HUD CAPER



HUD Consolidated Annual Performance and Evaluation Report

Program Year 2024

What's Inside:

Program Accomplishments
Program Resources
Program Investments



TABLE OF CONTENTS

CR-05 - GOALS AND OUTCOMES	2
CR-10 - RACIAL/ETHNIC COMPOSITION OF FAMILIES ASSISTED	8
CR-15 - RESOURCES AND INVESTMENTS	10
CR-20 - AFFORDABLE HOUSING	17
CR-25 - HOMELESS AND OTHER SPECIAL NEEDS	20
CR-30 - PUBLIC HOUSING	25
CR-35 - OTHER ACTIONS	26
CR-40 - MONITORING	33
CR-45 - CDBG	36
CR-50 - HOME	37
CR-58 - SECTION 3	40
CR-60 - FSG	43

CR-05 - Goals and Outcomes

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

Collier County's 2021-2025 Consolidated Plan identified several strategies to address community needs including: 1) Administration; 2) Improve Public Infrastructure; 3) Improve Public and Other Facilities; 4) New Construction, Rehabilitation, or Acquisition of Rental Housing; 5) New Construction, Rehabilitation, or Acquisition of Owner Housing; 6) Provide Public Services; 7) Emergency Housing and Services for the Homeless; 8) HMIS Support; 9) Provide Homelessness Prevention; 10) Tenant Based Rental Assistance; and 11) CHDO Set-Aside.

For Program Year 2024 (PY2024), the fourth year of the Consolidated Plan period, Collier County made significant strides in meeting strategic plan objectives. Collier County expended nearly \$3 million in PY2024 Entitlement funds to address housing and community development needs, particularly for low-income and vulnerable populations. Estimated expenditures include: 1) Community Development Block Grant (CDBG): \$2,468,329.16; 2) HOME Investment Partnerships Program (HOME): \$276,879.28; and 3) Emergency Solutions Grant (ESG): \$229,317.76.

The County also used special purpose grants including: 1) CDBG-CV: \$477,894.97; 2) ESG-RUSH: \$1,102,891.06; and 3) HOME-ARP: \$25,611.93. HOME-ARP beneficiaries will be reported in future CAPERs when the projects are completed.

In addressing Action Plan goals for PY2024 the County assisted 110 households through affordable housing activities, 899 people through public facility and public service activities, and 480 through homeless activities. Grant dollars primarily benefited low-and moderate-income people and households as well as vulnerable populations. In PY2024, Collier County was able to fund projects that directly addressed specific strategic plan goals including:

Affordable Housing - Rental

- The County funded a CDBG rental rehabilitation project that facilitated the installation of 37 new, environmentally friendly HVAC units at Farm Worker Village, benefiting low- and moderateincome households.
- The Collier County Housing Authority through their HOME Tenant-Based Rental Assistance program (TBRA) provided rent subsidies to 19 households to increase access to affordable rental housing for low-income persons.

Affordable Housing - Homeowner

- Funds were allocated for a HOME down payment assistance program that enabled two (2) households to purchase their first homes.
- The Habitat for Humanity land acquisition was finalized in conjunction with the completion of construction at Songbird at Whippoorwill, providing affordable housing to 52 households.

Non-Housing Community Development

- Collier County supported the design and roof replacement for The Shelter for Abused Women & Children, Inc., enhancing the safety and infrastructure of the building. This upgrade benefited 149 presumed benefit low- and moderate-income individuals (LMI).
- Construction of the Youth Haven Intake Center for Abused, Neglected, Abandoned and Homeless Youth, funded by CDBG-CV, was completed and initially benefited 4 individuals.
- The County funded public service activities to benefit a total of 746 low- to moderate-income (LMI) individuals.
 - CDBG funds enabled Project Help, Inc. to acquire a Forensic and Mental Health Mobile
 Unit to provide forensic exams and crisis intervention services to 85 LMI residents in Immokalee.
 - CDBG funds assisted Sunrise Community of Southwest Florida to provide transportation services to 47 adults with disabilities.
 - CDBG funds supported the HELP Homebuyer Academy & Housing Navigator program assist 42 households by offering counseling for homeownership and affordable rental opportunities.
 - CDBG-CV funds supported staffing costs at Collier Health Services, Inc. dba Healthcare
 Network to implement a case management and care navigation program that served 572
 vulnerable patients during and beyond the pandemic.

Homeless

- ESG funds assisted a total of 405 persons experiencing homelessness or at risk of becoming homeless through shelter operations, street outreach, rapid re-housing, and homelessness prevention programs.
- ESG-RUSH funding assisted a total of 75 persons, 13 persons with homelessness prevention, and 62 persons with rapid re-housing rental assistance to assist homeless persons, or those at risk of being homeless, that had been impacted by Hurricane Ian, Hurricane Helene or Hurricane Milton.

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	Indicator	Unit of Measure	Expected - Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected - Program Year 2024	Actual – Program Year 2024	Percent Complete
1	Administration & Planning	Administration	Other	Other	1	1	100%	1	1	100%
2	Improve Public Infrastructure	Non-Housing Community Development	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	5,625	8,210	100%	0	0	100%

3	Improve Public and Other Facilities	Non-Housing Community Development	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	900	91,301	100%	24,460	153	0.6%
4	Support New Construction,	Affordable	Rental units constructed	Household Housing Unit	400	4	1%	80	0	0.00%
7	Rehab/Acquisition Rental	Housing	Rental units rehabilitated	Household Housing Unit	265	117	44%	0	37	100%
5	Provide Public Services	Non-Housing Community Development	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	1,100	113,369	100%	187	746	100%
	New Construction,	Affordable	Homeowner Housing Added	Household Housing Unit	5	62	100%	1	52	100%
6	Rehabilitation/Acq Homeownership	/Acq Housing	Direct Financial Assistance to Homebuyers	Households Assisted	0	17	100%	0	2	100%

	Emergency Housing and	Tenant-based rental assistance / Rapid Rehousing	Households Assisted	0	186	100%	0	73	100%	
7	Services for the Homeless	Homeless	Homeless Person Overnight Shelter	Persons Assisted	0	323	100%	0	0	100%
			Homelessness Prevention	Persons Assisted	600	1,447	100%	319	407	100%
8	HMIS Support	Homeless	Homeless Person Overnight Shelter	Persons Assisted	1	1	100%	0	0	100%
9	Provide Homelessness Prevention	Homeless	Homelessness Prevention	Persons Assisted	25	19	76%	0	0	100%
10	Tenant Based Rental Assistance	Affordable Housing	Tenant-based rental assistance / Rapid Rehousing	Households Assisted	20	41	100%	5	19	100%
11	CHDO	Affordable Housing	Rental units constructed	Household Housing Unit	20	0	0.00%	1	0	0.00%

Table 1 - Accomplishments – Program Year & Strategic Plan to Date

Source: Consolidated Plan and Accomplishments IDIS Microstrategy Report; Collier County PY2021, PY2022 CAPERs, Collier County Project Tracking Spreadsheet.

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.

Collier County continues to demonstrate strong performance and meaningful progress in implementing the 2021-2025 Consolidated Plan. The Consolidated Plan included eleven (11) goals and in the fourth year the County achieved a 100% completion rate for eight (8) of the goals. Collier County far exceeded proposed accomplishments under several goals, particularly in the provision of public services, making improvements to public and other facilities, supporting affordable housing through homeownership activities, and preventing homelessness through emergency housing and services for the Homeless. The County does have multi-year projects still open, specifically with the goal of improvement of public and other facilities. It is important to note that while this goal under the Annual Action Plan has not yet been met, the Consolidated Plan goal has been met at 100%. The County will report multi-year project accomplishments in the year of completion to ensure accurate progress tracking.

