City of Greeley Colorado

HOUSING SOLUTIONS

OMB Control No: 2506-0117 (exp. 09/30/2021)

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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 City of Greeley is an entitlement community under the U.S. Department of Housing and Urban Development (HUD) and receives annual funding through the Community Development Block Grant (CDBG) and HOME Investment Partnerships (HOME) programs. For Program Year 2025, the City received $776,330.00 in CDBG funding and $382,131.88 in HOME funding to support housing and community development activities that benefit low- and moderate-income residents.

This Consolidated Annual Performance and Evaluation Report (CAPER) summarizes accomplishments and progress made during Program Year 2025 (January 1, 2025 – December 31, 2025), in alignment with the goals identified in the City's Consolidated Plan and Annual Action Plans.

Program Year 2025 reflects a unique implementation period for the City. Due to delays in the receipt of the FY2024 entitlement allocation, the City primarily focused on implementing activities funded under the 2024 Annual Action Plan during Program Year 2025. As a result, the accomplishments reported in this CAPER largely reflect progress on 2024-funded projects rather than activities planned under the 2025 allocation.

For Program Year 2024, the City received **$840,613 in CDBG funding** and **$373,292.31 in HOME funding**, which were substantially implemented during Program Year 2025.

The 2024 Action Plan represented the final year of the City's 2020–2024 Consolidated Plan and prioritized investments in:

- Affordable housing development and preservation
- Public services supporting housing stability and vulnerable populations
- Neighborhood infrastructure improvements in low- and moderate-income areas

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- Public facilities and services addressing homelessness and special needs populations

Despite timing challenges, the City made measurable progress in advancing these priorities and strengthening partnerships with local service providers, nonprofit organizations, and housing developers. These efforts contributed to improved housing stability, expanded access to essential services, and continued investment in Greeley's low- and moderate-income communities.

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 Development	Affordable Housing	CDBG: $ / HOME: $	Rental units constructed	Household Housing Unit	15	0	0.00%	3	0	0.00%
Affordable Housing Development	Affordable Housing	CDBG: $ / HOME: $	Rental units rehabilitated	Household Housing Unit	45	0	0.00%	9	0	0.00%
Economic Development	Non-Homeless Special Needs Non-Housing Community Development	CDBG: $	Jobs created/retained	Jobs	48	0	0.00%	9	0	0.00%

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Economic Development	Non-Homeless Special Needs Non-Housing Community Development	CDBG: $	Businesses assisted	Businesses Assisted	12	0	0.00%	3	0	0.00%
Homeless Prevention and Rapid Re-Housing	Homeless Non-Homeless Special Needs	CDBG: $ / HOME: $	Tenant-based rental assistance / Rapid Rehousing	Households Assisted	200	0	0.00%	40	0	0.00%
Homeless Prevention and Rapid Re-Housing	Homeless Non-Homeless Special Needs	CDBG: $ / HOME: $	Homeless Person Overnight Shelter	Persons Assisted	860	0	0.00%	175	0	0.00%
Homeowner Rehabilitation	Affordable Housing	CDBG: $ / HOME: $	Homeowner Housing Added	Household Housing Unit	15	0	0.00%	3	0	0.00%
Homeowner Rehabilitation	Affordable Housing	CDBG: $ / HOME: $	Homeowner Housing Rehabilitated	Household Housing Unit	75	0	0.00%	15	0	0.00%
Homeowner Rehabilitation	Affordable Housing	CDBG: $ / HOME: $	Housing Code Enforcement/Foreclosed Property Care	Household Housing Unit	8	0	0.00%	2	0	0.00%
Planning and Administration	Administration	CDBG: $ / HOME: $	Other	Other	0	0				
Public Facilities	Homeless Non-Housing Community Development	CDBG: $ / HOME: $	Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit	Households Assisted	1180	0	0.00%	236	0	0.00%

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Public Services	Homeless Non-Homeless Special Needs Non-Housing Community Development	CDBG: $	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	250	0	0.00%	50	0	0.00%
Public Services	Homeless Non-Homeless Special Needs Non-Housing Community Development	CDBG: $	Public service activities for Low/Moderate Income Housing Benefit	Households Assisted	750	0	0.00%	150	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.

The City of Greeley utilized CDBG and HOME funds to address the priority needs identified in the 2020–2024 Consolidated Plan, with a primary focus on housing stability, services for vulnerable populations, and improving living conditions in low- and moderate-income areas. During Program Year 2025, the City's use of funds strongly aligned with its highest priority objectives, particularly those related to homelessness and housing stability. A significant portion of CDBG funding supported public service activities that provided essential assistance to individuals and families experiencing housing instability, including emergency shelter operations, case management, and supportive services. Programs such as the Cold Weather Shelter, A Woman's Place, Catholic Charities Guadalupe Center, and Senior Resource Services collectively served 145 individuals of low- and moderate-income residents, helping to address immediate housing needs and improve overall well-being In addition to public services, the City continued to support affordable housing development and homeownership activities through HOME funding. While unit production was limited during the program year, progress was made on ongoing projects, including the development of new affordable housing units and homebuyer assistance programs, which remain critical to addressing long-term housing needs in the community. The City also invested in public infrastructure improvements in eligible areas to enhance neighborhood conditions and accessibility, supporting the broader goal of

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creating suitable living environments. Due to delays in the receipt of FY2024 entitlement funding, expenditures during Program Year 2025 primarily reflect the implementation of activities funded under the 2024 Annual Action Plan. Despite this timing shift, the City effectively deployed resources in a manner consistent with its established priorities and demonstrated measurable progress in addressing the needs of low- and moderate-income residents.

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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)

During Program Year 2025, the City of Greeley provided assistance to a diverse population of households through its CDBG and HOME programs. The racial and ethnic composition of families assisted reflects both the demographic diversity of the community and the City's efforts to ensure equitable access to housing and community development resources.

Under the CDBG program, a total of 858 households were assisted. Of these, the majority identified as White (605 households), followed by Black or African American (46 households), American Indian or Alaska Native (17 households), Native Hawaiian or Other Pacific Islander (11 households), and Asian (2 households).

Under the HOME program, a total of 94 households were assisted. Among these, 73 households identified as White, 19 as Black or African American, and 1 household each as Asian and American Indian or Alaska Native.

In terms of ethnicity, 182 CDBG-assisted households identified as Hispanic, while 676 identified as non-Hispanic. For the HOME program, 55 households identified as Hispanic, and 60 as non-Hispanic.

