

Clay County Board of County Commissioners
Fiscal Year 2024-2025 Consolidated Annual Performance and Evaluation Report (CAPER)
477 Houston St.
Green Cove Springs, FL 32043

DRAFT

Table of Contents

CR-05 – Goals and Outcomes

CR-10 – Racial and Ethnic composition of families assisted

CR-15 – Resources and Investments 91.520(a)

CR-20 – Affordable Housing 91.520(b)

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

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

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

CR-40 – Monitoring 91.220 and 91.230

CR-45 – CDBG 91.520(c)

CR-65 – Persons Assisted

CR-75 – Expenditures

DRAFT

CR-05 – Goals and Outcomes

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

Major accomplishments during this year’s action plan included completing 10 limited home rehabilitation projects, eight neighborhood clean-up projects, and three sidewalk restoration projects. Additionally, the County began work on five other limited home rehabilitation projects and completed environmental reviews for five more sidewalk restoration projects.

The County did not open a new application cycle for FY26 limited home rehabilitation projects; in its FY26 Annual Action Plan, the County made the decision to move away from home rehabilitation projects and focus resources on infrastructure projects like sidewalks. This decision was made with citizen and Board input during the Annual Action Plan public comment period.

Comparison of the proposed versus actual outcomes for each outcome measure submitted with the consolidated plan and explain, if applicable, why progress was not made toward meeting goals and objectives. 91.520(g)

The County completed 10 of 15 eligible limited home rehabilitation projects in FY24-25. The remaining five rehabilitation projects are in progress with anticipated completion in FY25-26.

The Annual Action Plan for FY24-25 included sidewalk restoration for three streets (Harrison, Jefferson, and Washington). All three sidewalk projects were completed using Public Works Department staff and concrete procured under CDBG.

The County coordinated eight neighborhood clean-ups in three locations: High Ridge Estates (four clean-ups), Tanglewood (two clean-ups) and Bellair Meadowbrook (two clean-ups). Collectively, 28.275 tons of debris were removed from low to moderate income (LMI) communities between October 2024 and September 2025. The goal of neighborhood clean-ups is to help improve the aesthetics of a community, foster a sense of pride among the residents, increase property values, promote community engagement, and address environmental concerns.

Project administration costs were related to program management and Neighborly software for tracking CDBG projects. The National Community Development Association recommends Neighborly as an approved tool for tracking complex HUD funded projects. The FY24-25 software has been successfully used to track the progress of each project, particularly home rehabilitation projects, and provide accurate reporting data.

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 FY24-25, 10 of 15 eligible home rehabilitation projects in low to moderate income areas in the County were completed through the CDBG Program.

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 FY24-25, there were eight neighborhood clean-ups funded through the CDBG program: four in High Ridge Estates, two in Tanglewood, and two in Bellair Meadowbrook.

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 FY24-25, portions of sidewalks on Harrison, Jefferson, and Washington Avenues in Orange Park, Florida, were improved.

Administration

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

Throughout FY24-25, Clay County staff managed the programmatic and financial aspects of CDBG funding. The Neighborly software, purchased and implemented in FY 23-24, was renewed.

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)

Families assisted during FY24-25 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)

