



# **PY 2023 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)**

This could be an overview that includes major initiatives and highlights that were proposed and executed throughout the program year.

The Town of Castle Rock is an entitlement jurisdiction, receiving an annual allocation of federal Community Development Block Grant (CDBG) program funds 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) 2023 was the third year of the 2021-2025 Consolidated Plan period, for which the Town was awarded \$255,712 from the CDBG annual allocation. The following accomplishments and the uses of these funds for PY 2023 are highlighted below.

**Public Facilities and Infrastructure Improvements:** In PY 2023, the Town completed the Recreation Center Pool Lifts activity (#18), which had a benefit to 3,325 low/mod persons. This activity involved the replacement of three pool lifts that have exhausted their life span. The pool lifts will also make this public facility ADA compliant. The Town contracted a developer to start the Cantril School Improvements Design and Administrative activity (#19), which will help make the facility ADA compliant. As of September 2024, the contractor has completed about 30% of work in this project and the Town anticipates this activity to be completed in the upcoming program year.

**Supportive Services:** The Town funded the Castle Rock Senior Activity Center's Home Delivery of Hot Meals program (#15) to assist 178 LMI elderly persons throughout PY 2023. The program targeted the most socially isolated and those with the most economic need as all beneficiaries were 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	6650	44.56%	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	464	92.80%	50	178	356.00%
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%	50	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 2023 is the third year of the 2021-2025 Consolidated Plan period, and the Town has identified its priority needs for the community as 1.) Improvements to Public Facilities & Infrastructure and 2.) 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 elderly persons.

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 2023:

Supportive Services for LMI & Special Needs: \$26,554.51  
Public Facilities & Infrastructure Improvements: \$32,669.16  
Administration of the CDBG Program: \$25,781.04  
Total: \$85,004.71

Note: Please note, the Town follows strict grant based accounting guidelines. For each FY CDBG grant allocation, there is a maximum spending cap of 15% for public services, and 20% for administrative costs. While much of the funds spent in PY 2023 were for public services and administrative costs, the Town ensures it will not spend more than the max allowable under CDBG guidelines for the FY grant awards.

**PR-23 and PY 2022 CR-05 Goals and Outcomes Table Comparison**

Public Facilities & Infrastructure

1A Improve Access to Public Facilities (ADA): The Town had a goal to assist 2,985 persons with this activity, and assisted 3,325 LMI persons. The Town completed the Recreation Center Pool Lifts activity (#18), which had a benefit to 3,325 low/mod persons. This activity involved the replacement of three pool lifts that have exhausted their life span. The pool lifts will also make this public facility ADA compliant.

1B Improve Capacity of Public Infrastructure LMI: The Town had a goal to assist 2,985 persons with this activity, however this goal was not met. As there are limited funds, the Town may prioritize improvements to facilities or infrastructure within the program year, but may not be able to

prioritize both. This still continues to be a need, and the Town will continue to seek opportunities as they arise.

Supportive Services for LMI & Special Needs:

2A Provide Supportive Services for Seniors: The Town had a goal to assist 50 persons with this activity, and assisted 178 LMI elderly persons through the Castle Rock Senior Activity Center Home Delivery of Hot Meals program (#15). Please note that the PR23 still includes the 229 LMI elderly already reported in the previous CAPER. This is because the PR23 collects all activities that are open and closed in IDIS within PY 2023, and this activity was actually completed in the previous program year.

2B Provide Supportive Services LMI & Special Needs: The Town had a goal to assist 50 persons with this activity. This goal will be combined with goal 2A as the intended target group receiving public services are LMI seniors.

## 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	3,248
Black or African American	118
Asian	0
American Indian or American Native	16
Native Hawaiian or Other Pacific Islander	41
<b>Total</b>	<b>3,423</b>
Hispanic	246
Not Hispanic	3,257

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 2023. 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 may not necessarily match the number of persons actually served by the CDBG program.

According to the most recent 2018-2022 American Community Survey 5-Year Estimates (DP-05), the population in Castle Rock was 74,065 persons. An estimated 87.3% were White, followed by 2.2% for Asian and 0.8% for Black or African American persons. “Some other” race made up 2.2% of the population and “Two or more” races made up 7.0% of the population. All other races accounted for less than 1%. About 10.7% of the Town population identified ethnically as Hispanic or Latino.