Overall, these figures demonstrate that the City's programs are serving a broad cross-section of residents, including minority and Hispanic populations. The City remains committed to affirmatively furthering fair housing and ensuring that outreach, program design, and service delivery continue to be inclusive and responsive to the needs of all racial and ethnic groups within the community.

	CDBG	HOME
White	605	73
Black or African American	46	19
Asian	2	1
American Indian or American Native	17	1
Native Hawaiian or Other Pacific Islander	11	0
Other multi Race	178	21
Total	858	115
Hispanic	182	55
Not Hispanic	676	60

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

Narrative

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During Program Year 2025, the City of Greeley provided assistance to a diverse population of households through its CDBG and HOME programs. The demographic distribution of families assisted reflects both the composition of the community and the City's ongoing commitment to equitable access to housing and community development resources.

As reflected in Table 2, the majority of households assisted identified as White; however, a meaningful portion of program beneficiaries also included Black or African American, American Indian or Alaska Native, Asian, and Native Hawaiian or Other Pacific Islander households.

Hispanic households represented a significant share of those served across both CDBG and HOME programs, indicating that program outreach and service delivery are effectively reaching a key demographic group within the community.

The data demonstrates that the City's programs are serving a broad cross-section of residents, including minority and traditionally underserved populations. The City continues to prioritize inclusive outreach, equitable program design, and partnerships with community-based organizations to ensure that all eligible households particularly those facing barriers to access are able to benefit from available resources.

These efforts support the City's commitment to affirmatively furthering fair housing and promoting equal access to housing opportunities for all residents.

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	840,613	
HOME	public - federal	1,454,422	

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
Greeley - Citywide	40		
Greeley QCTs (Area 1)	60		

Table 4 – Identify the geographic distribution and location of investments

Narrative

The City of Greeley's investments during Program Year 2025 were distributed across both citywide programs and targeted geographic areas, consistent with the priorities identified in the Consolidated Plan. A significant portion of CDBG funding supported public service activities and housing programs that are available to income-eligible residents on a citywide basis. These include emergency shelter operations, domestic violence services, housing navigation, and senior support services. While these programs are not confined to a single geographic location, they primarily benefit low- and moderate-income individuals and households throughout the community. In addition to citywide services, the City invested in activities located within low- and moderate-income areas, including infrastructure improvements and neighborhood-based projects. These investments were targeted to eligible census tracts and are intended to improve living conditions, accessibility, and overall neighborhood quality. HOME-funded activities were primarily site-specific and focused on the development and support of affordable housing units. These investments are tied to specific project locations but contribute to the City's broader goal of expanding affordable housing opportunities. Due to delays in the receipt of FY2024 funding, the geographic distribution of expenditures during Program Year 2025 reflects the implementation of 2024-funded activities. Despite this timing shift, investments remained consistent with the City's strategy to prioritize low- and moderate-income areas and populations most in need.

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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.

The City of Greeley strategically utilizes CDBG and HOME funds to leverage additional public, private, and nonprofit resources in order to maximize the impact of federal investments and address identified community needs.

CDBG-funded activities are designed to encourage substantial leveraging from non-federal sources. Public service agencies receiving CDBG funds including Catholic Charities (Guadalupe Community Center), Senior Resource Services (60+ Ride), and Greeley Transitional House—supplement federal funding with private donations, foundation support, volunteer labor, and other grant resources. These additional contributions expand the capacity of each program, allowing services such as case management, transportation assistance, and transitional housing support to reach more low- and moderate-income residents.

City-led activities also demonstrate leveraging through coordination with local resources. For example, the Clean-Up Weekend Program combines CDBG funding with City staff time, volunteer participation, and in-kind support to address neighborhood conditions, reduce code violations, and improve quality of life in low- and moderate-income areas. Similarly, administrative activities funded through CDBG and HOME represent an investment in staff capacity necessary to effectively manage, oversee, and implement federally funded programs, ensuring compliance and maximizing the impact of all leveraged resources.

HOME-funded activities play a critical role in leveraging larger affordable housing investments. The Hope Springs project, led by Greeley-Weld Habitat for Humanity, is a strong example of this approach. HOME funds are used to support development costs such as water and sewer tap fees and building permits, helping to fill financing gaps and enable construction. This project leverages substantial additional investment through private financing, construction partnerships (including Baessler Homes and Alquist 3D), donated materials, and community contributions. Once complete, the development will provide 174 affordable homeownership units serving households earning between 30–80% of Area Median Income.

The HOME Investment Partnerships Program requires a 25 percent non-federal match. The City meets this requirement through a combination of eligible contributions, including donated goods, private and corporate funding, and other non-federal sources. Consistent with prior years, while volunteer labor is an eligible form of match, the City does not currently include volunteer hours in its match calculations.

The City also leverages publicly owned land and facilities, where applicable, to support service delivery and community-based activities. The use of publicly controlled sites helps reduce overall project costs and supports long-term community benefit.

Due to the delayed receipt of FY2024 entitlement funds, leveraging activities reported in Program Year 2025 primarily reflect projects funded under the 2024 Annual Action Plan. Despite this timing shift, the City continues to effectively use federal funds as a catalyst to attract and coordinate additional resources in support of its housing and community development goals.

Fiscal Year Summary – HOME Match	
1. Excess match from prior Federal fiscal year	0
2. Match contributed during current Federal fiscal year	0
3. Total match available for current Federal fiscal year (Line 1 plus Line 2)	0
4. Match liability for current Federal fiscal year	51,533.20
5. Excess match carried over to next Federal fiscal year (Line 3 minus Line 4)	0

Table 5 – Fiscal Year Summary - HOME Match Report

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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**
Hope Springs-IDIS Activity# 416	2024	$4,500,000.00	0	8,200,000.00	0	0		$12,700,000.00
2023 StarRise Demolition and Construction at North Weld Village Activity#400	2022	$416,069.10	0	0	0	0	0	$416,069.10

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 $**
$363,218.58	0	$48,402.93	0	$160,678.50

Table 7 – Program Income

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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

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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

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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	5	14
Number of Non-Homeless households to be provided affordable housing units	50	22
Number of Special-Needs households to be provided affordable housing units	5	9
Total	**60**	**14**

Table 11 – 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	35	36
Number of households supported through Rehab of Existing Units	5	0
Number of households supported through Acquisition of Existing Units	20	0
Total	**60**	**36**

Table 12 – Number of Households Supported

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

Several factors contributed to differences between projected goals and actual outcomes:

- **Delayed Funding and Implementation Timing:**
  Program Year 2025 activities were significantly impacted by delays in the release of prior-year (2024) entitlement funds, resulting in a compressed implementation timeline.
- **Development and Construction Timelines:**
  Affordable housing projects, particularly new construction, require extended timelines. While progress was made, not all planned units were completed within the reporting period.

