



# 2021 Consolidated Annual Performance and Evaluation Report (CAPER)

**DRAFT**

Berkeley County  
P. O. Box 6122  
Moncks Corner, South Carolina 29461

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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.

Berkeley County is a new entitlement community that was allocated CDBG funds for the first time by the U.S. Department of Housing and Urban Development (HUD) in PY 2021. These funds help the County address the housing and community development objectives outlined by HUD, which include, but are not limited to: affirmatively furthering fair housing, affordable housing development and preservation, public improvements, and vital services for special needs and low- to moderate-income (LMI) populations.

PY 2021 is also the first year of the City's 5-Year 2021-2025 Consolidated Plan which includes the County's overall Strategic Plan for the time period. Each program year will have an Annual Action Plan (AAP) and a Consolidated Annual Performance and Evaluation Report (CAPER) to track the progress of the County's activities towards its goals in meeting the needs of the community for that year. This PY 2021 CAPER reports on the activities and goals set in the 2021 AAP, the first year of the Strategic Plan.

In PY 2021, Berkeley County worked to set up its CDBG program and contacted subrecipients to set up program activities. The County worked towards the development of its program policy and procedures, and identified activities to achieve its goals in the plan. There were two public improvement projects started in the program year, which were the Miracle League Ball Field project and infrastructure development for the purpose of affordable housing with Habitat with Humanity – both in the Town of Monks Corner. These activities are only underway, and are not yet reported in the accomplishments table below.

**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	Indicator	Unit of Measure	Expected – Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected – Program Year	Actual – Program Year	Percent Complete
1A Improve Access to Public Facilities	Non-Housing Community Development	CDBG	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	10000	0	0.00%	2000	0	0.00%
2A Reduce Slum & Blight in Residential Areas	Non-Housing Community Development	CDBG	Buildings Demolished	Buildings	15	0	0.00%	3	0	0.00%
3A Provide Supportive Services for Special Needs	Non-Housing Community Development	CDBG	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	1000					
3B Provide Vital Services for LMI Households	Non-Housing Community Development	CDBG	Public service activities for Low/Moderate Income Housing Benefit	Persons Assisted	1000					
3C Provide for Improvements to Owner-occupied Hous	Affordable Housing	CDBG	Public service activities other than Low/Moderate Income Housing Benefit	Household Housing Unit	10					
4A Affordable Owner-Occupied Housing Opportunities	Affordable Housing	HOME	Homeowner Housing Added	Household Housing Unit	8					

4A Affordable Owner-Occupied Housing Opportunities	Affordable Housing	HOME	Homeowner Housing Rehabilitated	Household Housing Unit	40					
4B Affordable Rental Housing Opportunities	Affordable Housing	HOME	Rental units constructed	Household Housing Unit	5					
4B Affordable Rental Housing Opportunities	Affordable Housing	HOME	Rental units rehabilitated	Household Housing Unit	10					

**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.**

PY 2021 is the first program year of the 2021-2025 Consolidated Plan, and the County has identified as its priority needs for the community: Expand & Improve Public Facilities, Reduce Slum & Blight in Residential Areas, Public Services & Quality of Life Improvements and Affordable Housing Development and Preservation. CDBG funded activities must address one of these needs as well as primarily benefit LMI persons or special needs populations.

In PY 2021, the County worked to address the needs of the community through public facility improvements and the removal of slum and blight. These funded activities were developed through the community’s desire to see impacts made towards the identified priority needs in the Consolidated Plan. The use of CDBG funds for PY 2021 is outlined below:

Public Facility and Infrastructure Improvements: \$331,179.59 (91.5%)

Administration of the CDBG Program: \$30,802.85 (8.5%)

Total CDBG in PY 2021: \$361,982.44

## **PY 2021 PR-23 and CR-05 Goals and Outcomes Table Comparison**

### 1A Improve Access to Public Facilities

Parks and Rec Facilities (03F): The County has started the Miracle League Field improvements in the Town of Monks Corner, and this activity has not yet started reporting accomplishments. When this activity is completed, accomplishments will be reported in the PR-23 and PR-03. This goal has a low/mod area benefit.

