

Clay County Board of County Commissioners
Fiscal Year (FY) 2023 Consolidated Annual Performance and Evaluation Report (CAPER)



Clay County
477 Houston St.
Green Cove Springs, Florida 32043

Approved by the Clay County Board of County Commissioners on 12-12-2023

Table of Contents

CR-05 – Goals and Outcomes

CR-10 – Racial and Ethnic composition of families assisted

CR-15 – Resources and Investments 91.520(a)

CR-20 – Affordable Housing 91.520(b)

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

CR3-30 – Public Housing 91.220(h); 91.320(j)

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

CR-40 – Monitoring 91.220 and 91.230

CR-45 – CDBG 91.520(c)

CR-65 – Persons Assisted

CR-75 – Expenditures

CR-05 – Goals and Outcomes

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

Major accomplishments during this year's action plan included seven sidewalk replacement projects, eight limited home rehabilitation projects, and five community clean-ups (Code Enforcement) projects in the community of High Ridge Estates. The Code Enforcement projects aligned with the High Ridge Initiative, a community led effort to improve the quality of life in one of the County's low to moderate income areas.

The sidewalk replacement infrastructure program benefitted over 200 homes in a low to moderate income area.

The County intends to reopen the application period for the limited home rehabilitation program in FY24.

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)

The County completed eight of the 10 proposed limited home rehabilitation projects in FY23. Due to extenuating circumstances, the County will schedule the remaining two rehabilitation projects the following fiscal year.

Cost increases impacted completion of the full FY23 sidewalk replacement list. The County issued two Requests for Proposals (RFPs) for the project but received only one bid. Within the budgeted amount, seven of the 14 sidewalks were funded. Next fiscal year, the County intends to bring the sidewalk replacement and infrastructure program in-house to make more efficient use of CDBG funds. The sidewalks that could not be replaced in FY23 have been included in the County's FY24 Annual Action Plan.

Neighborhood clean-up projects have been the focus of the Code Enforcement program. Other code enforcement projects were considered, but community interest and engagement is needed to make the projects successful. The Community and Social Services Division has added an outreach coordinator position to help build trust and program awareness in the community.

With regard to Administration projects, the County began laying the groundwork to transition to Neighborly software for tracking CDBG projects, per the National Community Development Association's recommendations. The County intends to complete software implementation in FY24.

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.

CDBG funds were used to make progress towards achieving the following objectives outlined in the Annual Action Plan –

Preservation of Housing:

Objective: Decent Housing (DH) – Provide funding for the acquisition and/or rehabilitation/preservation of housing affordable to low- and moderate-income residents

In FY23, the Clay County Community and Social Services Division completed eight of the 10 home rehabilitation projects in low to moderate income areas within the County. The two home rehabilitation projects that were not able to be completed will be moved to the FY24 project list and will take priority.

Code Enforcement:

Objective: Suitable Living Environment (SL) – Provide funding for the payment of salaries and overhead costs directly related to the enforcement of local codes in deteriorating or deteriorated areas in Target Areas.

In FY23, there were five neighborhood clean-ups organized by the County’s Community Services Division in the High Ridge Estates Neighborhood in Keystone Heights, Florida. The County selected a contractor to provide on-going services for approved CDBG code enforcement projects.

Neighborhood Improvements:

Objective: Creating Economic Opportunities (EO) – Provide funding for public facility improvements, physical improvements, and comprehensive neighborhood planning activities in Target Areas, and HUD designated Low-Mod Areas to improve the quality of life and health of neighborhood residents.

In FY23, Clay County Community Services Division partnered with their Engineering and Public Works Departments to complete the repair or replacement of seven sidewalks throughout the County. These improvements effected roughly 200 homes in a low to moderate income area.

Administration:

Objective: General planning and administration costs associated with administering Federal CDBG and State SHIP funds; and other local funding sources.

Throughout FY23, Clay County staff managed the programmatic and financial aspects of CDBG funding. For the FY24 program year, County staff will be responsible for conducting home inspections and completing infrastructure (sidewalk replacement) projects. This change is anticipated to reduce program costs and provide faster services.

