



DRAFT 2019 CONSOLIDATED ANNUAL PERFORMANCE AND EVALUATION REPORT

**Public Review/Comment Period is from
November 23, 2020 to December 8, 2020.**

The Virtual Public Hearing is scheduled for Tuesday, December 8, 2020, at 6:00 PM. The City will consider adoption of the document by resolution immediately after the public hearing.

Comments may be submitted prior to the public hearing to Community Works Department, 800 Municipal Drive, Farmington, NM 87401, Attn: Francisco Alvarado, CDBG Planner, by phone at (505) 599-1333, by email to falvarado@fmtn.org, or by attending the virtual hearing. Please contact the City Clerk's office at (505) 599-1101 for virtual access.

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 2019 Consolidated Annual Performance Evaluation Report is for the 2019 program year starting October 1, 2019 and ending September 30, 2020. Throughout the year, activities were evaluated and measured for effectiveness and efficiency of the projects, including the outcomes (goal and objectives) achieved as part of the 2019-2023 Consolidated Plan.

The CDBG-funded projects are required to address a priority need, goal, and objective established in the 2019-2023 Consolidated Plan. The priority needs established in the Consolidated Plan include homelessness, special needs populations, community facilities, infrastructure, and low-to-moderate income (LMI) households. A number of factors are taken into consideration in determining how funds are allocated to projects. The funding levels are highly dependent on the critical needs in the community, the number of applications received, and the types of projects submitted through a formal Request for Proposal (RFP) process. The City received six (6) public service applications for the 2019 CDBG program year. The City selected all six (6) Public Service projects and two (2) Capital projects. One (1) additional Capital project was added to the program year through a minor amendment by Council.

The Public Service projects addressed some of the many needs outlined in the 2019-2023 Consolidated Plan. The projects included homeless shelter services, transitional housing for domestic violence victims, mentoring and educational assistance for LMI youth, counseling services for abused LGBTQ youth, emergency rental assistance to prevent homelessness, and transitional housing for women recovering from substance abuse.

The following Capital projects were part of the program year: 1) Parks, Recreation and Cultural Affairs (PRCA) Americans with Disabilities Act (ADA) Improvements at the Indian Center and Recreation Center; 2) Multi-use Pathway with ADA Improvements on Broadway Bridge; 3) Shower-to-Storage Conversion at the Indian Center.

Additionally, the City continued working on Capital projects from the 2018 Action Plan. Currently, 1) the PRCA ADA Improvements at Sycamore Park Community Center and Rec Center is underway. Sycamore Park Community Center parking lot improvements have been completed and the parking lot is now ADA compliant. Construction is taking place at the Rec Center parking lot to bring the facility into compliance with ADA

requirements. The other project, 2) the Bonnie Dallas Senior Center, was put on hold after the City determined the allocated funds were not enough to fix steep slopes for ADA compliance, and funding from other sources is needed to move forward with the scope of work as initially proposed.

This program year, the City adopted a resolution declaring the month of April 2020 as Fair Housing Month. The 2020 Annual Action Plan was also adopted by the City Council. Moreover, the 2019-2023 Citizen Participation Plan was amended to include expedited and safe participation procedures under disaster/emergency conditions, and incorporate CDBG program waivers deemed necessary to protect public health from the transmission of the coronavirus.

Funding allocation this year was as follows: Capital projects: \$236,397, or 65.25%; Public Service projects: \$54,207, or 14.96% (HUD limit is 15%); Planning and Administration: \$72,651 (20%). Minor amendments were adopted by the City Council to reallocate \$26,417.46 in Capital project funds anticipated to remain from the PRCA Indian and Recreation Center ADA Restroom project (2019) to the PRCA Sycamore Park and Recreation Center ADA Parking Lot project (2018), which needed additional funds to achieve the full scope of work. Also, these PRCA projects were amended to remove Berg Park (2019) and Civitan Park (2018) items because of budget constraints.

Sixty days prior to the end of the program year, the City was within HUD's 1.5 timeliness regulatory standard.

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
Community Facilities: Community and Youth Centers	Non-Homeless Special Needs	CDBG: \$91781.54	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	300	-	-	300	-	-
Infrastructure: Water and Streets	Non-Homeless Special Needs Non-Housing Community Development	CDBG: \$118198	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	100	848	848%	100	848	848%
Public Services	Homeless Non-Homeless Special Needs	CDBG: \$54207	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	15	116	733.33%	15	116	773.33%
Public Services	Homeless Non-Homeless Special Needs	CDBG: \$54207	Homeless Person Overnight Shelter	Persons Assisted	384	294	76.56%	384	294	76.56%
Public Services	Homeless Non-Homeless Special Needs	CDBG: \$54207	Homelessness Prevention	Persons Assisted	42	10	23.81%	42	10	23.81%

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.