Acquisition of Real Property (01): Habitat for Humanity has just started this activity and there are no outcomes reported yet.

### 2A Reduce Slum & Blight in Residential Areas:

Clearance and Demolition (04): The County had a goal to remove 3 buildings in PY 2021, however this activity has not yet been started. The PR-23 reports there were no outcomes.

### 3A Provide Supportive Services for Special Needs

There were no outcomes for this goal in PY 2021 as the County focused on public facilities. No outcomes reported in the PR-23 & CR-05.

### 3B Provide Vital Services for LMI Households

There were no outcomes for this goal in PY 2021 as the County focused on public facilities. No outcomes reported in the PR-23 & CR-05.

### 3C Provide for Improvements to Owner-occupied Housing

There were no outcomes for this goal in PY 2021 as the County focused on public facilities. No outcomes reported in the PR-23 & CR-05.

### 4A Affordable Owner-Occupied Housing Opportunities

There were no outcomes for this goal in PY 2021 as the County focused on public facilities. No outcomes reported in the PR-23 & CR-05.

### 4B Affordable Rental Housing Opportunities:

There were no outcomes for this goal in PY 2021 as the County focused on public facilities. No outcomes reported in the PR-23 & CR-05.

## 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	0
Black or African American	0
Asian	0
American Indian or American Native	0
Native Hawaiian or Other Pacific Islander	0
<b>Total</b>	<b>0</b>
Hispanic	0
Not Hispanic	0

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

### Narrative

DATA NOTE: PY 2021 was the first year of the County’s 2021-2025 Consolidated Plan and first year of receiving CDBG funds. The County worked towards the development of its program policy and procedures and identified activities to achieve its goals in the plan. There were two public improvement projects started in the program year, however activities that record accomplishments by area benefit do not record race/ethnicity demographics and are not recorded above.

According to the most recent 2016-2020 American Community Survey 5-Year Estimates (DP-05), 65.7% of the population was white, followed by 23.3% for black and 2.4% for Asian. “Some other” race was 3.6% and “Two or more” races were 4.6% of the population. Persons who identified ethnically as Hispanic were 6.8% of the County population. CDBG funds will primarily target low- to moderate-income individuals and households, however the County will record and track how it’s funds are invested into minority groups when feasible. A comparison between the race/ethnicity of persons assisted with CDBG to the general population will be assessed.

### *Housing Needs Assessment*

The Needs Assessment in the County’s 2021-2025 Consolidated Plan, assesses if any racial and ethnic group by income category has a disproportionate need in the area with regards to 1.) Housing problems, 2.) Severe housing problems and 3.) Housing cost burden. Households with “housing problems” are those that reside in units lacking complete kitchen and plumbing facilities as well as overcrowding (more than one person per room) and cost burden (spending 30% or more of income on housing per month). Households with “severe housing problems” are those that reside in units lacking complete kitchen and plumbing facilities as well as severely overcrowded homes (more than 1.5 person per room) and severe cost burden (spending 50% or more of income on housing per month).

Housing Problems (from NA-15): According to the Needs Assessment for housing problems, Hispanic Households experience disproportionate housing problems across several income levels starting at 0-30%, 30-50% and 80-100% AMI. Asian households experience a disparity at 30-50% and 80-100% of AMI. While the group was small, Native American Indian households experience a disparity at 30-50% of AMI. There were no other racial or ethnic groups that consistently experience housing problems at a disproportionately high rate across income groups.

Severe Housing Problems (from NA-20): For severe housing problems, similar trends exist with minority groups that experience disproportionate housing needs. Hispanic Households experience disproportionate housing problems across income levels starting at 0-30% and 80-100% AMI. Asian and Native American Indian households experience a disparity at 30-50% of AMI. There were no other racial or ethnic groups that consistently experience housing problems at a disproportionately high rate across income groups.

Housing Cost Burden (from NA-25): Throughout Berkeley County, approximately 71.7% of residents are not cost burdened according to 2013-2017 CHAS data. At the 30-50% of AMI income level range, 15.4% of the population is cost burdened. American Indian or Alaska Native households are the only racial group disproportionately cost burdened, with approximately 29.7% of households being cost burdened. Approximately 11.6% of all households in the County are severely cost burdened, spending 50% or more of income on housing per month. There are no racial or ethnic groups disproportionately impacted by severe cost burden.

