



County of Gloucester

2020 Consolidated Annual Performance Evaluation Report

Community Development Block Grant Program
HOME Investment Partnership Program

Gloucester County Department of Economic Development
Office of Housing and Community Development

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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 County received \$1,367,975 in Program Year 2020 Community Development Block Grant (CDBG) entitlement funding and \$601,828 in HOME Investment Partnership (HOME) funding as well as two tranches of funding from the CARES Act to prepare for, prevent the spread of, or respond to the COVID-19 pandemic. The first tranche of CARES Act funding (known as CDBG-CV1) amounted to \$804,857. An additional \$1,939,512 was awarded in the 2nd tranche (CDBG-CV3) for a total of \$2,744,369. Several reports have been appended to this report so specifically report on the use of CV-1 and CV-3 funds.

The impact of the global coronavirus pandemic had a large effect on the 2019 program year and to a degree continues as the County adapts to life during the pandemic. In 2020, however, many of the programs bounced back to meet or exceed expectations, especially the housing rehab programs and infrastructure projects. Additionally, many public services programs halted during 2019 are back up and running and provided needed services to the low-mod community of Gloucester County.

In addition to CDBG and HOME entitlement funding, the County used nearly \$600,000 in CDBG-CV funds to assist 41 local small businesses and to provide pandemic-related public services to County residents, including a program that trained 50 disabled adults to make PPE to help combat the pandemic.

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 / Amount	Indicator	Unit of Measure	Expected – Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected – Program Year	Actual – Program Year	Percent Complete
Create New Rental Housing Vouchers	Affordable Housing	HOME: \$	Tenant-based rental assistance / Rapid Rehousing	Households Assisted	40	16	40.00%	7	16	228.57%
Develop New Affordable Housing	Affordable Housing	HOME: \$	Rental units constructed	Household Housing Unit	0	0		3	0	0.00%
Develop New Affordable Housing	Affordable Housing	HOME: \$	Homeowner Housing Added	Household Housing Unit	5	2	40.00%			
Improve Housing	Affordable	CDBG: \$	Homeowner	Household	60	42	70.00%	17	42	247.06%

Goal	Category	Source / Amount	Indicator	Unit of Measure	Expected – Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected – Program Year	Actual – Program Year	Percent Complete
Conditions	Housing	/ HOME: \$	Housing Rehabilitated	Housing Unit						
Improve Public Facilities and Infrastructure	Non-Housing Community Development	CDBG: \$ / HOME: \$	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	5000	4563	91.26%	5000	4563	91.26%
Increase Homeownership	Affordable Housing	HOME: \$	Direct Financial Assistance to Homebuyers	Households Assisted	75	2	2.67%	5	2	40.00%
Program Administration	Administration	CDBG: \$ / HOME: \$	Buildings Demolished	Buildings	0	0				
Program Administration	Administration	CDBG: \$ / HOME: \$	Other	Other	1	1	100.00%	1	1	100.00%
Support and Expand Public Services	Non-Homeless Special Needs Non-Housing Community Development	CDBG: \$ / HOME: \$	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	0	0		1290	2792	216.43%
Support and Expand Public Services	Non-Homeless Special Needs Non-Housing Community Development	CDBG: \$ / HOME: \$	Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit	Households Assisted	0	0		60	0	0.00%
Support and Expand Public Services	Non-Homeless Special Needs Non-Housing Community Development	CDBG: \$ / HOME: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	4000	2792	69.80%			
Support Emergency Shelters and Homeless Services	Homeless	CDBG: \$	Public service activities for Low/Moderate Income Housing Benefit	Households Assisted	45	0	0.00%			
Support Emergency Shelters and Homeless Services	Homeless	CDBG: \$	Homeless Person Overnight Shelter	Persons Assisted	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.

High Priority needs identified in the Consolidated Plan for the 2020-24 period include: Preservation of existing housing stock, addition of affordable housing, improvements to infrastructure and support for public services.