The 2019 Annual Action Plan projects coincide with and meet the 2019-2023 Consolidated Plan goals and objectives. The City of Farmington identified five (5) priority needs in the 2019-2023 Consolidated Plan. During the 2019 program year the following activities met a priority need:

1. Homelessness: this includes veterans, homeless families with children, victims of domestic violence, youth, and severely mentally ill.

- People Assisting the Homeless (PATH) provided overnight shelter services and meals for homeless persons.
- San Juan County Partnership Housing Assistance Program provided emergency rental assistance to prevent homelessness.
- The New Beginnings Program (Navajo United Methodist Center) provided transitional housing for homeless persons who had been displaced due to domestic violence circumstances.
- Masada House provided transitional housing for homeless women recovering from substance abuse.
- Financial literacy and credit repair classes were offered to PATH's homeless clients during the first quarter of 2019.

2. Special Needs Populations: include the elderly and frail elderly, persons with substance abuse, the severely mentally ill, victims of domestic violence and abuse, and the disabled.

- The New Beginnings Program (Navajo United Methodist Center) provided shelter for homeless persons who had been displaced due to domestic violence circumstances.
- Identity, Inc! provided counseling services to abused/neglected LGBTQ youth to further suicide prevention.
- Disabled persons will benefit from parking lot ADA Improvements at Sycamore Park Community Center and the Recreation Center. The parking lot project at Sycamore Park has been completed; however, due to the pandemic, the facility remains closed to the public. The Recreation Center parking lot project is currently underway.
- Completion of the multi-use pathway project means Broadway Bridge is now ADA accessible.

3. Community Facilities: is a need throughout the community to serve low-to-moderate income households, special needs populations, and homeless persons.

- Disabled persons will benefit from parking lot ADA Improvements at Sycamore Park Community Center and the Recreation Center. The

parking lot project at Sycamore Park has been completed; however, due to the pandemic, the facility remains closed to the public. The Recreation Center parking lot project is currently underway.

- Improvements to bring restrooms into compliance with ADA standards are underway at the Indian Center and Recreation Center.
- The Indian Center provides access to social services for low-to-moderate income people. The shower-to-storage conversion project, currently in construction, will allow staff to operate the kitchen, often at full capacity, and conduct coronavirus cleaning practices more efficiently.

4. Infrastructure: include street improvements, water system improvements and transportation facility improvements.

- Completion of the multi-use pathway project means Broadway Bridge is now ADA and bike accessible.

5. Low-to-Moderate Income Households: include a variety of needs.

- Big Brother Big Sisters provided mentoring and educational assistance for LMI youth.
- San Juan College offered daycare services for LMI students.

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	140
Black or African American	13
Asian	1
American Indian or American Native	229
Native Hawaiian or Other Pacific Islander	0
Total	383
Hispanic	47
Not Hispanic	336

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

Narrative

Please note that the numbers in this section correspond to individual beneficiaries. The racial and ethnic composition of persons assisted is based on subrecipients' activities. Project managers keep track of the number and racial/ethnic background of beneficiaries in their CDBG-funded activities. Subrecipients submit this information to the CDBG Division in their quarterly reports.

The table above is automatically generated with predetermined racial groups. The following race categories not shown on the table are as follows: Multi-racial: 26 (1 Hispanic); Black or African American and White: 1.

Through Public Service projects, the Farmington CDBG program assisted a total of 410 persons.

Additionally, as specified in CR-05, there are three Capital projects in the construction stage (two from the AAP 2019; one from the 2018 AAP). Two ADA projects were completed in 2019: Sycamore Park Community Center and the Broadway Bridge multi-use pathway. These improvements are now available to 262 physically disabled persons in Census Tract 1, 363 in Tract 2.05 and 485 in Tract 4.02.

The American Community Survey disability table does not classify persons by race and/or 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	363,255	229,474

Table 3 - Resources Made Available

Narrative

From October 1, 2019 to September 30, 2020, the City of Farmington expended \$229,474.37 in CDBG funds for Capital and Public Service projects, as well as for Planning and Administration of the grant. This is in contrast to \$110,443.23 expended during the 2018 program year. The increase in spending is due to the implementation of several Capital projects in 2019, as opposed to none in 2018.

