

# **FY 2017-18 ANNUAL ACTION PLAN County of Orange**

The Third Annual Action Plan  
Under the Urban County Consolidated Plan  
for Fiscal Years 2015-19

Housing & Community Development & Homeless Prevention  
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## **Urban County Program Participants**

City of Brea  
City of Cypress  
City of Dana Point  
City of Laguna Beach  
OC Unincorporated Areas

City of Laguna Hills  
City of Laguna Woods  
City of La Palma  
City of Los Alamitos

City of Seal Beach  
City of Stanton  
City of Villa Park

### **Metro Cities**

City of Aliso Viejo

City of Placentia

City of Yorba Linda

## **Executive Summary**

### **AP-05 Executive Summary - 24 CFR 91.200(c), 91.220(b)**

#### **1. Introduction**

The County of Orange is located along the Pacific Ocean between Los Angeles County to the north and northwest, San Bernardino County to the northeast, Riverside County to the east, and San Diego County to the southeast. Orange County stretches approximately 40 miles along the coast and extends inland approximately 20 miles, covering 798 square miles.

The Fiscal Year (FY) 2015-19 Consolidated Plan (ConPlan) for the Urban County of Orange is the planning document for Community Planning and Development (CPD) funds - Community Development Block Grant (CDBG), HOME investment Partnership, and Emergency Solutions Grant (ESG) funds. The Plan identifies the housing and community development needs in the Urban County and sets forth a strategic plan for addressing the identified needs. This Action Plan covers the third year of the FY 2015-19 ConPlan, beginning July 1, 2017 through June 30, 2018. The Action Plan will identify anticipated levels of funding for the program year, describes the geographic areas in which assistance will be provided, and the rationale used.

The “Urban County” of Orange is comprised of 11 cities with populations under 50,000 (participating cities), three “Metro” cities – Aliso Viejo, Placentia, and Yorba Linda – with populations over 50,000, and the unincorporated areas of Orange County. The 11 participating cities include Brea, Cypress, Dana Point, Laguna Beach, Laguna Hills, Laguna Woods, La Palma, Los Alamitos, Seal Beach, Stanton, and Villa Park. With populations over 50,000, Aliso Viejo, Placentia, and Yorba Linda are eligible to participate in the CPD programs as entitlement jurisdictions and receive funding directly from HUD. However, these cities have elected to join the Urban County for the overall implementation of these programs.

#### **2. Summarize the objectives and outcomes identified in the Plan**

This could be a restatement of items or a table listed elsewhere in the plan or a reference to another location. It may also contain any essential items from the housing and homeless needs assessment, the housing market analysis or the strategic plan.

The Urban County of Orange incorporated outcome measures for activities in accordance with the Federal Register Notice which require the following Performance Measure Objectives/Outcomes to be associated with each activity funded:

General Objective Categories- Activities will meet one of the following:

- Decent Housing (DH)
- A Suitable Living Environment (SL)
- Economic Opportunity (EO) General

Outcome Categories- Activities will meet one of the following:

- Availability/Accessibility (1)
- Affordability (2)
- Sustainability (3)

In addition to national objectives and performance outcomes, the County must weigh and balance the input from different groups and assign funding priorities that best bridge the gaps in the County's service delivery system. While other goals the County has set are also important, for the purposes of the Consolidated Plan, only those which are anticipated to be funded with CPD funding programs (CDBG, HOME, and ESG) during the five-year planning cycle are indicated to be high priorities. The County utilizes other funding sources to meet goals that are not considered high priority in the Consolidated Plan. The County established priorities for allocating CPD funds based on a number of criteria, including:

- Urgency of needs
- Cost efficiency
- Eligibility of activities/programs
- Availability of other funding sources to address specific needs
- Funding program limitations
- Capacity and authority for implementing actions
- Consistency with countywide goals, policies, and efforts

Needs which have been determined to be a High Priority level will receive funding during the Five-Year Consolidated Plan. The priorities for the FY 2015-2019 Consolidated Plan, established in consultation with residents and community groups, include the following:

#### High Priority

- Expand and preserve the supply of affordable housing to create housing opportunities for low- and moderate-income households and homeless individuals and families
- Strengthen, preserve, and enhance the physical character and quality of life in Orange County's low- and moderate-income neighborhoods, including the housing stock and public infrastructure and facilities.
- Continue to build the capacity of residents to empower themselves and help strengthen their community, through the funding of needed public services for seniors, the homeless, and those at risk of homelessness.
- Planning and administration.

### **3. Evaluation of past performance**

This is an evaluation of past performance that helped lead the grantee to choose its goals or projects.

Housing and Community Development/Homeless Prevention measures productivity and program impact in accordance with HUD Notices. Besides regular site visits to provide technical assistance to subrecipients, all projects/programs funded by Housing and Community Development/Homeless Prevention are officially monitored at least two times per fiscal year, which involves the following: performance, compliance, drawdown timeliness and exit monitoring.

A detailed summary report of prior year uses and performance is specified in the Consolidated Annual Performance and Evaluation Report (CAPER). As reported in the CAPER for FY 2015-16, the Urban County:

- Rehabilitated 229 owner-occupied single family units
- Placed 33 households (74 individuals) into housing through Rapid Rehousing funding
- Monitored HOME affordable housing units
- Assisted 2,196 unduplicated homeless individuals and families (equaling 37,006 shelter bed nights) in shelters
- Provided case management, food and assistance to homeless persons
- Completed 9 public infrastructure and community facility improvements
- Provided Public Service to 16,674 very low and low-income individuals such as children, youths, seniors, disabled, mentally ill, homeless, abused and battered women.

The limited resources of the Consolidated Plan/Action Plan are not sufficient to address all of the needs of low- and moderate-income and special needs residents in the Urban County. However, the Urban County overall has been successful in implementing its public improvement, housing, and community services projects to meet the objectives established in the Consolidated Plan. Overall, the activities have been very successful and in some cases have exceeded expectations. The County will continue to proceed in meeting these needs through the FY 2015-19 Consolidated Plan and Annual Action Plans.

### **4. Summary of Citizen Participation Process and consultation process**

Summary from citizen participation section of plan.

The Citizen Participation Plan provides a framework and process by which the County's consolidated planning efforts comply with the citizen participation requirements published by the U.S. Department of Housing and Urban Development (HUD). The Citizen Participation Plan is prepared and implemented in accordance with the guidance provided in HUD Regulations 24CFR Part 91.105.

The requirements for citizen participation do not restrict the responsibility or authority of the County of Orange from the development or execution of its Consolidated Plan. The County of Orange is entitled to receive annual grant funding from the Community Development Block Grant (CDBG), Home Investment Partnership (HOME), and the Emergency Shelter Grant (ESG) programs. It is the policy of Orange County to ensure adequate citizen involvement, with particular emphasis on participation by low- and moderate-income persons, in the planning, implementation, and evaluation of its housing and community development programs. This plan covers the Urban County of Orange comprised of Participating cities with populations under 50,000 (participating cities), cities with a population over 50,000 that elect to participate in the urban county (metropolitan city) and the unincorporated areas of Orange County. The County of Orange is the lead agency in developing the Citizen Participation Plan.

It is the policy of the County to follow its Citizen Participation Plan and to encourage and facilitate a participation (residents, service providers, government agencies, and others) in the development of all Community Planning and Development (CPD) required consolidated planning documents including the Five-Year Consolidated Plan, Annual Action Plans, Substantial Amendments, and the Consolidated Annual Performance and Evaluation Report (CAPER).

The primary purpose of the participation will be in needs identification, priority setting, funding allocations, and program recommendations related to the consolidated planning process. The County shall provide for and encourage citizen participation with particular emphasis on low- and moderate-income persons; persons residing in predominantly low -and moderate-income neighborhoods or slum and blighted areas; and persons residing in areas where the use of CDBG funds is being proposed.

The primary purpose of the CPD programs covered by this Citizen Participation Plan is to improve communities by providing decent housing, a suitable living environment and growing economic opportunities. The County encourages the participation of all its citizens.

## **5. Summary of public comments**

This could be a brief narrative summary or reference an attached document from the Citizen Participation section of the Con Plan.

None have been received.

## **6. Summary of comments or views not accepted and the reasons for not accepting them**

The County invites and accepts all comments. There were no comments received.

## **7. Summary**

See discussion above.

**PR-05 Lead & Responsible Agencies – 91.200(b)**

**1. Agency/entity responsible for preparing/administering the Consolidated Plan**

Describe the agency/entity responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

<b>Agency Role</b>	<b>Name</b>	<b>Department/Agency</b>
CDBG Administrator	ORANGE COUNTY	OC Community Resources
HOME Administrator	ORANGE COUNTY	OC Community Resources
ESG Administrator	ORANGE COUNTY	OC Community Resources

**Table 1 – Responsible Agencies**

**Narrative (optional)**

Housing and Community Development/Homeless Prevention, a Division of OC Community Resources, administers the Urban County’s CDBG, HOME, and ESG programs.

**Consolidated Plan Public Contact Information**

For matters concerning the Urban County of Orange’s CDBG, HOME, and ESG programs, contact: Craig Fee, Manager, Housing and Community Development/Homeless Prevention, 1300 S. Grand Ave. Bldg. B, Santa Ana, CA 92705, (714) 480-2996.

## **AP-10 Consultation – 91.100, 91.200(b), 91.215(I)**

### **1. Introduction**

As part of this Consolidated Plan development, the Urban County of Orange undertook an extensive outreach program to consult and coordinate nonprofit agencies, affordable housing providers, and government agencies regarding the needs of the low- and moderate-income community. The outreach program was summarized in the Executive Summary and Citizen Participation sections of this Consolidated Plan. Comments received and results of the survey were summarized in Appendix A to the Consolidated Plan.

### **Provide a concise summary of the jurisdiction’s activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies (91.215(I))**

To outreach to various agencies and organizations, the Urban County compiled an outreach list consisting of 311 agencies, including:

- Nonprofit service providers that cater to the needs of low- and moderate-income households and persons with special needs, including persons with disabilities;
- Affordable housing providers;
- Housing advocates;
- Housing professionals;
- Public agencies (such as school districts, health services, public works);
- Economic development and employment organizations; and
- Community and neighborhood groups.

