

**Clay County Board of County Commissioners**  
**FY2023-2024 Consolidated Annual Performance and Evaluation Report (CAPER)**

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

## 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.

Major accomplishments during this year’s action plan included paving Dennison and Baylor Avenues, two dirt roads in an LMI neighborhood, which benefitted over 291 homes and created safe access for residents and emergency services. The County also completed eight limited home rehabilitation projects during this plan year. The application period for the FY24-25 limited home rehabilitation program opened in September 2024. Improved methods of outreach resulted in record numbers of applicants.

### 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
Affordable Housing	Affordable Housing	CDBG: \$	Homeowner Housing Rehabilitated	Household Housing Unit	10	14	140.00%	10	9	90.00%
Code Enforcement	Non-Housing Community Development	CDBG: \$	Housing Code Enforcement/Foreclosed Property Care	Household Housing Unit	15	0	0.00%	15	0	0.00%

Infrastructure improvements	Non-Housing Community Development	CDBG: \$	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	0	0		100	291	291.00%
Infrastructure improvements	Non-Housing Community Development	CDBG: \$	Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit	Households Assisted	100	400	400.00%			
Neighborhood Cleanups	Non-Housing Community Development	CDBG: \$	Other	Other	100	6000	6,000.00%	100	6000	6,000.00%

**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.**

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

Preservation of Housing: Objective: Decent Housing (DH) – Provide funding for the acquisition and/or rehabilitation/preservation of housing affordable to low- and moderate-income residents In FY23-24, nine of sixteen eligible home rehabilitation projects in low to moderate income areas within the County, were completed through the CDBG Program, exceeding the Annual Action Plan’s 10 projected homes. The remaining seven home rehabilitation projects completed before the close of the FY23-24 program year will be prioritized on the FY24-25 project list.

Code Enforcement/Neighborhood Cleanups: Objective: Suitable Living Environment (SL) – Provide funding for the payment of salaries and overhead costs directly related to the enforcement of local codes in deteriorating or deteriorated areas in Target Areas. In FY23-24 the County conducted three neighborhood clean-up activities funded through the CDBG program and organized by the County’s Community and Social Services Division. High Ridge Estates, located in Keystone Heights, Florida is a community of approximately 700-800 residents, Tanglewood, a community in Orange Park, Florida, has approximately 5,200 residents, per the US Census, and Tanglewood Park, a public park located Orange

Park, Florida.

Neighborhood Improvements: Objective: Creating Economic Opportunities (EO) – Provide funding for public facility improvements, physical improvements, and comprehensive neighborhood planning activities in Target Areas, and HUD designated Low-Mod Areas to improve the quality of life and health of neighborhood residents. In FY23-24, Dennison Avenue and Baylor Avenue, both located in a historically LMI neighborhood in Keystone Heights, Florida, were paved by a bid-awarded contractor, using CDBG funds. These improvements effected roughly 291 homes in a low to moderate income area.

Administration: Objective: General planning and administration costs associated with administering Federal CDBG and State SHIP funds; and other local funding sources. Throughout FY23-24, Clay County staff managed the programmatic and financial aspects of CDBG funding along with conducting post-application home inspections. This proved to be more time consuming than anticipated resulting in the decision to outsource contractors to conduct the required inspections.

## 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)

	<b>CDBG</b>
White	8
Black or African American	8
Asian	0
American Indian or American Native	0
Native Hawaiian or Other Pacific Islander	0
<b>Total</b>	<b>16</b>
Hispanic	1
Not Hispanic	15

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

### Narrative

Families assisted during the FY23-24 fell within a wide range of socio, racial and ethnic ranges. Of those that applied, single women outnumbered the men, and racial and ethnic statuses were more heavily white (50%) and black/African American (35%) with roughly 4% of those that reported the information, stating they were of Hispanic ethnicity.

