in the process of planning the development of its' Analysis of Impediments to Fair Housing Choice (AI). Though public policies are meant to address the overall needs of citizens in the area, there are times where they may have a negative effect on certain aspects of the community, which in this case, are affordable housing and residential investment. Affordable housing and public and private residential investments are key components in furthering fair housing in any community.

With the development of the AI, the Town will be able to inform residents, stakeholders and policy makers on affirmatively furthering fair housing and to identify the major impediments to fair housing choice and barriers to affordable housing.

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

The activities identified in the 2021 AAP worked to directly address the underserved needs of the LMI and special needs populations, particularly elderly and disabled populations. The Town continues to use CDBG funds to benefit elderly households in the community and provide services that directly work to prevent poverty or conditions that may lead to homelessness. In the 2021 program year, the Town funded a meal delivery program for Castle Rock Senior Activity Center, delivering essential meals to 57 elderly residents. CDBG funded programs will continue to expand on these successful programs and the goal is to fill service gaps and meet underserved needs.

The Town continues to work to address improvements and access to public facilities through ADA improvements in LMI areas. In addition, the Town plans to fund future public infrastructure improvements that will benefit LMI communities with expansion and ADA improvements to streets and sidewalks. CDBG funding for improvements into these LMI areas will not only help to address underserved needs in the community, but also have an added goal to attract other private or public investments into these areas.

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

The Town does not work on affordable housing projects, and therefore does not address lead-based paint hazards. Castle Rock has a low percentage of housing units which have the potential for lead-based paint. The majority of the Town's housing was built after 1978, when lead-based paint was banned nationwide for consumer use. There are however still over 900 owner-occupied and almost 600 renter-occupied housing units that were built before 1980 (Source: 2015-2019 ACS). Residents of these homes could risk exposure to lead-based paint during a home repair project. The Town does not provide lead-based paint

services but refers cases to the Douglas County Health Department if children are exposed.

As instructed by the Douglas County Health Department website, when a child has a confirmed blood lead level greater than or equal to 5µg/dL, Douglas County Health Department will conduct an investigation which could include a home visit. These services are free of charge, and households with this need can contact the department at 720-643-2400 for more information.

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

The activities in PY 2021 worked directly and indirectly to reduce the number of poverty level families in Castle Rock. The Town made public park facility improvements at Butterfield Park with the remodel of an existing restroom to be ADA accessible. Improved accessibility enhancements to the park will allow all residents to equally enjoy the park. The Town also funded the Castle Rock Senior Activity Center’s Home Delivery of Hot Meals program to assist 57 elderly persons during the program year. The program targeted the most socially isolated and those in the most economic need as all beneficiaries were low- to moderate- income (LMI). These vital services can help off-set everyday costs of other basics needs such as medical and housing costs.

While CDBG funds are limited and the Town cannot possibly address every poverty issue in Castle Rock, the Town continues to utilize CDBG funds where they have the most impact. Future funds will go towards supportive services for LMI and special needs groups such as the elderly. These supportive services may include activities such as independent living services, health and self-sufficiency assistance. The goal is to help the elderly remain in their homes and enjoy their quality of life.

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

The Town continually works to develop its institutional structure by working closely with other Town departments and programs such as the Town’s Parks and Recreation Department, Public Works Department, Castle Rock Senior Center and senior resources programs. Ongoing communication and planning with these Town departments and programs help strengthen the institutional structure of the CDBG program. Currently, the Town institutional deliver structure includes these agencies and organizations that deliver services to residents in Castle Rock:

Public Services (LMI & Non-Homeless Special Needs): Castle Rock Senior Center, Castle Rock Parks and Recreation Department, Castle Rock Water, Metro Denver Health Initiative, Douglas County and Douglas County Health Department

Public Facilities & Infrastructure Improvements: Castle Rock Public Works Department and Douglas County

Actions taken to enhance coordination between public and private housing and social service

agencies. 91.220(k); 91.320(j)

The Town has developed a process that will involve the many public and private housing and social service agencies to participate in coordination of the CDBG program. In the development of the 2021 Annual Action Plan, the Town worked with Douglas County to provide a stakeholder survey which gave organizations the opportunity to help determine the funding priorities in the program. This survey provided the basis of the priority needs identified in the Town's 5-Year Strategic Plan. The Town will continue to consult with these stakeholder organizations during the planning period. The Town also held several public meetings to provide information on the CDBG program and eligible activities and uses of funds. These meetings will continue in future program years to help build the capacity of the Town stakeholders.