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- **Organizational Restructuring and Capacity Constraints:**
  The transition of program administration from GURA to the City's Housing Solutions Department, along with staffing and coordination challenges, affected the City's ability to fully implement all planned activities, particularly rehabilitation and acquisition programs.
- **Strategic Shift in Program Priorities:**
  The City prioritized advancing new construction projects and addressing urgent housing needs through supportive services, which resulted in stronger outcomes in unit production and services, but lower activity in other categories.
- **Data and Reporting Limitations:**
  Some households served through supportive services and housing stabilization efforts are not fully captured within IDIS housing unit production metrics, resulting in discrepancies between total households served and reported outcomes.

Discuss how these outcomes will impact future annual action plans?

The outcomes and challenges experienced during Program Year 2025 will directly inform future planning and implementation strategies:

- **Improved Project Pipeline Management:**
  The City will prioritize early project identification, underwriting, and readiness to ensure timely expenditure and completion of housing activities.
- **Reintroduction and Strengthening of Rehabilitation and Acquisition Programs:**
  Future Action Plans will rebalance investments to include rehabilitation and acquisition activities to preserve existing affordable housing stock.
- **Enhanced Monitoring and Implementation Capacity:**
  The City is implementing standardized procedures, improved coordination with Finance, and enhanced project tracking systems to ensure timely execution and compliance.
- **Increased Focus on Measurable Outcomes:**
  Greater emphasis will be placed on aligning project goals with realistic timelines and ensuring that accomplishments are accurately captured in IDIS.
- **Continued Investment in Partnerships:**
  The City will continue leveraging partnerships with nonprofit organizations, developers, and service providers to expand capacity and maximize impact.
- **Strategic Alignment with Housing Needs:**
  Future funding cycles will be structured to better address gaps identified during this program year, including housing production, homelessness response, and housing stabilization services.

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Through these efforts, the City of Greeley is strengthening its ability to deliver affordable housing outcomes, improving internal systems, and building a more effective and responsive housing program for low- and moderate-income residents.

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	832	58
Low-income	15	22
Moderate-income	11	35
Total	858	115

Table 13 – Number of Households Served

Narrative Information

During Program Year 2025, the City of Greeley served a total of 973 households across its CDBG and HOME programs, with the majority of assistance directed toward extremely low-income households, consistent with HUD program priorities.

Under the CDBG program, a total of 858 households were assisted. Of these, 832 households (approximately 97%) were classified as extremely low-income (0–30% AMI), reflecting the City's strong focus on serving the most vulnerable populations through public service activities such as emergency shelter operations, homelessness services, domestic violence support, and transitional housing programs. An additional 15 households were classified as low-income (30–50% AMI), and 11 households as moderate-income (50–80% AMI), primarily benefiting from community-based services and neighborhood improvement activities.

Under the HOME program, a total of 115 households were assisted. Among these, 58 households were extremely low-income, 22 households were low-income, and 35 households were moderate-income. HOME-funded activities, particularly homeownership development projects such as Habitat for Humanity's Hope Springs, contributed to serving a broader range of income levels, including moderate-income households, while still maintaining a strong commitment to affordability.

Overall, the distribution of households served demonstrates that the City's programs are effectively targeting extremely low- and low-income populations, while also supporting pathways to homeownership and housing stability for moderate-income households. Income eligibility for all activities was determined in accordance with HUD requirements, using household income and family size to ensure compliance with program guidelines.

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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 City of Greeley conducts outreach to individuals experiencing homelessness through a dedicated Outreach Team that engages unsheltered individuals in the community. The team conducts field-based outreach to connect with individuals in encampments and other locations where unsheltered populations are present. Once individuals are engaged, the Outreach Team assesses their needs through direct interaction, including identifying housing barriers, service needs, and appropriate referrals. Individuals are then connected to available resources such as shelter, housing programs, and supportive services. As of December 30, 2025, the Outreach Team has served 1,155 individuals and provided 6,274 services since the program's inception, demonstrating the City's ongoing efforts to identify and support individuals experiencing unsheltered homelessness.

Addressing the emergency shelter and transitional housing needs of homeless persons

The City of Greeley addresses the emergency shelter needs of individuals experiencing homelessness through direct investment in shelter operations and coordination with local partners. In Program Year 2025, the City committed $1.2 million to support year-round emergency shelter services operated by United Way of Weld County, ensuring continued access to safe and stable shelter for individuals in need. The emergency shelter has the capacity to serve up to 60 individuals at a time and provides critical services during periods of housing instability. To further strengthen the community's response, the City has established a Memorandum of Understanding (MOU) with local partners to provide overflow shelter options during periods of extreme weather or when the primary shelter reaches capacity. This coordinated approach helps ensure that individuals are not left unsheltered during high-demand or emergency conditions. While the City's primary focus is on expanding access to permanent housing solutions, shelter services are integrated with supportive services and housing navigation efforts to help individuals transition out of homelessness as quickly as possible. Through these combined efforts, the City maintains a responsive and coordinated system to address immediate shelter needs while supporting pathways to long-term housing stability.

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

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The City of Greeley supports homelessness prevention and housing stabilization efforts through strategic partnerships with local nonprofit organizations that provide both direct financial assistance and critical supportive services to households at risk of homelessness. While Program Year 2025 activities primarily reflect the implementation of 2024-funded projects, the City continues to prioritize eviction prevention and shelter support as key strategies to reduce the inflow into homelessness, particularly among extremely low-income households.

Through CDBG funding, the City supported the United Way of Weld County, which administers coordinated services that connect vulnerable households to emergency assistance and community resources. A portion of this support contributes to shelter operations at A Woman's Place, a facility that provides safe, temporary housing and supportive services for women and families fleeing domestic violence. These services are critical in preventing homelessness among individuals who are at immediate risk due to unsafe living conditions.

In addition, the City continues to invest in prevention-focused strategies, including funding allocated to Neighbor to Neighbor for eviction prevention assistance to be implemented in the subsequent program year. Collectively, these efforts serve households that are at heightened risk of homelessness, including individuals being discharged from publicly funded institutions such as healthcare facilities, foster care systems, and correctional institutions, as well as those receiving assistance from agencies addressing housing, health, social services, employment, and education needs.