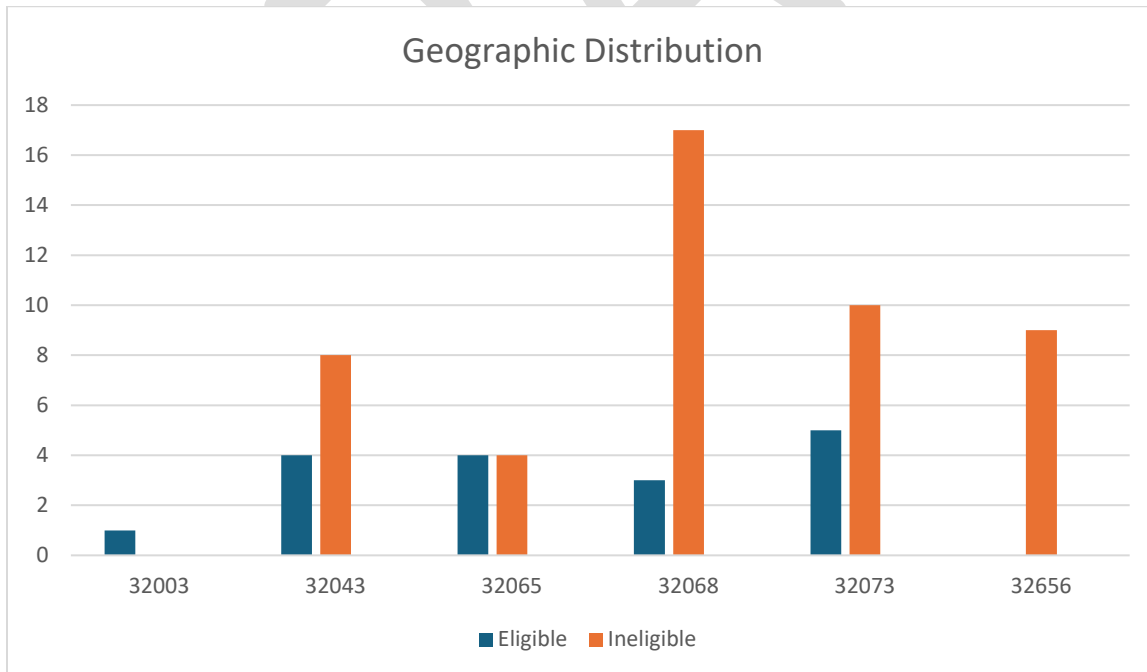
Identify the resources made available

CDBG Activity	Actual Expenditures
Infrastructure	\$610,207
Code Enforcement/Neighborhood Clean-ups	\$0 [Prior year’s funding still available]
Home Rehabilitation	\$350,112
Administration	\$40,000
Total	\$1,000,319

While the FY24-25 Annual Action Plan allocated the most funding to infrastructure, the County’s largest expenses in FY24-25 supported limited home rehabilitation. This was partially due to the large number of applicants that rolled over from FY23-24. Another factor was the County’s decision to outsource sidewalk improvements to improve efficiency. Sidewalks were selected and staff completed environmental assessments for the project locations. The County anticipates that infrastructure will be a high priority activity in the FY25-26 Annual Action Plan and spending in this category will increase as home rehabilitation projects are completed.

A Substantial Amendment will be drafted during the FY25-26 program year, moving the majority of unspent funding into infrastructure projects (primarily sidewalk improvements).

Identify the geographic distribution and location of investments



Narrative

The majority of eligible applicants for home rehabilitation came from Orange Park (53%), Green Cove Springs (24%), Middleburg (18%), and Fleming Island (5%).

Leveraging

Explain how federal funds leveraged additional resources (private, state and local funds), including a description of how matching requirements were satisfied, as well as how any publicly owned land of property located within the jurisdiction that were used to address the needs identified in the plan.

No matching funds are required for the County's CDBG Entitlement Funding. However, CDBG does work alongside the State Housing Initiative Partnership (SHIP) to help meet the housing needs of the County.

CR-20 – Affordable Housing 91.520(b)

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

The average median income of all approved applicants for housing rehabilitation projects was \$27,358.17. Inspection services and assessments for the most qualified applicants began in FY22-23. Several housing rehabilitation projects began during the FY24-25 Annual Action Plan and will continue into FY25-26.