As mentioned above, the Town continually works to develop its institutional structure by working closely with other Town departments and programs such as the Town's Parks and Recreation Department, Public Works Department, Castle Rock Senior Center and senior resources programs. Ongoing communication and planning with these Town departments and programs will help strengthen the institutional structure of the CDBG program.

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

As a new entitlement jurisdiction, the Town of Castle Rock is in the process of planning the development of its' Analysis of Impediments to Fair Housing Choice (AI). Though public policies are meant to address the overall needs of citizens in the area, there are times where they may have a negative effect on certain aspects of the community, which in this case, are affordable housing and residential investment. Affordable housing and public and private residential investments are key components in furthering fair housing in any community.

With the development of the AI, the Town will be able to inform residents, stakeholders and policy makers on affirmatively furthering fair housing and to identify the major impediments to fair housing choice and barriers to affordable housing.

CR-40 - Monitoring 91.220 and 91.230

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

Monitoring is designed specifically to apply to monitoring of funded projects in Castle Rock that address one or more of HUD's national objectives of benefiting low-to-moderate income persons, which include the Town's activities for public improvements and public services. Monitoring is used to evaluate regulatory performance in the administrative, financial and programmatic areas.

The Town of Castle Rock views monitoring as an ongoing process involving continuous communication with the CDBG community development office and inter-Town departments in regards to evaluation of financial records and project/program performance. Such a process involves frequent telephone/email contacts, written communications, analysis of reports and audits, and periodic meetings. It is the responsibility of Town staff to keep fully informed concerning the compliance with program requirements and the extent to which technical assistance is needed by and provided for any manager of CDBG program funds.

Monitoring of projects consists of both desktop and on-site reviews and is conducted at least annually. Through on-site and desktop monitoring, the Town CDBG program can determine whether the project performance meets program requirements and improve performance by providing guidance and making recommendations.

The Town monitors CDBG expenditures and IDIS cash disbursements. The Town ensures that all project expenses are correctly added and coded and the Town's recorded revenues match cash disbursements in HUD's IDIS reporting system. The Town tracks and reviews expenditures of activities and reports all activities in the Consolidated Annual Performance and Evaluation Review (CAPER) at the end of the program year.

Further, the Town monitors timeliness of expenditures of program funds. Timely tracking and reviewing activities expenditure information helps to monitor the progress and successful completion of activities.

MBE/WBE & Section 3

To the extent possible, the Town of Castle Rock works to include MBE/WBE and Section 3 businesses in carrying out contracts through the CDBG program. At this time the Town does not utilize subrecipients; however, if there are future contracts that involve the use of CDBG funds, these businesses will be considered. If that is to occur, the Town will create a list of MBE/WBE and Section 3 contractors.

Comprehensive Planning Requirements

The comprehensive planning requirements include the development and consolidated plan process of the 5-Year ConPlan, the AAP, and CAPER. Citizen participation is a vital part of the Consolidated Plan process and the Town will make sure to follow its HUD approved Citizen Participation Plan (CPP) which helps guide the Town to gather information, which is an essential component in identifying the priority housing and community development needs in Castle Rock. These priority needs form the basis of the Town's Strategic Plan in the ConPlan and annual goals and activities carried out in each subsequent AAP.

The ConPlan is developed every 5 years, with identified priority needs and goals to address these needs. Each year of the 5-Year plan, the Town develops an AAP which identifies the projects and activities that will address and further the goals of the plan. This plan is required to be submitted to and approved by HUD each year to receive CDBG funding annually. At the end of each AAP program year, the Town will report on the accomplishments and performance of the program through the CAPER. Citizen participation is required in the development of each of these stages as per 24 CFR 91.105. This PY 2021 CAPER is the first program year of the 2021-2025 Consolidated Plan.

Citizen Participation Plan 91.105(d); 91.115(d)

Describe the efforts to provide citizens with reasonable notice and an opportunity to comment on performance reports.

The Town of Castle Rock, through its citizen participation process, allows for adequate opportunity for residents of the Town to provide input and make comments on the PY 2021 CAPER. The following details are provided on how citizens can participate.

PUBLIC COMMENT PERIOD: Citizens can review and make comments on the draft CAPER. The draft CAPER will be available for (15) fifteen days from **November 21, 2022 to December 6, 2022**. The draft CAPER will be available at Town Hall, located at 100 Wilcox St, Castle Rock, CO 80104, and Douglas County Public Library, located at 100 South Wilcox St, Castle Rock CO 80104 or it can be viewed on the Town's website at: crgov.com/CDBG. Written comments are encouraged and can be mailed or delivered to the address above or via email to TKucewesky@crgov.com.