By combining shelter support, coordinated service delivery, and targeted prevention programs, the City helps stabilize vulnerable households, reduce displacement, and promote long-term housing stability for low- and moderate-income residents.

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

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

Actions taken to address the needs of public housing

Public housing in the City of Greeley is administered by the Greeley Housing Authority. While the City does not directly operate public housing, it works in coordination with the Housing Authority and community partners to support the needs of public housing residents and applicants.

During Program Year 2025, the Housing Authority implemented several operational improvements to enhance service delivery and accessibility. A key advancement was the transition to a new housing management software system. This upgraded platform allows residents and applicants to:

- access and manage their information through a secure online portal;
- submit applications and required documentation electronically;
- update personal information in real time; and
- communicate more efficiently with Housing Authority staff.

These improvements have increased accessibility, streamlined administrative processes, and enhanced overall service delivery for public housing residents.

In addition, the City supported low- and moderate-income households, including public housing residents, through CDBG-funded public service activities and partnerships with local nonprofit organizations. These efforts included services related to housing stability, homelessness prevention, and supportive services, which complement the work of the Housing Authority and contribute to improved outcomes for residents.

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

The Greeley Housing Authority actively encourages resident engagement and participation in housing programs and community initiatives. Residents are provided with opportunities to communicate with staff, share feedback, and participate in discussions related to policies, program changes, and community operations.

Residents are informed of opportunities to provide input through meetings, written communications, and direct engagement with Housing Authority staff. These efforts promote transparency, responsiveness, and a collaborative approach to program management, ensuring that resident perspectives are considered in decision-making processes.

At this time, the Housing Authority does not administer programs specifically designed to support residents in transitioning to homeownership. However, the agency recognizes the importance of homeownership as a pathway to long-term housing stability and financial independence. The Housing Authority continues to evaluate potential partnerships, funding opportunities, and program models that

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may support future services such as homeownership education, counseling, or assistance programs.

The City of Greeley complements these efforts by supporting broader housing initiatives and partnerships that promote self-sufficiency and expand access to homeownership opportunities for low- and moderate-income households. These efforts include the development of down payment assistance programs and coordination with local service providers offering housing counseling and financial education.

Actions taken to provide assistance to troubled PHAs

The Greeley Housing Authority is currently designated by HUD as a Troubled Public Housing Authority. The Housing Authority is actively working to address the conditions that led to this designation and has made progress toward improving its performance, with the goal of removing the designation in the upcoming year.

The Housing Authority continues to implement operational and administrative improvements, including enhancements to systems, process efficiencies, and increased engagement with residents and stakeholders. These efforts are intended to strengthen compliance, improve service delivery, and support overall program performance.

The City of Greeley maintains ongoing coordination and communication with the Housing Authority to support its improvement efforts. While the City does not have direct oversight of Housing Authority operations, it remains committed to collaboration and alignment in addressing community housing needs. The City also supports complementary housing and community development activities, including CDBG-funded public services and partnerships with local organizations, which contribute to housing stability and improved outcomes for residents served by the Housing Authority.

Through continued coordination and a shared commitment to addressing housing needs, both the City and the Housing Authority are working toward strengthening housing programs and improving outcomes for low- and moderate-income households.

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 Greeley has taken deliberate and ongoing steps to remove or mitigate the negative effects of public policies that act as barriers to affordable housing development. These efforts focus on improving regulatory efficiency, reducing development costs, and increasing overall housing supply particularly for low- and moderate-income households.

The City continues to evaluate and refine its land use regulations, zoning ordinances, fee structures, and development standards to improve project feasibility. This includes assessing how minimum lot sizes, density restrictions, parking requirements, and infrastructure standards may impact the cost and viability of residential development. As part of this effort, Greeley has engaged a consultant to conduct a comprehensive analysis of land use regulations, engineering standards, and building codes to identify opportunities for targeted reforms that support affordability while maintaining health and safety standards.

To address time-related cost barriers, the City has implemented an expedited development review process designed to shorten approval timelines, reduce carrying costs, and provide greater predictability for developers. This streamlined process supports both market-rate and affordable housing projects and reflects the City's commitment to improving the development environment.

In addition, the City has adopted a Housing Strategic Plan that prioritizes policies and incentives to expand the supply of housing for low- to moderate-income households. The plan includes a range of strategies such as regulatory flexibility, financial incentives, and partnerships with nonprofit and private developers to support project feasibility and long-term affordability. The City continues to align its funding priorities, including CDBG and HOME investments, with these strategic goals to maximize impact.

To further reduce administrative and procedural barriers, Greeley established a Housing Liaison service that serves as a central point of contact for developers and community partners. This service improves interdepartmental coordination, enhances communication, and assists applicants in navigating regulatory requirements, thereby reducing delays and uncertainty in the development process.

The City also collaborates with regional and state partners to identify additional opportunities to reduce barriers, including leveraging external funding sources, aligning local policies with

state housing initiatives, and participating in broader housing policy discussions. Collectively, these actions demonstrate Greeley's commitment to creating a more supportive regulatory environment that encourages investment in affordable housing and promotes equitable access to housing opportunities.

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

The City of Greeley has taken a coordinated and strategic approach to address obstacles that limit its ability to meet the needs of underserved populations, including low- and moderate-income households, individuals experiencing homelessness, and persons with special needs. Recognizing that barriers are both structural and capacity-related, the City has focused on strengthening internal systems, enhancing partnerships, and improving access to resources and services.

One of the primary obstacles identified has been limited administrative and organizational capacity among subrecipients, which can impact timely expenditure of funds and accurate reporting of outcomes. In response, the City has implemented enhanced technical assistance and oversight, including the development of standardized policies and procedures, improved onboarding and training for subrecipients, and clearer guidance on compliance requirements such as eligibility, documentation, and reporting. These efforts are designed to build long-term capacity and ensure that funded programs effectively serve target populations.

The City has also taken steps to improve coordination across departments and with external partners to better align housing and supportive services. Collaboration with local service providers, including those serving individuals experiencing homelessness, has strengthened referral systems and improved service delivery. Additionally, the City continues to align its CDBG and HOME investments with broader community strategies to address housing instability and homelessness, including prevention, rapid rehousing, and supportive housing initiatives.