For activities where the Town recorded race/ethnicity information, 92.7% of CDBG funding went towards assisting White persons, 3.4% went towards assisting Black or African American persons, and 1.2% towards assisting Native Hawaiian or Other Pacific Islander persons. All other races were less than 1%. An estimated 7.0% of persons assisted with CDBG funding identified ethnically as Hispanic. Benefits were generally in line with the Town-wide demographic population.

While the Town adequately assisted the Black and Native Hawaiian or Other Pacific Islander community in PY 2023, the Town recognizes the need to identify all minority groups such as Asians, Native American and Alaskan Natives, and Hispanic households for assistance with CDBG programs even if their populations are small. There is also a need to reach more Hispanic persons.

## 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	255,712	85,005

Table 3 - Resources Made Available

### Narrative

In PY 2023 the Town had resources made available in the amount of \$255,712 in CDBG funds from the annual allocation. According to the PR-07, during the program year the Town expended \$85,004.71 on public services for elderly persons, public facility improvements and admin of the CDBG program. Unspent funds have already been programmed towards other eligible uses such as public facility improvements and will be expended as activities are completed. The following lists expenditures by priority need:

Supportive Services for LMI & Special Needs: \$26,554.51  
Public Facilities & Infrastructure Improvements: \$32,669.16  
Administration of the CDBG Program: \$25,781.04  
Total: \$85,004.71

Note: Each FY CDBG grant allocation has a maximum expenditure cap limit of 20% for admin costs and 15% for public services, and expenditures will not exceed these cap amounts. These costs are budgeted during the AAP development process and are approved by HUD. Once all FY funds have been expended and programmed, the Town anticipates final expenditures of the FY 2023 grant allocation will meet the required guidelines of the grant.

### FY CDBG Grant Allocation Close-Out

Each year the Town reports if a prior FY CDBG annual allocation has been fully spent. At the end of PY 2022, the Town fully expended their FY 2021 allocation. The Town contacted HUD on January 11, 2024 to notify them that the 2021 grant had been fully expended. HUD responded that they would not invoke the close out process until 2028 and that no further action was needed. There were no other FY annual allocations fully spent during PY 2023.



**Identify the geographic distribution and location of investments**

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description
N/A	N/A	N/A	N/A

**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 2023, 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 ConPlan. 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 178 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
<b>Total</b>	<b>0</b>	<b>0</b>

**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
<b>Total</b>	<b>0</b>	<b>0</b>

**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 investments to vital services, improvements to public facilities, as well as 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 within the current 5-year planning period. If 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.**

<b>Number of Households Served</b>	<b>CDBG Actual</b>
Extremely Low-income	0
Low-income	0
Moderate-income	0
<b>Total</b>	<b>0</b>

**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 2023.

*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 such as hot meals for the elderly population which helps offset basic costs and provides support that allows this group to age in place. The goal is that these activities will prevent housing instability, and ultimately help lead to fewer instances of 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 Town's homeless population and to meet and assess their needs. The Town also relies on its many local services agencies to reach out to and provide services for the local homeless population.

The MDHI is responsible for coordinating with all seven counties in the Denver area and various local providers to ensure that the needs of the homeless population are met. MDHI coordinates programs, including 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 engages with MDHI to address the needs of individuals experiencing homelessness 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, and SECOR Cares.

### **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 Castle Rock. Unfortunately, identifying persons experiencing homelessness and directly addressing their needs is difficult within the Town due to limited resources and a small homeless population within the town. The 2024 PIT Count, conducted on January 22, 2024 identified 80 homeless persons for all of Douglas County, including 43 unsheltered and 37 sheltered. Current programs that reach out and support the homeless in Castle Rock and Douglas County include the facilitation of hotel vouchers by the following agencies: Catholic Charities, Help and Hope Center, Parker Task Force, and SECOR Cares.

**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 Douglas County Department of Community Services and other stakeholders launched the Housing Stability Program in August 2024. The program is focused on targeting at-risk households with the goal to avoid becoming homeless. This Douglas County program is available to eligible Castle Rock residents. 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 2023 program year, the Town used CDBG funds for a Senior Center Home Meal Delivery program, which targeted elderly and disabled populations.