The PY2024 Annual Action Plan included eight (8) goals of which five (5) goals were successfully achieved at 100%. For those goals not met, Collier County continues to track progress and report on barriers faced in achieving goals. The County remains committed to housing objectives including rehabilitation and construction of rental units. The success of housing goals is often dependent on partnerships. Community Housing Development Organizations (CHDOs) are primary partners in developing and redeveloping units and currently Collier County does not have access to a CHDO organization. The County is working with a local non-profit to become a certified HUD CHDO so that the County can meet its housing goals. It is to be noted that during this process the County has been granted a CHDO waiver by HUD for PY2024.

The County ensures that all funds expended address Consolidated Plan and Annual Action Plan priority needs and currently only funds activities that will accomplish goals associated with those specific objectives. The County utilizes its CDBG, HOME, and ESG funds to the maximize extent to address the housing, community development, and homeless needs identified in the needs assessment and market analysis of the associated Consolidated Plan. The County assesses those needs annually during the Annual Action plan process to ensure goals and objectives are still relevant to addressing the highest priorities for residents, particularly low-income and vulnerable populations.

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	HOME
White	662	18
Black or African American	263	6
Asian	6	1
American Indian or American Native	7	0
Other	50	0
Total	988	25
Hispanic	472	11
Not Hispanic	516	14

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

Source: Collier County Project Tracking Spreadsheet

Describe the clients assisted (including the racial and/or ethnicity of clients assisted with ESG)

	HESG
American Indian, Alaska Native, or Indigenous	1
Asian or Asian American	5
Black, African American, or African	94
Hispanic/Latina/e/o	61
Middle Eastern or North African	0
Native Hawaiian or Pacific Islander	0
White	149
Multiracial	3
Client doesn't know	11
Client prefers not to answer	0
Data not collected	156
Total	480

Table 3 – Table of assistance to racial and ethnic populations by source of funds

Source: Collier County SAGE Reports

Narrative

To best serve its residents, Collier County's housing and community development programs are open to all eligible low- and moderate-income applicants. As demonstrated above, individuals of all races benefit from County programs, but a large portion of beneficiaries identify as Hispanic (nearly 50%), aligning with

the County's population trends. According to the American Community Survey 2023 one-year estimates, the County's racial/ethnic composition is primarily White at 84% followed by African Americans at 8%, Asian at 2%, and the County's Hispanic population is 28%.

Race/ethnicity numbers are reported by projects able to collect such information. Infrastructure projects qualify by low-mod data (at least 51% of target areas must be low mod) and are typically unable to collect race/ethnicity data. The table above only represents projects able to collect race/ethnicity data most likely through an application process, therefore total race/ethnicity numbers may not equal total persons served as reported in this CAPER.

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	\$3,166,687	\$2,468,329.16
HOME	Public - Federal	\$1,558,085.65	\$276,879.28
ESG	Public - Federal	\$212,060	\$229,317.76

Table 4 - Resources Made Available

Source: Collier County Project Tracking Spreadsheet, Collier County Finance Department

Narrative

Going into PY2024, Collier County had available a cumulative total of \$4,936,832.65 of Entitlement resources (CDBG, HOME, and ESG), including available program income and uncommitted funds carried forward from previous program years. The County's expenditure rate in PY2024 for these funds was 60%. The County has several ongoing projects that will report expenditures over multiple years; therefore, the County is on track with expenditures and remains committed to meet HUD timeliness requirements. In addition, in PY2024 the County spent \$1,606,397.96 of its special purpose funding which includes \$477,894.97 of CDBG-CV, \$1,102,891.06 of ESG RUSH, and \$25,611.93 of HOME-ARP funds to address community needs.

Identify the geographic distribution and location of investments

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description	
Countywide	100%	100%	Collier County boundaries.	

Table 5 – Identify the geographic distribution and location of investments

Narrative

Collier County targeted resources in low-moderate income census block groups to meet regulatory requirements for CDBG grant funds and to focus on areas with the highest level of needs. Maps provided in the 2021-2025 Consolidated Plan show Collier County block groups where 51% or more of the population have incomes at or below 80% of the area median income. These areas are considered "target areas" for use of HUD grant funds for area improvements, such as public infrastructure or facility improvements. To determine these block groups the County used HUD CDBG Low Mod Income Summary Data (LMISD), which has defined the eligible tracts within the jurisdiction. The identified block group tracts within the County that are considered low-moderate income can be found on the HUD Exchange website at: https://www.hudexchange.info/programs/acs-low-mod-summary-data/.

A portion of HUD funds may be spent outside of these targeted areas, if activities funded provided services, affordable housing, or other benefits directly for low- and moderate-income households or special needs populations. In addition, Collier County may spend funds in current Opportunity Zones which align with HUD low-income target areas. Tracts include 104.11, 108.02, 112.05, 113.01, and 114.

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.

Leveraging

Collier County continued to leverage grant funds with other public and private resources to maximize impact for beneficiaries. Leveraging resources helps align goals across departments and supports interagency collaboration for community revitalization. Collier County routinely emphasizes to applicants the need to leverage federal funds with local funds to stretch the benefit of the federal dollars. These efforts have been successful, and projects funded under CDBG, HOME, and ESG have substantially exceeded accomplishments that could not have been achieved by using federal funds alone.

The County requires applicants for entitlement funds to outline any leveraged funds and offers bonus points in the award process for the degree to which this is achieved. Also, in the application process, the County rewards collaborative projects with additional points, which may also constitute leverage. Collier County has added leverage of funds as a performance indicator for the Community and Human Services (CHS) Division, and it is published and tracked in the County budget documents.

Federal funds also leveraged state funds received through the State Housing Initiative Partnership (SHIP) program, which supports the housing needs of low- and moderate-income households and helps expand or preserve the availability of affordable housing. Collier County was allocated \$3,026,866 in SHIP funds during the 2024 program year, which were used for a wide variety of rental, owner occupied, or homeownership programs.

CDBG funds awarded to public services providers help to leverage additional public and/or private funding that provide services to the community. An example of leveraging by public services non-profits are state funds received from the Department of Children and Families which support a variety of community programs.

HOME Match

The HOME program requires a 25% local match for any HOME funds drawn. The HOME required match may be reduced by HUD if the County is distressed or suffers a presidentially declared disaster. On November 11, 2024, due to the impacts of Hurricane Helene and Hurricane Milton, Collier County submitted the following waiver request to David Noguera, HUD Director for: Waiver for Streamlined Process for Suspensions and Waivers of Community Planning and Development (CPD) Grant Program and Consolidated Plan Requirements to Facilitate Recovery from Presidentially Declared Major Disasters (Hurricane Helene & Hurricane Milton).

This request is pursuant to HUD's memorandum from Principal Deputy Assistant Secretary Marion McFadden regarding HUD waivers and Presidentially Declared Major Disasters. This match reduction

applies to funds expended by Collier County in the declared-disaster area from October 1, 2023 – September 30, 2025. Based on this request, there is no match liability for Program Year 2024 (October 1, 2024 – September 30, 2025). Collier County still recorded and contributed match from prior years to be carried forward, which is detailed in the match contribution table. Please note that the PR33 IDIS report currently shows a match liability for PY2024 as \$154,663.37, however the match liability was waived for PY2024.

The State of Florida has the State Housing Initiative Partnership (SHIP) Program that local Entitlement counties and cities can use as match for HOME. When Collier County has match liability, a portion of the SHIP allocation is used as local match.

Fiscal Year Summary – HOME Match							
1. Excess match from prior Federal fiscal year \$ 959,730							
2. Match contributed during current Federal fiscal year	\$ 125,000						
3. Total match available for current Federal fiscal year (Line 1 plus Line 2)	\$ 1,084,730						
4. Match liability for current Federal fiscal year	\$ 0						
5. Excess match carried over to next Federal fiscal year (Line 3 minus Line 4)	\$ 1,084,730						

Table 6 – Fiscal Year Summary - HOME Match Report

Source: Collier County Match Report 40107

ESG Match

ESG regulations require grant recipients to make matching contributions equivalent to the ESG annual award- or a 100% match. Matching funds may include contributions to any of the County's ESG programs, including funds awarded to a subrecipient. The matching requirements are met per 24 CFR Part 576.201. The program year ESG funds allocation for 2024 was \$212,060. Community and Human Services requests at the time of application that expenditures are matched by applicant donations, in-kind contributions, other state and local funds, as well as private and foundation donations. ESG subrecipients can also satisfy the match with volunteer hours.