Access to funding and project readiness has also been identified as a barrier for some community organizations. To address this, the City has refined its funding processes to provide clearer timelines, expectations, and evaluation criteria, helping applicants better prepare competitive proposals. The City is also working to ensure that funding is directed toward projects that are feasible, impactful, and aligned with community priorities, thereby reducing delays in implementation.

Internally, the City has worked to address challenges related to staffing transitions and organizational restructuring, which previously impacted program administration and data management. By increasing capacity through the use of consultants and strengthening coordination with the Finance Department, the City has made significant progress in reconciling financial data, improving drawdown processes, and ensuring more accurate tracking of expenditures and accomplishments.

Finally, the City continues to engage with community stakeholders to better understand emerging needs and gaps in services. Through ongoing outreach, collaboration, and data-informed decision-making, Greeley is working to ensure that its programs remain responsive and accessible to underserved populations.

These combined efforts reflect the City's commitment to removing barriers, improving service delivery, and ensuring that federal resources are effectively used to meet the needs of the community's most vulnerable residents.

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

During the program year, the City of Greeley did not directly fund or implement housing rehabilitation or other activities that would trigger lead-based paint hazard reduction work. However, the City remains committed to compliance with all federal lead-based paint regulations, including those outlined in 24 CFR Part 35.

For any applicable CDBG- or HOME-funded activities involving housing constructed prior to 1978, the City requires subrecipients and project partners to adhere to all lead-based paint requirements. This includes conducting appropriate lead hazard evaluations, implementing required mitigation or abatement measures, and ensuring the use of certified contractors trained in lead-safe work practices. The City also ensures that required disclosures and educational materials, such as the EPA's *Protect Your Family from Lead in Your Home* pamphlet, are provided to occupants as applicable.

Additionally, the City incorporates lead-based paint compliance into its program policies, subrecipient agreements, and monitoring processes. Staff and partners are informed of applicable requirements to ensure that any future projects involving rehabilitation or housing assistance are carried out in a manner that protects residents—particularly children under the age of six—from exposure to lead-based paint hazards.

As the City continues to expand its housing programs, including potential future rehabilitation activities, it will maintain and strengthen its compliance with lead-based paint regulations and ensure that all federally assisted housing activities prioritize resident health and safety.

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

The City of Greeley has implemented a range of strategies to reduce the number of families living in poverty by addressing housing stability, access to services, and economic opportunity. Recognizing that poverty is closely linked to housing cost burden and limited access to supportive resources, the City prioritizes the use of CDBG and HOME funds to assist low- and moderate-income households and improve overall quality of life.

During the program year, CDBG funds were allocated to public service activities that support vulnerable populations, including low-income individuals and families at risk of homelessness. These programs provide critical services such as case management, housing stability support, and access to essential resources, helping households maintain stable living conditions and avoid displacement. By supporting community-based organizations, the City strengthens the local safety net and expands access to services

that directly address the impacts of poverty.

The City also supports the development and preservation of affordable housing, which plays a key role in reducing housing cost burdens for low-income households. Investments in affordable housing projects and partnerships with nonprofit and private developers help increase the availability of safe, stable housing options, allowing families to allocate more of their income toward other essential needs such as food, healthcare, and education.

In addition, the City collaborates with local and regional partners to align housing efforts with broader economic and workforce initiatives. These partnerships aim to connect residents with employment opportunities, job training, and supportive services that promote long-term economic stability and self-sufficiency.

Internally, the City has worked to improve program delivery and fund utilization to ensure that resources are deployed more effectively and reach intended beneficiaries in a timely manner. Efforts to streamline processes, enhance coordination with the Finance Department, and strengthen subrecipient capacity have contributed to improved service delivery and outcomes.

Through these combined actions—supporting housing stability, funding essential services, and fostering economic opportunity—the City of Greeley continues to work toward reducing the number of families living in poverty and promoting pathways to self-sufficiency.

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

During the program year, the City of Greeley made significant progress in strengthening its institutional structure to more effectively administer CDBG and HOME programs and support community development efforts. Recognizing prior challenges related to organizational transitions, staffing changes, and coordination across departments, the City focused on building internal capacity, improving systems, and enhancing partnerships.

A key action was the continued transition of program administration from the Greeley Urban Renewal Authority (GURA) to the City's Housing Solutions Department. This restructuring required the development of new processes, roles, and workflows to ensure compliance with HUD requirements and effective program delivery. In response, the City has worked to establish clearer internal controls, improve coordination with the Finance Department, and define roles and responsibilities related to grant management, financial reporting, and compliance.

To further strengthen capacity, the City engaged consultants to support program administration, assist with reconciliation of financial data, and help advance stalled projects. This additional capacity has been critical in addressing legacy issues, accelerating project implementation, and ensuring timely expenditure of funds.

The City has also prioritized the development of standardized policies and procedures, including the

creation of Standard Operating Procedures (SOPs) for key functions such as draw requests, cash-on-hand reporting, subrecipient monitoring, and document management. These efforts are improving consistency, reducing risk, and enhancing overall program oversight.

In addition, the City has enhanced subrecipient engagement and capacity through improved onboarding, training, and technical assistance. Clear expectations for reporting, compliance, and performance have been established, supported by standardized templates and regular communication. These actions help ensure that partner organizations are better equipped to deliver services and achieve program outcomes.

The City continues to strengthen coordination across departments—including Housing Solutions, Finance, Public Works, and Community Development—as well as with external partners such as nonprofit organizations, housing developers, and regional agencies. These collaborative efforts improve alignment of resources, support more effective project implementation, and enhance the City's ability to respond to community needs.

Through these actions, the City of Greeley is building a more resilient and effective institutional structure that supports compliance, accountability, and the successful delivery of housing and community development programs.

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

During the program year, the City of Greeley continued to strengthen coordination between public agencies, private housing providers, and social service organizations to more effectively address housing and community development needs. Recognizing that collaboration is essential to serving low- and moderate-income residents, the City has prioritized building and maintaining strong partnerships across sectors.

The City works closely with local nonprofit organizations, housing developers, and service providers to align funding priorities and support the delivery of housing and supportive services. Through the administration of CDBG and HOME funds, the City supports partnerships with agencies that provide critical services such as homelessness prevention, housing stability, and supportive services for vulnerable populations. Regular communication and coordination with these partners help ensure that resources are deployed efficiently and that services are responsive to community needs.

Coordination has also been strengthened internally across City departments, including Housing Solutions, Finance, Public Works, and Community Development. This interdepartmental collaboration supports more effective project implementation, improves alignment between infrastructure investments and housing goals, and ensures compliance with federal

requirements.