Additionally, 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 quality of life for 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 third year Annual Action Plan, the Town targeted an estimated 100 LMI and special needs persons to be served 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 are 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 has been completed 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**

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 owns Oakwood Senior Apartments in Castle Rock, which provides 109 units for seniors. The Town also allowed fee waivers for the Meadowmark project, which will provide additional affordable units for the Town's residents. Additionally, the Town is supporting DCHP with the Proposition 123 affordable housing initiative which dedicates 0.1% of the state's annual revenue to a variety of affordable housing programs, such as land banks and down payment assistance. Through this effort, the Town has pledged to work to secure about 270 affordable housing units by the end of 2026. The Town will continue to partner with the DCHP and other Douglas County municipalities to work as a region to increase affordable housing units across the county. 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. Town residents who are homeless or at-risk of homelessness are eligible for Douglas County Department of Community Services' Housing Stability Program. With limited CDBG funds, the Town's efforts are focused on prevention through its public service activities.

The Town refers its homeless needs to the MDHI, the Continuum of Care (CoC) in the wider region. MDHI has a wide array of services and housing programs that meet the needs of the homeless and their unique situations. Town residents are also eligible for Douglas County's Housing Stability Program.

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 2023 program year, the Town

used CDBG funds for the Senior Center Home Meal Delivery program, which targeted elderly and disabled populations.

Additionally, 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, including assistance with the transition to permanent housing and independent living.



**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)**

As of 2021, the Town of Castle Rock became a new entitlement jurisdiction, and the Town is in the process of planning the development of its' Analysis of Impediments to Fair Housing Choice (AI) and has not yet developed the assessment. Castle Rock will provide an assessment to fair housing in the Town in the upcoming Equity Plan that was noticed by HUD on February 9, 2023. This Equity Plan will provide a fair housing analysis, goals and strategy as well as community engagement. The Equity Plan will answer questions on demographics, segregation and integration, racially/ethnically concentrated areas of poverty (R/ECAP), access to community assets, access to affordable housing opportunities, access to homeownership and economic opportunity, and local/state policies and practices that impact fair housing in Castle Rock.

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 Equity Plan, 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 2023 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 2023 program year, the Town funded a meal delivery program delivering essential meals to 178 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, sidewalks, and public facilities. In PY 2023, the Town completed the Recreation Center Pool Lifts activity (#18). This activity involved the replacement of three pool lifts that have exhausted their life span, and will make this facility ADA compliant. The Town also contracted a developer to start the Cantril School Improvements Design and Administrative activity (#19), which will help make the facility ADA compliant. As of September 2024, the contractor has completed about 30% of work in this project and the Town anticipates this activity to

be completed in the upcoming program year. CDBG funding for improvements in 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.

Town supportive services include independent living services and health and self-sufficiency assistance for the elderly. Funding may also be used to provide services for the disabled, youth, and vulnerable population groups while offering job training, emergency assistance and health services. For more information, citizens could reach the Town through the program's webpage at: <https://crgov.com/3212/CDBG>

### **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 stock was built after 1978, when lead-based paint was banned nationwide for consumer use. There are however still over 1,300 owner-occupied and 500 renter-occupied housing units that were built before 1980 (Source: 2018-2012 ACS, B25036). 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 2023 worked directly and indirectly to reduce the number of poverty level families in Castle Rock. The Town funded the Castle Rock Senior Activity Center's Home Delivery of Hot Meals program to assist 178 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 and to public facility and infrastructure improvements to benefit these populations. These supportive services may include activities such as independent living services, health services, 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 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 Consolidated 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 of 2021, the Town of Castle Rock became a new entitlement jurisdiction, and the Town is in the process of planning the development of its' Analysis of Impediments to Fair Housing Choice (AI) and has not yet developed the assessment. Castle Rock will provide an assessment to fair housing in the Town in the upcoming AFH Equity Plan that was noticed by HUD on February 9, 2023. This Equity Plan will provide a fair housing analysis, goals and strategy as well as community engagement. The Equity Plan will answer

questions on demographics, segregation and integration, racially/ethnically concentrated areas of poverty (R/ECAP), access to community assets, access to affordable housing opportunities, access to homeownership and economic opportunity, and local/state policies and practices that impact fair housing in Castle Rock.

## **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 for the review 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 administrative, financial, and programmatic areas of the Town's CDBG program.