Publicly Owned Land

Collier County approved \$10,585,310.76 in U.S. Department of the Treasury, American Rescue Plan, State and Local Fiscal Recovery Funds (SLFRF) and \$2,621,747.80 in State Housing Initiatives Partnership Program (SHIP) Funds for new affordable workforce housing, on County-owned land, located at the former Golden Gate Golf Course. The Renaissance Hall at Old Course, LLC project is currently under construction. The 252-unit rental development will provide affordable housing for very low and low-income households. Funding from the SHIP grant will support the construction of 22 very low-income units and 28 low-income units, for a total of 50 affordable rental units. The Certificate of Completion for the first three buildings is expected in February 2026 after which leasing will begin. Workforce housing is for essential service workers, including government employees, healthcare professionals, and educators. The Renaissance Hall at Old Course project is designed to provide affordable housing options in a region where nearly 50,000 households are cost-burdened and spend more than 30% of their annual income on housing.

Collier County previously provided a land donation for the Ekos on Santa Barbara project, an affordable housing project located in Naples, FL. Ekos on Santa Barbara is an 82-unit, new construction project which provides needed workforce housing to households making between 30-80% of Area Medium Income. Collier County partnered with McDowell Housing Partners on a 99-year ground lease and provided the land for the project. The eighty-two affordable housing units are complete and 100% occupied.

Ekos Creekside, a 160-unit affordable housing community located in East Naples, FL, is currently in the site development planning phase. This project will provide apartments for households earning 30% to 80% of the Area Median Income, with rents more than 30% below market rates. The land was acquired by Collier County using its Workforce Housing Land Acquisition Surtax fund and will be developed under a 99-year ground lease. Ekos Creekside is being developed by McDowell Housing Partners and completion is expected in mid-2027.

In accordance with Florida Statutes Section 166.0451, disposition of municipal property for affordable housing requires that the County create an inventory list of real property with fee simple title appropriate for affordable housing. In compliance with the statute, Collier County maintains the inventory of County-owned surplus land that are potential properties for the development of permanent affordable housing. The County may partner with nonprofit organizations that develop affordable housing for low-income households. The disposition of any of these properties for affordable housing is subject to the discretion of the County.

	HOME Match Contribution for the Federal Fiscal Year 2024										
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			
Exantus	03/20/2025	\$50,000	\$0	\$0	\$0	\$0	\$0	\$50,000			
Padilla	04/25/2025	\$75,000	\$0	\$0	\$0	\$0	\$0	\$75,000			

Table 7 – Match Contribution for the Federal Fiscal Year

Program Income

		Program Income		
Balance on hand at the 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 \$
\$69,840.44	\$31,571.43	\$6,718.54	\$0	\$94,693.33

Table 8 – Program Income

Source: IDIS Program Income Report PR-09

HOME MBE/WBE report

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					
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non- Hispanic	Hispanic	Hispanic		
Contracts								
Number	0	0	0	0	0	0		
Dollar Amount	0	0	0	0	0	0		
Sub-Contrac	ts							
Number	0	0	0	0	0	0		
Dollar Amount	0	0	0	0	0	0		
	Total	Women	Male					

Amount			
	Total	Women Business Enterprises	Male
Contracts			
Number	0	0	0
Dollar	0	0	0
Amount		U	0
Sub-Contracts	s		
Number	0	0	0
Dollar	0	0	0
Amount			

Table 9 - 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 Prop	perty Owners		White Non-
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non- Hispanic	Hispanic	Hispanic
Number	0	0	0	0	0	0
Dollar Amount	0	0	0	0	0	0

Table 10 – Minority Owners of Rental Property

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	d		0			
Businesses Disp	laced		0			
Nonprofit Organ	nizations	Displaced	0			
Households Ten	nporarily	Relocated,	0			
not Displaced			0			
Households	Total		Minority Prope	erty Enterprises		White Non-
Households Displaced	Total	Alaskan	Minority Prope Asian or	erty Enterprises Black Non-	Hispanic	White Non- Hispanic
	Total	Alaskan Native or			Hispanic	
	Total		Asian or	Black Non-	Hispanic	
	Total	Native or	Asian or Pacific	Black Non-	Hispanic	
	Total	Native or American	Asian or Pacific	Black Non-	Hispanic	

0

0

0

0

Table 11 – Relocation and Real Property Acquisition

Cost

0

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	0	73
provided affordable housing units	0	/5
Number of Non-Homeless households to be	87	110
provided affordable housing units	0/	110
Number of Special-Needs households to be	0	0
provided affordable housing units	0	U
Total	87	183

Table 12 – Number of Households

Source: Collier County Project Tracking Spreadsheet

	One-Year Goal	Actual
Number of households supported through	5	92
Rental Assistance	3	92
Number of households supported through	82	52
The Production of New Units	02	52
Number of households supported through	0	37
Rehab of Existing Units	U	37
Number of households supported through	0	2
Acquisition of Existing Units	0	2
Total	87	183

Table 13 – Number of Households Supported

Source: Collier County Project Tracking Spreadsheet

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

Collier County far exceeded goals for providing affordable housing to low-income residents and vulnerable populations, including those that were homeless or at-risk of becoming homeless. Through activities including Rapid-Rehousing rental assistance (RRH), Tenant-Based Rental Assistance (TBRA), land acquisition leading to the construction of new units, down-payment assistance, and housing rehabilitation, the County was able to increase access to affordable housing for 73 households through rapid rehousing activities and 110 households through other affordable housing assistance like new construction, rehabilitation, tenant based rental assistance and homebuyer assistance.

While the County met goals, it did not come without challenges. In PY2024, the housing market remained somewhat volatile, keeping the cost of housing and rents high. To offset costs, the County had to increase subsidies resulting in less homebuyers or renters being served through purchase assistance or tenant-based rental assistance programs. The County is still expending TBRA funds and will report additional

beneficiaries in the PY2025 CAPER. Inflation also increased the cost of labor and materials, reducing the number of affordable rental units that could be constructed with available resources.

Collier County has experienced significant storm damage from hurricanes including Ian in 2022, Idalia in 2023, and Helene and Milton in 2024. These disasters significantly impacted the County's housing stock. Hurricane recovery is a long-term effort and difficult to navigate because of federal restrictions and high costs of replacement. Additionally, the County must consider incorporating resiliency into its housing programs, which further increases costs. These factors create additional challenges for the County in PY2024 in carrying out its housing activities.

The County is also currently lacking a key partnership with a local Community Housing Development Organization (CHDO) which could increase development and redevelopment opportunities. However, the County is working with a local organization to obtain HUD CHDO certification and has been granted a CHDO waiver by HUD for PY2024.

Discuss how these outcomes will impact future annual action plans.

While the County does not anticipate significant changes to future Annual Action Plans, gaining a partnership with a CHDO organization which will increase capacity to carry out construction and rehab goals and outcomes for the remaining years of the Consolidated Plan. The County will continue to utilize its CDBG, HOME, and ESG funds to the fullest extent to assist in meeting goals and assess program performance annually. Leveraging efforts with public and private funding agencies will be made to supplement federal funds and increase the resources available to address community needs.

The County will take into consideration housing market shifts and assess the impact on affordable housing programs including new construction, purchase assistance, rehabilitation, and rental assistance. The County may have to increase subsidies to accommodate increased home values, higher interest rates, inflation, and the cost of construction.

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	131	9
Low-income	275	13
Moderate-income	360	3
Total	766	25

Table 14 – Number of Households Served

Source: Collier County Project Tracking Spreadsheet

Narrative Information

Collier County supports access to affordable housing for all households meeting the definition of low-to moderate-income in accordance with HUD regulation. The County consistently prioritizes serving the

lowest income and most vulnerable residents, directing resources toward households with the greatest need whenever feasible. At the same time, depending on the nature of the activity and the community's service patterns, moderate-income households may make up a significant share of beneficiaries. This reflects both the eligibility structure of certain programs and the demand profile within the service area, while still aligning with the County's commitment to universal access and meaningful impact for those facing the most substantial barriers.