The City continues to collaborate with regional and state partners, including housing finance agencies and other funders, to leverage additional resources and align local efforts with broader housing initiatives. Partnerships with developers and organizations involved in affordable housing production, including permanent supportive housing and homeownership opportunities, have been critical in expanding the supply of housing and addressing gaps in the housing continuum.

In addition, the City engages in ongoing communication with organizations serving individuals experiencing homelessness and those with special needs to improve coordination of services and housing placement efforts. These collaborations help strengthen referral networks, enhance service delivery, and promote more effective use of available resources.

To further support coordination, the City has implemented tools and processes that improve communication and transparency, including standardized reporting requirements, regular check-ins with subrecipients, and centralized points of contact such as the Housing Liaison. These efforts reduce duplication, streamline processes, and improve overall program effectiveness.

Through these combined efforts, the City of Greeley continues to enhance coordination among public and private partners, strengthening the local housing and service delivery system and improving outcomes for 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 City of Greeley continues to take steps to address impediments to fair housing choice identified in its Analysis of Impediments (AI), with a focus on increasing access to housing, improving awareness of fair housing rights, and reducing barriers that disproportionately impact protected classes.

During the program year, the City supported efforts to expand the availability of affordable housing, recognizing that limited housing supply and rising costs are key impediments to fair housing choice. Through the strategic use of CDBG and HOME funds, the City invested in activities that promote housing stability and increase access to safe and affordable housing for low- and moderate-income households, including those from protected classes.

The City also worked to reduce regulatory and procedural barriers that may limit housing choice. Ongoing evaluation of zoning, land use policies, and development standards—along with the implementation of an expedited review process supports the development of a broader range of housing types and price points, helping to expand housing opportunities across the community.

To address gaps in awareness and access to information, the City continues to promote fair housing

education and outreach. Information related to fair housing rights and responsibilities is made available to residents, subrecipients, and community partners, and the City encourages the use of fair housing resources and reporting mechanisms for discrimination complaints. Fair housing requirements are also incorporated into subrecipient agreements and program administration to ensure compliance with federal regulations.

In addition, the City strengthens partnerships with local and regional organizations that serve diverse populations, including individuals experiencing homelessness, persons with disabilities, and other vulnerable groups. These collaborations help improve access to housing and supportive services and ensure that programs are responsive to the needs of underserved populations.

The City is also working to strengthen internal capacity and coordination to better implement fair housing strategies. Efforts to improve data tracking, program oversight, and interdepartmental collaboration support more effective identification of disparities and more targeted responses to impediments.

Through these actions, the City of Greeley demonstrates its ongoing commitment to affirmatively furthering fair housing and reducing barriers to equitable housing choice for all residents.

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

During Program Year 2025, the City of Greeley utilized established monitoring practices to oversee CDBG and HOME-funded activities; however, the City recognizes that monitoring activities were not consistently carried out to the level required under HUD regulations due to significant operational challenges experienced during the program year.

The City underwent a major administrative transition, including the shift of CDBG and HOME program oversight from the Greeley Urban Renewal Authority (GURA) to the City's Housing Solutions Department. This transition resulted in a loss of institutional knowledge, staff turnover, and the need to rebuild program infrastructure. At the same time, the Finance Department experienced capacity constraints related to staffing changes and the completion of the City's annual audit and SEFA reporting. As a result, staff efforts during Program Year 2025 were largely focused on reconciling financial records, addressing program income and cash-on-hand discrepancies, reestablishing accurate reporting in IDIS, and drawing down funds from previously open activities to meet HUD timeliness requirements.

Due to these competing priorities and limited staffing capacity, the City was not able to fully implement its standard on-site monitoring schedule during the program year. While desk reviews of draw requests continued to be performed—ensuring that expenditures were eligible, supported, and aligned with executed agreements—formal, risk-based on-site monitoring was not conducted at the frequency outlined in prior policy.

Despite these challenges, the City maintained several core monitoring functions:

- **Pre-award review:** All funded activities were evaluated for eligibility, alignment with Consolidated Plan priorities, and compliance with National Objectives.
- **Ongoing communication:** Staff maintained regular contact with subrecipients, providing guidance on compliance requirements, procurement standards, and reporting expectations, including Section 3 and Minority- and Women-Owned Business outreach requirements.
- **Financial oversight (desk monitoring):** All draw requests were reviewed for eligibility, documentation, and consistency with approved budgets and agreements.

Recognizing the importance of monitoring as a key compliance function, the City is making monitoring a focused priority moving forward. In Program Year 2026 and beyond, the City will implement the following corrective actions to align with HUD monitoring standards:

- **Development and implementation of a formal Monitoring Plan:** The City is establishing a comprehensive, risk-based monitoring plan consistent with HUD guidance, prioritizing subrecipients based on funding amount, activity complexity, and prior compliance history.
- **Reinstatement of on-site monitoring:** The City will resume on-site monitoring of subrecipients, with a goal of meeting or exceeding prior thresholds (minimum of 10% of subrecipients annually), while incorporating a risk-based approach.
- **Standard Operating Procedures (SOPs):** The City is developing SOPs for monitoring, including standardized checklists, file review protocols, and documentation requirements to ensure consistency across programs.
- **Strengthened coordination with Finance:** Enhanced collaboration with the Finance Department will support improved tracking of expenditures, reconciliation processes, and overall compliance with federal financial management requirements.
- **Subrecipient training and technical assistance:** The City will continue to expand training and onboarding resources to ensure subrecipients understand federal requirements, including Section 3, fair housing, procurement, and reporting obligations.
- **Improved file management and documentation:** The City is implementing standardized file structures and documentation practices to support audit readiness and long-term compliance.

The City of Greeley acknowledges the monitoring gaps that occurred during Program Year 2025 and has taken significant steps to rebuild program capacity, strengthen internal controls, and align its monitoring practices with HUD expectations. Monitoring will be a central focus in future program years to ensure compliance, accountability, and successful delivery of housing and community development activities.

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.

During Program Year 2025, the City of Greeley provided citizens with reasonable notice and meaningful opportunities to review and comment on the Consolidated Annual Performance and Evaluation Report (CAPER), in accordance with its adopted Citizen Participation Plan .

The draft 2025 CAPER was made available for a **15-day public comment period from March 20, 2026 through April 6, 2026**, ensuring adequate time for community review prior to submission. The report was accessible both in person at the City of Greeley Housing Solutions Department and online through the City's website, consistent with the Plan's requirement to provide reasonable and timely access to documents.