## 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	1,848,756	1,356,248

Table 3 - Resources Made Available

### Narrative

### Identify the geographic distribution and location of investments

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description
Cattail Street in Middleburg	0	0	
County wide low and moderate income areas Code Enforcement	5	0	
County wide low and moderate income CTS	95	100	
Louie Carter Road in Middleburg	0	0	

Table 4 – Identify the geographic distribution and location of investments

### Narrative

The majority of this year’s funding supported investments in infrastructure. The County anticipates that infrastructure will continue to be a high priority activity in the FY24-25 Annual Action Plan. With the newly established process for review of proposed projects and the identification of local contractors able and willing to perform the required work, investments in home rehabilitation projects are expected to increase in FY24-25.

A Substantial Amendment was undertaken during the FY23-24 program year. Unused funds from Code Enforcement, Housing Rehabilitation and Administration totaling \$828,129.01 were re-allocated to Infrastructure projects, which included streets and sidewalks.

## 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.**

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

## CR-20 - Affordable Housing 91.520(b)

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

	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	10	16
Number of Special-Needs households to be provided affordable housing units	0	0
<b>Total</b>	<b>10</b>	<b>16</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	10	16
Number of households supported through Acquisition of Existing Units	0	0
<b>Total</b>	<b>10</b>	<b>16</b>

Table 6 – Number of Households Supported

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

The average median income of all approved applicants for housing rehabilitation projects was \$27,358.17. Inspection services and need assessments for the most qualified applicants began in FY22-23. Housing rehabilitation projects began during the FY23-24 Annual Action Plan and will continue into FY24-25.

Outcomes for FY23-24 were on par with the expected goals and outcomes. Project management was streamlined which resulted in greater efficiency in securing contractors for specific activities rather than using general contractors for a broad range of limited rehabilitation of homes. Nine homes received new roofs using this process and the County anticipates more successful rehabilitations using this process going forward.

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

Outcomes for FY23-24 were on par with the expected goals and outcomes. Project management was streamlined which resulted in greater efficiency in securing contractors for specific activities rather than using general contractors for a broad range of limited rehabilitation of homes. Nine homes received new roofs using this process and the County anticipates more successful rehabilitations using this process going forward.

**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>	<b>HOME Actual</b>
Extremely Low-income	0	0
Low-income	16	0
Moderate-income	0	0
<b>Total</b>	<b>16</b>	<b>0</b>

**Table 7 – Number of Households Served**

**Narrative Information**

In FY23-24, large scale projects experienced cost increases and limited timelines. In FY24-25, the County will implement the use of more focused scopes of work for home rehabilitation projects to provide benefit to the greatest number of people.

The CDBG Program is working with the balance of the eligible resident owners whose home rehabilitation projects were not completed in the FY23-24 program year. It is the intention of the County to initiate these projects within the first quarter of the FY24-25 program year, along with any new eligible applicants.

## **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 County's Community and Social Services Division oversees homelessness stabilization assistance programs, pairing individuals with resources. As part of the outreach process for the Consolidated Plan and Annual Action Plan, local non-profits who provide homelessness services are consulted for feedback in setting CDBG goals and developing activities. Building a deeper partnership with the County's Community Paramedicine program is an FY24-25 goal that will further the identification of potential individuals in need.

### **Addressing the emergency shelter and transitional housing needs of homeless persons**

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

### **Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: likely to become homeless after being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); and, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs**

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

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

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



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

### **Actions taken to address the needs of public housing**

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

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

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

### **Actions taken to provide assistance to troubled PHAs**

Not applicable.

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

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

The State of Florida adopted the Live Local Act in FY23, and accordingly, the County has published their list of affordable housing developments on its website ([www.claycountygov.com/government/purchasing/real-estate](http://www.claycountygov.com/government/purchasing/real-estate)). The County also uses its SHIP funds to support affordable housing and has allocated a portion of its State and Local Fiscal Recovery Funds (ARPA) for affordable housing projects like Nathan Ridge in Middleburg, Florida.