All owner-occupied and rental housing assisted with HOME funds meet the Section 215 definition of affordable housing as follows: the TBRA units are made affordable for the households receiving assistance as their tenant portion of the rent does not exceed 30% of their monthly adjusted gross income; the homeownership units qualify as affordable housing as the purchase price does not exceed 95% of the median purchase price for the area, the home is used as the primary residency, and are subject to resale restrictions if sold during the affordability period.

Extremely low-income renter households are at imminent risk of homelessness as they lack the funds to maintain housing during emergencies and times of crisis. According to the Comprehensive Housing Affordability Strategy (CHAS) data reported in the County's 2021-2025 Consolidated Plan needs assessment, there are approximately 3,180 extremely low-income renters (0-30% AMI) in Collier County that are also severely cost burdened (households paying 50% of income towards housing costs). To address this need, the County will continue to direct funds towards affordable rental housing opportunities such as TBRA and new affordable rental unit developments. Previous activities focusing on special needs groups such as the elderly and individuals with disabilities include SHIP funds that were awarded for the construction of special needs housing units at the Renaissance Hall at Old Course project. Through these rental assistance programs, the County and its partners were able to assist households atrisk of homelessness with affordable housing.

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

Collier County participates in and works closely with the Southwest Florida (SWFL) Regional Coalition to End Homelessness, the lead agency of the Continuum of Care (CoC). A primary means by which the County reaches out to homeless persons, identifies individual needs, and understands the landscape of homelessness in the region, is through efficient data collection and analysis through the HMIS system. While Collier County no longer directly funds HMIS, the County supports HMIS data operations to ensure accurate tracking and reporting of the homeless population in Collier County.

The County participates in monthly general membership meetings along with bi-weekly housing partner meetings with the CoC to review the housing needs of homeless veterans and general homeless populations. These bi-weekly meetings identify available resources to best facilitate connecting persons experiencing homelessness to available services and assist in housing placement through partnerships with other social service agencies.

The Community and Human Services (CHS) Division administers homeless prevention, rapid rehousing activities and street outreach services under the ESG program. In addition to these services, the County funds The Shelter for Women & Children under the ESG program. The Shelter provides safe shelter, counseling, prevention and community education programs. Emergency shelter services are provided free of charge.

Collier County also participates in the SWFL Regional Coalition to End Homelessness annual Point-in-Time (PIT) Count Survey. The PIT is a snapshot of the homeless population on any given night, typically in the last week of January each year. The survey results help to show the current state of homelessness in the County and identify which homeless subgroups (chronically Homeless, seniors, veterans, unaccompanied youth etc.) are in need of assistance. The survey is conducted to provide an annual count of sheltered and unsheltered homeless persons in Collier County meeting the following requirements: (1) unsheltered persons, the number of homeless persons who are living in places not designed or ordinarily used as a regular sleeping accommodation for humans, who must be counted as unsheltered homeless persons; (2) sheltered persons, persons living in emergency shelters and transitional housing projects; (3) other requirements established by HUD notification.

The 2023 PIT showed 500 homeless individuals including 185 in emergency shelters, 188 in transitional housing, and 127 unsheltered. The 2024 Homeless Snapshot of PIT data showed an increase of homelessness with a total of 660 homeless individuals including 131 sheltered through an emergency shelter, 123 in transitional housing, and 406 unsheltered. In PY2024, having to serve more households, the County targeted populations most in need according to the PIT count which included single adults.

Notably, the count identified a total of 1,665 homeless students, including 192 unaccompanied youth. Of these, 116 were under 16 years old, while 75 were over 16.

Addressing the emergency shelter and transitional housing needs of homeless persons

Collier County currently funds a subrecipient for the operation of an emergency shelter, while Collier County CHS operates a rapid re-housing program, and funds homeless prevention to stably house individuals and families so they can avoid homelessness. CHS offers rental assistance programs to very low and low-income individuals and families to provide rent subsidies, security and move-in deposits and one-time electric/utility deposits.

The County allocated \$117,401 of ESG funding in PY2024 to the Shelter for Abused Women & Children, assisting 370 homeless persons. The Shelter operates in two locations, in Naples and Immokalee, each providing a 60-bed emergency shelter addresses Collier County's priority to serve homeless individuals. The County provided operating support to emergency shelter providers to maintain year-round beds, enhance safety and service capacity, and ensure that shelters met HUD habitability, HMIS, and performance standards. Funding also supported essential services, including case management, and basic needs—which helped reduce length of stay and connect clients to permanent housing resources more quickly. The Shelter's emergency shelters are available day and night, 365 days per year for homeless victims of domestic violence and human trafficking. In addition to its emergency shelters, The Shelter offers vital services that are free of charge to assist survivors in becoming safe and independent including wrap-around outreach services and educational programs. As the only state certified domestic violence centers in Collier County, The Shelter offers unduplicated services that are not offered by any other agency in the community. These services are vital to helping survivors attain immediate safety from their abusers. Achieving immediate safety is the first step to moving forward and achieving independence, which eventually benefits the entire community.

The County also administers special allocations of ESG-RUSH which funds homelessness prevention and rapid re-housing programs along with CDBG-CV funds which provided funds to the Youth Haven Shelter project. During PY2024 the County served 75 persons through homelessness prevention and rapid re-housing programs with ESG-RUSH funds. The Youth Haven Shelter project, where the County funded the new construction of a youth intake center, is now complete. The intake center serves four (4) youth at any one time.

In response to the HEARTH Act and 24 CFR part 576, Collier County, in collaboration with its subrecipients, is working to prevent homelessness by helping families remain within their communities and retain their current permanent housing or diverting people to permanent housing solutions. The first step in this process was to streamline the intake of homeless families seeking emergency shelter. The improved coordination has resulted in more families being diverted from homelessness and more families exiting homelessness and being rapidly re-housed in permanent housing. Other than the funds available through this process, emergency shelter and transitional housing needs may be addressed through grant funding opportunities, such as the competitive Continuum of Care process, or through other state or local funding

streams.

In coordination with the CoC, the County participated in system-wide strategies to prioritize the most vulnerable persons for shelter placement, improve coordinated entry referrals, and ensure that shelter and transitional programs were fully integrated into the broader housing crisis response system. Providers were encouraged to adopt Housing First principles, including low-barrier entry, rapid connection to services, and individualized case planning.

Throughout the pandemic, County staff facilitated extensive working groups with community-based organizations to administer subsistence payments for rent. Housing and Federal grants staff have been instrumental in developing policies and data tools to increase efficiency and ensure no duplication of efforts. This work has resulted in millions of dollars being issued and thousands of households maintaining stable housing throughout lockdown.

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

Collier County and the SWFL Regional Coalition to End Homelessness recognize the need to support individuals and families avoid becoming homeless, especially those who are discharged from publicly funded institutions and systems of care. Helping these individuals and families leaving these systems of care with housing support and prevention services immediately will help to end chronic homelessness.

In PY2024 the County continued to help reduce homelessness by utilizing its HOME and ESG funds for homelessness prevention activities including rental assistance to help low-income families avoid becoming homeless. HOME funds supported a CHS Tenant Based Rental Assistance (TBRA) program. Recognizing the high need for rental assistance for households with extremely low incomes who lack resources in times of crisis such as health issues and loss of employment, CHS launched a Tenant Based Rental Assistance program. Administered by CHS, the TBRA program assists households with essential housing costs, such as rent, security deposits and utility costs. During PY2024, CHS implemented new software, received the initial applications, executed landlord agreements and began serving households Providing assistance to reduce housing costs, in conjunction with providing supportive services, allows atrisk individuals and families to stay in their homes and gives them the chance to regain economic independence. CHS will continue to serve applicants and compile beneficiary data to report in the PY2025 CAPER.