These agencies were mailed notices of the Urban County’s Consolidated Plan process and public meetings and specific agencies were also contacted to obtain data in preparation of the Consolidated Plan. For example, the State Developmental Services Department and State Social Services Department were contacted to obtain data and housing resources for persons with disabilities.

### **Describe coordination with the Continuum of Care and efforts to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans, and unaccompanied youth) and persons at risk of homelessness.**

For the past several years, leadership and coordination of Orange County’s Continuum of Care (CoC) planning process has been the shared responsibility of 2-1-1 Orange County and Housing and Community Development/Homeless Prevention. This public-nonprofit partnership helps ensure comprehensive, regional coordination of efforts and resources to reduce the number of homeless and persons at risk of homelessness throughout Orange County. This group serves as the regional convener

of the annual CoC planning process and as a catalyst for the involvement of the public and private agencies that make up the regional homeless system of care. Housing and Community Development/Homeless Prevention provides support to the CoC governing body, the Commission to End Homelessness and routinely aligns funding available to address the needs of the homeless with the local Ten Year Plan to End Homelessness.

Also, the Coordinated Entry System (CES), a process to help communities prioritize assistance based on vulnerability and severity of service needs to ensure that people who need assistance the most can receive it in a timely manner, was developed with input from homeless providers in the County and continues to evolve with input from the CoC through the CES committee and various subcommittees. In 2016, 2-1-1 Orange County received a CoC Grant for the implementation of the CES system. 2-1-1 Orange County is now the CoC designated lead for both HMIS and CES.

**Describe consultation with the Continuum(s) of Care that serves the jurisdiction's area in determining how to allocate ESG funds, develop performance standards for and evaluate outcomes of projects and activities assisted by ESG funds, and develop funding, policies and procedures for the operation and administration of HMIS**

As the Continuum of Care lead agency, the County of Orange collaborates with ESG recipient jurisdictions in the region (i.e. Anaheim, Garden Grove and Santa Ana) to discuss new ESG regulations and to plan for the allocation of ESG funds through the following ways:

- Coordination across regional entitlement jurisdictions by developing and utilizing standardized eligibility and assessment tools;
- Compliance with new eligibility and verification requirements (HMIS, housing status, homeless definitions, etc.). Support of federal and local goals for priority populations;
- Allow for variations in the program design that responds to the needs and resources of the jurisdiction; and

In particular, to ensure that funds are leveraged to create maximum impact, the ESG recipient cities have created a single Request for Proposal (RFP) to select eligible organizations that provide homeless prevention and rapid rehousing services, street outreach, emergency shelters and transitional housing facilities for various homeless populations. The collaborative effort is intended to minimize duplication of efforts and to ensure funds are leveraged to create maximum impact. The collaborative is also looking at further options for leveraging of resources including joint monitoring and coordinated reporting requirements.

The County of Orange requires all public service projects and activities providing services to homeless individuals and/or families to actively participate in the Homeless Management Information System (HMIS). The Ten Year Plan to End Homelessness also prioritizes the strengthening of data collection and participation across the system of care for homeless individuals and families.

**2. Describe Agencies, groups, organizations and others who participated in the process and describe the jurisdiction’s consultations with housing, social service agencies and other entities**

**Table 2 – Agencies, groups, organizations who participated**

1	<b>Agency/Group/Organization</b>	Abrazar, Inc.
	<b>Agency/Group/Organization Type</b>	Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Health Services-Education Services-Employment Senior Transportation Neighborhood Organization
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Non-Homeless Special Needs
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The Non-Profit was sent the Funding Allocation Policy & Process and the draft Annual Action Plan was posted on our website for review and provide input on developing the plans.
2	<b>Agency/Group/Organization</b>	CITY OF BREA
	<b>Agency/Group/Organization Type</b>	Other government - Local
	<b>What section of the Plan was addressed by Consultation?</b>	Public Facilities and Infrastructure
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The City was sent the Funding Allocation Policy & Process and draft Annual Action Plan to review and provide input on developing the plans. Each Cooperating City was encouraged to participate in the Citizen Participation Process. Cities submitting applications for Community Planning and Development grant funds are required to publicly notice and hold at least one public meeting to discuss the proposed use of these funds.

3	<b>Agency/Group/Organization</b>	COMMUNITY ACTION PARTNERSHIP OC
	<b>Agency/Group/Organization Type</b>	Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Health Services-Education Services-Employment
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Non-Homeless Special Needs
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The Non-Profit was sent the Funding Allocation Policy & Process and a draft Annual Action Plan was posted on our website for review and provide input on developing the plans.
4	<b>Agency/Group/Organization</b>	CITY OF CYPRESS
	<b>Agency/Group/Organization Type</b>	Other government - Local
	<b>What section of the Plan was addressed by Consultation?</b>	Public Facilities and Infrastructure
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The City was sent the Funding Allocation Policy & Process and draft Annual Action Plan to review and provide input on developing the plans. Each Cooperating City was encouraged to participate in the Citizen Participation Process. Cities submitting applications for Community Planning and Development grant funds are required to publicly notice and hold at least one public meeting to discuss the proposed use of these funds.

5	<b>Agency/Group/Organization</b>	CITY OF LAGUNA BEACH
	<b>Agency/Group/Organization Type</b>	Housing Services-homeless Other government - Local
	<b>What section of the Plan was addressed by Consultation?</b>	Homeless Needs - Chronically homeless
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The City was sent the Funding Allocation Policy & Process and draft Annual Action Plan to review and provide input on developing the plans. Each Cooperating City was encouraged to participate in the Citizen Participation Process. Cities submitting applications for Community Planning and Development grant funds are required to publicly notice and hold at least one public meeting to discuss the proposed use of these funds.
6	<b>Agency/Group/Organization</b>	CITY OF LAGUNA HILLS
	<b>Agency/Group/Organization Type</b>	Other government - Local
	<b>What section of the Plan was addressed by Consultation?</b>	Public Facilities and Infrastructure
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The City was sent the Funding Allocation Policy & Process and draft Annual Action Plan to review and provide input on developing the plans. Each Cooperating City was encouraged to participate in the Citizen Participation Process. Cities submitting applications for Community Planning and Development grant funds are required to publicly notice and hold at least one public meeting to discuss the proposed use of these funds.
7	<b>Agency/Group/Organization</b>	CITY OF LA PALMA
	<b>Agency/Group/Organization Type</b>	Other government - Local

	<b>What section of the Plan was addressed by Consultation?</b>	Public Facilities and Infrastructure
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The City was sent the Funding Allocation Policy & Process and draft Annual Action Plan to review and provide input on developing the plans. Each Cooperating City was encouraged to participate in the Citizen Participation Process. Cities submitting applications for Community Planning and Development grant funds are required to publicly notice and hold at least one public meeting to discuss the proposed use of these funds.
8	<b>Agency/Group/Organization</b>	CITY OF LAGUNA WOODS
	<b>Agency/Group/Organization Type</b>	Other government - Local
	<b>What section of the Plan was addressed by Consultation?</b>	Public Facilities and Infrastructure
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The City was sent the Funding Allocation Policy & Process and draft Annual Action Plan to review and provide input on developing the plans. Each Cooperating City was encouraged to participate in the Citizen Participation Process. Cities submitting applications for Community Planning and Development grant funds are required to publicly notice and hold at least one public meeting to discuss the proposed use of these funds.
9	<b>Agency/Group/Organization</b>	CITY OF LOS ALAMITOS
	<b>Agency/Group/Organization Type</b>	Other government - Local
	<b>What section of the Plan was addressed by Consultation?</b>	Public Facilities and Infrastructure

	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The City was sent the Funding Allocation Policy & Process and draft Annual Action Plan to review and provide input on developing the plans. Each Cooperating City was encouraged to participate in the Citizen Participation Process. Cities submitting applications for Community Planning and Development grant funds are required to publicly notice and hold at least one public meeting to discuss the proposed use of these funds.
10	<b>Agency/Group/Organization</b>	CITY OF SEAL BEACH
	<b>Agency/Group/Organization Type</b>	Other government - Local
	<b>What section of the Plan was addressed by Consultation?</b>	Pacific Facilities and Infrastructure
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The City was sent the Funding Allocation Policy & Process and draft Annual Action Plan to review and provide input on developing the plans. Each Cooperating City was encouraged to participate in the Citizen Participation Process. Cities submitting applications for Community Planning and Development grant funds are required to publicly notice and hold at least one public meeting to discuss the proposed use of these funds.
11	<b>Agency/Group/Organization</b>	FAIR HOUSING COUNCIL OF OC
	<b>Agency/Group/Organization Type</b>	Service-Fair Housing
	<b>What section of the Plan was addressed by Consultation?</b>	Fair Housing Services
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	A range of "no-cost" fair housing services provided to eligible clientele throughout the County's Urban County program areas that are victimized and affected by illegal housing practices were evaluated and have been included in the document. The Non-Profit was sent the Funding Allocation Policy & Process and draft Annual Action Plan to post to review and provide input on developing the plans.

12	<b>Agency/Group/Organization</b>	ORANGE COUNTY HOUSING AUTHORITY
	<b>Agency/Group/Organization Type</b>	Housing PHA Services - Housing Services-homeless Other government - County
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The Orange County Housing Authority was sent the Funding Allocation Policy & Process and draft Annual Action Plan to review and provide input on developing the plans.
13	<b>Agency/Group/Organization</b>	CITY OF ALISO VIEJO
	<b>Agency/Group/Organization Type</b>	Other government - Local
	<b>What section of the Plan was addressed by Consultation?</b>	Public Facilities and Infrastructure

	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The City was sent the Funding Allocation Policy & Process and draft Annual Action Plan to review and provide input on developing the plans. Each Cooperating City was encouraged to participate in the Citizen Participation Process. Cities submitting applications for Community Planning and Development grant funds are required to publicly notice and hold at least one public meeting to discuss the proposed use of these funds.
14	<b>Agency/Group/Organization</b>	CITY OF PLACENTIA
	<b>Agency/Group/Organization Type</b>	Other government - Local
	<b>What section of the Plan was addressed by Consultation?</b>	Public Facilities and Infrastructure
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The City was sent the Funding Allocation Policy & Process and draft Annual Action Plan to review and provide input on developing the plans. Each Cooperating City was encouraged to participate in the Citizen Participation Process. Cities submitting applications for Community Planning and Development grant funds are required to publicly notice and hold at least one public meeting to discuss the proposed use of these funds.
15	<b>Agency/Group/Organization</b>	CITY OF YORBA LINDA
	<b>Agency/Group/Organization Type</b>	Other government - Local
	<b>What section of the Plan was addressed by Consultation?</b>	Public Facilities and Infrastructure
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The City was sent the Funding Allocation Policy & Process and draft Annual Action Plan to review and provide input on developing the plans. Each Cooperating City was encouraged to participate in the Citizen Participation Process. Cities submitting applications for Community Planning and Development grant funds are required to publicly notice and hold at least one public meeting to discuss the proposed use of these funds.