As noted above, CDBG funds will primarily target low- to moderate-income individuals and households. The County however will record and track how it's funds are invested into minority groups when feasible for housing programs. A comparison between the race/ethnicity of persons assisted with CPD funds to the general population will be assessed. The County will make efforts to include all minority groups in its affordable housing programs, and in particular for Asian and Hispanic households as they are disproportionately impacted among several income levels.



## CR-15 - Resources and Investments 91.520(a)

### Identify the resources made available

Source of Funds	Source	Resources Made Available	Amount Expended During Program Year
CDBG	public - federal	1,227,757	361,982

Table 3 - Resources Made Available

### Narrative

In PY 2021, \$1,227,757 was made available in CDBG funds from the annual allocation. According to the PR-07, in PY 2021 the County expended \$361,982. Unexpended funds have been programmed towards admin of the CDBG program, public facilities and removal of slum and blight. These funds will remain programed towards these activities and will be expended in the future.

PY 2021 expenditures were as follows:

#14 Habitat for Humanity: \$61,548

#13 Miracle League Field: \$269,631

#10 CDBG Administration: \$30,803

### Identify the geographic distribution and location of investments

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description
Countywide	100	100	Countywide based on priority needs.

Table 4 – Identify the geographic distribution and location of investments

### Narrative

Berkley County implements its projects countywide based on its priority needs and income of beneficiaries. Attention will be directed to low- and moderate-income households and the special needs population. Public facility improvements will be targeted towards low/mod areas where 51% of the population is considered LMI.

## 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.**

Berkeley County is continually working to expand resources that will help to address the needs of the community. The use of federal CDBG funds is crucial in helping to leverage additional funds. Activities that are funded with CDBG also have additional funding for their projects.

Recently the County has been able to secure federal funding from the Department of Justice to address high crime areas and assist victims of crimes. Recent state funding includes grants from the SC Department of Health and Environmental Control, SC Department of Commerce, SC Rural Infrastructure Authority and SC Department of Parks and Recreation for various community development and infrastructure improvements throughout the County.

*Publicly owned land or property located used to address the needs identified in the plan*

The various Berkeley County Libraries provide a space for community participation with the County when meeting with the public on CDBG programming.

While the County doesn't own the public facilities being funded for improvements in PY 2021, facilities such as the Miracle League Ball Field is owned by the Town of Monks Corner and the Senior Center Rehabilitation facility is owned by the City of Goose Creek.

## 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
<b>Total</b>	<b>0</b>	<b>0</b>

**Table 5 – Number of Households**

	One-Year Goal	Actual
Number of households supported through Rental Assistance	0	0
Number of households supported through The Production of New Units	0	0
Number of households supported through Rehab of Existing Units	0	0
Number of households supported through Acquisition of Existing Units	0	0
<b>Total</b>	<b>0</b>	<b>0</b>

**Table 6 – Number of Households Supported**

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

In PY 2021, Berkeley County did not provide funding directly for the development of new affordable housing, however the County funded improvements to public infrastructure which will help to encourage and support development of affordable housing for LMI residents in the County. This funding was provided to Habitat for Humanity to develop infrastructure in Moncks Corner.

In upcoming program years, the County will support the development of housing and housing rehab.

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

The County will continue to address affordable housing development and preservation as it's been identified as a priority by the County and its residents. In the upcoming program year, HOME will be awarded to the County, and as a result the County's Consolidated Plan was Substantially Amended to

include the HOME grant and affordable housing goals for both homeowners and renters in the areas of new housing development and housing rehab. Future Annual Action Plans will reflect the changes made in the Substantial Amendment to the Consolidated Plan.

**Include the number of extremely low-income, low-income, and moderate-income persons served by each activity where information on income by family size is required to determine the eligibility of the activity.**

<b>Number of Households Served</b>	<b>CDBG Actual</b>
Extremely Low-income	0
Low-income	0
Moderate-income	0
<b>Total</b>	<b>0</b>

**Table 7 – Number of Households Served**

### **Narrative Information**

In PY 2021, Berkeley County did not provide funding directly for the development of new affordable housing, and there were no households reported.