The County also realized the need for a dedicated Housing/CDBG Manager within Community and Social Services and pivoted to using an industry standard software for

tracking housing, economic, and community development projects more efficiently. Software implementation will take place in FY24.

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)

In FY23, we did not open a new cycle and this data was not collected during the application process during FY22. It will be incorporated into the FY24 application.

CR-15 – Resources and Investments 91.520(a)

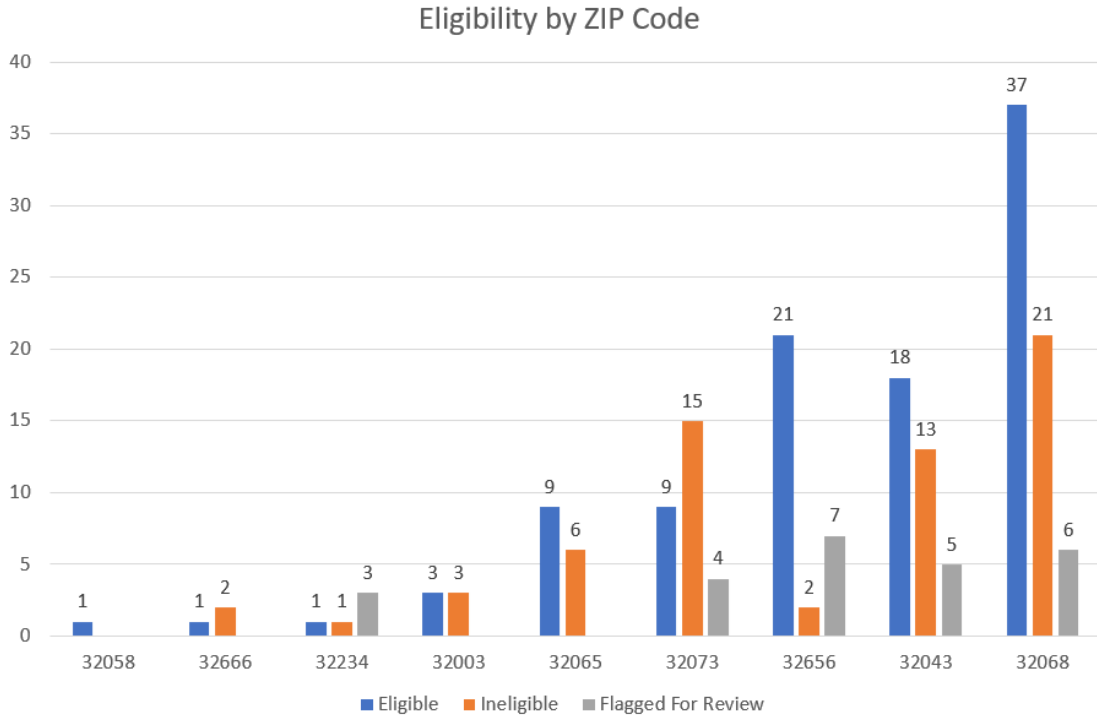
Identify the resources made available

CDBG Activity	Actual Expenditures
Infrastructure	\$306,850.00
Code Enforcement	\$9,502.74
Home Rehabilitation	\$168,473.83
Administration	\$20,369.27
Total	\$505,195.84

Narrative

The majority of this year’s funding supported investments in infrastructure. The County anticipates that infrastructure will continue to be a high priority activity in the FY24 Annual Action Plan. With the newly established process for review of proposed projects and the identification of local contractors able and willing to perform the required work, investments in code enforcement and home rehabilitation projects are expected to increase in FY24.

Identify the geographic distribution and location of investments



Narrative

The majority of eligible applicants for home rehabilitation and code enforcement resolution came from Middleburg (37 eligible applicants) and Keystone Heights (21 eligible applicants). Orange Park and Green Cove Springs each had 18 eligible applicants. Jacksonville, Melrose, and Lawtey each had one eligible applicant; portions of these zip codes are located geographically in Clay County.

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 of property located within the jurisdiction that were used to address the needs identified in the plan.