The Town of Castle Rock views monitoring as an ongoing process involving continuous communication with the Community Development team 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 as needed. 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 involved in the project.

### **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 closely follows its HUD approved Citizen Participation Plan (CPP) which helps guide the Town to gather information, 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 2023 CAPER is the third program year of the 2021-2025 Consolidated Plan.

### **Citizen Participation for the 2023 AAP**

Citizen participation efforts for the development of the 2023 Annual Action Plan included a 30-day public comment period from June 16, 2023 to July 18, 2023 to allow members from the public an opportunity to review and make comments on the draft plan; a public input meeting held May 30, 2023 before the development of the plan; and a public hearing on July 18, 2023 to review and formally adopt the plan. Copies of the draft plan were made available online, at the Douglas County Library Philip & Jerry Miller Branch in Castle Rock, and in the lobby of Town Hall. All comments from the public were welcome. There were no comments received from the public during the public comment period, the public input meeting or the public hearing.

### **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 2023 CAPER as per the requirements in 24 CFR 91.105. The following details are provided on how citizens could participate in the development of this year's CAPER.

**PUBLIC COMMENT PERIOD:** Citizens can review and make comments on the draft 2023 CAPER. The draft CAPER will be available for (15) fifteen days from **November 5, 2024 to November 20, 2024**. The draft CAPER will be available at Town Hall, located at 100 N Wilcox St, Castle Rock, CO 80104, or it can be viewed on the Town's website at: [crgov.com/CDBG](http://crgov.com/CDBG). Written comments are encouraged and can be mailed or delivered to the address above or via email to [BBland@crgov.com](mailto:BBland@crgov.com).

**PUBLIC HEARING:** A public hearing will be held to review and discuss the draft 2023 CAPER. The hearing will be held on **November 4, 2024 at 4:30 PM** and will take place in Town Hall, located 100 N. Wilcox St. Castle Rock, CO 80104.

**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](mailto:kread@CRgov.com) at least two business days 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.**

PY 2023 is the third year of the Town's 2021-2025 Consolidated Plan, and there were no changes to the overall goals and outcomes of the plan. The Town remains committed to fulfilling its community development program objectives as established in the 2023 Annual Action Plan (AAP) and 5-Year Consolidated Plan. 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.

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

Federal CARES Act CDBG (CDBG-CV) funds were appropriated in 2020 to assist LMI communities prevent, prepare for, and respond to the COVID-19 pandemic. As the Town was awarded CDBG funds for the first time in PY 2021, there were no CDBG-CV funds awarded to Castle Rock. While the Town did not receive these funds, it will still continue to monitor the needs of citizens as it relates to the pandemic, in particular vulnerable populations such as senior citizens in Castle Rock.

**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	0
Total Section 3 Worker Hours	0
Total Targeted Section 3 Worker Hours	0

**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	0
Outreach efforts to generate job applicants who are Other Funding Targeted Workers.	0
Direct, on-the job training (including apprenticeships).	0
Indirect training such as arranging for, contracting for, or paying tuition for, off-site training.	0
Technical assistance to help Section 3 workers compete for jobs (e.g., resume assistance, coaching).	0
Outreach efforts to identify and secure bids from Section 3 business concerns.	0
Technical assistance to help Section 3 business concerns understand and bid on contracts.	0
Division of contracts into smaller jobs to facilitate participation by Section 3 business concerns.	0
Provided or connected residents with assistance in seeking employment including: drafting resumes, preparing for interviews, finding job opportunities, connecting residents to job placement services.	0
Held one or more job fairs.	0
Provided or connected residents with supportive services that can provide direct services or referrals.	0
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.	0
Assisted residents with finding child care.	0
Assisted residents to apply for, or attend community college or a four year educational institution.	0
Assisted residents to apply for, or attend vocational/technical training.	0
Assisted residents to obtain financial literacy training and/or coaching.	0
Bonding assistance, guaranties, or other efforts to support viable bids from Section 3 business concerns.	0
Provided or connected residents with training on computer use or online technologies.	0
Promoting the use of a business registry designed to create opportunities for disadvantaged and small businesses.	0
Outreach, engagement, or referrals with the state one-stop system, as designed in Section 121(e)(2) of the Workforce Innovation and Opportunity Act.	0
Other.	0

**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 has been 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 2023. An IDIS Section 3 report has been attached to the final report in the CR-00.