

# ANNUAL COMMUNITY ASSESSMENT

JURISDICTION - Thornton, CO

PROGRAM YEAR START – March 1, 2015

PERIOD COVERED BY ASSESSMENT – March 1, 2015 – February 28, 2016

HUD is required to conduct an annual review of performance by grant recipients according to the provisions of the Housing and Community Development Act and the National Affordable Housing Act. We must determine that each recipient is in compliance with the statutes and has the continuing capacity to implement and administer the programs for which assistance is received. This is to report the results of our review of the 2015 Program Year (PY) performance by the city of Thornton, Colorado.

## **Part I. Summary of Consolidated Plan/Action Plan Review and Assessment**

The city of Thornton is reporting that it is meeting the primary objective of the Community Development Block Grant (CDBG) Program which is the development of viable urban communities, by providing decent housing and a suitable living environment and is expanding economic opportunities, principally for low- and moderate-income (LMI) residents. The city offers a good variety of programs to address the affordable housing needs of its LMI residents and continues to look for new ways to meet the increasing demand for affordable housing. The Integrated Disbursement & Information System (IDIS) CDBG Financial Summary Report, PR26 and related data show that Thornton is well above the statutory requirement of 70 percent low- and moderate-income benefit with 100 percent of CDBG funds used to benefit low- and moderate-income individuals and families over the one-year certification period.

Projects funded in the first year of the 2015-2019 Consolidated Plan are consistent with the city's strategies and goals as listed in the Consolidated Plan and Annual Action Plan. According to IDIS PR03, the 2015 Annual Action Plan provided the following accomplishments:

- Community Resources and Housing Development Corporation (CRHDC) provided down payment and closing cost assistance to 24 low- and moderate-income households (\$50,000).
- Village of Yorkshire Exterior Rehabilitation used \$346,000 for the installation of new siding, windows, patio doors, and decks on the existing buildings. Sixty-six households were assisted.
- Arapahoe House used CDBG funds to install an access control system to the existing building, to provide increased safety and security for clients and staff and the surrounding residential neighborhood. Nineteen households benefitted from this security improvement (\$50,000).
- Clinical Family Services Facility provides medical and dental treatments to low- and moderate-income individuals and families who are without insurance or under-insured (\$79,747.53).
- Minor Home Repair Program provided assistance to 13 households for home repairs to low- and moderate-income households with \$23,721 from CDBG funds.

The Annual Action Plan provided for a multitude of priorities with underlying objectives and the CAPER shows very little accomplishments for the 2015 program year. A few of the projects have been stalled due to issues with the program/activity. The subrecipient had to make changes to the program design to increase the number of persons/individuals assisted. The CAPER accomplishments numbers are different than what is in the system.

The city is encouraged to continue to enhance its citizen participation plan and to provide communication in languages that reflect the diversity of its citizenry.

The regulations at 24 CFR § 91.520(g) require “the report will include a comparison of the proposed versus actual objectives for each outcome measure submitted with the consolidated plan and explain, if applicable, why progress was not made toward meeting goals and objectives.” The city of Thornton report lacks detail in the narratives describing how the jurisdiction’s program provided new or improved availability/accessibility, affordability, sustainability of decent housing, and a suitable living environment through data in IDIS.

It was noted that for all projects/activities the property address is suppressed. The city is reminded the only addresses that can be suppressed are the domestic violence projects. The project addresses are identified at the end of the rehabilitation activity for the properties completed at which time the staff should go into the system and input the addresses for those households that were assisted.

## **Part II. Summary of Grantee Performance**

### **CDBG**

The regulations limit entitlements to the amount of CDBG funds that can be obligated for planning and administrative costs to 20 percent of the sum of any grant plus current year program income. According to calculations on the administration and public service caps report, for Program Year 2015, the planning and administrative costs were 14.26 percent. The city’s CDBG administration and planning is in compliance with 24 CFR § 570.200(g).

The regulations also limit obligations for public services to no more than 15 percent of grant funds and prior year program income. The city did not fund any public service activities in the 2015 program.

### **Fair Housing and Equal Opportunity**

HUD’s Office of Fair Housing and Equal Opportunity (FHEO) review of the CAPER was received by the Community Planning and Development (CPD) office and will follow this report. The city of Thornton completed its Analysis of Impediments to Fair Housing Choice (AI) in October 2009. During the 2014 program year, the City

completed the Housing Needs Assessment, Analysis of Impediments to Fair Housing and the 2015-2019 Consolidated Plan.

The city has included disability data and published the public participation notice in Spanish as well as English. The FHEO state the FHEO data table is great. The FHEO staff is able to identify good ways to collect some data on some of these AFFH activities to show these efforts having an effect on overcoming impediments. The city is doing a great job reporting its activities and the FHEO staff appreciates your attention to fair housing issues.

### **Part III. HUD Evaluation and Conclusions**

- A. **OVERALL EVALUATION** - Overall, the city of Thornton is making strides in providing affordable housing and addressing its community development needs. The city is committed to carrying out successful rehabilitation programs as well as leveraging other Federal, State, and local funds to carry out affordable housing and community development activities.
  
- B. **CONCLUSIONS AND FINDINGS** – The Community Planning and Development (CPD) Office Region VIII has reviewed available facts and data pertaining to the performance of Thornton for its Consolidated Plan and the formula Community Planning and Development Programs specified in the Plan (Community Development Block Grant) during the period March 1, 2015 through February 28, 2016. Based on the overall review record and the information summarized above, CPD makes the following findings:
  - 1. During the period specified above, Thornton has carried out its program satisfactorily as described in its Consolidated Plan as approved and amended.
  - 2. The Consolidated Plan, as implemented, complies with the requirements of applicable laws and regulations.
  - 3. Thornton has the continuing capacity to carry out its approved program in a timely manner.