#### *Worst Case Needs*

Worst case needs are extremely low-income households that are at imminent risk of homelessness and are in need of affordable housing or emergency assistance. Unfortunately, due to funding priorities towards public improvements in the program year, the County did not assist any extremely low-income households with CDBG funds. In the future, the County will seek to help those with worst case needs.

The County also did not specifically report any persons with a disability in affordable housing programs. In the future, when funds become available to assist residents with affordable housing programs, if a household with a disability is identified for assistance, the County will make all necessary accommodations within reason to meet the needs of the household.

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

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

### **Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs**

The County is a member of the Lowcountry Continuum of Care, the local Continuum of Care (COC). The City Charleston is the largest population center in the area and borders Berkeley County. While the homeless population is relatively high within Charleston, Berkeley County only reported 26 homeless persons in the 2020 Point-in-Time Count. This is in part due to the challenges of reporting homelessness in rural areas, as much of Berkeley County is unincorporated and rural. It is expected that the actual rates of homelessness in the County are much higher. The County relies on service providers and nonprofits to identify individuals experiencing homelessness in the County and connect them with appropriate services.

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

According to the 2021 Housing Inventory Count, the Lowcountry Continuum of Care has nearly 300 emergency shelter and transitional housing beds available in the region. No emergency shelters or transitional housing in Berkeley County were included in the Count.

The County has worked to identify partners that can address the emergency and transitional housing needs of individuals experiencing homeless in the County. Beginning in PY 2022, the County will provide CDBG funding for facility improvements to two organizations that provide transitional housing to homeless persons.

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

The County recognizes that low-income individuals and families who have been recently discharged or are about to be discharged from public institutions and/or systems of care are at high risk of becoming homeless. The County relies on the network of experienced service providers in the Tri-County area to address the needs of these individuals and families. These providers include Florence Crittenton, Family Promise, One80Place, Charleston Trident Urban League, Origin, Community Action Partnership, and

Changed Lives Ministries.

In PY2021, the County disbursed over \$10 million in rental assistance through the Emergency Rental Assistance (ERA) Program. This program prevented eviction for 1,410 LMI households in Berkeley County.

**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**

In PY2021 County awarded funding to Habitat for Humanity to purchase and prepare land for the development of affordable housing. When the project is complete with constructed homes, 10 affordable housing units will be provided to low income individuals and families in Berkeley County. In PY2022 additional funding will be awarded to Habitat for Humanity to prepare land for affordable housing at another location as well.

Both Berkeley County and the Berkeley County School District hold a seat on the Lowcountry CoC governing council and participate quarterly meetings to be involved with the planning of the Continuum's strategies to address homelessness for individuals and families.

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

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

The local housing authority operating in Berkeley County is the South Carolina Regional Housing Authority No. 3 (SCRHA3). SCRHA3 manages two public housing complexes in the County with 78 units at St. Francis Villa Apartments in Moncks Corner and 50 units at Belangia Apartments in St. Stephen. SCRHA3 also administers over 1,300 Housing Choice Vouchers (HCV) across the seven counties it serves, including Berkeley County.

In PY2021, the County provided \$33,128 in rental assistance to SCHRA3 through its Emergency Rental Assistance (ERA) program funded by the U.S Treasury. Assistance was paid on behalf of public housing residents experiencing financial hardship due to the COVID-19 pandemic to prevent eviction.

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

SCRHA3 offers supportive services that help to increase residents' involvement with activities within the community. Supportive services provide opportunities for personal growth, leadership advancement and community engagement; resident job training and employment placement; case management and supportive group environments; and health and wellness initiatives. These programs include:

Youth Enrichment Scholarships (YES): This program provides assistance with registration fees to connect residents with community and school-based activities and resources.

Benefit Access: This program provides access to resources needed by families to achieve and maintain self-sufficiency.

Resident Training Program: This program provides job training and employment opportunities through hands-on experience and job coaching.