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

The CDBG Program and Community and Social Services Division staff are available to guide homeowners through the CDBG application process at no cost. These staff members also connected individuals who applied for CDBG funding with other outside resources to meet their immediate needs, including transportation and health care.

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

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

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

Income evaluation is the most heavily weighted factor used for qualifying and ranking applicants for assistance. Poverty-level families are the highest priority for assistance. The Clay County CDBG Program provides a free needs-assessment to poverty-level families and helps pair them with Career Source and employee training opportunities.

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

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

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

The County's Community and Social Services Division conducts needs assessments and matches

individuals with appropriate social service agencies and non-profits to assist them outside of CDBG activities. The Division also works with its SHIP office to coordinate the needs of residents.

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

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

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

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

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

## **CR-40 - Monitoring 91.220 and 91.230**

**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**

The Clay County Grants Division is responsible for all grant compliance and monitoring, including the CDBG program. The Grants Compliance Team works with the Community and Social Services Division and the CDBG Program Manager to implement the program under HUD rules and guidance.

## **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 Draft FY 2023-2024 Consolidated Annual Performance and Evaluation Report was available for review at the County's Website at <https://www.claycountygov.com/community/community-development-block-grant> and at the following locations:

- Clay County Community & Social Services
  - o8:30 am – 12:00 pm and 1:00 pm -4:00 pm Monday – Friday, excluding legal holidays
  - o420 College Drive, Ste 107, Middleburg, FL 32068
- Clay County Library Locations
  - o10:00 a.m. and 8:00 p.m., Monday-Thursday, and 9:00 a.m. to 5:00 p.m., Friday-Saturday
  - oFleming Island Library- 1895 Town Center Blvd., Fleming Island, FL 32003
  - oGreen Cove Springs Library- 403 Ferris Street, Green Cove Springs, FL32043
  - oKeystone Heights Library- 175 Oriole Avenue, Keystone Heights, FL 32656
  - oMiddleburg-Clay Hill Library- 2245 Aster Avenue, Middleburg, FL 32068
  - oOrange Park Library- 2054 Plainfield Avenue, Orange Park, FL 32073

PUBLIC COMMENT PERIOD: The 15-day public review and comment period was Wednesday, October 23, 2024, through Thursday, November 14, 2024, at close of business. Comments from the public were encouraged and accepted during this period at the Clay County Community & Social Services between

the hours of 8:30 am – 12:00 pm and 1:00 pm -4:00 pm, excluding legal holidays, at 420 College Drive, Ste 107, Middleburg, FL 32068. Comments could also be given by calling 904-541-3814 or be sent by email to [cdbg@claycountygov.com](mailto:cdbg@claycountygov.com).

One citizen attended the public comment meeting and requested more info on the County's volunteer program and the Neighborhood Clean-ups.

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

### **CR-45 - CDBG 91.520(c)**

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

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

In FY23-24, a study conducted on the LMI community of High Ridge Estates Initiative showed that there is a need for infrastructure and home rehab improvements in the southern part of the County. This could become a focus area in future annual action plans.

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

No

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

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No

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

### CR-58 – Section 3

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

<b>Total Labor Hours</b>	<b>CDBG</b>	<b>HOME</b>	<b>ESG</b>	<b>HOPWA</b>	<b>HTF</b>
Total Number of Activities	0	0	0	0	0
Total Labor Hours	0				
Total Section 3 Worker Hours	5				
Total Targeted Section 3 Worker Hours	0				

**Table 8 – Total Labor Hours**

<b>Qualitative Efforts - Number of Activities by Program</b>	<b>CDBG</b>	<b>HOME</b>	<b>ESG</b>	<b>HOPWA</b>	<b>HTF</b>
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				
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**Table 9 – Qualitative Efforts - Number of Activities by Program**

**Narrative**

Not Applicable