During 2020, the County used CDBG, CDBG-CV and HOME funds exclusively to address high-priority needs. Feedback from the County's municipalities, housing developers and non-profit service providers continues to emphasize the importance of CDBG and HOME support to the ability of those organizations to serve their constituents. In order to combat the economic ramifications of the COVID-19 Pandemic the County utilized most of its CDBG-CV funds to help small businesses throughout the County.

Of the CDBG-CV funds, at this time 579 persons have been assisted. Primarily of these figures, 500 of the persons assisted were part of a project to advance Rowan University COVID-19 outreach efforts in Personal Protective Equipment Face Masks. After real-world testing by two regional hospitals, Rowan released the designs and instructions for a 3D printed face mask that can be washed, disinfected and reused in case of an emergency shortage. 50 of those assisted with CDBG-CV funds were from a Public Service activity for an organization, Abilities Solutions, that gave employment training to disabled persons to help them make PPE equipment. The additional assisted were from small business assistance 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	HOME
White	1,610	24
Black or African American	1,471	18
Asian	1	0
American Indian or American Native	1	0
Native Hawaiian or Other Pacific Islander	157	1
Total	3,240	43
Hispanic	855	1
Not Hispanic	2,385	42

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

Narrative

Above statistics are taken from accomplishments reported for individual activities, rather than from the PR-23 reports, which are often inaccurate. Often times, activities are done in one year & 'completed' in IDIS during another year. Instead of relying of the PR 23 report, we count the activities individually, based on when the work actually took place and in order to correct those discrepancies from year to year. The statistics above are the most accurate account of the work that happened during the 2020 program year. The Native Hawaiian or Other Pacific Islander category is actually the number of "Other multi-racial" beneficiaries.

Beneficiaries of Gloucester County's CDBG and HOME activities are comprised of a higher percentage of minority residents than the County as a whole, according to the latest American Community Survey data. African-American residents make up some 45% of program beneficiaries, compared to 10.2% of the County population, while Hispanic residents were 26% of the program's beneficiaries and 6.2% of the County population.

Of CDBG-CV Activities completed in 2020 that reported race the majority, 50 of those assisted fall under the other race category. Twenty Three of those assisted are White, 2 are black, and 4 are Asian. None of those assisted in 2020 were Hispanic.

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	2,550,835	1,087,815
HOME	public - federal	601,828	666,862

Table 3 - Resources Made Available

Narrative

Gloucester County received an allocation of \$ 1,367,975 in CDBG funds for 2020 and \$601,823 in HOME funds. The County also budgeted \$65,000 in CDBG Program Income in the 2020 Annual Action Plan.

The County also received \$2,744,369 in CDBG-CV funds.

Identify the geographic distribution and location of investments

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

Table 4 – Identify the geographic distribution and location of investments

Narrative

Of all funds used in 2020, not including administrative funds, approximately 32.1% of those funds were used to directly improve low-mod areas with public facilities projects. The remaining 67.9% of the funds addressed low-mod clientele and low-mod housing.

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.

From infrastructure projects to public services, virtually all non-housing rehab activities receiving CDBG or HOME funds also receive other forms of support. Those funds include local municipal monies, state transportation funds and a wide variety of public and private resources that support the public services.

HOME match requirements are incorporated in the County's solicitation, review and award of HOME projects. Developers wishing to use HOME funds are encouraged by the application scoring system to include funds from other sources and, in fact, HOME projects other than homeowner rehab are not viable without non-HOME resources being part of the mix.

Public property used to address needs identified in the 2020 plan consisted of streets and public facilities where needed improvements were completed.