16	<b>Agency/Group/Organization</b>	CITY OF DANA POINT
	<b>Agency/Group/Organization Type</b>	Other government - Local
	<b>What section of the Plan was addressed by Consultation?</b>	Public Facilities and Infrastructure
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The City was sent the Funding Allocation Policy & Process and draft Annual Action Plan to review and provide input on developing the plans. Each Cooperating City was encouraged to participate in the Citizen Participation Process. Cities submitting applications for Community Planning and Development grant funds are required to publicly notice and hold at least one public meeting to discuss the proposed use of these funds.
17	<b>Agency/Group/Organization</b>	CITY OF VILLA PARK
	<b>Agency/Group/Organization Type</b>	Other government - Local
	<b>What section of the Plan was addressed by Consultation?</b>	Public Facilities and Infrastructure
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The City was sent the Funding Allocation Policy & Process and draft Annual Action Plan to review and provide input on developing the plans. Each Cooperating City was encouraged to participate in the Citizen Participation Process. Cities submitting applications for Community Planning and Development grant funds are required to publicly notice and hold at least one public meeting to discuss the proposed use of these funds.
18	<b>Agency/Group/Organization</b>	CITY OF STANTON
	<b>Agency/Group/Organization Type</b>	Other government - Local
	<b>What section of the Plan was addressed by Consultation?</b>	Public Facilities and Infrastructure

	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The City was sent the Funding Allocation Policy & Process and draft Annual Action Plan to review and provide input on developing the plans. Each Cooperating City was encouraged to participate in the Citizen Participation Process. Cities submitting applications for Community Planning and Development grant funds are required to publicly notice and hold at least one public meeting to discuss the proposed use of these funds.
19	<b>Agency/Group/Organization</b>	WORKFORCE INVESTMENT BOARD
	<b>Agency/Group/Organization Type</b>	Services-Children Services-Victims of Domestic Violence Services-Employment
	<b>What section of the Plan was addressed by Consultation?</b>	Economic Development
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	In collaboration with the County's Workforce Investment Board (OCWIB), the County will continue to offer outreach and training to poverty level families and individuals. Through the CoC system, the County will work with the OCWIB job-training providers to ensure that low- and moderate-income persons are trained with employable skills with the potential to earn higher wages.

**Identify any Agency Types not consulted and provide rationale for not consulting**

The Urban County contacted all participating cities, published on Website and posted at all Community Centers for Public Review.

**Other local/regional/state/federal planning efforts considered when preparing the Plan**

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	Commission to End Homelessness	Potential funding allocations to address homeless needs will complement the CoC Strategy.
Ten Year Plan to End Homelessness	Commission to End Homelessness	Potential funding allocations to address homeless needs will be consistent with the Ten-Year Plan to End Homelessness.

**Table 3 – Other local / regional / federal planning efforts**

**Narrative (optional)**

The implementation of this FY 2017-18 Action Plan is a third year update to the FY 2015-19 Consolidated Plan which involved various agencies of County government, participating/metro cities, nonprofit organizations, and private industry. As part of the public outreach program for the FY 2015-19 Consolidated Plan, Housing and Community Development/Homeless Prevention consulted over 300 agencies, groups, and organizations involved in the development of affordable housing, and/or provision of services to children, elderly persons, persons with disabilities, persons with HIV/AIDS and their families, and homeless persons.

The Urban County seeks to reduce the number of people living in poverty (extremely low-income households earning less than 30 percent of the AMI) by providing a number of programs including housing assistance, supportive services, economic development assistance, and job training opportunities. The Urban County will continue to leverage opportunities to support funding for Community Based Development Organizations, cities, and other groups to provide training and employment opportunities to extremely low-income persons.

## **AP-12 Participation – 91.105, 91.200(c)**

### **1. Summary of citizen participation process/Efforts made to broaden citizen participation Summarize citizen participation process and how it impacted goal-setting**

Citizen participation is one of the most important components of the Consolidated Plan process. To solicit public input during the development of the Consolidated Plan, the Urban County conducted four Community Workshops and three Focus Group Workshops for local housing and services providers. The Urban County also administered a Housing and Community Development Needs Survey.

**Public Hearing:** A Public Hearing was held on December 13, 2016 before the Board of Supervisor for the adoption of the FY 2017-18 Funding Allocation Policy & Process and will be held on May 9, 2017 for the adoption of the FY 2017-18 Annual Action Plan.

**Public Review of Draft Documents:** A 30-day public review was held from October 7, 2016 through November 7, 2016 for the FY 2017-18 Funding Allocation Policy and Process and from March 13, 2017 to April 12, 2017 for the FY 2017-18 Annual Action Plan. The final Consolidated Plan, Annual Action Plans, amendments to the Plan, Funding Allocation Policy & Process and annual performance reports are available for five years at the County Government Offices.

**Citizen Participation Outreach**

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Internet Outreach	Minorities  Non-English Speaking - Specify other language: Spanish and Vietnamese  Persons with disabilities  Non-targeted/broad community  Residents of Public and Assisted Housing	Public Notices and FY 2017-18 Funding Allocation Policy and Process and FY 2017-18 Annual Action Plan was posted on the County's website for public review.	No comments were received.	The County invites and accepts all comments. There were no comments received.	<a href="http://occommunityservices.org/hcd/community/">http://occommunityservices.org/hcd/community/</a>

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
2	Newspaper Ad	Minorities  Non-English Speaking - Specify other language: Spanish and Vietnamese  Persons with disabilities  Non-targeted/broad community  Residents of Public and Assisted Housing	Public notices were published in the OC Register, Unidos (Spanish) and Nguoi Viet (Vietnamese) for FY 2017-18 Funding Allocation Policy & Process on October 7, 2016 and FY 2017-18 Annual Action Plan on March 13, 2017.	No comments were received.	The County invites and accepts all comments. There were no comments received.	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
3	Public Hearing	<p>Minorities</p> <p>Non-English Speaking - Specify other language: Spanish and Vietnamese</p> <p>Persons with disabilities</p> <p>Non-targeted/broad community</p> <p>Residents of Public and Assisted Housing</p>	<p>A public hearing was held at the Orange County Board of Supervisors on December 13, 2016 for the FY 2017-18 Funding Allocation Policy &amp; Process outlining the proposed funding process and policies for the distribution of Federal funds and on May 9, 2017 for the adoption of the FY 2017-18 Annual Action Plan.</p>	<p>No comments were received on the FY 2017-18 Funding Allocation Policy and Process.</p>	<p>The County invites and accepts all comments. There were no comments received on the FY 2017-18 Funding Allocation Policy and Process.</p>	

**Table 4 – Citizen Participation Outreach**



## Expected Resources

### AP-15 Expected Resources – 91.220(c)(1,2)

#### Introduction

A number of housing and community development resources are currently available in the Urban County area. They include:

Community Development Block Grant (CDBG) funds

HOME Investment Partnership Program (HOME) funds

Emergency Solutions grant (ESG) funds

State Emergency Solutions grant (ESG) funds

General funds

HUD Section 108 Loan funds

HUD Housing Choice Voucher Program (through Orange County Housing Authority)

California Housing Finance Agency funds (CALHFA)

State Housing and Community Development (HCD) housing funds

State transportation funds

County of Orange Special Needs Housing Program (SNHP)

No Place Like Home funds

Bringing Families Home

**Anticipated Resources**

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	3,227,880	198,202	815,126	4,241,208	6,105,276	The estimated amount of CDBG funds available over the planning period is based on allocations from FY 2017, estimated program income and funds carried over from prior years. This amount does not include amounts leveraged from sub-recipients.
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	744,255	419,248	0	1,163,503	3,176,337	The estimated amount of HOME funds available over the planning period is based on allocations from FY 2017 and prior year program income.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
ESG	public - federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing	215,408	0	0	215,408	495,343	The estimated amount of ESG funds available over the planning period is based on allocations from FY 2017, excluding funds carried over from prior years.

Table 5 - Expected Resources – Priority Table

**Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied**

A number of housing and community development resources are currently available in the Urban County area. They include:

- Community Development Block Grant (CDBG) funds
- HOME Investment Partnerships Program (HOME) funds
- Emergency Solutions Grant (ESG) funds
- State Emergency Solutions (ESG) funds
- General funds

- HUD Section 108 Loan funds
- HUD Housing Choice Voucher Program (through the Orange County Housing Authority)
- California Housing Finance Agency funds (CalHFA)
- State Housing and Community Development (HCD) housing funds
- State transportation funds
- National Housing Trust Fund
- County of Orange Special Needs Housing Program (SNHP)
- No Place Like Home funds
- Bringing Families Home funds

For CDBG Public Facilities and Improvements Projects, Subrecipients are required to match funds if the project funding amount requested is over \$150,000, with a maximum request of \$350,000, the Subrecipient is required to match 20% of the total amount requested. For those project up to \$150,000, no match funding is required.

The Urban County is now the Administrative Entity for State ESG funding and recieved \$1,208,146 over the next two years to allocate to activities outline in the adopted Funding Allocation Policy & Process.

**If appropriate, describe publically owned land or property located within the jurisdiction that may be used to address the needs identified in the plan**

In 2015, the Orange County Board of Supervisors approved the acquisition and rehabilitation of an emergency shelter site located at 1000 N. Kraemer Place, Anaheim. Multi-year Federal, State and local funding will be utilized to rehabilitate this site for a year round emergency shelter and multi-service center for homeless families and individuals in Orange County.