ESG funds were allocated to the Shelter for Abused Women and Children for operating costs of the homeless domestic violence shelters to assist adults and children fleeing from domestic violence. A variety of services are offered including the Children's Protection Investigations Program, the Community

Education Program, Collier County Jail Group, youth services and Rapid Rehousing. More details on these programs and others offered by the agency, can be found on their website at: https://naplesshelter.org/programs/.

Collier County worked closely with hospitals, behavioral health providers, correctional institutions, and the child welfare system to identify individuals who were at risk of homelessness upon discharge. Providers were trained to make referrals through the Continuum of Care's Coordinated Entry (CE) system, ensuring that these high-risk individuals were connected quickly to prevention resources, diversion services, and housing-focused case management. Special emphasis was placed on youth exiting foster care, individuals exiting mental health or substance-use treatment, and persons completing jail or prison sentences.

In addition, the County's Homeless Case Management team partnered with public and private agencies delivering supportive services, including employment programs, health and mental health services, education and youth programs, domestic violence services, and financial literacy supports—to ensure that households receiving these services could also access housing stability assistance when needed. Case managers and outreach teams coordinated closely with these partners to identify early warning signs of housing instability and to intervene before a crisis resulted in homelessness.

These combined efforts strengthened the safety net for vulnerable residents, reduced the risk of housing loss, and supported long-term housing stability for households most likely to experience homelessness.

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

Collier County continued to allocate ESG grant funds during PY2024 to help homeless individuals and families make the transition from homelessness to permanent housing and independent living situations. The County supported rapid re-housing activities that housed individuals and families quickly and provided a stable environment for them to be able to pursue employment and stable education for families with children. The County also leveraged its federal funds with state SHIP funds to help increase access and the supply of affordable housing through activities such as housing rehab, rental assistance, and homebuyer assistance. Increasing the affordable housing stock in Collier County helps to provide permanent housing for homeless individuals and families seeking stable housing.

The County coordinated with the Collier County Veteran's Service Division to provide services to Veterans to assist them in accessing benefits from the Veteran's Administration Department. Local Veterans Affairs Supportive Housing (VASH) vouchers are provided through a regional partnership with the Housing Authority of the City of Fort Myers. The VASH program combines HUD's Housing Choice Voucher (HCV)

rental assistance for homeless Veterans with case management and clinical services provided by the Department of Veterans Affairs. Collier County currently has several Veterans receiving rental assistance which helps their homes remain affordable and prevents homelessness.

The County's Senior & Social Services program continued to provide prescription and medical assistance and referral services for citizens and seniors. Assistance helps reduce monthly expenses, making housing costs more affordable for individuals and seniors on fixed incomes and helps to reduce homelessness. CHS facilitates an Emergency Home Energy Assistance for the Elderly Program (EHEAP) which provides home energy assistance for low-income households. EHEAP funds help reduce utility expenses, freeing up other resources to cover rent.

Collier County collaborated with other organizations to transition as many people as possible into permanent housing as quickly as possible. Some families or individuals only required limited assistance for a short period of time, such as emergency food and shelter -- until a first paycheck is received or a medical emergency has passed, but others required more comprehensive and long-term assistance, such as transitional housing with supportive services and job training. Due to limited resources, it is important for agencies to eliminate duplication of effort by local agencies, both in intake and assessment procedures, and in subsequent housing and supportive services. The Homeless Management Information System (HMIS) is continuously improved with common intake forms, shared data, effective assessment instruments and procedures, and on-going coordination of assistance among community organizations.

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

Actions taken to address the needs of public housing

In PY2024, the County partnered with Collier County Housing Authority (CCHA) to fund the Farmworker Village (FWV) project which provided HVAC to 37 units. The installation of efficient HVAC systems in the FWV housing units will not only improve the comfort of the families that currently reside in the units, but it will also extend the property's service life to meet the needs of low-income households that cannot otherwise qualify or have the financial means to live in market rate properties. The installation of new HVAC units will also reduce electric bills further supporting affordable housing. The Housing Authority proposes addressing these issues to ensure that these affordable housing units can play a vital role in the community for decades to come.

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

CCHA offers a Family Self-Sufficiency (FSS) program to promote economic opportunities for Housing Choice Voucher assisted families. Through the FSS program, case managers work with families to identify employment goals and access support services to achieve these goals. As a family's income rises, CCHA deposits the increased rent charges that the family pays in an escrow account. The escrow account may then be used by the family for college or vocational education expenses, work-related expenses, or toward homeownership as they graduate from the program.

CCHA has a Section 8 Advisory Board and interested voucher holders are encouraged to join. This gives voucher participants a formal opportunity to offer input on the voucher program to CCHA. The Section 8 Advisory Board also reviews CCHA's PHA plans and the agency's progress toward its goals.

Actions taken to provide assistance to troubled PHAs

The Collier County Housing Authority (FL141) 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)

Affordable housing is a challenge faced nationwide. It is important to foster and maintain affordable housing to keep the housing market balanced and fair. Collier County is committed to maintaining housing opportunities and to eliminating barriers to affordable housing.

The County's land development codes suggest that the residential zoning criteria for the jurisdiction are not inherently prohibitive, and yet there is general consensus among residents, planning officials, housing advocates, and other stakeholders that Collier County and Naples suffer from an affordability gap for both affordable and workforce housing. Currently, the County offers a density bonus, impact fee deferrals, and expedited permitting to support the increase of affordable housing.

The County has embarked on a planning initiative to develop additional incentives and programs to address affordable and workforce housing needs in the community. The County has an Affordable Housing Plan in place. The Affordable Housing Plan was accepted in October 2017 and County staff have been working to implement changes identified in the plan. Some changes have been made in recent years while some are still being worked on. While not an exhaustive list of the report's recommendations, potential strategies include:

- Waiving or substantially reducing (rather than deferring) impact fees for affordable housing development for low- and moderate-income households;
- Allowing and encouraging the use of Accessory Dwelling Units;
- Prioritizing capital improvements in Immokalee;
- Providing guidance on suitable types of farmworker housing by zoning district;
- Improving code compliance efforts at mobile home parks in Immokalee;
- Revisions to the County's Local Housing Assistance Plan to require a 30-year affordability period, rather than the previous 15-year requirement;
- Reviewing the use of Affordable Housing Density Bonus provisions, including determining how
 many units have been created under the provision and whether enforcement actions were taken
 against developers that neglected to provide the agreed upon units.

Beyond incentives to negate the effect of public policy, the County has further assisted in reducing barriers to affordable housing by implementing various programs targeted towards low-and moderate-income households. Through its grant programs, the County supports affordable housing by providing

homeownership opportunities, rental assistance and the support of new construction of units to increase access to affordable housing. These efforts assist in eliminating barriers to affordable housing by providing economic opportunities, minimizing overall household expenses, and increasing the supply of affordable housing.

In addition to the activities undertaken by the County, the Housing Authority's activities are specifically intended to address barriers to affordable housing by providing economic subsidies to those most in need of affordable housing. Towards this end, the Collier County Housing Authority continued to reduce the barriers to affordable housing by providing Section 8 vouchers and assistance programs aimed at transitioning residents from public housing into the private housing market.

Applications for housing, and the resulting units to be assisted with CDBG and HOME funds will be reviewed to assure that the housing is fully available to all residents of the community, regardless of race, color, national origin, gender, handicap, or familial status.

The County also continued to work cooperatively with the SWFL Regional Coalition to End Homelessness, Immokalee Interagency Council, Public Health Department, Collier County Housing Authority, and United Way of Collier County to continue to identify and address underserved and unmet needs.

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

The County makes every effort to efficiently utilize resources to maximize benefit but addressing the underserved needs of residents continues to be increasingly difficult. Housing affordability is a primary need but to achieve this, deep subsidies are needed, particularly in the recent market. At this point, appropriations for housing programs are not at levels to widely support deep subsidies. Additionally, the number of families and individuals needing access to services has increased and the capacity to fund and implement existing or additional programs is limited.