Fiscal Year Summary – HOME Match	
1. Excess match from prior Federal fiscal year	1,703,567
2. Match contributed during current Federal fiscal year	230,263
3. Total match available for current Federal fiscal year (Line 1 plus Line 2)	1,933,830
4. Match liability for current Federal fiscal year	102,056
5. Excess match carried over to next Federal fiscal year (Line 3 minus Line 4)	1,831,774

Table 5 – Fiscal Year Summary - HOME Match Report

Match Contribution for the Federal Fiscal Year								
Project No. or Other ID	Date of Contribution	Cash (non-Federal sources)	Foregone Taxes, Fees, Charges	Appraised Land/Real Property	Required Infrastructure	Site Preparation, Construction Materials, Donated labor	Bond Financing	Total Match
Borough of Glassboro	08/31/2021	0	2,675	0	0	0	0	2,675
Habitat for Humanity	08/31/2021	107,467	0	0	0	120,122	0	227,588

Table 6 – Match Contribution for the Federal Fiscal Year

HOME MBE/WBE report

Program Income – Enter the program amounts for the reporting period				
Balance on hand at beginning of reporting period \$	Amount received during reporting period \$	Total amount expended during reporting period \$	Amount expended for TBRA \$	Balance on hand at end of reporting period \$
29,999	148,445	69,521	10,084	98,839

Table 7 – Program Income

Minority Business Enterprises and Women Business Enterprises – Indicate the number and dollar value of contracts for HOME projects completed during the reporting period						
	Total	Minority Business Enterprises				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
Contracts						
Dollar Amount	0	0	0	0	0	0
Number	0	0	0	0	0	0
Sub-Contracts						
Number	0	0	0	0	0	0
Dollar Amount	0	0	0	0	0	0
	Total	Women Business Enterprises	Male			
Contracts						
Dollar Amount	0	0	0			
Number	0	0	0			
Sub-Contracts						
Number	0	0	0			
Dollar Amount	0	0	0			

Table 8 - Minority Business and Women Business Enterprises

Minority Owners of Rental Property – Indicate the number of HOME assisted rental property owners and the total amount of HOME funds in these rental properties assisted						
	Total	Minority Property Owners				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
Number	0	0	0	0	0	0
Dollar Amount	0	0	0	0	0	0

Table 9 – Minority Owners of Rental Property

Relocation and Real Property Acquisition – Indicate the number of persons displaced, the cost of relocation payments, the number of parcels acquired, and the cost of acquisition						
Parcels Acquired		0		0		
Businesses Displaced		0		0		
Nonprofit Organizations Displaced		0		0		
Households Temporarily Relocated, not Displaced		0		0		
Households Displaced	Total	Minority Property Enterprises				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
Number	0	0	0	0	0	0
Cost	0	0	0	0	0	0

Table 10 – Relocation and Real Property Acquisition

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	28	62
Number of Special-Needs households to be provided affordable housing units	0	0
Total	28	62

Table 11 – Number of Households

	One-Year Goal	Actual
Number of households supported through Rental Assistance	9	16
Number of households supported through The Production of New Units	3	2
Number of households supported through Rehab of Existing Units	16	42
Number of households supported through Acquisition of Existing Units	0	2
Total	28	62

Table 12 – Number of Households Supported

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

In 2020, production exceeded expectations, a reflection of the demand for this assistance. Demand for housing rehab and rental assistance is exceeding expectations. The production of new units was below annual goals, while homebuyer assistance demand was still rather soft.

Discuss how these outcomes will impact future annual action plans.

Need continues to exist in all housing-related programs so it is anticipated that all will continue to be included in future Action Plans with the possible exception of the homebuyer assistance program, which has been under-utilized for several years.

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	HOME Actual
Extremely Low-income	10	6
Low-income	6	18
Moderate-income	3	19
Total	19	43

Table 13 – Number of Households Served

Narrative Information

Housing assistance is fairly evenly distributed across eligible income levels, with the majority of those being assisted being low income.

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

Through fiscal and technical support for the front-line organizations that conduct this important work, Gloucester County continued to reach out to the homeless, including unsheltered homeless. The County's Point in Time Survey is one method area providers use to connect with the homeless and try to bring them into the regional support network to transition from homelessness.