The County of Orange has started improvements to the industrial/manufacturing building, phase one is complete, located at 1000 North Kraemer Place in order to implement a Year Round Emergency Temporary Shelter and Multi-Service Center. The proposed facility is designed to provide safe shelter, basic needs, and access to support to move individuals and families out of homelessness and into permanent housing opportunities. The project will serve 200 shelter temporary residents while providing access to a range of programs and supportive services at an on-site Multi-Service Center.

The target goals and expected outcomes for the Year Round Emergency Shelter Program will adhere to guidelines and expectations set forth by the U.S. Department of Housing and Urban Development's HEARTH Act as well as the Orange County Ten Year Plan to End Homelessness. The Year Round Emergency Shelter Program and Multi-Service Center should not be regarded as a singular program(s) but should provide support to the entire Orange County Continuum of Care (CoC) helping to move the system towards higher a level of system performance, a reduction in the number of persons who experience homelessness in our community and an increase in access to housing opportunities for chronically homeless individuals utilizing Year Round Emergency Shelter Program services.

**Discussion**

## Annual Goals and Objectives

### AP-20 Annual Goals and Objectives

#### Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Expand Affordable Housing Opportunities	2015	2019	Affordable Housing		Expand Affordable Housing Opportunities	CDBG: \$812,497 HOME: \$1,047,154	Rental units constructed: 14 Household Housing Unit Homeowner Housing Rehabilitated: 163 Household Housing Unit Tenant-based rental assistance / Rapid Rehousing: 100 Households Assisted
2	Enhance Quality of Life	2015	2019	Affordable Housing Non-Housing Community Development		Enhance Quality of Life	CDBG: \$2,263,286	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 89208 Persons Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
3	Public Services	2015	2019	Homeless Non-Homeless Special Needs		Public Services	CDBG: \$480,211 ESG: \$199,400	Public service activities other than Low/Moderate Income Housing Benefit: 3670 Persons Assisted Tenant-based rental assistance / Rapid Rehousing: 27 Households Assisted Homeless Person Overnight Shelter: 1117 Persons Assisted
4	Planning and Administration	2015	2019	Administration		Planning and Administration	CDBG: \$685,214 HOME: \$116,349 ESG: \$16,008	

**Table 6 – Goals Summary**

### Goal Descriptions

1	<b>Goal Name</b>	Expand Affordable Housing Opportunities
	<b>Goal Description</b>	
2	<b>Goal Name</b>	Enhance Quality of Life
	<b>Goal Description</b>	

<b>3</b>	<b>Goal Name</b>	Public Services
	<b>Goal Description</b>	
<b>4</b>	<b>Goal Name</b>	Planning and Administration
	<b>Goal Description</b>	

# Projects

## AP-35 Projects – 91.220(d)

### Introduction

This plan outlines the action steps that the County of Orange will use to address housing and community development needs in the Orange Urban County. The plan includes a listing of activities that the County will undertake during FY 2017-2018 (July 1, 2017 through June 30, 2018) that utilize CDBG, HOME, and ESG funds. For FY 2017-18, the County has a combined CDBG, HOME, and ESG allocation of \$5,620,120, including program income and prior year resources. All proposed activities' budgets will be proportionally increased or decreased from the estimated funding levels to match actual allocation amounts.

### Projects

#	Project Name
1	County's Emergency Shelters (CDBG)
2	County's Emergency Shelters (ESG)
3	City of Laguna Beach Emergency Weather Shelter
4	Midway City Community Services and Education Center
5	El Modena Community Family Resource Center
6	Single Family Housing Rehabilitation (Brea)
7	Single-Family Housing Rehabilitation Program (Cypress)
8	Leisure World Bathroom Accessibility Program (Seal Beach)
9	Year Round Emergency Shelter(County of Orange)
10	Brea Senior Center Kitchen Improvements (Brea)
11	Pedestrian Accessibility Improvements Project Phase I (Laguna Woods)
12	Florence Sylvester Senior Center Improvements (Laguna Hills)
13	La Palma ADA Accessible Curb Ramps (La Palma)
14	Cerritos Sidewalk Improvements Project (Los Alamitos)
15	Community Center Improvements (County of Orange)
16	Fair Housing Education, Counseling and Enforcement (Urban County)
17	Administration (CDBG)
18	Administration (HOME)
19	Administration (Aliso Viejo)
20	Administration County (Aliso Viejo)
21	2017 CDBG Curb Ramps Project (PF&I) (Aliso Viejo)
22	Administration (Placentia)
23	Administration County (Placentia)

#	Project Name
24	Neighborhood Services (Placentia) PS
25	Senior Services (Placentia) PS
26	Pedestrian Accessibility Improvements Phase IV (Placentia)
27	Neighborhood Facility Improvement PF&I (Placentia)
28	Housing Rehabilitation - SFR (Placentia)
29	Facade Improvements - HR (Placentia)
30	Administration (Yorba Linda)
31	Administration County (Yorba Linda)
32	Senior Nutrition Program (Yorba Linda) PS
33	Neighborhood Improvement Program (Yorba Linda)
34	Senior Complex ADA Improvements HR - Multi Unit (Yorba Linda)
35	ADA Improvements - Public Facility (Yorba Linda)
36	Affordable Housing (HOME)

**Table 7 - Project Information**

**Describe the reasons for allocation priorities and any obstacles to addressing underserved needs**

**AP-38 Project Summary**  
**Project Summary Information**

1	<b>Project Name</b>	County's Emergency Shelters (CDBG)
	<b>Target Area</b>	
	<b>Goals Supported</b>	Public Services
	<b>Needs Addressed</b>	Public Services
	<b>Funding</b>	CDBG: \$183,934
	<b>Description</b>	Funds will be used to provide essential service, operations, emergency shelter, showers and meals for homeless clients.
	<b>Target Date</b>	6/30/2018
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	An estimated 610 homeless person are expected to benefit from this proposed activity.
	<b>Location Description</b>	
	<b>Planned Activities</b>	Funds will be provided to Mercy House for the provision of essential services, operations, emergency shelter, showers, and meals for homeless clients.
2	<b>Project Name</b>	County's Emergency Shelters (ESG)
	<b>Target Area</b>	
	<b>Goals Supported</b>	Public Services
	<b>Needs Addressed</b>	Public Services
	<b>Funding</b>	ESG: \$215,408
	<b>Description</b>	Funds will be provided to Mercy House for the provision of essential services, operations, emergency shelter, showers, and meals for homeless clients, rapid rehousing, data research and input and administration of HUD-sponsored Urban County programs.
	<b>Target Date</b>	6/30/2018
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	An estimated 462 homeless persons will be assisted through emergency shelter and 27 households through rapid rehousing.
	<b>Location Description</b>	
	<b>Planned Activities</b>	Funds will be used to provide essential services, operations, emergency shelter, showers, and meals for homeless clients, rapid rehousing, data research and input and administration.

3	<b>Project Name</b>	City of Laguna Beach Emergency Weather Shelter
	<b>Target Area</b>	
	<b>Goals Supported</b>	Public Services
	<b>Needs Addressed</b>	Public Services
	<b>Funding</b>	CDBG: \$118,150
	<b>Description</b>	Funds will be used to provide emergency shelter for 45 homeless individuals from the City of Laguna Beach and surrounding cities.
	<b>Target Date</b>	6/30/2018
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	An estimated 45 persons are expected to benefit from these proposed activities.
	<b>Location Description</b>	The Emergency Shelter called the Alternative Sleeping Location located at 20652 Laguna Canyon Road, Laguna Beach CA.
<b>Planned Activities</b>	Funds will used to provide transportation to and from the emergency shelter for 45 homeless individuals from the City of Laguna Beach and surrounding cities along with essential services, meals and casework for the individuals.	
4	<b>Project Name</b>	Midway City Community Services and Education Center
	<b>Target Area</b>	
	<b>Goals Supported</b>	Public Services
	<b>Needs Addressed</b>	Public Services
	<b>Funding</b>	CDBG: \$43,650
	<b>Description</b>	Funds will be used to provide social services programming at the Community Center. Abrazar, Inc. will be responsible for delivery of continuous support of social services programs for residents within the immediate neighborhoods. Services provided include: educational, recreational, and cultural programming, transportation, senior citizen programming, employment, health and medical information and referrals.
	<b>Target Date</b>	6/30/2018

	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	An estimated 1075 person are expected to benefit from these proposed activities.
	<b>Location Description</b>	The Community Center is located at 14900 Park Ln, Midway City CA.
	<b>Planned Activities</b>	Funds will be used to provide social services programming at the Community Center. Abrazar, Inc. will be responsible for delivery of continuous support of social services programs for residents within the immediate neighborhoods. Services provided include: educational, recreational, and cultural programming, transportation, senior citizen programming, employment, health and medical information and referrals.
<b>5</b>	<b>Project Name</b>	El Modena Community Family Resource Center
	<b>Target Area</b>	
	<b>Goals Supported</b>	Public Services
	<b>Needs Addressed</b>	Public Services
	<b>Funding</b>	CDBG: \$43,650
	<b>Description</b>	Funds will be used to provide social services programming. Community Action Partnership of OC (CAPOC) will be responsible for the delivery of inter-generational social services including: recreational, educational and cultural programming, health services, employment information and referrals, and senior citizen activities.
	<b>Target Date</b>	6/30/2018
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	An estimated 1000 persons are expected to benefit from these proposed activities.
	<b>Location Description</b>	The Community Center is located at 18672 East Center Ave, Orange CA.
	<b>Planned Activities</b>	Funds will be used to provide social services programming. Community Action Partnership of OC (CAPOC) will be responsible for the delivery of inter-generational social services including: recreational, educational and cultural programming, health services, employment information and referrals, and senior citizen activities.
<b>6</b>	<b>Project Name</b>	Single Family Housing Rehabilitation (Brea)
	<b>Target Area</b>	