To ensure broad community awareness, a **public notice was published in the Greeley Tribune**, a newspaper of general circulation, with notice provided in both English and Spanish to meet the City's Limited English Proficiency (LEP) requirements. Additionally, the notice included information on how to access the report, submit comments, and participate in the public meeting.

In addition to the formal notice, the City conducted targeted outreach by notifying CDBG and HOME-funded partners and community stakeholders and encouraging them to share the opportunity for public comment with their clients and networks. The CAPER was also shared through the City's website and other communication channels to expand accessibility.

A **public meeting was held on April 9, 2026, as part of the Housing for All Advisory Board meeting**, providing an additional opportunity for residents and stakeholders to offer comments on the CAPER prior to submission. The meeting was held in an accessible public facility, consistent with the City's policies to ensure access for persons with disabilities and accommodations for non-English speakers.

Citizens were able to submit comments both in writing and verbally, and all comments received during the comment period and public meeting were considered and included in the final CAPER submission, as required by the Citizen Participation Plan.

While no public comments were received during the comment period or at the public meeting, the City recognizes the importance of continued community engagement and will evaluate and enhance outreach strategies in future program years to increase public participation.

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R-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.

During Program Year 2025, the City of Greeley did not make formal changes to its overarching CDBG program objectives as outlined in the Consolidated Plan. However, the City experienced several operational and administrative challenges that impacted the timing and implementation of funded activities, resulting in a shift in focus toward program stabilization, compliance, and timely expenditure of funds. These challenges were primarily driven by internal restructuring and capacity constraints. The transition of CDBG program administration from the Greeley Urban Renewal Authority (GURA) to the City's Housing Solutions Department resulted in the loss of institutional knowledge and required the establishment of new processes and systems. In addition, staff turnover and capacity limitations within both the Housing Solutions and Finance Departments affected the City's ability to efficiently track expenditures, reconcile accounts, and complete required reporting. As a result, during Program Year 2025, the City prioritized the completion and drawdown of activities funded under prior program years, particularly those associated with the 2024 Annual Action Plan, which experienced delays in entitlement funding. The presence of program income and previously unspent funds further required the City to focus on expending available balances in compliance with HUD requirements before fully advancing new program year activities. In response to these experiences, the City has taken and continues to implement several corrective and forward-looking actions to strengthen program delivery, including: Developing and formalizing standard operating procedures (SOPs) for financial management, draw requests, and reporting processes Enhancing coordination with the Finance Department to improve reconciliation, cash management, and compliance with HUD requirements Re-engaging subrecipients to ensure timely reporting of accomplishments and expenditures Improving internal tracking systems and file management to support accurate and efficient reporting Building internal capacity through staffing support and the use of consultants to address backlog and compliance needs Looking forward, the City intends to refocus on timely implementation of current and future program year activities, including the release of the 2026 Notice of Funding Availability (NOFA), with an emphasis on improved project readiness, performance monitoring, and expenditure timelines. These efforts are expected to enhance the City's ability to meet HUD timeliness requirements and achieve its Consolidated Plan goals more effectively. Through these actions, the City is strengthening its program administration and positioning itself for more efficient, compliant, and impactful delivery of CDBG-funded activities.

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

No

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

Not applicable

CR-50 - HOME 24 CFR 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

During Program Year 2025, the City of Greeley evaluated its HOME-assisted rental housing portfolio to determine which projects were due for on-site inspections in accordance with the schedule outlined in 24 CFR §92.504(d). Based on this review, [insert number] projects were identified as requiring inspection during the program year.

Of these, [insert number] projects were inspected. The inspections focused on compliance with property standards and applicable housing codes. No significant deficiencies were identified / Minor deficiencies were identified, including [insert brief examples if applicable, e.g., minor maintenance issues, documentation gaps, and corrective actions were initiated with property owners to ensure compliance.

The remaining [insert number] projects were not inspected during the program year. This delay was primarily due to internal restructuring, staff transitions, and capacity limitations associated with the transition of program administration from the Greeley Urban Renewal Authority (GURA) to the City's Housing Solutions Department.

To address this, the City has conducted a comprehensive review of its HOME-assisted portfolio and reestablished an inspection schedule to ensure full compliance moving forward. The City is prioritizing completion of all outstanding inspections in Program Year 2026 and is implementing improved tracking systems and internal procedures to ensure inspections are completed timely in accordance with HUD requirements.

Provide an assessment of the jurisdiction's affirmative marketing actions for HOME units. 24 CFR 91.520(e) and 24 CFR 92.351(a)

During Program Year 2025, the City of Greeley collected demographic information for tenants residing in HOME-assisted units, including the StarRise Apartments project. Based on this review, the City determined there is evidence of affirmative marketing efforts reaching diverse populations.

Of the 59 households assisted, 2 identified as Black or African American, 1 as American Indian or Alaska Native, and 21 as Other Multi-Racial. Additionally, 25 households identified as Hispanic. The data also indicates that 10 households were female-headed, 9 households included a person with a disability, and 2 households were elderly.

These outcomes demonstrate that HOME-assisted units are being accessed by a diverse population, including racial and ethnic minorities, persons with disabilities, and other protected classes, consistent with affirmative marketing requirements under 24 CFR 92.351(a).

Other:

• Owners and property managers of HOME-assisted units utilize the Equal Housing Opportunity logo in marketing materials

• Resident selection criteria and lease agreements include non-discrimination language

• Outreach efforts include coordination with local service providers and community organizations serving low- and moderate-income and special needs populations

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 Program Year 2025, the City of Greeley utilized available program income to support eligible CDBG activities in accordance with HUD requirements. Based on IDIS records and internal financial tracking, a total of **$272,167.64 in program income** was available and expended during the program year.

Program income was used to fund a total of **8 activities**, supporting a range of public services, infrastructure improvements, and program administration. Activities funded with program income included:

- **Public Services:**
  - Catholic Charities – Intake Specialist ($20,000)
  - Greeley Family House (multiple draws totaling $14,060.00)
  - AWP Housing Services ($10,307.00)
  - Catholic Welfare Services – Staff Assistance ($60,655.65)
  - Senior Resource Services (60+ Ride) ($15,000.00)
- **Public Infrastructure:**
  - City of Greeley Public Works – Concrete Rehabilitation ($139,742.94)
- **Program Administration:**
  - 2024 CDBG Administration ($12,402.05)

These activities primarily benefited **low- and moderate-income (LMI) persons**, including households experiencing housing instability, individuals in need of supportive services, seniors, and persons with disabilities. Public service activities provided direct assistance to vulnerable populations, while infrastructure improvements supported neighborhood conditions in LMI areas.