During 2020, the County provided CDBG funding to Center for Family Services, Inc.: FIRST CALL FOR HELP(\$40,000), which provides homeless intervention and case management, emergency shelter placements, and emergency food assistance to Gloucester County Residents.

Addressing the emergency shelter and transitional housing needs of homeless persons

Through fiscal and technical support for shelter and transitional housing providers and by offering networking opportunities for them, the County continued to address the emergency shelter and transitional housing needs of homeless persons throughout the County.

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 County's housing rehab program helped low-income homeowners avoid homelessness by providing repairs that kept their homes habitable. Economic development activities also prevented homelessness by expanding and retaining employment opportunities. The County's many social service providers also connected their own clients with other needed services, including job training, housing assistance, information on employment and child care and much more.

The HOME-supported Tenant Based Rental Assistance program helped make housing affordable for 16 low-mod income County families, expending about \$120,000.

Gloucester County also participates in the formulation and implementation of policies regarding those being discharged from publicly funded institutions and systems of care. Those policies include the

provision of information on receiving assistance regarding housing, health, social services, employment, education and youth needs.

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

By expanding housing options for low income residents, the County helped shorten the period of homelessness. Gloucester County supported the creation of additional affordable units and provided rent assistance through the Tenant Based Rental Assistance program.

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

Actions taken to address the needs of public housing

The County supplemented the Public Housing voucher programs by allocating \$108,000 in HOME funds for a Tenant Based Rental Assistance program in 2020.

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

Public housing residents were encouraged to become more involved in management and participate in home ownership through continued operation of resident councils at Public Housing developments.

Additionally, *the Housing Authority of Gloucester County* required each non-exempt adult public housing resident to contribute a minimum of 8 hours of community service per month or participate in an economic self-sufficiency program for a least 8 hours per month. Residents were referred to the Gloucester County Volunteer Center, which acts as a clearinghouse for residents to offer their time or services to organizations in need of volunteers. The Authority considers activities that are designed to encourage, train or facilitate economic independence as valid activities.

The Glassboro Housing Authority identifies the promotion of resident participation in its annual goals. The Authority recognizes the need for “Effective Resident Organization Partnerships” that meet regularly to ensure proactive support for building, managing and maintaining sound, safe, affordable communities. The resident councils meet on a regular basis and consistently work with the Glassboro HA regarding problem identification and pursuing positive approaches to addressing community issues.

Actions taken to provide assistance to troubled PHAs

Neither of the County's housing authorities are troubled PHAs

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)

While it is beyond the ability of the County or any of its municipalities to control market forces and other factors, there are some steps that can be taken. During the 2020 Program Year, the County:

- Through the use of HOME funding, the County continued to assist affordable housing development. The County also continued to provide technical assistance to non-profit organizations seeking state and federal funds for affordable housing development, both rental and homeownership.
- Continued the homebuyers program to help families afford home ownership.
- Worked with municipalities to assess zoning, design guidelines and local government standards to ensure that these elements of the construction process do not hinder the creation of affordable housing.
- Reviewed building fee ordinances as requested by municipalities and recommended modifications as necessary; investigate possibility of non-profit organizations having fees waived.
- Continued to seek supplementary funding and opportunities to leverage limited resources.

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

The primary obstacle to meeting underserved needs is a lack of funds. There are many needs in all of the areas - public facilities, public services, infrastructure, and economic development – and municipal resources go only so far.

During the 2020 Program Year, the County, through both staff and consultants, continued its practice of constantly looking for additional funding sources to address the unmet needs identified in our community. Gloucester County succeeded in attracting state, federal, regional and private funding for improvements and services that aide the community at large and lower income neighborhoods and residents in particular.

The development of more and better jobs for low and moderate income persons would help reduce the scale or scope of needs as well. In this vein, the County undertakes economic development projects to attract and retain employers and works with local and regional job training entities to enhance residents' work skills. The County utilized CDBG-CV funds distributing in 2020 in order for businesses to retain jobs of low-mod employees.