	<b>Goals Supported</b>	Expand Affordable Housing Opportunities
	<b>Needs Addressed</b>	Expand Affordable Housing Opportunities
	<b>Funding</b>	CDBG: \$190,800
	<b>Description</b>	Funds will be used for the rehabilitation of single-family low or very-low income owner occupied residences. Improvements will include interior and exterior improvements to homes and mobile home units.
	<b>Target Date</b>	6/30/2018
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	An estimated 20 households are expected to benefit from these proposed activities.
	<b>Location Description</b>	City of Brea
	<b>Planned Activities</b>	Funds will be used for the rehabilitation of single-family low or very-low income owner occupied residences. Improvements will include interior and exterior improvements to homes and mobile home units.
<b>7</b>	<b>Project Name</b>	Single-Family Housing Rehabilitation Program (Cypress)
	<b>Target Area</b>	
	<b>Goals Supported</b>	Expand Affordable Housing Opportunities
	<b>Needs Addressed</b>	Expand Affordable Housing Opportunities
	<b>Funding</b>	CDBG: \$143,100
	<b>Description</b>	Funds will be used to support the Home Enhancement Program or HELP II, which provides forgivable loans up to \$20,000 to income eligible homeowners in order to assist them with home improvements.
	<b>Target Date</b>	6/30/2018
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	An estimated six (6) households are expected to benefit from these proposed activities.
	<b>Location Description</b>	City of Cypress
	<b>Planned Activities</b>	Funds will be used to support the Home Enhancement Program or HELP II, which provides forgivable loans up to \$20,000 to income eligible homeowners in order to assist them with home improvements.
<b>8</b>	<b>Project Name</b>	Leisure World Bathroom Accessibility Program (Seal Beach)
	<b>Target Area</b>	

	<b>Goals Supported</b>	Expand Affordable Housing Opportunities
	<b>Needs Addressed</b>	Expand Affordable Housing Opportunities
	<b>Funding</b>	CDBG: \$190,800
	<b>Description</b>	Funds will used to provide grants to income qualified, disabled seniors to improve bathroom accessibility and safety by converting the tub/shower into an accessible shower stall.
	<b>Target Date</b>	6/30/2018
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	An estimated 65 households are expected to benefit from these proposed activities.
	<b>Location Description</b>	City of Seal Beach Leisure World
	<b>Planned Activities</b>	Funds will used to provide grants to income qualified, disabled seniors to improve bathroom accessibility and safety by converting the tub/shower into an accessible shower stall.
<b>9</b>	<b>Project Name</b>	Year Round Emergency Shelter(County of Orange)
	<b>Target Area</b>	
	<b>Goals Supported</b>	Enhance Quality of Life
	<b>Needs Addressed</b>	Enhance Quality of Life
	<b>Funding</b>	CDBG: \$901,000
	<b>Description</b>	Funds will be used for the rehabilitation of a regional low threshold year round emergency shelter and multi-service center located at 1000 N. Kraemer Place, Anaheim, CA 92806.
	<b>Target Date</b>	6/30/2018
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	The population served will be approximately 2,500 at-risk and homeless individuals and families and approximately 73,000 bed nights.
	<b>Location Description</b>	1000 N. Kraemer Pl, Anaheim, CA 92806
	<b>Planned Activities</b>	Funds will be used for the rehabilitation of a regional low threshold year round emergency shelter and multi-service center located at 1000 N. Kraemer Place, Anaheim, CA 92806.
<b>10</b>	<b>Project Name</b>	Brea Senior Center Kitchen Improvements (Brea)
	<b>Target Area</b>	

	<b>Goals Supported</b>	Enhance Quality of Life
	<b>Needs Addressed</b>	Enhance Quality of Life
	<b>Funding</b>	CDBG: \$212,000
	<b>Description</b>	Funds will be used to improve the Senior Center mobility, safety and accessibility, replacing flooring and exterior doors at the center.
	<b>Target Date</b>	6/30/2018
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Brea's 4,950 seniors are expected to benefit from this proposed activity.
	<b>Location Description</b>	The Brea Senior Center is located at 500 Sievers Ave, Brea, CA 92821
	<b>Planned Activities</b>	Funds will be used to improve the Senior Center mobility,safety and accessibility, replacing flooring and exterior doors at the center.
<b>11</b>	<b>Project Name</b>	Pedestrian Accessibility Improvements Project Phase I (Laguna Woods)
	<b>Target Area</b>	
	<b>Goals Supported</b>	Enhance Quality of Life
	<b>Needs Addressed</b>	Enhance Quality of Life
	<b>Funding</b>	CDBG: \$154,442
	<b>Description</b>	Funds will be used for the reconstruction of curp ramps to comply with ADA requirements, sidewalk lifts and adjustments needed on Moulton Parkway.
	<b>Target Date</b>	6/30/2018
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	
	<b>Location Description</b>	Laguna Woods 10,770 seniors are expected to benefit from this proposed activity.
	<b>Planned Activities</b>	Funds will be used for the reconstruction of curp ramps to comply with ADA requirements, sidewalk lifts and adjustments needed on Moulton Parkway.
<b>12</b>	<b>Project Name</b>	Florence Sylvester Senior Center Improvements (Laguna Hills)

	<b>Target Area</b>	
	<b>Goals Supported</b>	Enhance Quality of Life
	<b>Needs Addressed</b>	Enhance Quality of Life
	<b>Funding</b>	CDBG: \$148,400
	<b>Description</b>	Funds will be used to rehabilitate the senior center through flooring and restroom improvements.
	<b>Target Date</b>	6/30/2018
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Laguna Hills' 5,045 seniors are expected to benefit from this proposed activity.
	<b>Location Description</b>	Florence Sylvester Memorial Senior Center 23721 Moulton Pkwy, Laguna Hills, CA 92653
	<b>Planned Activities</b>	Funds will be used to rehabilitate the senior center through flooring improvements and complete the restroom improvements.
<b>13</b>	<b>Project Name</b>	La Palma ADA Accessible Curb Ramps (La Palma)
	<b>Target Area</b>	
	<b>Goals Supported</b>	Enhance Quality of Life
	<b>Needs Addressed</b>	Enhance Quality of Life
	<b>Funding</b>	CDBG: \$286,200
	<b>Description</b>	Funds will be used to remove accessibility barriers by installing 75 ADA compliant curb ramps.
	<b>Target Date</b>	6/30/2018
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	roAn estimated 2,013 persons are expected to benefit from this proposed activity.
	<b>Location Description</b>	City of La Palma
	<b>Planned Activities</b>	Funds will be used to remove accessibility barriers by installing 75 ADA compliant curb ramps.
<b>14</b>	<b>Project Name</b>	Cerritos Sidewalk Improvements Project (Los Alamitos)
	<b>Target Area</b>	
	<b>Goals Supported</b>	Enhance Quality of Life

	<b>Needs Addressed</b>	Enhance Quality of Life
	<b>Funding</b>	CDBG: \$95,400
	<b>Description</b>	Funds will be used for removal of deteriorated sections of sidewalk and the addition of ADA ramps.
	<b>Target Date</b>	6/30/2018
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	An estimated 519 persons are expected to benefit from this proposed activity.
	<b>Location Description</b>	City of Los Alamitos
	<b>Planned Activities</b>	Funds will be used for improvements of deteriorated sections of sidewalk and the addition of ADA ramps.
15	<b>Project Name</b>	Community Center Improvements (County of Orange)
	<b>Target Area</b>	
	<b>Goals Supported</b>	Enhance Quality of Life
	<b>Needs Addressed</b>	Enhance Quality of Life
	<b>Funding</b>	CDBG: \$50,952
	<b>Description</b>	Funds will be used for improvements to County owned Community Centers of El Modena and Midway City.
	<b>Target Date</b>	6/30/2018
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Approximately 2,075 people in the surrounding communities will benefit from the improvements to the two community centers.
	<b>Location Description</b>	Midway City Community Center located at 14900 Park Ln, Midway City CA El Modena Community Center located at 18672 E. Center Street, Orange CA
<b>Planned Activities</b>	Funds will be used for improvements to County owned Community Centers of El Modena and Midway City.	
16	<b>Project Name</b>	Fair Housing Education, Counseling and Enforcement (Urban County)
	<b>Target Area</b>	
	<b>Goals Supported</b>	Planning and Administration

	<b>Needs Addressed</b>	Planning and Administration
	<b>Funding</b>	CDBG: \$50,000
	<b>Description</b>	Utilize funds to provide fair housing education, community events, counseling, enforcement, and landlord/tenant counseling and updates to the AI.
	<b>Target Date</b>	
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Approximately 1808 people will benefit from these activities.
	<b>Location Description</b>	Fair Housing Council of Orange County located at 1516 Brookhollow Drive, Santa Ana Ca
	<b>Planned Activities</b>	Utilize funds to provide fair housing education, community events, counseling, enforcement, and landlord/tenant counseling and updates to the AI.
<b>17</b>	<b>Project Name</b>	Administration (CDBG)
	<b>Target Area</b>	
	<b>Goals Supported</b>	Planning and Administration
	<b>Needs Addressed</b>	Planning and Administration
	<b>Funding</b>	CDBG: \$469,178
	<b>Description</b>	Funds will be utilized for administration of CDBG HUD-sponsored Urban County programs.
	<b>Target Date</b>	6/30/2018
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	
	<b>Location Description</b>	
	<b>Planned Activities</b>	Funds will be utilized for administration of HUD-sponsored Urban County programs.
<b>18</b>	<b>Project Name</b>	Administration (HOME)
	<b>Target Area</b>	
	<b>Goals Supported</b>	Planning and Administration

	<b>Needs Addressed</b>	Planning and Administration
	<b>Funding</b>	HOME: \$116,349
	<b>Description</b>	Funds will be utilized for administration of HOME HUD-sponsored Urban County program.
	<b>Target Date</b>	
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	
	<b>Location Description</b>	
	<b>Planned Activities</b>	Funds will be utilized for administration of HOME HUD-sponsored Urban County program.
<b>19</b>	<b>Project Name</b>	Administration (Aliso Viejo)
	<b>Target Area</b>	
	<b>Goals Supported</b>	Planning and Administration
	<b>Needs Addressed</b>	Planning and Administration
	<b>Funding</b>	CDBG: \$22,461
	<b>Description</b>	Funds will be utilized for administration of the City of Aliso Viejo HUD-sponsored program.
	<b>Target Date</b>	6/30/2018
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	
	<b>Location Description</b>	
	<b>Planned Activities</b>	Funds will be utilized for administration of the City of Aliso Viejo HUD-sponsored program.
<b>20</b>	<b>Project Name</b>	Administration County (Aliso Viejo)
	<b>Target Area</b>	
	<b>Goals Supported</b>	Planning and Administration
	<b>Needs Addressed</b>	Planning and Administration
	<b>Funding</b>	CDBG: \$22,461