SCRHA3 partners with Southeastern Housing and Community Development's Financial Resource Center to provide pre-purchase counseling, financial counseling, homebuyer education, and a Lease Purchase Program. Potential homeowners in the Lease Purchase Program can move into an available unit while they are working to become mortgage ready. During the rental period, the homeowner must actively participate in housing counseling and will pay rent based upon their income. Once the potential homeowner becomes mortgage ready, they will begin the process to purchase the home. Fifty dollars from each month's rent is set aside for the potential homebuyer to use for down payment and closing cost assistance for the purchase of that home.

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

SCRHA3 is not designated as troubled.

## **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)**

Berkeley County has implemented several important public policies to address the housing needs of Berkeley County residents and demonstrate its commitment to expanding affordable housing in the community. The Analysis of Impediments completed in 2021 identified public policies that have and can continue to make positive impacts on the affordable housing market include:

- Incentives for Housing Preservation and Renovation – The County has enacted a Special Property Tax Assessment Ordinance for rehabilitating historic properties (Ordinance 19-04-08). This supports the county’s policy to protect existing communities and neighborhoods from physical deterioration.
- Sustainable Infrastructure Funding – The Transportation Sales Tax program was enacted to help support street infrastructure to accommodate new housing. This program can reduce the cost of constructing new housing.
- Progressive Planning Approach – The One Berkeley Comprehensive Plan incorporates scenario planning. This approach considers community desires and the impacts and trade-offs to provide more informed decision-making. County planning policies also support a range of residential lot sizes and diverse housing types that can result in a wider range of home values.
- Presence of Intergovernmental Cooperation – Many jurisdictions lack intergovernmental cooperation that can result in a disconnect between services and facilities. The county practices coordination planning with the Berkeley County School District to anticipate the need for additional school facilities.
- Encourage Housing Density – The 2018 Comprehensive Plan Update encourages clustering of residential lots through a density bonus approach, and low-density development supports diverse housing choices. New residential development planning policies also emphasizes linkages to public transportation that will enable better access to employment opportunities.
- Availability of an Affordable Housing Financing Mechanism - The Lowcountry Housing Trust (LHT) finances the production of affordable housing. Today, financing offered by LHT includes development loans for affordable housing, including land acquisition, predevelopment, infrastructure, construction, and mini-perm loans. The county also promotes other housing partnerships and home buyer education programs.
- Commitment to Reducing Regulatory Barriers – The County Council and Planning Commission are working to identify and reduce regulatory barriers to affordable housing.



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

The Analysis of Impediments identified affordable-housing related impediments for the County. The County addressed affordable housing in PY2021 by providing funding to Habitat for Humanity to create infrastructure for affordable housing. When Habitat for Humanity completes the construction of the houses on the property, 10 LMI households become homeowners.

Expanding and Improving Facilities was identified as a priority need in the 2021 Consolidated Plan. In PY2021, The County provided CDBG funds to the Miracle League Field. The Miracle League Field is being constructed to provide opportunities for adults and children with disabilities to play baseball. Construction of special facilities will meet the needs of the disabled individuals participating in the recreation.

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

The County did not undertake any housing activities in PY 2021 that required the mitigation of lead-based paint hazards. The County makes HUD Lead Hazard Information pamphlets available to all citizens, upon request.

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

In PY2021, the County funded the Tri-County Community Center for public facility improvements. The Center is located in an LMI area and provides services to the community such as food giveaways and health events. The project has not begun but is expected to begin in PY 2022.

The County did not fund any public service activities in PY 2021, however, public services are identified as a priority need in the 2021 Consolidated Plan. In the coming years, the County will also fund agencies providing public services to reduce the number of poverty-level families.

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

Berkeley County continues to work with organizations that address the various needs of the citizens of the County. Each funded organization is provided an overview of the CDBG program, and the County monitors and provides assistance as needed throughout the program year. The County also works with the South Carolina Regional Housing Authority No. 3 (PHA) and Lowcountry Continuum of Care (COC) in planning to meet the needs of its citizens.

In PY 2021, the County took the following actions to further develop and enhance institutional structure: Participated in HUD webinars to enhance knowledge of the CDBG program and cross-cutting requirements; Worked with sub-recipient organizations to train their staff on the CDBG administrative requirements as needed; Participated on the Lowcountry CoC Governing Council; and developed relationships with neighboring jurisdictions and non-profit organizations that carry out community

development programs.