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

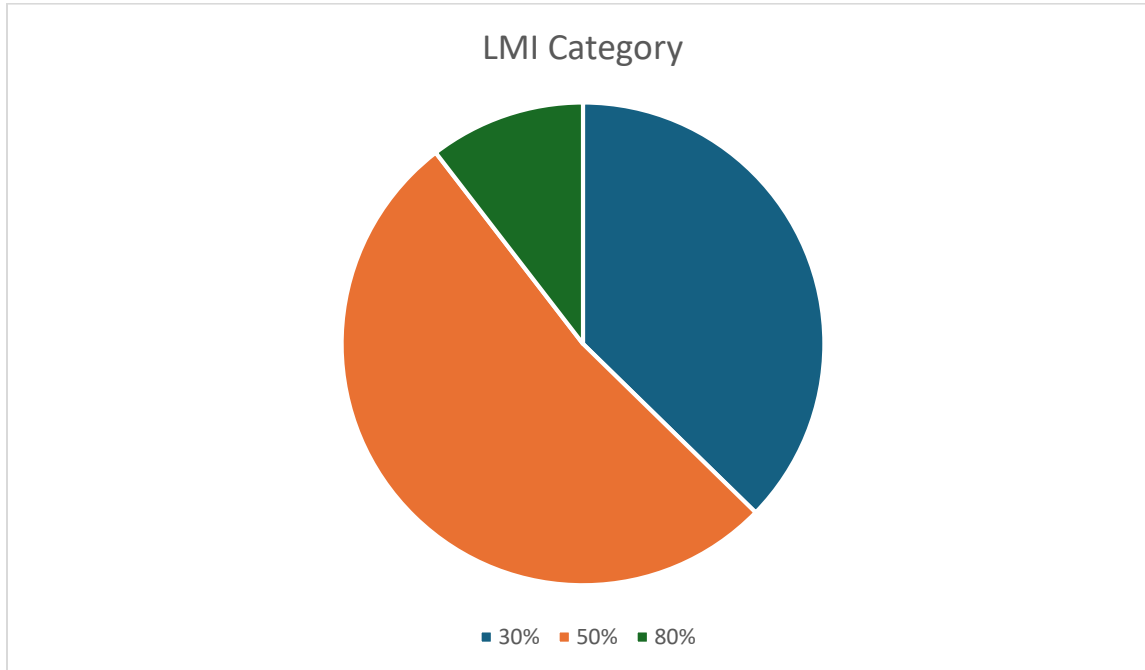
Outcomes for FY24-25 were on par with the expected goals and outcomes. Management of projects was streamlined, which resulted in the ability to secure appropriate contractors for specific needs rather than general contractors for a broad range of limited rehabilitation of homes. Nine homes received new roofs using this more specific bid request process.

Staff also determined that it is more efficient to bid out sidewalk replacement and improvement projects to contractors who can address several specific ADA requirements in addition to pouring concrete. In FY25-26, sidewalks will be competitively awarded to a third-party contractor in compliance with federal regulations.

Discuss how these outcomes will impact future annual action plans. Include the number of extremely low-income, low-income, and moderate-income persons served by each activity where information on income by family size is required to determine the eligibility of the activity.

In FY24-25, large scale projects became problematic with cost increases and limited timelines. In FY25-26, staff intend to focus on completing more sidewalk improvement projects to create the greatest benefit for the greatest number of people.

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



CR-25 – Homeless and Other Special needs 91.220(d, e); 91.320(d, e); 91.520(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 provides resources to assist residents with homelessness stabilization assistance programs and conducts needs assessments to pair individuals with resources. As part of the outreach process for the Consolidated Plan and Annual Action Plan, local non-profits who provide homelessness services are consulted for feedback in setting CDBG goals and developing activities.

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. Though the Emergency Rental Assistance Program provided limited funding, County staff still works with individuals using referral services to connect them with assistance.

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 address 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. The County's Extension Office/University of Florida also provide low-cost or free educational workshops on financial management and homeownership.

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); 92.320 (i)

The State of Florida adopted the Live Local Act in FY23, and accordingly, the County published their list of affordable housing developments on its website www.claycountygov.com/government/purchasing/real-estate). The County also uses its SHIP funds to support affordable housing and allocated a portion of its State and Local Fiscal Recovery Funds (ARPA) to fund 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 provides staff support to guide homeowners through the application process at no cost. Staff will also connect individuals with other outside resources to meet their immediate needs, such as transportation or health care services.

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 Development Block 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 connects them with Career Source and employee training opportunities.

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

The County formed the Community Services Division in 2021 to provide human services and programmatic support for funding opportunities like CDBG. Though that division no longer exists as a standalone department, the County does still have staff available to support the CDBG program and residents' community needs.

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

County staff conducts needs assessments for the public upon request and matches individuals with appropriate social service agencies and non-profit organizations to assist individuals outside of CDBG activities. The SHIP office can also step in with resources to support safe housing activities.