Identify the geographic distribution and location of investments

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description
City of Farmington's Metropolitan Development Area			
Low Mod Targeted Neighborhood	65	65	

Table 4 – Identify the geographic distribution and location of investments

Narrative

All CDBG funds were used within the boundaries of the City of Farmington.

Public Service projects were clientele-based, as opposed to location-based.

Even though Capital projects were both clientele- and location-based, the City prioritized activities in low- and moderate-income areas, allocating 100% of Capital funds toward such areas.

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.

While there is no specific requirement for leveraging CDBG grant funds, the City has found that subrecipients typically leverage other grant funds and private funds through their organizations. The 2019 Annual Action Plan project contracts had no required matching funds.

2019 Annual Action Plan Capital projects were leveraged with staff time, as it generally happens, as projects were managed and construction supervised through the Community Works and Parks, Recreation and Cultural Affairs Departments. The projects, whether completed or underway, are focused on the Consolidated Plan's goals of 'Infrastructure' and 'Community Facilities' to address needs of low- and moderate-income households and special needs populations. The projects are based on bringing existing public facilities into compliance with inclusive accessibility standards, increasing walkability and bikeability in low- and moderate-income neighborhoods, and facilitating operational activities within public buildings.

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
Total	0	0

Table 5 – Number of Households

	One-Year Goal	Actual
Number of households supported through Rental Assistance	9	26
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
Total	9	26

Table 6 – Number of Households Supported

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

While there are sufficient numbers of households with unmet housing needs, the City did not utilize any CDBG funds for rehabilitation or a new housing project. Though annual CDBG funding is limited to support such projects, the City continues to encourage and assist affordable housing initiatives. For example, the CDBG-funded affordable rental housing project is on a long-term review program, and CDBG staff annually monitors and ensures compliance with contract requirements and federal regulations. Additionally, the San Juan County Partnership subrecipient provides emergency

rental assistance to low- and moderate-income families. It addresses affordable housing and critical housing needs by providing rapid rehousing services for homeless persons, as well as preventing homelessness for people struggling to meet financial obligations. Eligible beneficiaries in the City of Farmington earned less than 80% MFI. Households with and without children were assisted with the first month’s rent, security deposits, and utility deposits. These households remain in permanent supportive housing in the City.

Note: the table above reflects the total number of beneficiaries assisted in a total of 14 households.

Discuss how these outcomes will impact future annual action plans.

The City’s Annual Action Plan outcome will continue to have a positive impact on the community by ensuring that the special needs population will be served as a priority. The Analysis to Impediments to Fair Housing Choice, Affordable Housing Plan for Northeast San Juan County, Housing Needs Assessment, Affordable Housing Ordinance, and the upcoming updates to the Unified Development Code and Farmington Comprehensive Plan will be used to guide the City in planning for affordable housing development. In addition, staff will continue to work on identifying projects in the future to assist special needs persons, including making funds available for public service projects.

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	17	0
Low-income	9	0
Moderate-income	0	0
Total	26	0

Table 7 – Number of Households Served

Narrative Information

The 2019 Action Plan subrecipient San Juan County Partnership provided funds to fourteen (14) households with twenty-six (26) persons in need of emergency rental assistance. All 14 families met the MFI criteria.

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

During the 2019 program year, CDBG funded five (5) public service projects that provided assistance to prevent and/or tackle homelessness:

- People Assisting the Homeless (PATH) provided emergency shelter services such as temporary shelter, food, and clothing for the homeless. They also provided counseling and basic life skill classes regarding parenting, budget management, employment, health, and social skills. PATH addressed chronic homelessness by providing transitional housing, treatment, and training to homeless individuals to re-enter the traditional housing market.
- A second project by PATH involved offering financial literacy and credit repair classes to homeless clients during the first quarter of 2019.
- San Juan County Partnership provided emergency rental assistance with rapid rehousing and eviction prevention for people at risk of homelessness. In addition, SJCP assisted the families by connecting them to federal and state resources.
- The New Beginnings Program provided shelter to individuals and families who were displaced due to domestic violence circumstances. Staff also offered case management, training for finding employment, and various life skills classes.
- Masada House operated a transitional housing program for homeless women recovering from substance abuse. Participants were offered case management, training to enter the job and housing market.