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

The County Community Development Program addressed lead hazards during housing rehabilitation efforts. All pre-1978 homes receiving rehabilitation assistance and where painted surfaces were to be disturbed were tested for the presence of lead-based paint hazards. When evidence of lead paint hazards was found, the appropriate level of action was taken. Most often, that was the use of interim controls to address all identified lead hazards. In the homebuyers program, when defective painted surfaces are found, the surfaces are tested for lead-based paint as well and addressed by a qualified trained contractor. The County's Lead-Based Hazard reduction strategy, administered by the Department of Health, involves the administration of the Lead Intervention for Children at Risk Program (LICAR) which supports the abatement or reduction of lead-based paint hazards in low-income housing.

During 2020, the Department of Health provided administrative and program delivery staff responsible for marketing the LICAR program; conducted application intake, review, and approval; completed environmental reviews; completed housing inspections and, when funding was available, prepared work write-ups and cost estimates for lead hazard control work; prepared contractor bid packages and supervised advertisement for bids and selection of contractors; managed temporary resident relocation while lead hazard control work was completed and monitored work in progress through to completion.

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

The County's anti-poverty strategy is linked to the Economic Programs that have been implemented and operated for almost a decade. The objective of poverty reduction requires programming for job readiness areas, including job training and placement, supportive public services, education and basic skills development. The overriding principle, however, is to create new jobs and opportunities for households with incomes below the poverty level. It is only through comprehensive, coordinated strategies that nurture skills and provide opportunities to gain and retain employment and thus improve the quality of life, that people can improve their situation.

Much of the County's public services dollar support youth development programming, supporting success at a young age in order to build a strong foundation for high school graduation and post-secondary education and/or training completion.

All projects to be funded with CDBG funding were encouraged to follow Section 3 requirements to recruit needed employees from very low income neighborhoods and where possible from the pool of WIA Program graduates. This coordinated effort created additional employment opportunities for low-income residents. All economic development activities/projects that created jobs were also coordinated with the WIA and the FDP Programs.

Employment programs reach only a part of the poverty population. Many of the people living in poverty are not employable and thus the County worked cooperatively with numerous public, social and civic

service organizations to develop and implement direct assistance and service delivery programs to improve the quality of life of these persons. The first step of providing health and social services is necessary to enable an unemployed person to become employable.

The County provided financial assistance through direct grants as well as technical and advisory assistance to non-profits and community agencies that administer a wide variety of programs for lower income residents.

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

The County continued its participation in regional and state networking and information opportunities. Also continued familiarity with the service providers in Gloucester County and in neighboring and nearby counties.

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

As a common partner with so many of the public and private housing and social service providers, the Gloucester County Department of Economic Development, Office of Housing and Community Development continued in its role of a natural conduit for communication and interaction among these entities. The CD Program served in that capacity while respecting the autonomy and uniqueness of each partner.

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

Gloucester County formally updated its Analysis of Impediments to Fair Housing Choice during the preparation of its 2020 Consolidated Plan. For actions taken during the 2020 Program Year, however, the County reviewed its prior Analysis of Impediments to Fair Housing Choice and concluded that it continued to accurately reflect the issues and concerns that need to be addressed.

Specifically, the analysis showed a continued need for further educational efforts in the area of fair housing rights and responsibilities and the processes and procedures in place to help assure housing fairness. In response to that need, the County continued to provide information to the public on relevant fair housing topics. Pamphlets, posters and contact information are provided at County offices.

Additionally, a general lack of affordable housing options quite naturally impacts residents in the lower income ranges. As detailed in the Affordable Housing portion of this report, the County sought to address this impediment in 2020 through rehab of existing units, creation of new units and provision of rental assistance vouchers.

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

Performance monitoring is an important component in the long-term success of the Consolidated Plan and Action Plans. The County, through the Office of Housing and Community Development, has developed standards and procedures for ensuring that the recipients of CDBG and HOME funds meet the purposes of the appropriate legislation and regulations, and that funds are disbursed in a timely fashion.