No matching funds are required for the County’s CDBG Entitlement Funding. However, the County does receive federal funding to assist with homelessness stabilization through the U.S. Treasury’s Emergency Rental Assistance Program. This funding helps support the goals and objectives outlined in the Consolidated Plan and Annual Action Plan. Indirect administrative costs (i.e., legal, procurement, budget) are not charged to CDBG.

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.

The average median income of all approved applicants for housing rehabilitation projects was \$25,674. Inspection services and need assessments for the most qualified applicants began in FY22. Housing rehabilitation projects began during the FY23 Annual Action Plan and will continue in to FY24. Applicants must be requalified each year for income eligibility.

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

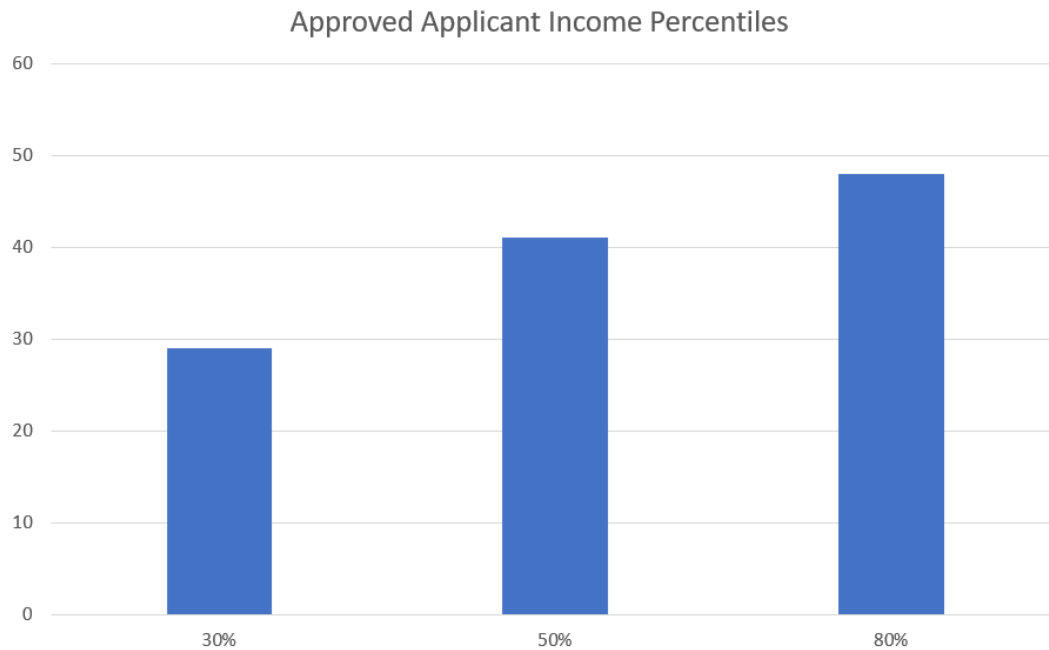
Outcomes for FY23 were less than expected based on procurement of services proving to be challenging with limited local vendors available and increased costs of goods and services.

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

In FY23, large scale projects became problematic with cost increases and limited timelines. In FY24, staff intends to focus on completing more rehab projects overall but with a more concentrated project scope (focused on safety projects, for example) to create the greatest benefit for the greatest number of people.

The County’s Community and Social Services Division has been working with a pool of individuals from its previous year application cycle who are still interested in benefiting from CDBG funded home rehabilitation or code enforcement projects in future annual action plans. This pool of qualified applicants will serve as a starting point for FY24 Annual Action Plan activities; applicants must requalify based on income each year to ensure eligibility.

The table below shows the number of approved applicants in the 30%, 50%, and 80% low to moderate income categories.



CR-25 – Homeless and Other Special needs 91.220(d, e); 91.320(d, e); 91.520©

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 County’s Community and Social Services Division oversees homelessness stabilization assistance programs and conducts needs assessments to pair individuals with resources. As part of the outreach process for the Consolidated Plan and Annual Action Plan, local non-profits who provide homelessness services are consulted for feedback in setting CDBG goals and developing activities. It is a goal to also further build out a partnership with the County’s Community Paramedicine program to identify potential individuals in need.