Addressing the emergency shelter and transitional housing needs of homeless persons

People Assisting the Homeless provided emergency shelter services such as temporary shelter, food, and clothing for the homeless. PATH addressed chronic homelessness by providing transitional housing, treatment, and training to homeless individuals to re-enter the traditional housing market.

The New Beginnings Program prevented domestic violence survivors from being homeless with transitional housing for up to 12 months, while supporting savings and employment skills needed for independence. Equally, the Masada House program provided homeless women having suffered from substance abuse with a transitional home while offering personal development courses.

The majority of the social service agencies in the community work collaboratively to reach out to homeless persons and provide individual assessments.

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

PATH provided an emergency shelter, a transitional living facility, and daily meals to the homeless. For residents of the emergency shelter and the transitional living facility, PATH provided guidance and support to prevent homelessness in the future. Weekly group/individual meetings were scheduled to provide education on housing, budgeting, nutrition, employment, and health care. Residents could take advantage of learning basic computer literacy, learning how to save money, learning skills for living independently, and have the use of a daycare while job searching.

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

The PATH program provided both an emergency shelter, with a transitional living apartment on their campus. The residents of the emergency shelter and the transitional living facility were provided guidance and support to prevent homelessness in the future. Weekly group/individual meetings were scheduled to provide education on housing, budgeting, nutrition, employment, and health care. Residents could take advantage of learning basic computer literacy, learning how to save money, learning skills for living independently, and have the use of a daycare while searching for employment.

By definition in the McKinney-Vento Homeless Assistance Act, SJCP benefitted people who are literally homeless or at risk of homelessness with outreach services and financial assistance in the form of utility deposits, security deposits, rental assistance and eviction prevention.

The New Beginnings Program offered displaced families and individuals a safe, community-based living environment, for up to a year. The emphasis was on breaking the cycle of violence, being safe and becoming independent. Support services included helping resident locate and secure permanent housing and employment while providing life skills and independent living assistance.

Masada House offered homeless people recovering from substance abuse a safe, secure home in which to live and practice the skills taught to them in treatment to allow them to become productive members of the community. The program worked to address the needs and development of beneficiaries. They provided in-house training and life skills.

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

Actions taken to address the needs of public housing

Public housing in San Juan County exists in the form of Section 8 vouchers issued by the San Juan County Housing Authority. According to this public housing authority, there are currently 241 HUD vouchers being utilized in the county, with a majority of them being allocated to Farmington residents. In the previous program year, 81% of all San Juan County vouchers were within the city limits.

The City of Farmington does not have public housing available due to the limited amount of CDBG grant funding. With the variety of needs identified, it is not possible to create a public housing project at this time. According to the HUD USER Low-Income Housing Tax Credit (LIHTC) database, there are seven (7) low-income apartment complexes within Farmington with a combined 331 low-income units.

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

There is no public housing in the City of Farmington.

Actions taken to provide assistance to troubled PHAs

There are no public housing authorities (PHAs) in the City of Farmington, and no problems have been identified regarding San Juan County PHA's operating procedures. Nonetheless, City staff complements monitoring of CDBG-assisted affordable housing units under the HUD voucher program.

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 City of Farmington continues to identify and address barriers to affordable housing in order to increase the availability of affordable housing units. The 2019 Action Plan did not include specific actions that address barriers to affordable housing. However, in contrast to last year, one more public service project offering housing assistance was funded through the CDBG program.

Additionally, the City continually updates its zoning regulations and zoning map purposely to increase the support of the availability of affordable housing in the City. Land availability is an issue in Farmington. The Navajo Nation, as well as numerous State and Federal properties surround the City.

During the 2019 program year, the City has worked with consultants to update the Farmington Comprehensive Plan. The following recommendations have been incorporated to the draft:

- Develop and adopt a housing policy incorporating inclusionary guidelines for residential development projects.
- Continue the development of strategies for infill and redevelopment activities, such as flexibility in development regulations, exemption of development fees, and allocation of grants, particularly for affordable housing.
- Develop a retrofit program to help increase the number of energy-efficient, age-in-place homes.

The City has also recommended changes to the Unified Development Code. The draft now includes allowing rental apartments on single-family lots to have separate utility meters.

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

There is an underserved need across most categories, including the homeless, special needs populations, and low-income residents. A major obstacle to meeting these needs is the lack of funding required to provide solutions. The 2019 Action Plan strategically placed an emphasis on projects that had the most impact for high needs populations. This means that an emphasis was placed on projects that utilize a high degree of coordination with other agencies that meet the highest-rated needs, and that had a measureable impact on the persons served.