Identify actions taken to overcome the effects of any impediments identified in the jurisdiction's 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’s Land Development Code considers all these possible impediments and is revised and updated as necessary. Furthermore, the County provides a density incentive program for affordable housing projects.

CR-40 – Monitoring 91.220 and 91.230

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

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

The Grants Division is the division within Clay County with primary responsibility for all grant compliance and monitoring, including the CDBG program. The Grants Division and other pertinent County staff work collaboratively to implement the program under HUD rules and guidance.

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

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

Clay County has prepared the Draft FY 2024 - 2025 Consolidated Annual Performance and Evaluation Report, which is required by the U.S. Department of Housing and Urban Development (HUD) in order for the County to receive Federal Community Development Block Grant (CDBG) funds. The Consolidated Annual Performance and Evaluation Report provides details of the County’s performance in administrating the funds provided under the CDBG program during the previous grant year. The Consolidated Annual Performance and Evaluation Report will be available for public review and comment as set forth below.

THE PLAN DOCUMENT: The Draft FY 2024-2025 Consolidated Annual Performance and Evaluation Report will be available November 7 - November 21, 2025 for review on the County’s Website at <https://www.claycountygov.com/community/community-development-block-grant> and at the following locations:

Clay County Grants Department between the hours of 8:30 a.m-12:00 p.m. and 1:00 p.m. 4:30 p.m., Monday through Friday, excluding legal holidays at 420 College Drive, Ste 107, Middleburg, FL 32068

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

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

Report Summary: The Consolidated Annual Performance and Evaluation Report summarizes the progress made towards the five-year goals established in the Consolidated Plan. It describes how funds were allocated and the extent to which funds benefitted low- and moderate-income persons. Funded activities must serve one of the three CDBG National Objectives: 1) to benefit low-and moderate-income persons, 2) to aid in the prevention or elimination of slum or blight, and 3) to meet a community development need of urgency.

PUBLIC COMMENT PERIOD: The 15-day public review and comment period is **Friday, November 7, 2025, through Friday, November 21, 2025**, at close of business. Comments from the public are encouraged and will be accepted during this period at the Clay County Grants Department, 420 College Drive, Suite 107, Middleburg, FL 32043, Monday through Friday, excluding legal holidays, 8am-12pm and 1pm-4:30 pm. Comments can also be given by calling 904-529-4256 or can be sent by email to cdbg@claycountygov.com.

PUBLIC MEETING:

Purpose: To obtain public input on the proposed Consolidated Annual Performance and Evaluation Report.

Date: Tuesday, November 18, 2025

Time: 6:30 p.m.

Place: Middleburg-Clay Hill Public Library

2245 Aster Avenue, Middleburg, FL 32068

Non-English-Speaking Persons:

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

Special Accommodations for Persons with Disabilities:

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

Access to records/recordings:

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

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) 679-8596, no later than three (3) days prior to the hearing or proceeding for which this notice has been given. Deaf and hard-of-hearing persons can access the telephone number by contacting the Florida Relay Service at 1-800-955-8770 (Voice) or 1-800-955-8771 (TDD).

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

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.

Community input indicates that more funding is needed for infrastructure projects in low-mod areas of the County. Requests for infrastructure funding, including sidewalk replacements and new sidewalks. The County is committed to acting on this feedback and will submit a substantial amendment during FY25-26 moving the majority of unspent CDBG funding to infrastructure projects, primarily sidewalk construction and/or improvements.

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

Not applicable.

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

Not applicable.

CR-65 – Persons Assisted

Complete for CDBG Activities.

Activity Description	Persons Assisted
Infrastructure Improvements	3,000
Affordable Housing – Rehabilitation Projects	60
Code Enforcement – Community clean-up projects	3,000
Estimated Total Persons Assisted	6,060

CR-75 – Expenditures

	FY24-25 CDBG Program Year
Expenditures for Infrastructure Improvements	\$71,356.41
Expenditures for Affordable Housing – Housing Rehabilitation Program	\$163,901.50
Expenditures for Code Enforcement/Neighborhood Clean-Up	\$3,025.26
Administration	\$40,000
Total	\$278,282.91

DRAFT