PUBLIC HEARING: A public hearing will be held to discuss housing and community development needs in the Town of Castle Rock. The hearing will be held on December 6, 2022 at 6:00 PM and will be in Town Hall, located 100 N. Wilcox St. Castle Rock, CO 80104. For more information, phone (720) 733-3593.

Disability & ADA Compliance: The Town of Castle Rock will make efforts to provide all reasonable accommodations to disabled members of the public in accessing the Town's programs and public meetings in accordance with Title II of the Americans with Disability Act (ADA) and Section 504 of the Rehabilitation Act of 1973. Please contact the Assistant Town Manager Kristin Read, serving as the Town's ADA coordinator, by phone at (720) 733-3552 or by email at kread@CRgov.com at least 48 hours in

advance for special accommodations. A reasonable accommodation request form can also be made at:
<http://www.crgov.com/FormCenter/Facilities-and-ADA-Compliance-14/Reasonable-accommodation-request-form-112>

CR-45 - CDBG 91.520(c)

Specify the nature of, and reasons for, any changes in the jurisdiction’s program objectives and indications of how the jurisdiction would change its programs as a result of its experiences.

The Town remains committed to fulfilling its housing and community development program objectives included in the 2021 Annual Action Plan (AAP) and the 2021-2025 Consolidated Plan. The Town did not make any changes to its original program objectives during the program year. The priority needs in the Town of Castle Rock continue to be Improvements to Public Facilities & Infrastructure and Supportive Services for LMI & Special Needs.

If there are any changes to the priorities or program objectives, the Town will properly document the changes and take the proper steps to make substantial amendments necessary to add these changes to the program.

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

No

CR-58 – Section 3

Identify the number of individuals assisted and the types of assistance provided

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

Table 8 – Total Labor Hours

Qualitative Efforts - Number of Activities by Program	CDBG
Outreach efforts to generate job applicants who are Public Housing Targeted Workers	
Outreach efforts to generate job applicants who are Other Funding Targeted Workers.	
Direct, on-the job training (including apprenticeships).	
Indirect training such as arranging for, contracting for, or paying tuition for, off-site training.	
Technical assistance to help Section 3 workers compete for jobs (e.g., resume assistance, coaching).	
Outreach efforts to identify and secure bids from Section 3 business concerns.	
Technical assistance to help Section 3 business concerns understand and bid on contracts.	
Division of contracts into smaller jobs to facilitate participation by Section 3 business concerns.	
Provided or connected residents with assistance in seeking employment including: drafting resumes, preparing for interviews, finding job opportunities, connecting residents to job placement services.	
Held one or more job fairs.	
Provided or connected residents with supportive services that can provide direct services or referrals.	
Provided or connected residents with supportive services that provide one or more of the following: work readiness health screenings, interview clothing, uniforms, test fees, transportation.	
Assisted residents with finding child care.	
Assisted residents to apply for, or attend community college or a four year educational institution.	
Assisted residents to apply for, or attend vocational/technical training.	
Assisted residents to obtain financial literacy training and/or coaching.	
Bonding assistance, guaranties, or other efforts to support viable bids from Section 3 business concerns.	
Provided or connected residents with training on computer use or online technologies.	
Promoting the use of a business registry designed to create opportunities for disadvantaged and small businesses.	

Outreach, engagement, or referrals with the state one-stop system, as designed in Section 121(e)(2) of the Workforce Innovation and Opportunity Act.	
Other.	

Table 9 – Qualitative Efforts - Number of Activities by Program

Narrative

This section reports on the requirements for Section 3 under 24 CFR 75 for construction activities assisted under HUD grant programs that provide housing and community development. Section 3 helps to establish more economically sustainable communities by ensuring that employment and other economic opportunities generated by Federal assistance for development programs are directed towards very low- and low-income persons to the greatest extent possible, and in particular to those who are recipients of the Federal assistance. The Final Rule changes tracking the number of qualified new hires in Section 3 projects, to tracking the total labor hours worked. HUD made this Final Rule effective on October 29, 2020.

As applicable to the Town of Castle Rock, the benchmark for Section 3 workers is set at 25 percent or more of the total number of labor hours worked by all workers on a Section 3 project. Section 3 Projects cover housing rehab/construction and public improvement construction activities assisted under HUD grant programs that provide housing and community development financial assistance which exceed a threshold of \$200,000. A \$100,000 project threshold applies to grants under HUD's Lead Hazard Control and Healthy Homes programs.

The Town did not have any activities that met the Section 3 threshold in PY 2021.