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

There are no Action Plan projects related to lead-based paint and the City does not intend to fund renovations. However, the San Juan County Partnership, a subrecipient, provides emergency rental

assistance to families within the City. As part of their program, they have taken the lead-based paint visual inspection training and apply testing on apartment rentals for their clientele, including CDBG-funded beneficiaries.

The City updated its CDBG contract template to include the Section 3 clause in all applicable solicitations and contracts over \$100,000. Section 3 requirements apply to new construction and rehabilitation activities, including demolition and lead-based paint abatement.

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

The 2019 Action Plan reduced the number of poverty-level families through the implementation of funding for the Public Services projects. These projects have provided support for households by assisting them to self-sufficiency, allowed families to access new opportunities, and provided the support and education needed to ameliorate their economic situation.

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

The planning and administration of CDBG funds have allowed the City to monitor and guide the implementation of goals. This guidance has ensured that the City meets its obligations as outlined by HUD.

The City of Farmington's Mayor and City Council serves as the legislative, policy-making and administrative body governing the City. The Mayor and City Council performs legislative and quasi-judicial functions, which include adopting ordinances and resolutions for the safety, health, and well-being of the community.

The Mayor and City Council appoints a City Manager to carry out the policy directions of the City Council and to supervise and coordinate the work of department staff. With the exception of the City Attorney and the City Clerk, the City Manager has line authority over all City departments. The Community Works Department, which administers the CDBG program, is one of these departments.

Actions to continue developing institutional structure included:

- Providing data and updates through the appropriate channels to Mayor and City Council to ensure that they were well-informed of the CDBG Program and could make decisions accordingly.
- Implementing the 2019-2023 Consolidated Plan and the 2019 Annual Action Plan for the CDBG program.
- Continue engaging with former subrecipients for long-term monitoring accountability.
- Training and technically assisting subrecipients on the CDBG process, answering questions and applying 2 CFR 200 requirements in contract amendments and program monitoring in compliance with HUD policies.

All development in the City must comply with the City's 2020 Comprehensive Plan. Chapter 7, Housing, provides the following overarching goal: "Promote quality, affordable, and safe housing that meets the needs of the community and assures implementation of sound standards for orderly development and growth."

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

Coordination among all providers was essential in improving the conditions and addressing service gaps for the City's citizens. Actions to enhance coordination between public and private housing and social service agencies included:

- Awarding CDBG funds to eligible projects for housing and social services (e.g. homelessness prevention, transitional housing, and rental assistance).
- Encouraging agencies to work together to apply for CDBG funds to leverage resources to the fullest extent.
- Discussing the potential of CDBG funds in housing and social service programs with agencies interested in participating in the program.
- Facilitating the communication between housing assistance subrecipients and social service agencies for data sharing.

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 2019 Analysis of Impediments to Fair Housing Choice list the City of Farmington's impediments and recommended actions. There are two (2) private sector and four (4) public sector impediments; the City is currently working on the recommended actions for fair housing.

Private Sector Impediments:

- Impediment 1: Frequent denial of home purchase loans to American Indian applicants - Financial literacy and credit repair classes were offered this program year. Classes provided budget and credit counseling, which are considered a high priority need in the community. The classes were offered to 99 clients of the PATH homeless shelter.
- Impediment 2: Inadequate fair housing education and awareness in the community - The City adopted a resolution to declare April 2020 as Fair Housing Month. Staff will continue to provide educational outreach activities to affirmatively further fair housing at the Annual San Juan County Home Builder Expo. Due to the pandemic, the expo was cancelled this year, but posters were posted for the public at City Hall and the Community Works Department.

Public Sector Impediments:

- Impediment 1: Nimbyism (“Not in My Backyard”) attitudes regarding locations of new multi-family and affordable housing projects - The City has worked with consultants to update the Farmington Comprehensive Plan, and has included in the draft the recommendation of developing and adopting a housing policy incorporating inclusionary guidelines for residential development projects.
- Impediment 2: Lack of affordable housing for low and moderate income minority households - The City has worked with consultants to update the Farmington Comprehensive Plan, and has included in the draft the recommendation of continuing the development of strategies for infill and redevelopment activities, such as flexibility in development regulations, exemption of development fees, and allocation of grants, particularly for affordable housing.
- Impediment 3: Segregation of Hispanics in Census Tract 1 - As part of the overall assessment of land parcels in the City, staff will continue to monitor these census tracts. Staff will continue to review planning petitions that are requesting zone changes and special use permits to residential areas within the City.
- Impediment 4: Segregation of American Indians in Census Tracts 4.02, 5.03, and 6.07 - As part of the overall assessment of land parcels in the City, staff will continue to monitor these census tracts. Staff will continue to review planning petitions that are requesting zone changes and special use permits to residential areas within the City.