	<b>Description</b>	Funds will be utilized for administration of contracts for the City of Aliso Viejo HUD-sponsored programs.
	<b>Target Date</b>	6/30/2018
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	
	<b>Location Description</b>	Funds will be utilized for administration of contracts for the City of Aliso Viejo HUD-sponsored programs.
	<b>Planned Activities</b>	
<b>21</b>	<b>Project Name</b>	2017 CDBG Curb Ramps Project (PF&I) (Aliso Viejo)
	<b>Target Area</b>	
	<b>Goals Supported</b>	Enhance Quality of Life
	<b>Needs Addressed</b>	Enhance Quality of Life
	<b>Funding</b>	CDBG: \$179,696
	<b>Description</b>	Funds will be utilized for improvements to fifty-four (54) Curb Ramps in the City of Aliso Viejo to benefit the elderly and severely disabled adult clientele.
	<b>Target Date</b>	6/30/2018
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	An estimated 14,377 people are expected to benefit from the proposed activity.
	<b>Location Description</b>	City of Aliso Viejo
	<b>Planned Activities</b>	Funds will be utilized for improvements to fifty-four (54) Curb Ramps in the City of Aliso Viejo to benefit the elderly and severely disabled adult clientele.
<b>22</b>	<b>Project Name</b>	Administration (Placentia)
	<b>Target Area</b>	
	<b>Goals Supported</b>	Planning and Administration
	<b>Needs Addressed</b>	Planning and Administration
	<b>Funding</b>	CDBG: \$40,479

	<b>Description</b>	Funds will be utilized for administration of the City of Placentia HUD-sponsored programs.
	<b>Target Date</b>	6/30/2018
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	
	<b>Location Description</b>	
	<b>Planned Activities</b>	Funds will be utilized for administration of the City of Placentia HUD-sponsored programs.
<b>23</b>	<b>Project Name</b>	Administration County (Placentia)
	<b>Target Area</b>	
	<b>Goals Supported</b>	Planning and Administration
	<b>Needs Addressed</b>	Planning and Administration
	<b>Funding</b>	CDBG: \$40,479
	<b>Description</b>	Funds will be utilized for administration of the contracts for the City of Placentia HUD-sponsored programs.
	<b>Target Date</b>	6/30/2018
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	
	<b>Location Description</b>	
	<b>Planned Activities</b>	Funds will be utilized for administration of the contracts for the City of Placentia HUD-sponsored programs.
<b>24</b>	<b>Project Name</b>	Neighborhood Services (Placentia) PS
	<b>Target Area</b>	
	<b>Goals Supported</b>	Public Services
	<b>Needs Addressed</b>	Public Services
	<b>Funding</b>	CDBG: \$40,000
	<b>Description</b>	Neighborhood Services
	<b>Target Date</b>	6/30/2018

	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Approximately 800 person will benefit from the proposed activity.
	<b>Location Description</b>	City of Placentia
	<b>Planned Activities</b>	Neighborhood Services
25	<b>Project Name</b>	Senior Services (Placentia) PS
	<b>Target Area</b>	
	<b>Goals Supported</b>	Public Services
	<b>Needs Addressed</b>	Public Services
	<b>Funding</b>	CDBG: \$20,710
	<b>Description</b>	Funds will be used for the Senior Lunch Program Providers.
	<b>Target Date</b>	6/30/2018
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Approximately 450 seniors will benefit from this lunch program monthly.
	<b>Location Description</b>	The Edwin T. Powell building located at 143 S. Bradford Ave Placentia, CA
	<b>Planned Activities</b>	Funds will be used for the Senior Lunch Program Providers.
26	<b>Project Name</b>	Pedestrian Accessibility Improvements Phase IV (Placentia)
	<b>Target Area</b>	
	<b>Goals Supported</b>	Enhance Quality of Life
	<b>Needs Addressed</b>	Enhance Quality of Life
	<b>Funding</b>	CDBG: \$68,565
	<b>Description</b>	Funds will be used to remove barriers by installing ADA compliant curb ramps citywide.
	<b>Target Date</b>	6/30/2018
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Approximately 8,600 people will benefit from this project.
	<b>Location Description</b>	City of Placentia

	<b>Planned Activities</b>	Funds will be used to remove barriers by installing ADA compliant curb ramps citywide.
<b>27</b>	<b>Project Name</b>	Neighborhood Facility Improvement PF&I (Placentia)
	<b>Target Area</b>	
	<b>Goals Supported</b>	Enhance Quality of Life
	<b>Needs Addressed</b>	Enhance Quality of Life
	<b>Funding</b>	CDBG: \$108,124
	<b>Description</b>	Neighborhood Facility Improvements - ADA compliant accessibility improvements to the Edward T. Powell Building including bathroom renovations, entry door and window replacement.
	<b>Target Date</b>	6/30/2018
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Placentia's 600 residents with ambulatory difficulties are expected to benefit from this proposed activity.
	<b>Location Description</b>	143 S. Bradford Avenue, Placentia
	<b>Planned Activities</b>	Neighborhood Facility Improvements - Bathroom renovations and entry door and window replacement
<b>28</b>	<b>Project Name</b>	Housing Rehabilitation - SFR (Placentia)
	<b>Target Area</b>	
	<b>Goals Supported</b>	Expand Affordable Housing Opportunities
	<b>Needs Addressed</b>	Expand Affordable Housing Opportunities
	<b>Funding</b>	CDBG: \$66,500
	<b>Description</b>	Funds will be used for Single Family Rehabilitation Grant Program.
	<b>Target Date</b>	6/30/2018
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Approximately 5 households will be rehabilitated.
	<b>Location Description</b>	Throughout the Low to moderate income households located in the City of Placentia.
	<b>Planned Activities</b>	Funds will be used for Single Family Rehabilitation Grant Program.
<b>29</b>	<b>Project Name</b>	Facade Improvements - HR (Placentia)

	<b>Target Area</b>	
	<b>Goals Supported</b>	Enhance Quality of Life
	<b>Needs Addressed</b>	Enhance Quality of Life
	<b>Funding</b>	CDBG: \$50,000
	<b>Description</b>	The Facade Improvement Program will be implemented in an effort to remove blight and provide for the expansion of the City's tax base through the use of CDBG funded loans for eligible facade improvements to local businesses. The loans can be used for exterior improvements among the aging commercial buildings in the Old Town Santa Fe District area.
	<b>Target Date</b>	6/30/2018
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	
	<b>Location Description</b>	
	<b>Planned Activities</b>	The Façade Improvement Program will be implemented in an effort to remove blight and provide for the expansion of the City's tax base through the use of CDBG funded loans for eligible façade improvements to local businesses. The loans can be used for exterior improvements for up to 5 aging commercial buildings in the Old Town Santa Fe District area.
<b>30</b>	<b>Project Name</b>	Administration (Yorba Linda)
	<b>Target Area</b>	
	<b>Goals Supported</b>	Planning and Administration
	<b>Needs Addressed</b>	Planning and Administration
	<b>Funding</b>	CDBG: \$20,078
	<b>Description</b>	Funds will be utilized for administration of the City of Yorba Linda HUD-sponsored programs.
	<b>Target Date</b>	6/30/2018
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	

	<b>Location Description</b>	
	<b>Planned Activities</b>	Funds will be utilized for administration of the City of Yorba Linda HUD-sponsored programs.
<b>31</b>	<b>Project Name</b>	Administration County (Yorba Linda)
	<b>Target Area</b>	
	<b>Goals Supported</b>	Planning and Administration
	<b>Needs Addressed</b>	Planning and Administration
	<b>Funding</b>	CDBG: \$20,078
	<b>Description</b>	Funds will be utilized for administration of the Contracts for the City of Yorba Linda HUD-sponsored programs.
	<b>Target Date</b>	6/30/2018
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	
	<b>Location Description</b>	
	<b>Planned Activities</b>	Funds will be utilized for administration of the Contracts for the City of Yorba Linda HUD-sponsored programs.
<b>32</b>	<b>Project Name</b>	Senior Nutrition Program (Yorba Linda) PS
	<b>Target Area</b>	
	<b>Goals Supported</b>	Public Services
	<b>Needs Addressed</b>	Public Services
	<b>Funding</b>	CDBG: \$30,117
	<b>Description</b>	Funds will be used for operational costs associated with the daily senior lunch program held at the Yorba Linda Community Center.
	<b>Target Date</b>	6/30/2018
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	An estimated 300 seniors are expected to benefit from the proposed activity.
	<b>Location Description</b>	City of Yorba Linda
	<b>Planned Activities</b>	Funds will be used for operational costs associated with the daily senior lunch program held at the Yorba Linda Community Center.