Addressing the emergency shelter and transitional housing needs of homeless persons

Several non-profit providers and faith-based organizations offer services and facilities to the homeless population, which include cold weather shelters, transitional housing, and permanent support housing.

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.

Though CDBG funds do not directly address this, other federally funded programs within the County do. The Emergency Rental Assistance Program, for example, helps at-risk individuals find transitional and temporary housing until they can find a permanent solution.

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

Please see response above. CDBG funds do not directly provide this kind of assistance, because other programs are currently addressing this need.

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

Actions taken to address the needs of public housing

The St. Johns Housing Authority runs the State Housing Initiatives Partnership (SHIP) program and assists with Section 108 projects to serve the residents of Clay County.

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

Clay County’s SHIP program offers education programs through their various partnerships with County non-profits related to housing, food and waste.

Actions taken to provide assistance to troubled PHAs

Not applicable.

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 State of Florida adopted the Live Local Act in FY23, and accordingly, the County has published their list of affordable housing developments on its website (www.claycountygov.com/government/purchasing/real-estate). The County also uses its SHIP funds to support affordable housing and has allocated a portion of its State and

Local Fiscal Recovery Funds (ARPA) for affordable housing projects like Nathan Ridge in Middleburg, Florida.

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

The Community and Social Services Division provides a representative to walk homeowners through the CDBG application process at no cost. This representative will also connect individuals who applied for CDBG funding with other outside resources to meet their immediate needs. This may include connecting individuals with transportation or health care.

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

If lead-based paint is found during the house inspection, it is mitigated as part of the housing rehabilitation project in accordance with the Clay County Community Block Development Grant Policies and Procedures Manual.

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

Income evaluation is the most heavily weighted factor used for qualifying and ranking applicants for assistance. Poverty-level families are the highest priority for assistance. Community Services will provide a free needs assessment to poverty-level families and help pair them with Career Source and employee training opportunities.

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

The County formed the Community Services Division in 2021 to provide human services and programmatic support for funding opportunities, like CDBG.

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

The County's Community and Social Services Division conducts needs assessments and matches individuals with appropriate social service agencies and non-profits to assist them outside of CDBG activities. The Division also works with its SHIP office to coordinate the needs of residents.

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

The following three key areas were reviewed in the Analysis of Impediments –

1. Definition used for “family” and restrictions on the number of unrelated persons in dwelling units
2. Dispersal requirements and regulatory provisions for housing facilities for persons with disabilities (i.e. group homes) in single-family districts.
3. Minimum lot size requirements, and the opportunity to develop various housing types including apartments and housing at various densities.

The County is currently contracting with a consulting firm to revise its Land Development Code to address all three of these areas. Recommendations for revisions will be forthcoming and presented to the Board of County Commissioners for adoption.

Furthermore, the County provides a density incentive program for affordable housing projects.

CR-40 – Monitoring 91.220 and 91.230

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

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

The responsibility of monitoring is shared by three primary divisions within the County: Grants, Community Services, and Planning. The Grants Division is responsible for overall compliancy for federal funding received through HUD and the CDBG Program. The Community Services Division is responsible for programmatic oversight of the housing rehabilitation and code enforcement activities, as well as identifying qualified homeowners for the program. The Planning Division is responsible for ensuring that CDBG activities align with comprehensive planning requirements and that infrastructure activities are reasonable and serve a community benefit.

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

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

The Draft FY 2022-2023 Consolidated Annual Performance and Evaluation Report was available for review at the County’s Website at www.claycountygov.com/community/community-services/cdbg and at the following locations:

Clay County Administration Building, Department of Economic & Development Services between the hours of 8:30 a.m. and 4:30 p.m., Monday through Friday, excluding legal holidays at 477 Houston St., 3rd Floor, Planning & Zoning Division, Green Cove Springs, FL 32043

Clay County Library Locations listed below between the hours of 10:00 a.m. and 8:00 p.m., Monday-Thursday, and 9:00 a.m. to 5:00 p.m., Friday-Saturday.