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

Berkeley County continues to coordinate with the South Carolina Regional Housing Authority No. 3 to meet the needs of citizens in publicly assisted housing in the County. The County participated in Lowcountry Continuum of Care's governing council and was involved with the CoC's planning to address the needs of the homeless population.

In PY 2022, the County will begin to receive HOME funding and work closely with private housing agencies to develop affordable housing and rehabilitate owner-occupied homes of low income households.

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

In March 2021, the County completed an Analysis of Impediments. Since the completion of the analysis, the County has taken the following action:

- County staff were elected to sit on the Governing Council of the Lowcountry Continuum of Care
- The Berkeley County website has basic information, the local hotline, and links to related local, state, and federal sources of information on fair housing. The Joint Analysis of Impediments to Fair Housing Choice is also available on the website.
- CDBG funds were provided to Habitat for Humanity to create infrastructure for the development of affordable housing.

## **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**

Monitoring is used to evaluate regulatory performance in the administrative, financial and programmatic areas of CDBG funded activities.

Berkeley County's monitoring process involves continuous communication with the subrecipient, project manager and evaluation of financial records. Such a process involves frequent telephone/email contacts, written communications, analysis of reports and audits, and periodic meetings. County staff provide technical assistance as needed to any subrecipient or internal project manager.

Monitoring consists of both desktop and on-site reviews. On-site reviews include an in-depth review of project and client files. Each grant close-out requires an on-site monitoring review. Quarterly desktop monitoring includes a review of contractual commitments, financial documentation, determination of cost eligibility, drawdown rates, and outcome/performance measurement review. Through on-site and desktop monitoring, the monitor can determine whether the participant's performance meets program requirements and improve performance by providing guidance and making recommendations. The specific purposes of monitoring are to:

- Validate the accuracy of information presented by the applicant;
- Determine compliance for those activities where there is sufficient information to make eligibility and/or national objective determinations;
- Evaluate the reasonableness of judgments made for those activities that necessarily involve high levels of program participant judgment;
- Establish the subrecipient's ability to ensure that activities carried out meet compliance requirements;
- Verify the accuracy of the program participant's records; and,
- Identify apparent causes of any problem(s) and offer recommendations for corrective actions.

Due to the necessity of disbursing CDBG funds quickly, County staff frequently monitor each project for timely expenditure of funds. Subrecipients that are not spending their grant funds in a timely manner are strongly encouraged to make spending corrections or risk losing current and future funding through the County HUD funding. to determine the types of projects or applicants that may be more high risk and require additional monitoring in the coming year(s).

### **Comprehensive Planning Requirements**

The comprehensive planning requirements include the community planning and development process of the 5-Year ConPlan, subsequent AAPs, and CAPERs as per 24 CFR 91 Subpart A, C & F. Citizen participation

is a vital part of the consolidated plan process, and the County will make sure to follow its HUD approved Citizen Participation Plan (CPP) which helps guide staff to gather community input which is an essential component in identifying the priority housing and community development needs in the County.

The ConPlan is developed every 5 years, with identified priority needs and goals to address these needs. Each year of the 5-Year plan, the County develops an AAP which identifies the projects and activities that will address and further the goals of the plan. This plan is required to be submitted to and approved by HUD each year to receive CDBG funding annually. At the end of each AAP program year, the County will report on the accomplishments and performance of the program through the CAPER (performance report). Citizen participation is required in the development of each of these stages as per 24 CFR 91.105.

## **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 purpose of the citizen participation process is to actively encourage citizens, particularly low- and moderate-income households, to participate in the planning of the Consolidated Plan, the Annual Action Plan (AAP), the development of the Consolidated Annual Performance Evaluation Report (CAPER) and any required submission of substantial amendments to those plans. Berkeley County works to ensure community stakeholders and County citizens have adequate opportunities to participate in this planning process.