The Office of Housing and Community Development oversees the County's housing and community development programs, and is responsible for most performance measurement activities. The Division has incorporated performance standards into the process of awarding funds, allocating resources to programs and agencies, and obtaining progress and completion reports from those programs and agencies. The monitoring requirements and procedures followed during 2020 were built upon existing monitoring systems and experience in administering federal and state programs and funds.

Following execution of sub-recipient agreements, activities are subsequently monitored through the use of checklists and reports to facilitate uniform monitoring of program activities. Each description of projects and activities and the written agreements related to them contain the specific measures by which the activity is evaluated.

Fiscal monitoring included review and approval of budgets, compliance with executed Grant Agreements, review and approval of expense documentation, review of fiscal reports on a monthly basis, and a review of municipal and non-profit audits on an annual basis.

Monitoring occurred through on-site monitoring visits. These visits occurred as necessary with frequency being determined by an analysis of the activity and the sub-recipient, including complexity of the activity, experience of the sub-recipient staff and their timely and accurate reporting of accomplishments.

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.

Gloucester County placed the CAPER document on public display for a period in excess of the required 15 days, from November 15, 2021 through November 29, 2021. The CAPER was available on the County website. The public was notified of the public comment period by an advertisement in the local publication *South Jersey Times*. A copy of the advertisement is provided with this report.

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.

Ongoing assessments of community needs and ongoing successes of the County's CDBG program in addressing those needs suggest that no significant changes are needed in the program's objectives. The program will continue to seek efficient, effective means to provide housing, facilities and services to our most vulnerable residents. The County will continue to seek community partners capable of assisting in those efforts.

While always aware of opportunities to improve, the County believes that the overall direction and implementation of its CDBG program meet both the requirements of the federal government and the needs of our local residents.

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

No

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

CR-50 - HOME 91.520(d)

Include the results of on-site inspections of affordable rental housing assisted under the program to determine compliance with housing codes and other applicable regulations

Please list those projects that should have been inspected on-site this program year based upon the schedule in §92.504(d). Indicate which of these were inspected and a summary of issues that were detected during the inspection. For those that were not inspected, please indicate the reason and how you will remedy the situation.

TBRA units inspected during the program year consisted of:

Provide an assessment of the jurisdiction's affirmative marketing actions for HOME units. 92.351(b)

No individual HOME-funded projects meet the threshold for affirmative marketing requirements. The program as a whole, though, including housing rehab activities, are publicized to all segments of the County's population through general circulation advertising and through information provided by our municipal partners.

These affirmative marketing efforts are clearly effective as 41.86% of HOME beneficiaries in 2020 were African-American, compared to the County population that is 11% African-American.

Refer to IDIS reports to describe the amount and use of program income for projects, including the number of projects and owner and tenant characteristics

During the 2020 Program Year, \$50,473.32 of HOME Program Income funds was drawn for projects. These funds were used on eight (8) homeowner rehabilitation projects and Tenant Based Rental Assistance for sixteen (16) renters. These projects that provided assistance to 2 extremely low income household, 13 low income household and 9 moderate income households. Five of the households consisted of elderly residents. Thirteen households were White, and 11 were Black. None of the assisted households identified themselves as being of Hispanic origin. Ten of the households assisted with Tenant Based Rental Assistance were single-parent households.

Describe other actions taken to foster and maintain affordable housing. 91.220(k) (STATES ONLY: Including the coordination of LIHTC with the development of affordable housing). 91.320(j)

During 2020, the County also used HOME funds on these activities that fostered and maintained affordable housing:

- 1) Completion of 23 owner-occupied residential rehab projects;

- 2) Homebuyer assistance to 2 households moving in to homeownership;
- 3) Tenant-based rental assistance to 16 households.
- 4) Construction and and creation of 2 energy certified homes that were sold to low-mod households.