To overcome these barriers, the County continued to invest its state and federal funds into viable projects and combine and leverage other resources to continue providing residents with affordable housing options and to increase access to poverty reduction services. The County continued to utilize CDBG, HOME, and ESG funds to the fullest extent to assist in meeting underserved needs.

To help remove obstacles to meeting underserved needs and improve service delivery, Collier County worked with local non-profits and other subrecipients to coordinate the work of social service organizations, disseminate news and information, and spearhead community-wide solutions to local needs. Specifically, the County worked on projects to construct and improve public infrastructure and facilities, to support the development of affordable housing and benefit low- and moderate-income families; to provide public services such as transportation and staffing services for persons with disabilities and other populations, senior case management services, housing navigator services and services for victims of violence.

The County also continued to work cooperatively with the CoC, Immokalee Interagency Council, Public Health Department, Collier County Housing Authority, and United Way of Collier County to continue to identify and address underserved and unmet needs.

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

The County did not undertake any housing activities in PY2024 that required the mitigation of lead-based paint hazards. When the County does undertake housing activities, it follows all regulations as required by HUD and the Residential Lead-Based Paint Hazard Reduction Act of 1992 and HUD's Lead Safe Housing Rule (24 CFR Part 35). Prior to any construction activities on a pre-1978 dwelling that could potentially disturb paint, a certified inspection of the structure and testing to detect the presence of lead-based paint is conducted. If lead-based paint is found to exist, a risk assessment is conducted to determine the type, severity and location of the hazards. The findings of the risk assessment may direct abatement as the solution to best protect children from lead exposure. The County makes HUD Lead Hazard Information pamphlets available to all citizens, upon request.

Lead poisoning in Collier County has been a relatively minor problem as over 80% of the County's housing stock was built after 1980 (Source: 2015-2019 ACS). The County has implemented a rental housing rehabilitation program and continued to operate the program within the HUD Lead-Safe Housing regulations. The rehabilitation program offered through the County is reducing lead hazard by focusing on code compliance. The County also ensured that staff are appropriately trained in lead-based paint, pamphlets are distributed, inspections and assessments are conducted when required, and contractors trained in lead safe practices are used.

Collier County's Health Department has historically monitored and responded to all suspected cases of lead poisoning. Prior to issuing a Notice to Proceed or beginning any type of project, CHS completes an Environmental Review (ER). In addition to the requirements outlined in the ER, the potential for Lead Based Paint is always addressed. When a structure is identified as built prior to 1978 a separate review is completed. A specialist is hired to review the possibility of lead-based paint within the structure. If lead-based paint is found in the structure, all individuals doing renovations, repairs and painting are required to be certified to safely complete improvements beyond minor repairs. The County follows procedures as specified in applicable regulations and, specifically, those detailed in Title X. The Division and its representatives and/or subrecipients provide all required notifications to owners and occupants. All Division policies and procedures have been revised to conform to Title X.

All projects carried out with federal funds incorporate the current procedures for hazard reduction or LBP abatement guidelines as defined in 24 CFR Part 35 and Section 302(c) of the Lead-Based Paint Poisoning and Prevention Act (42 U.S.C. 4822). These procedures govern projects contracted to subrecipients and developers and funded by CDBG, HOME, and ESG. Collier County has designated staff to act as liaison with the Health Department to address cases of lead poisoning within the community.

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

Collier County recognizes the interrelationship between housing and economic opportunities and the need to pursue both to assist households to attain self-sufficiency. The County recognizes that while it has defined priority strategy areas, they are not separate or isolated strategies. These strategies are interrelated and impact, reinforce, and contribute to each other to achieve the common goal of a viable and vibrant community. Collier County continued to implement critical housing activities such as rental assistance to help reduce the number of households in poverty.

All the programs outlined in the Consolidated Plan are intended to provide benefits to residents that are considered low-income and/or fall below the federal poverty line. The Community Development Block Grant Program's objectives are to develop viable communities that provide decent, safe, and sanitary housing, a suitable living environment, and expanded economic opportunities primarily for persons of low- and moderate-income. The County utilizes its CDBG program to make a difference in the lives of its residents by providing resources to address unique community development needs. The County's HOME and SHIP programs are utilized to help increase the supply of affordable housing for low- to moderate-income households. The County's housing programs help to reduce housing costs for low-income families and assist in reducing the overall poverty level of the community. Programs include rental subsidies and homebuyer assistance.

Collier County also provides funds to the Shelter for Abused Women and Children which offers emergency shelter facilities and essential services for homeless prevention to assist in reducing the number of households living below the poverty level.

The County is proud of its work to eliminate cost burden and target resources in an effective and coordinated manner. In addition to combatting poverty through its housing and community development programs, the County has two designated CRAs and continues to focus much of its HUD funding in those areas. By doing so, the County leveraged complementary initiatives aimed at workforce development, business development, public infrastructure and community programming initiatives, and other quality of life features that connect persons living in poverty with services, and opportunities to lift those families out of poverty.

Other actions and strategies the County employed to reduce the number of poverty-level families included:

- 1. Supporting the collaborative efforts of the service providers in Collier County to attract new business and industry.
- 2. Supporting the efforts of the Chamber of Commerce to target certain segments of the economy for business development/job creation.
- 3. Encouraging nonprofit organizations to expand housing development programs to incorporate job-training opportunities as a part of their operations.

- 4. Promoting the use of referral services for the existing Human Service Centers which involves a partnership with many human service agencies, including job referrals.
- 5. Working to develop a CHDO to meet the requirements of the designation in order to develop affordable housing for low/moderate income persons.
- Participating in the development of a regional social service collaborative to coordinate the work
 of social service organizations, disseminate news and information, eliminate duplication of
 efforts, and spearhead community-wide solutions to local needs.
- 7. Using enhanced accomplishment data as a criterion in the evaluation of applications for ESG funding.
- 8. Supporting any expansion of local transit service and/or for express transit service.

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

The Collier County Community and Human Services Division (CHS) serves as the lead entity in carrying out Consolidated Plan objectives and in making sure CDBG, HOME, and ESG funds are carried out in accordance with federal regulations. CHS coordinated with various public, private, and non-profit agencies in carrying out its activities. Collaboration between local, county, and state agencies is important in successfully carrying out the goals and objectives identified in the Consolidated Plan and addressing community needs.

Collier County maintains a robust Affordable Housing Advisory Committee (AHAC), composed of representatives from the residential home building, banking/mortgage, labor, low-income advocacy, for-profit social service, non-profit social service, real estate, employers, and the local planning industries. These representatives serve as an informed body of experts with unique perspectives on the local landscape of affordable housing needs and market dynamics in Collier County. Collier County continued to work with the AHAC to strengthen its leadership role in guiding affordable housing decisions in the community. Strengthening the institutional expertise and authority of the AHAC will improve the county's work in the years ahead.

The County also partnered with the SWFL Regional Coalition to End Homelessness and is a regular participant in CoC meetings. The County contributes and participates at the requested levels to aid the Coalition in addressing the homeless situation that exists in the area.

The County has continued to focus on its mental health and substance abuse treatment services to better serve clients who have both types of needs. The County has instituted an opioid drug response team that helps to improve communication between all levels of those in the medical, mental health and substance abuse and government agencies.

The County is also working to establish a Community Housing Development Organization (CHDO) it can partner with to carry out housing development activities. This will increase capacity and the institutional structure to carry out HOME programs.

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

The County will work to foster collaboration through dissemination of services, news, and information across social service organizations, subcontractors, and public and private entities. One way the County will accomplish this is through subrecipient meetings that bring together affordable housing developers and social service agencies.

There is a quarterly housing alliance meeting hosted by the Collier County Community Land Trust and they bring together legislators, commissioners, philanthropic organizations and developers to address affordable housing issues and strategies to implement partnerships and pending and upcoming legislation at the state and local level.

The County will encourage community-based solutions and regional partnerships and will continue to support and participate in the CoC, whose membership includes both affordable housing and social service agencies.