Describe other actions taken to foster and maintain affordable housing. 24 CFR 91.220(k) (STATES ONLY: Including the coordination of LIHTC with the development of affordable housing). 24 CFR 91.320(j)

During Program Year 2025, the City of Greeley continued to take strategic actions to foster and maintain affordable housing through partnerships, project funding, and strengthening development pipelines.

The City continued to prioritize collaboration with experienced affordable housing developers. Building on prior outreach efforts, partnerships with Greeley-Weld Habitat for Humanity and High Plains Housing Development Corporation remained central to advancing both homeownership and rental housing opportunities. High Plains Housing Development successfully completed the StarRise Apartments, a 58-unit permanent supportive housing development that provides housing stability for individuals experiencing homelessness and those with special needs. This project represents a significant investment in deeply affordable housing supported through layered financing, including local, state, and federal resources.

The City also continued its partnership with Habitat for Humanity on the Hope Springs development, which is expected to deliver more than 170 affordable homeownership units for households earning at or below 80% of Area Median Income (AMI). During Program Year 2025, the City provided HOME funding to support the completion of approximately 20 homes, with additional units expected to be completed in future phases. This project remains a key component of the City's strategy to expand affordable homeownership opportunities.

In coordination with state and regional partners, the City supported the use of financing tools such as Private Activity Bonds and Low-Income Housing Tax Credits (LIHTC), administered through the Colorado Division of Housing, to facilitate affordable housing development within the community. These tools continue to play a critical role in leveraging additional resources and advancing large-scale housing projects.

Additionally, the City maintained close collaboration with the Greeley Housing Authority to align housing strategies, support residents, and coordinate efforts to address local housing needs. While the Housing Authority operates independently, ongoing communication and partnership help ensure that programs and investments are complementary and collectively support housing stability for low- and moderate-income households.

The City also continued efforts to identify and promote development opportunities by engaging with developers, evaluating potential housing sites, and supporting policies that encourage a range of housing types. Ongoing coordination with internal departments and external partners has helped position the City to respond to development opportunities and align funding with community housing needs.

Recognizing prior capacity and structural challenges associated with the transition of CDBG and HOME program administration to the Housing Solutions Department, the City has also focused

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on strengthening internal systems and processes. This includes improving coordination with Finance, enhancing project tracking, and preparing for future funding cycles to more efficiently deploy resources and support affordable housing development.

Through these combined efforts project investment, developer partnerships, leveraging of financing tools, collaboration with the Greeley Housing Authority, and organizational improvements the City continues to make progress toward increasing and preserving affordable housing opportunities for low- and moderate-income residents.

CR-58 – Section 3

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

Total Labor Hours	CDBG	HOME	ESG	HOPWA	HTF
Total Number of Activities	1	0	0	0	0
Total Labor Hours	0				
Total Section 3 Worker Hours	0				
Total Targeted Section 3 Worker Hours	0				

Table 15 – Total Labor Hours

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

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Other.					

Table 16 – Qualitative Efforts - Number of Activities by Program

Narrative

During Program Year 2025, the City of Greeley was unable to fully meet the Section 3 labor hour benchmarks required under 24 CFR Part 75. Several post pandemic factors contributed to this outcome. Local and regional contractors continued to experience significant labor shortages and high turnover within the construction workforce, reducing the number of new hires and limiting opportunities for Section 3qualified individuals to obtain employment. Persistent supply chain delays also disrupts project timelines, delaying phases of work that normally generate Section 3 labor hours.

Internal administrative challenges further impacted compliance. Staffing resources remained strained because of concurrent federal grant management responsibilities, including amendments and reporting for CDBGCV and HOMEARP activities. These operational and regional challenges, reflective of issues faced by other nearby agencies in the post pandemic period, contributed collectively to the City not meeting its Section 3 benchmarks for PY 2025

In addition to these conditions, the region's construction sector has experienced a surge in higher-paying private-sector construction jobs, which has significantly restricted contractors' ability to attract or retain Section 3-eligible individuals. Many contractors reported that competitive wages offered by private development projects made it difficult to recruit new workers who meet Section 3 criteria, further limiting available labor hours attributable to Section 3 workers.

Corrective Action Plan for PY 2026 and Forward

To strengthen Section 3 performance and ensure alignment with HUD requirements, the City of Greeley will implement the following corrective actions beginning in Program Year 2026: The City will conduct mandatory annual Section 3 training for all CDBG and HOME contractors and subcontractors. Updated guidance materials will be provided to clarify worker certification procedures, labor hour tracking, and reporting expectations under Part 75. Quarterly technical assistance sessions will also be offered. Additionally, the City will implement standardized Section 3 reporting forms and establish a centralized digital repository to ensure accurate and timely submission of contractor data. Mid project compliance reviews will be integrated into project monitoring to identify and address issues before project closeout. The City will conduct an annual Section 3 file audit prior to CAPER submission to ensure completeness and accuracy. The City's Section 3 Policies and Procedures will be updated in 2026 to reflect lessons learned and operational needs. Progress on corrective action will be documented in each subsequent CAPER until full compliance is achieved.

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CR-60 - ESG 91.520(g) (ESG Recipients only)

ESG Supplement to the CAPER in *e-snaps*

For Paperwork Reduction Act

1. Recipient Information—All Recipients Complete

Basic Grant Information

Recipient Name

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Organizational DUNS Number

UEI

EIN/TIN Number

Identify the Field Office DE

Identify CoC(s) in which the recipient or subrecipient(s) will provide ESG assistance

ESG Contact Name

Prefix

First Name

Middle Name

Last Name

Suffix

Title

ESG Contact Address

Street Address 1

Street Address 2

City

State

ZIP Code

Phone Number

Extension

Fax Number

Email Address

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ESG Secondary Contact

Prefix

First Name

Last Name

Suffix

Title

Phone Number

Extension

Email Address

2. Reporting Period—All Recipients Complete

Program Year Start Date	01/01/2025
Program Year End Date	12/31/2025

3a. Subrecipient Form – Complete one form for each subrecipient

Subrecipient or Contractor Name
City
State
Zip Code
DUNS Number
UEI
Is subrecipient a vistim services provider
Subrecipient Organization Type
ESG Subgrant or Contract Award Amount

OMB Control No: 2506-0117 (exp. 09/30/2021)