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 City of Farmington monitors the CDBG program and projects by the following:

- **Subrecipient Training:** City staff works with the management and case workers of partner agencies to ensure that all key personnel understand their contract's scope of services, pertinent Federal Regulations, and accomplishment reporting. Training occurs after contracts are signed in order to provide important information and answer any questions subrecipients may have regarding the CDBG program.
- **On-site Monitoring and Information Monitoring:** Staff has developed a multi-page monitoring worksheet. This worksheet includes a wide variety of review questions and a regulation compliance checklist. The partner agency is provided a copy of the worksheet and an appointment is made for an on-site visit. During that visit, case files are reviewed, the worksheet is filled out, and any findings or concerns are noted. A copy of the final worksheet is provided to the partner agency for their review. Any findings or concerns will be corrected and documentation of the correction/revision are kept in the project file. On-site monitoring takes place a minimum of once a year. In addition to the on-site monitoring informal monitoring such as phone calls and emails are also made to follow-up on specific issues and to maintain consistent communication with subrecipients. During the 2019 program year, a desk review replaced the on-site review to comply with safety measures during the pandemic.
- **Invoice Monitoring:** All partner agencies are required to submit documented invoices for CDBG payments. The documentation must include justification of paid expenses and required accomplishments. City staff reviews the invoices to ensure that they are both eligible and reasonable costs. This is the most frequent type of monitoring which occurs monthly and quarterly.
- **Timeliness Monitoring:** City staff monitors project expenditures to ensure that funds are being drawn down in a timely manner and to ensure contract compliance. This monitoring is on-going through the year.
- **Accomplishment Reporting for goals and objectives:** All contracts for CDBG projects include in the scope of services, a requirement to provide an end of the year accomplishment report. These include all data required to report accomplishments in HUD's IDIS web page. These reports are typically due 10 days after the end of the fiscal year.
- **CAPER:** The Consolidated Annual Performance Evaluation Report (CAPER) includes a summary of the year's monitoring efforts. This report is prepared by the staff, made available to the public for review and comment, presented to and adopted by the City Council, and submitted to HUD for Federal review. The CAPER focuses on accomplishments, financial reporting, and compliance with Federal regulations.

- Long-Term Monitoring for Capital Projects: The City of Farmington has developed some CDBG projects that have long-term compliance requirements such as the development of affordable housing, the operation of facilities, and liens on properties that are forgivable over time. The long-term monitoring happens once a year in the fall. For instance, the affordable rental housing project was monitored for compliance with federal regulations and the City agreement. This included National Objective requirements, record keeping systems, property acquisition, fair market rental caps, and conformance with tenant income eligibility.

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 Citizen Participation Plan describes how the City of Farmington will involve residents in the planning, implementation and assessment of how the CDBG funds are to be used. The Citizen Participation Plan documents the processes and public involvement for the development of the Consolidated Plan, the Annual Action Plans, and the Consolidated Annual Performance and Evaluation Reports (CAPER). All public meetings and hearings are publicized in accordance with applicable HUD, state, and local regulations.

All applicable citizen participation requirements were met to finalize the 2019 CAPER. A public hearing will be held with the City Council on December 8, 2020, for adoption of the CAPER by resolution. A 15-day public review and comment period beginning November 23, 2020 through December 8, 2020, has been noticed in English and Spanish in the Daily Times newspaper. CAPER copies and bilingual notices for the public review and hearing were made available at City Hall, the Community Works Department, and the City of Farmington website. Notices and report copies commonly available at other public buildings were not distributed this year, as these facilities remain closed to the public due to the ongoing pandemic.

The opportunity for auxiliary aid or service is included in the public notification. In addition, staff makes reasonable efforts to provide language assistance to ensure meaningful access for Limited English Proficiency (LEP) persons. Staff is proficient in Spanish, and oral interpretation of documents is available upon request. In addition, an interpreter may be provided for inquires in other languages, including Navajo.

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.

There were no changes made to the 2019-2023 Consolidated Plan objectives in the program year 2019.

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

No

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