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 County's most recent Analysis of Impediments to Fair Housing was developed in June 2021. The AI identified four (4) specific impediments which the CHS staff has been addressing.

Impediment #1 Lack of Fair Housing Organization/Fair Housing Education

In PY2024, Collier County addressed this impediment by:

- Providing funding to Housing Education Lending Programs (HELP) and other housing entities;
- Continue to fund educational workshops and fair housing workshops along with other efforts to educate and assist the community. In addition, the Community and Human Services Division continued the following activities to assist in addressing fair housing impediments;
- Fair housing notices and fair housing pamphlets (English/Spanish) are provided to libraries, social service agencies, churches, and the Collier County housing website. Fair Housing Training is conducted, and the website has been enhanced for additional Fair Housing Information. In addition, Fair Housing information is included in the CHS Compliance website for subrecipients and contractors;
- Collier County's Communications and Customer Relations Division is tasked with taking calls and/or complaints on housing and job discrimination and referring callers to the appropriate services. They also provide printed materials to the public;

- CHS has a Fair Housing plan;
- CHS requires all subrecipients/developers to have an Affirmative Fair Housing Policy and submit to CHS within 60 days of agreement execution;
- CHS conducts annual Fair Housing training for all subrecipients and area landlords/property managers.

Impediment #2 Limited Supply of Affordable Housing Restricts Housing Choice

In 2024, the County continued to focus on implementing recommendations outlined in the Community Housing Plan including modifications to existing incentives including impact fee deferral, affordable housing density-bonus program, making publicly owned land available for housing construction, identifying additional funding sources for affordable housing, and other recommendations.

Impediment #3 High Concentrations of Low-Income Housing

Staff is also working to identify publicly owned land that can be used to develop affordable housing for working families, young professionals, and others; improve the family's ability to obtain mortgages through financial counseling & training; and other recommendations.

In 2024, the Board of County Commissioners continued to work with the affordable housing developers, Renaissance Hall at Old Course and McDowell Housing Partners, slated to build affordable rental units on County owned property.

Impediment #4 Lack of Accessible/Special Needs Housing

Special Needs housing has been addressed in the 2017 Community Housing Plan and many of the plan's recommendations discuss a minimum set-aside for senior and special needs housing; encouraging the creation of a community land trust (CLT) and other recommendations to address these special needs population.

In addition, the SHIP program requires that a minimum of 20% of the SHIP allocation be used to serve households that include one or more individuals with a disability. The County continues to comply with this requirement when utilizing SHIP funds, further supporting housing for special needs populations.

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

Subrecipients receive information on federal and local regulations relating to their specific activity, along with an explanation as to how they apply to the project. Specific performance objectives are outlined within each subrecipient agreement, giving measurable objectives for the eligible activity to be carried out. Each project is monitored on an ongoing basis, and all preconstruction conferences are attended by division staff. Prior to any contract, CHS staff reviews program requirements with prospective subrecipients, including emphasis on conflict of interest and special requirements for each subrecipient's specific agreement. This process ensures subrecipients are fully aware of program requirements. Documentation submitted with reimbursement requests is reviewed for compliance with applicable regulations and measurable objectives prior to issuing funds.

On-site monitoring of selected subrecipients is scheduled by the County and conducted by the CHS Grant Compliance Monitoring Team using an enhanced monitoring checklist. The Monitoring Team is typically composed of the Compliance Supervisor, the Project Grant Coordinator, a Management Analyst, and a Senior Accountant. This team is charged with providing a progress monitoring visit and evaluation and a second visit at final project closeout (the timing of which are subject to change based on current divisional policies). The specific number of monitoring visits is based on a risk evaluation, but every project has closeout monitoring. Projects still under construction for more than a year are also monitored until the project is complete. Projects are reviewed to ensure all aspects of the activity are carried out in accordance with applicable regulations. After a monitoring visit, CHS sends a follow-up letter to the subrecipient stating the outcome of the monitoring. Where required by the monitoring outcome, Corrective Action Plans are developed and the subrecipient's compliance with the Corrective Action Plan is reviewed until the plan is satisfied. After the Corrective Action Plan is satisfied and all monitoring findings are cleared, CHS closes out the monitoring with a letter to the subrecipient identifying future compliance requirements and reporting responsibilities.

In addition to the above, any subrecipient determined to need or requests additional training on how to meet grantee and federal requirements receives technical assistance (TA) in the form deemed most appropriate to the circumstances.

The County has developed written policies and procedures that are in place for all federal grant programs. CHS continues to monitor and assist subrecipients to become aware of and knowledgeable about all grant requirements. Additionally, CHS provides TA to achieve compliance with all federal requirements and holds a quarterly partnership meeting with each subrecipient to ensure successful project completion.

MBE/WBE

Collier County continues to collaborate with local businesses to establish contracts with woman-owned and minority-owned businesses, when applicable. Further, the County complies with Section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C 1701u) and implementing regulations at 24 CFR Part 75. In an effort to increase the participation of MBE/WBE businesses in the HUD programs, CHS provides mandatory training to subrecipients on an annual basis. The training outlines the requirements for encouraging MBE/WBE participation in contracting opportunities to increase economic opportunities to businesses that certify as minority or women owned.

Comprehensive Planning Requirements

The comprehensive planning requirements include the community planning and development process of the 5-Year Consolidated Plan, subsequent Annual Action Plans, 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 makes sure to follow its HUD approved Citizen Participation Plan (CPP) which helps guide CHS staff to gather community input which is an essential component in identifying the priority housing and community development needs in the County.

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.

Collier County understands the importance of citizen participation in developing its CAPER and related Annual Action Plan establishing the activities that will be reported on for PY2024.

The County's citizen participation process began with the development of the PY2024 Action Plan. The County ensured compliance with its adopted Citizen Participation Plan and citizen participation requirements by publishing notices for grant application cycles, public hearings and meetings, and end of year reporting in the local newspaper and on the County's website. The County included all required information such as deadline dates, dates of public hearings, locations and times of public hearings, and information on how to obtain the grant application or request technical assistance. The County also published its recommendations for funding providing the public with an opportunity to comment. The activities established in the Action Plan are the current activities being reported in this CAPER.

The fourth year CAPER program year covered October 1, 2024, to September 30, 2025. Pursuant to HUD guidelines, this CAPER allowed for reasonable notice for review and comment, as well as a fifteen (15) day comment period prior to submission. Public notice of comment period was published on November 19, 2025, notifying the public that the CAPER was available for comment from November 20, 2025, through December 5, 2025. The public was provided with proper notice and was given the opportunity to comment on the draft CAPER. Upon request, IDIS reports were also available for citizen review during the 15-day public review period. No comments were received on the CAPER during the comment period.

The public notice included the address of the Collier County Community and Human Services Division, staff contacts, mailing addresses, phone numbers, the website to view the report and information on where to direct comments and questions.

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.

Collier County does not anticipate any significant changes in program objectives. Housing and community revitalization activities, including public services and infrastructure improvements, remain as high priority needs and the use of CDBG funds is essential to address these needs.

Addressing the objectives identified greatly relies on the amount of funding available from the federal government and effective leveraging of resources. Collier County continues to meet Consolidated Plan objectives and goals utilizing available funding and if at any point in the future determines there is a need to revise objectives, Collier County will provide proper documentation to support the need for a change and will follow proper amendment procedures.

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

The county does not have any Brownfields Economic Development Initiative grants.

[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.

Please list those projects that should have been inspected on-site this program year based upon the schedule in 24 CFR §92.504(d). Indicate which of these were inspected and a summary of issues that were detected during the inspection. For those that were not inspected, please indicate the reason and how you will remedy the situation.

On-site inspections for HOME units are scheduled to be inspected at three-year intervals. The County completed 31 inspections during PY2024 for the HOME program, as detailed below. All units passed inspection meaning they had no Housing Quality Standard (HQS) minimum criteria marked in the "fail" or "inconclusive" columns of the HQS checklist.