**PUBLIC COMMENT PERIOD:** Citizens were invited to review and make comments on the draft 2021 CAPER. The draft CAPER was available for (15) fifteen days beginning August 29, 2022 to September 12, 2022. Comments concerning the draft CAPER were required to be received by September 12, 2022. The draft CAPER was available online at [www.berkeleycountysc.gov](http://www.berkeleycountysc.gov), or at the County's Grants Administration office, located at the Administrative Building, 1003 Highway 52, Moncks Corner, SC 29461. Written comments may be submitted to the County's Grants Administrator, at [cecilia.anthony@berkeleycountysc.gov](mailto:cecilia.anthony@berkeleycountysc.gov), or delivered to the Grants Administration office.

**PUBLIC HEARING:** A public hearing was held in the County Council Assembly Room in the Administrative Building, 1003 Highway 52, Moncks Corner, SC 29461 on September 12, 2022 at 5:00pm to review and discuss the draft CAPER. For more information, citizens could call (843) 719-4766.

**Disability & Translation Assistance:** Berkeley County made efforts to provide reasonable accommodations to disabled members of the public in accessing County programs and public meetings. Berkeley County also made efforts to provide translation assistance for public meetings and program participation. Citizens could contact the County Human Resources Office at (843) 719-4163 at least 24 hours in advance if they had special needs or require translation services.

A summary of comments will be attached to this report at the conclusion of the citizen participation process.

A summary of comments and proof of citizen participation efforts are attached in the CR-00.

## **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.**

Berkeley County is a new entitlement community receiving CDBG funds for the first time in PY 2021. As such, PY 2021 is the first program year of the County's 2021-2025 Consolidated Plan and reports on activities from July 1, 2021 to June 30, 2022.

The County was also notified by HUD on May 13, 2022 that it will receive HOME funds for the first time in PY 2022, which will be the second year of the 2021-2025 ConPlan. To administer HOME funds the County made a Substantial Amendment to the ConPlan to include HOME as a resource. For the Substantial Amendment to the ConPlan, the County included a priority for Affordable Housing Development and Preservation and create two associated goals for low- to moderate-owner and renter households. Starting from PY 2022 the County will begin reporting HOME funds and affordable housing development and preservation activities.

CDBG priorities and goals remained unchanged. The County does not anticipate any changes to the priorities identified in the ConPlan, and there are no changes in the goals and objectives of the 5-Yr Strategic Plan that would result in the revision of its objectives for CDBG.

As the County was awarded CDBG funds for the first time in PY 2021, there were no CARES Act funds awarded to the County. Federal CARES Act funds were appropriated in 2020 to assist LMI communities prevent, prepare for, and respond to the COVID-19 pandemic. While the County did not receive these funds, it will continue to monitor the needs of citizens as it relates to the pandemic.

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

No

## CR-58 – Section 3

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

Total Labor Hours	CDBG
Total Number of Activities	0
Total Labor Hours	0
Total Section 3 Worker Hours	0
Total Targeted Section 3 Worker Hours	0

**Table 8 – Total Labor Hours**

Qualitative Efforts - Number of Activities by Program	CDBG
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.	
Other.	

**Table 9 – Qualitative Efforts - Number of Activities by Program**

**Narrative**

On October 29, 2020 HUD made effective the Final Rule, which set new benchmarks for Section 3 under 24 CFR 75. Section 3 helps to establish more economically sustainable communities by ensuring that employment and other economic opportunities generated by Federal assistance for development programs are directed towards very low- and low-income persons to the greatest extent possible, and in particular to those who are recipients of the Federal assistance. The Final Rule changes tracking the number of qualified new hires in Section 3 projects, to tracking the total labor hours worked.

As applicable to Berkeley County, the benchmark for Section 3 workers is set at 25 percent or more of the total number of labor hours worked by all workers on a Section 3 project. The benchmark for Targeted Section 3 workers is set at 5 percent or more of the total number of labor hours worked by all workers on a Section 3 project.

Section 3 Projects cover housing rehab/construction and public improvement construction activities assisted under HUD grant programs that provide housing and community development financial assistance which exceed a threshold of \$200,000. A \$100,000 project threshold applies to grants under HUD's Lead Hazard Control and Healthy Homes programs. In PY 2021, the County has not reported any activities and therefore labor hours for Section 3, however there are upcoming development projects that are subject to this requirement. These two activities that will meet Section 3 reporting thresholds are #13 Miracle League Field and #14 Habitat for Humanity Affordable Housing.