- Fleming Island Library- 1895 Town Center Blvd., Fleming Island, FL 32003
- Green Cove Springs Library- 403 Ferris Street, Green Cove Springs, FL 32043
- Keystone Heights Library- 175 Oriole Avenue, Keystone Heights, FL 32656
- Middleburg-Clay Hill Library- 2245 Aster Avenue, Middleburg, FL 32068
- Orange Park Library- 2054 Plainfield Avenue, Orange Park, FL 32073

PUBLIC COMMENT PERIOD: The 15-day public review and comment period was **Thursday, November 16, 2023, through Thursday, November 30, 2023**, at close of business. Comments from the public are encouraged and will be accepted during this period at the Department of Economic & Development Services, 477 Houston St., 3rd Floor, Planning & Zoning Division, Green Cove Springs, FL 32043. Comments can also be given by calling 904-541-3814 or be sent by email to cdbg@claycountygov.com.

PUBLIC MEETING:

Purpose: To announce the Consolidated Annual Report and Evaluation Report for public review and comments and obtain public input on the Draft Consolidated Annual Report and Evaluation Report.

Date: **Wednesday, November 29, 2023**

Time: 6:00 p.m.

Place: Orange Park Public Library
2054 Plainfield Avenue, Orange Park, FL 32065

Non-English-Speaking Persons:

Special arrangements for a translator will be made by the County. A citizen requiring a translator should send a request at least two (2) business days before the event.

Special Accommodations for Persons with Disabilities:

Special arrangements for a sign language interpreter will be made by the County. A request should be sent to the County at least two (2) business days prior to the event. Recorded events will be posted with closed captioning for those hard of hearing.

Access to records/recordings:

A recording of the public meetings and hearings will be made public for those who are not able to attend. Minutes of the public meetings and hearings will also be taken. Citizen input will be summarized and documented in the minutes. The recordings and minutes will be posted on the County's website at <https://www.claycountygov.com/community/community-services/cdbg>.

In accordance with the Americans with Disabilities Act, any person needing accommodations to participate in this matter should contact Clay County Risk Management by mail at P.O. Box 1366, Green Cove Springs, Florida 32043, or by telephone at (904) 278-4718, no later than three (3) days prior to the hearing or proceeding for which this notice has been given. Deaf and hard of hearing persons can access the telephone number by contacting the Florida Relay Service at 1-800-955-8770 (Voice) or 1-800-955-8771 (TDD).

All interested persons are invited to attend the public meeting or hearing. Pursuant to Section 286.0105, Florida Statutes, a person deciding to appeal any decision made by the Clay County Board of County Commissioners (Board) with respect to any matter considered at the meeting, hearing, or at any subsequent meeting or hearing to which the Board has continued its deliberations is advised that such person will need a record of all

proceedings and may need to ensure that a verbatim record of all proceedings is made, which must include the testimony and evidence upon which the appeal is to be based.

No public comment was received between Thursday, November 16, 2023, and Thursday, November 30, 2023.

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.

At present, there are no substantial changes to the County’s program objectives. However, based on public feedback and staff’s experience reviewing applications for assistance, there is an opportunity to revisit how the County’s CDBG allocation is distributed across activities. Community input indicates that more funding is needed for infrastructure projects in Low-Mod areas of the County. Requests for infrastructure funding include road paving or resurfacing projects, sidewalk repairs, and well replacement.

In FY23, a study conducted on the LMI community of High Ridge Estates Initiative showed that there is a need for infrastructure and home rehab improvements in the southern part of the County. This could become a focus area in future annual action plans.

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

Not applicable.

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

Not applicable.

CR-65 – Persons Assisted

Complete for CDBG Activities

Activity Description	Persons Assisted
Infrastructure Improvements	200 individuals; 57% Low/Mod Income Households
Affordable Housing – rehabilitation projects	8 households
Code Enforcement – Community clean-up projects	5 neighborhood clean-up projects in High Ridge Estates, benefitting approximately 509 households in the community
Estimated Total Persons Assisted	718

CR-75 – Expenditures

	FY23 CDBG Program Year
Expenditures for Infrastructure Improvements	\$306,850.00
Expenditures for Affordable Housing – Housing Rehabilitation Program	\$168,473.83
Expenditures for Code Enforcement	\$9,502.74
Administration	\$20,369.27
Total	\$505,195.84