December 5, 2024, HOME Inspections

1384 Boxwood Drive

1380 Boxwood Drive

136 Anhinga Way Apt 1

131 Vireos Way, Apt 3

February 25, 2025, HOME Inspections

2735 Wilton Court

2731 Wilton Court

2716 Wilton Court

2712 Wilton Court

2486 Sanders Pine Circle

2471 Sanders Pine Circle

2466 Sanders Pine Circle

2460 Sanders Pine Circle

June 26, 2025, HOME Inspections

2531 55th Terrace SW Unit B

2531 55th Terrace SW Unit A

2500 55th Terrace SW Unit B

2500 55th Terrace SW Unit A

2418 Santa Barbara Unit B

2418 Santa Barbara Unit A

2124 Sunshine Unit B

2124 Sunshine Unit A

July 30, 2025, HOME Inspections

3186 Esperanza Ct

3185 Esperanza Ct

3178 Esperanza Ct

3177 Esperanza Ct

3174 Esperanza Ct

3173 Esperanza Ct

3168 Esperanza Ct

3164 Esperanza Ct

3160 Esperanza Ct

3156 Esperanza Ct

3153 Esperanza Ct

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

Collier County Community and Human Services (CHS) monitor subrecipients for compliance with affirmative marketing requirements by reviewing tenant selection policies, marketing materials, and property management interviews. Any project using HOME funds must provide a marketing plan to the CHS office for review prior to approval of a funding agreement. For new construction, the development entity is responsible for affirmatively marketing the housing units they develop whether the units serve special needs populations, or senior housing, or low-income working families.

HOME applicants or awardees who receive funding submit an affirmative marketing plan that includes the following:

- 1. Methods for informing the public, owners, and potential tenants about Federal fair housing laws and their fair housing policy (e.g., use of commercial media, use of community contacts, use of the Equal Housing Opportunity logo or slogan in press releases, solicitations to owners, and written communication);
- 2. Requirements and practices each owner must adhere to in order to carry out affirmative marketing procedures and requirements;
- Procedures to be used by owners to inform and solicit applications from persons in the housing market area who are not likely to apply for housing without special outreach (e.g., use of community organizations, places of worship, employment centers, fair housing groups, or housing counseling agencies);
- 4. Addresses the items in CFR 92.351.

Additional efforts to reach those who are least likely to apply include the distribution of program flyers, providing staff training, and presenting at community events or workshops. All HOME program flyers and brochures contain the "Equal Opportunity" logo.

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.

The County started the program year with \$69,840.44 of program income on hand. Program income on hand is paid out to projects before entitlement funds for new and existing projects. Program income received during the 2024 program year totaled \$31,571.43. Expenditures of program income during the year were \$6,718.54, and a balance of \$94,693.33 in program income is available to be drawn for eligible activities. Refer to CR-10 and CR-20 for race/ethnicity and income characteristics of beneficiaries that may have been served through activities utilizing program income.

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 the 2024 program year, CHS Division staff participated in several committees and working groups to foster and maintain affordable housing. Staff are active members of the Affordable Housing Advisory Committee that evaluates potential opportunities for maximizing affordable housing stock throughout the County. This group focuses on the chronic affordable housing challenges.

Collier County continues to implement a range of complementary strategies to foster and maintain affordable housing. These actions include expanding partnerships with nonprofit and private developers to increase the production and preservation of affordable units, leveraging federal and state funding sources to support rehabilitation of aging housing stock, and promoting programs that reduce development barriers such as expedited permitting and flexible zoning tools. The County further supports affordable housing through the Local Government Voluntary Contribution (LGC) and Local Government Area of Opportunity (LGAO), which strengthen applications for state-funded programs and help incentivize the development of new income-restricted units. The jurisdiction also strengthens long-term affordability by enforcing deed restrictions, monitoring compliance, and supporting homebuyer assistance programs that create stable, sustainable ownership opportunities for low- and moderate-income households. Additionally, outreach and technical assistance are provided to developers, community organizations, and residents to encourage participation in affordable housing initiatives and to ensure existing units remain safe, decent, and accessible.

In addition, staff coordinate with other divisions within the County to facilitate the efficient processing of affordable and special needs housing applications. When project approvals require cooperation between divisions, staff facilitate expedition of permits whenever possible and appropriate.

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	3	0	0	0	0
Total Labor Hours	6,409	0	0	0	0
Total Section 3 Worker Hours	0	0	0	0	0
Total Targeted Section 3 Worker Hours	0	0	0	0	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	1				
health screenings, interview clothing, uniforms, test fees,					
transportation.					
Assisted residents with finding childcare.					
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	1		
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	1		
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 16 – Qualitative Efforts - Number of Activities by Program

Narrative

Section 3 projects are housing rehabilitation, housing construction, and other public construction projects assisted under HUD programs that provide housing and community development, financial assistance when the total amount of assistance to the project exceeds a threshold of \$200,000. The County had three projects underway in PY2024, one of which reported 6,409 labor hours and may require Section 3 reporting.

Collier County is committed to promoting job training, employment, and contracting opportunities for low- and very low-income residents particularly in connection with HUD-funded projects and activities within their communities. To the greatest extent feasible, the County encourages recipients of applicable HUD financial assistance to prioritize local hiring and support economic development in these areas. The County makes every reasonable effort to meet Section 3 benchmarks, however, it is often not feasible to fully achieve these benchmarks for certain project types, particularly roof replacement projects, where the specialized and short-duration nature of the work limits opportunities for hiring or subcontracting that meet Section 3 criteria.

Collier County actively partners with local businesses to increase participation from women-owned and minority-owned enterprises. This includes working with subrecipients to take all necessary affirmative steps to ensure that minority-owned firms, women's business enterprises, and labor surplus area firms are given full and fair opportunities to participate in HUD-funded contracts. Efforts include adding qualified small, minority, and women-owned businesses to solicitation lists, bid advertisements and ensuring they are considered whenever potential sources are sought.

These businesses, in turn, are encouraged to recruit residents from low- and very low-income neighborhoods where HUD funds are invested.

Furthermore, Collier County complies with Section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u) and its implementing regulations at 24 CFR Part 75. To support the inclusion of Minority Business Enterprises (MBEs) and Women's Business Enterprises (WBEs) in HUD programs, Collier County's Community and Human Services (CHS) department provides mandatory annual training for subrecipients. This training outlines the requirements for promoting MBE/WBE participation and expanding contracting and economic opportunities for certified minority- and women-owned businesses in federally assisted agreements.

Collier County also offers resources that assist Section 3 workers compete for jobs in the form of referrals to agencies to assist with job coaching, resume building, and soft skill development. All bid packages contain information on Section 3 reporting as well as providing a preference for Section 3 businesses. Subrecipients are required to report on Section 3 quarterly for construction projects.

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 NameCOLLIER COUNTY **Organizational DUNS Number**076997790

UEI

EIN/TIN Number 596000558
Identify the Field Office South Florida

Identify CoC(s) in which the recipient or

subrecipient(s) will provide ESG

assistance

ESG Contact Name

Prefix Mrs.
First Name Kristi

Middle Name

Last Name Sonntag

Suffix

Title Community and Human Services Director

ESG Contact Address

Street Address 13339 Tamiami Trail EastStreet Address 2Building H Suite 213644

City Naples
State FL
ZIP Code 34112

Phone Number (239) 252-2486

Extension

Fax Number (239) 252-2331

Email Address kristi.sonntag@collier.gov

ESG Secondary Contact

PrefixMr.First NameDonaldLast NameLuciano

Suffix

Title Assistant Director, Community & Human Services

Phone Number (239) 252-2509

Extension

2. Reporting Period—All Recipients Complete

Program Year Start Date 10/01/2024 Program Year End Date 09/30/2025

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

Subrecipient or Contractor Name: Shelter for Abused Women & Children

City: Naples State: FL

Zip Code: 34101, 0102 **DUNS Number:** 836680769

UEI:

Is subrecipient a victim services provider: Y

Subrecipient Organization Type: Other Non-Profit Organization

ESG Subgrant or Contract Award Amount: \$117,401