33	<b>Project Name</b>	Neighborhood Improvement Program (Yorba Linda)
	<b>Target Area</b>	
	<b>Goals Supported</b>	Expand Affordable Housing Opportunities
	<b>Needs Addressed</b>	Expand Affordable Housing Opportunities
	<b>Funding</b>	CDBG: \$61,942
	<b>Description</b>	Funds will be used to provide rehabilitation grants to qualified homeowners for general property improvements and repairs to meet local codes, standards and ordinances.
	<b>Target Date</b>	6/30/2018
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	An estimated 10 households are expected to benefit from this proposed activity.
	<b>Location Description</b>	City of Yorba Linda
	<b>Planned Activities</b>	Funds will be used to provide rehabilitation grants to qualified homeowners for general property improvements and repairs to meet local codes, standards and ordinances.
34	<b>Project Name</b>	Senior Complex ADA Improvements HR - Multi Unit (Yorba Linda)
	<b>Target Area</b>	
	<b>Goals Supported</b>	Enhance Quality of Life
	<b>Needs Addressed</b>	Enhance Quality of Life
	<b>Funding</b>	CDBG: \$109,355
	<b>Description</b>	Funds will be used for ADA improvements at the Senior Affordable Housing Community Evergreen Villas.
	<b>Target Date</b>	6/30/2018
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	ADA improvements to assist 52 seniors at Senior Affordable Housing Community Evergreen Villas.
	<b>Location Description</b>	The senior center is located at 5100 Avocado Circle, Yorba Linda, CA
	<b>Planned Activities</b>	Funds will be used for ADA improvements at the Senior Affordable Housing Community Evergreen Villas.
35	<b>Project Name</b>	ADA Improvements - Public Facility (Yorba Linda)

	<b>Target Area</b>	
	<b>Goals Supported</b>	Enhance Quality of Life
	<b>Needs Addressed</b>	Enhance Quality of Life
	<b>Funding</b>	CDBG: \$58,507
	<b>Description</b>	ADA Improvements to a Public Facility located at Hurless Barton Park and Yorba Linda Community Center.
	<b>Target Date</b>	6/30/2018
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	An estimate 7,091 persons are expected to benefit from this proposed activity.
	<b>Location Description</b>	Improvement of ADA ramps throughout the city.
	<b>Planned Activities</b>	Improvement of ADA ramps throughout the city.
36	<b>Project Name</b>	Affordable Housing (HOME)
	<b>Target Area</b>	
	<b>Goals Supported</b>	Expand Affordable Housing Opportunities
	<b>Needs Addressed</b>	Expand Affordable Housing Opportunities
	<b>Funding</b>	HOME: \$1,047,154
	<b>Description</b>	County will use funds for affordable housing development opportunities.
	<b>Target Date</b>	
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	14 HOME funds may be utilized to assist in the development of up to 14 affordable rental housing units.
	<b>Location Description</b>	
	<b>Planned Activities</b>	County will use funds for affordable housing development opportunities.

## **AP-50 Geographic Distribution – 91.220(f)**

### **Description of the geographic areas of the entitlement (including areas of low-income and minority concentration) where assistance will be directed**

The “Urban County” of Orange is comprised of 11 cities with populations under 50,000 (participating cities), three “Metro” cities – Aliso Viejo, Placentia, and Yorba Linda – with populations over 50,000, and the unincorporated areas of Orange County. The 11 participating cities include Brea, Cypress, Dana Point, Laguna Beach, Laguna Hills, Laguna Woods, La Palma, Los Alamitos, Seal Beach, Stanton, and Villa Park. With populations over 50,000, Aliso Viejo, Placentia, and Yorba Linda are eligible to participate in the CPD programs as entitlement jurisdictions and receive funding directly from HUD. However, these cities have elected to join the Urban County for the overall implementation of these programs.

Currently, the County uses a competitive funding application process to distribute CDBG funds. Individual participating cities and County departments are required to submit applications for funding. Housing and Community Development/Homeless Prevention works with an Evaluation Committee to rank each applications. The Committee ranks the applications according to the Consolidated Plan priorities, urgency of needs, readiness of projects, experience of program/project administrators, and cost-effectiveness. The committee consist of an evaluation team comprising of professionals knowledgeable about community development, community services, and housing activities. Many factors, such as the administrative burden of the program, the number of eligible census block groups, annexations, and population growth in the participating cities, weigh into the analysis of the most efficient and effective way to distribute CPD funds to meet the high-priority activities outlined in this Annual Action Plan.

The competitive basis for funding distribution has the advantage of flexibly dealing with the changing needs and geographic disparities in terms of needs and resources. Using this method, the County is able to devote resources to communities where the needs are most urgent and extensive.

CDBG program funds will be distributed and expended based on program criteria. Housing rehabilitation programs will be provided on a citywide basis in each participating city and in the unincorporated County areas based on low- and moderate-income qualified residents. Supportive services will be available throughout the Urban County to low- and moderate-income residents and persons with special needs. Public and infrastructure improvements will be located primarily in the Urban County’s low- and moderate-income areas. HOME funds will be distributed to those projects that meet priority needs and meet other underwriting factors that indicate a strong probability the project will come to fruition. ESG funds will be awarded to projects that will best serve the priority needs of homeless individuals and families and those at risk of becoming homeless.

### **Geographic Distribution**

Target Area	Percentage of Funds

**Table 8 - Geographic Distribution**

**Rationale for the priorities for allocating investments geographically**

The Urban County has not established geographic target areas for expending funds.

**Discussion**

Please see above.

## Affordable Housing

### AP-55 Affordable Housing – 91.220(g)

#### Introduction

The Orange Urban County plans to utilize CDBG and HOME funds to support a number of authorized housing activities, including various residential rehabilitation programs and an affordable housing development program. HOME funds may be allocated to assist in the development of up to 14 affordable rental units for homeless.

<b>One Year Goals for the Number of Households to be Supported</b>	
Homeless	14
Non-Homeless	260
Special-Needs	0
Total	274

**Table 9 - One Year Goals for Affordable Housing by Support Requirement**

<b>One Year Goals for the Number of Households Supported Through</b>	
Rental Assistance	0
The Production of New Units	14
Rehab of Existing Units	260
Acquisition of Existing Units	0
Total	274

**Table 10 - One Year Goals for Affordable Housing by Support Type**

#### Discussion

See discussion above.

## **AP-60 Public Housing – 91.220(h)**

### **Introduction**

The public housing needs of Urban Orange County residents are met by the Orange County Housing Authority (OCHA), a division within Orange County Community Resources/Housing and Community Development and Homeless Prevention.

### **Actions planned during the next year to address the needs to public housing**

There are no public housing projects in the Urban County program.

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

Orange County Housing Authority (OCHA) administers a tenant-based assistance and has established a Resident Advisory Board with the membership representing the residents assisted by OCHA. The Board was consulted in the development of OCHA's Five-Year and Annual Public Housing Agency Plan.

### **If the PHA is designated as troubled, describe the manner in which financial assistance will be provided or other assistance**

Not applicable.

### **Discussion**

See discussions above.

## **AP-65 Homeless and Other Special Needs Activities – 91.220(i)**

### **Introduction**

Factors contributing to the rise in homelessness include a lack of housing affordable to low- and moderate-income persons, increases in the number of persons whose income falls below the poverty level, reductions in subsidies to the poor, drug/alcohol abuse, and the de-institutionalization of the mentally ill. The recent housing market and economic conditions have also resulted in some families facing homelessness due to foreclosures, unemployment, and/or underemployment.

With the implementation of Coordinated Entry, the community has identified the lack of affordable housing in the area as the largest challenge to housing the chronically homeless. When housing is found in the private market, it often has requirements that are challenging for homeless clients to meet such as background checks. Many owners have policies that deny tenancy to individuals with felonies. Unfortunately many of the chronically homeless individuals have criminal backgrounds that make it challenging to obtain housing and therefore wait longer periods of times to be housed.

Homeless people in Orange County are diverse: they are young and old, men and women, chronic and newly homeless, alone or in families. Despite their differences, each homeless person is in need of safe and permanent housing. The County of Orange recognizes that fully engaging in efforts to end homelessness requires a deeply involved community and accurate information. Based on the findings from the 2015 Orange County Point-In-Times Count and Survey, a total of 4,452 individuals are homeless on any given night. This represents an increase of roughly 5% from the 2013 PIT Count (or an increase of 201 individuals).

### **Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including**

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

The goals include reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs, which includes opening a year-round emergency shelter/service center site and deploying resources to place homeless in permanent supportive housing.

Since 1998, the County of Orange has had a comprehensive, coordinated, and regional Continuum of Care strategy that includes participation of all 34 cities in Orange County, County Agencies, the County's homeless housing and service providers, and other community groups, including non-profits, local governmental agencies, faith-based organizations, the homeless and formerly homeless, interested business leaders, schools and other stakeholders to identify the gaps and unmet needs of the County's homeless. Homeless needs and priorities continue to be identified through the County's Continuum of Care (CoC) system. The Ten-Year Plan and the implementation groups formed are public and inclusive to

participation of all stakeholders including homeless and formerly homeless individuals. In addition, the CoC consults with and engages homeless individuals to participate in the Point-in-Time Count and Survey of the homeless and the Implementation Groups of the Commission to End Homelessness to address the emergency shelter and transitional housing needs of homeless persons.

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

The County has allocated \$213,434 in ESG funds and \$184,237 in CDBG funds during FY 2016-2017 for essential services, operations, emergency shelter, showers, and meals for homeless clients. The County operates the “Armory Emergency Shelter Program,” which allows for emergency shelter for approximately five months out of the year, serving a maximum capacity of 400 individuals nightly, divided between two locations.

The County also applied to be the Administrative Entity for allocation of State ESG funds. This has brought an additional \$1,208,146 of funding to the County to address emergency shelter and transitional housing needs of homeless persons.

### **Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again**

The goal of the current model of homeless case management is to move clients towards self-sufficiency and a permanent home. This current system model works well when partnered with a variety of supportive services that can prevent a client against future homelessness. In Orange County, a variety of private, federal, state and county-funded programs offer job training courses, child care, work-appropriate clothing, food bags and/or meals, among other services. Many of these services follow clients through their shelter stay(s), and sometimes even after they have found permanent housing. The variety of non-profit service providers that have formed in Orange County over the last 30 years has meant that many different types of clients can be served simultaneously. Each provider tends to specialize in a particular type of client in order to tailor services effectively. Currently served populations include, but are not limited to: families, victims of domestic violence, veterans, chronically homeless men and women, individuals with mental health issues and their families, and individuals with physical and developmental disabilities and their families.

The Commission to End Homelessness has implementation group and committees that focus on the subpopulations such as veteran, families, etc. With Coordinated Entry there is additional focus on creating the correct system/s for the County as well as the subpopulations and their diverse needs.

Historically, the most difficult clients to house are the chronically homeless. Most chronically homeless people have a disability that requires significant and costly support. One program that is developing permanent housing units tied to supportive services is the Mental Health Services Act (MHSA) Housing Program. Orange County was allocated \$33 million to provide additional housing for the homeless mentally ill. In addition to the MHSA Housing Program, other housing and supportive services are provided through the MHSA Community Services and Supports component of the MHSA for clients enrolled in a Full Service Partnership Program. Clients of these programs must be seriously mentally ill adults or older adults or seriously mentally ill/seriously emotionally disturbed children and youth. The programs are client and family-driven and provide flexible resources that are tailored to each client's specific needs. Additionally, the County adopted an Affordable Housing Strategic Plan and allocated \$8 million in Federal HOME and local funds for the development of Permanent Supportive Housing for the homeless through a Notice of Funding Availability.

**Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: 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); or, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs.**

The most fundamental risk factor for becoming homeless is acute poverty. Orange County has dozens of organizations, both private and public, providing resources to those at risk of homelessness. The solutions to developing a system capable of ensuring that people have the right resources to remain housed generally involve a continued high level of supportive services once an individual or family has been placed in permanent housing.

The CoC/Commission has developed action plans and is reviewing its structure to ensure it is more effectively creating systems of care that are formally linked and coordinated with the various existing systems such as those listed in the prompt. Implementation of the Mental Health Services Act in Orange County has provided a large array of supportive services for those who are homeless or at high-risk of homelessness as well as having a serious mental illness. Supportive services include, but are not limited to, employment services, mentoring, in-home crisis stabilization, education and training, centralized assessment team services, recovery centers, residential treatment, a wellness center, and a transitional age youth discovery program.

## **Discussion**

See discussions above.

## **AP-75 Barriers to affordable housing – 91.220(j)**

### **Introduction:**

The County recognizes that barriers to affordable housing exist and continues to employ strategies to overcome them.

**Lack of Affordable Housing Funds:** The availability of funding for affordable housing has been severely affected by the dissolution of redevelopment agencies in the State of California.

**Environmental Protection:** State law (California Environmental Quality Act and California Endangered Species Act) and federal law (National Environmental Policy Act and Federal Endangered Species Act) regulations require environmental review of proposed discretionary projects (e.g., subdivision maps, use permits, etc.). Costs and time delay resulting from the environmental review process are also added to the cost of housing.

**Land Use Policies:** Housing growth is expected to slow in many South County cities as they reach “build-out” because the trend of higher density housing is not widely accepted in these areas. Homeowners associations and their related CC&Rs, the predominant development form after the 1970s that most of South Orange County was developed under, may also prevent local land use flexibility and the policies necessary to address workforce housing challenges over the long-term.

**Planning and Development Fees:** Planning and development impact fees, such as for transportation, water, and sewer infrastructure improvements, often add to the overall cost of development.

**Permit and Processing Procedures:** Builders and developers frequently cite the cost of holding land during the evaluation and review process as a significant factor in the cost of housing. Processing times vary with the complexity of the project. Holding costs associated with delays in processing have been estimated to add between 1.1 percent and 1.8 percent to the cost of a dwelling unit for each month of delay.

**State and Federal Davis-Bacon Prevailing Wages:** The State Department of Industrial Relations (DIR) expanded the kinds of projects that require the payment of prevailing wages. Prevailing wage adds to the overall cost of development. A prevailing wage must also be paid to laborers when federal funds are used to pay labor costs for any project over \$2,000 or on any multi-family project over eight units. Based on discussions with developers, various prevailing wage requirements typically inflate the development costs by 35 percent.

**Actions it planned 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**

In January 2009, the Orange County Board of Supervisors amended the Housing Opportunities Overlay Regulations to expand the Overlay to high density multi-family residential districts located along arterial highways. Originally adopted in 2006, the Housing Opportunities Overlay Regulations permit the “by-right” development of affordable housing units on commercial, industrial and certain high density residential zoned sites through an administrative approval process.

The County and participating cities have also worked to address the issues surrounding barriers to affordable housing development through the Housing Element process required by the State of California. The California Department of Housing and Community Development (HCD) must review the Housing Element for compliance with State law. Among other things, each jurisdiction’s Housing Element is required to identify opportunity sites with land use controls that facilitate affordable housing development. Another key component of HCD review is the extent of government policies that act as barriers to housing development, especially affordable housing development, and the jurisdiction’s commitment to eliminating or mitigating the barriers.

Each jurisdiction in California (including all participating cities and the County of Orange) adopts a housing element as a required component of the general plan. The County of Orange 2014-2021 Housing Element was adopted in December 2013. The document includes specific actions to facilitate affordable housing.

Between January 1, 2003 and December 31, 2016, the County has loaned over \$26 million to fund the construction of 573 affordable housing units in the unincorporated areas. In addition, the County has provided project-based housing choice vouchers to 87 families. The County has also approved a Zoning Code amendment that allows emergency shelters “by-right” (with no public hearing requirement) in commercial and industrial zoned areas. County staff has identified funds and locations for the development of a year-round emergency shelter in Anaheim.

To address neighborhood resistance to affordable housing, Housing and Community Development/Homeless Prevention encourages all developers to work closely with local residents and community groups. In efforts to educate the public about Housing and Community Development/Homeless Prevention and affordable housing efforts, the County also consults with the Kennedy Commission, a nonprofit organization that provides advocacy and education related to affordable housing in the County. The County’s 2014-21 Housing Element establishes an action that the County’s Affordable Housing Project Manager and Housing and Community Development/Homeless Prevention staff will work cooperatively with other governmental agencies, business groups, universities, environmental organizations, housing advocates and the development community to increase public awareness of the importance of affordable housing to the County’s long-term viability.

### **Discussion:**

See discussions above.

## **AP-85 Other Actions – 91.220(k)**

### **Introduction:**

Priority Needs established in the FY 2015 - FY 2019 Five-Year Consolidated Plan, which form the basis for establishing objectives and outcomes in the FY 2017-2018 One-Year Action Plan, are as follows:

### **High Priority**

- Expand and preserve the supply of affordable housing to create housing opportunities for low- and moderate-income households and homeless individuals and families
- Strengthen, preserve, and enhance the physical character and quality of life in Orange County's low- and moderate-income neighborhoods, including the housing stock and public infrastructure and facilities.
- Continue to build the capacity of residents to empower themselves and help strengthen their community, through the funding of needed public services for seniors, the homeless, and those at risk of homelessness.
- Planning and administration.

### **Actions planned to address obstacles to meeting underserved needs**

One of the greatest challenges in meeting the underserved needs of low- and moderate-income persons is having limited financial resources. The County must weigh and balance the input from different groups and assign funding priorities that best bridge the gaps in the County's service delivery system. While other goals the County has set are also important, for the purposes of the Consolidated Plan, only those which are anticipated to be funded with CPD funding programs (CDBG, HOME, and ESG) during the five-year planning cycle are indicated to be high priorities. The County utilizes other funding sources to meet goals that are not considered high priority in the Consolidated Plan. The County established priorities for allocating CPD funds based on a number of criteria, including:

- Urgency of needs
- Cost efficiency
- Eligibility of activities/programs
- Availability of other funding sources to address specific needs
- Funding program limitations
- Capacity and authority for implementing actions
- Consistency with countywide goals, policies, and efforts

### **Actions planned to foster and maintain affordable housing**

OCHA's Section 8 Housing Choice Voucher Program provides assisted families an incentive for employment opportunities through its Family Self Sufficiency (FSS) Program. The FSS Program

participants receive resources and are taught job skills that enable them to gain employment and become self-sufficient.

Furthermore, housing costs often consume a large portion of lower-income households' monthly income. This creates a housing cost burden, leaving less money accessible for other necessities. As such, the County's efforts to create new affordable housing, both permanent and transitional, and rehabilitate existing housing contribute to curbing poverty in the County. Additionally, the County adopted an Affordable Housing Strategic Plan and allocated \$8 million in Federal HOME and local funds for the development of Permanent Supportive Housing for the homeless through a Notice of Funding Availability.

### **Actions planned to reduce lead-based paint hazards**

In Orange County, the Childhood Lead Poisoning Prevention Program (CLPPP) follows children with abnormal or high blood lead levels, making home visits to families of affected children to determine the source of lead and provide education about lead poisoning. Program staff also coordinates health care needs; follow-up visits when needed, and provides outreach and educational presentations to the community. CLPPP also provides resources to cities with significant number of older housing units to help respond to complaints of deteriorated lead-based paint and other lead-related hazards in residential housing.

The CLPPP's Environmental Health Department is currently working toward:

- Using progressive notification and action to achieve elimination of lead hazards identified during environmental investigations;
- Developing and implementing programs for training of investigation and enforcement agency personnel on identifying and correcting lead hazards in high risk jurisdictions;
- Providing educational materials on renovation and remodeling activities to housing and building departments, for public distribution; and
- Encouraging building departments to incorporate informing about lead-safe work practices into their building permit process (such as attaching renovation pamphlets to building permits) for housing built before 1978.

### **Actions planned to reduce the number of poverty-level families**

One of the greatest challenges in meeting the underserved needs of low- and moderate-income persons is having limited financial resources. The County must weigh and balance the input from different groups and assign funding priorities that best bridge the gaps in the County's service delivery system. While other goals the County has set are also important, for the purposes of the Consolidated Plan, only those which are anticipated to be funded with CPD funding programs (CDBG, HOME, and ESG) during the five-year planning cycle are indicated to be high priorities. The County utilizes other funding sources

to meet goals that are not considered high priority in the Consolidated Plan. The County established priorities for allocating CPD funds based on a number of criteria, including:

- Urgency of needs
- Cost efficiency
- Eligibility of activities/programs
- Availability of other funding sources to address specific needs
- Funding program limitations
- Capacity and authority for implementing actions
- Consistency with countywide goals, policies, and efforts

### **Actions planned to develop institutional structure**

The institutional structure, through which this Annual Action Plan will be implemented, includes various agencies of County government, participating cities, nonprofit organizations, and private industry. Housing and Community Development/Homeless Prevention has oversight responsibility for the Consolidated Plan/Annual Plan processes. Housing and Community Development/Homeless Prevention is a component of OC Community Resources, which consists of OC Animal Care, OC Community Services, Housing & Community Development & Homeless Prevention, OC Parks, and OC Public Libraries.

### **Actions planned to enhance coordination between public and private housing and social service agencies**

Housing and Community Development and Homeless Prevention is responsible for the administration and compliance of programs and grant management. Housing and Community Development/Homeless Prevention performs audits, compliance, and legal notification procedures required by HUD for both the Housing and Neighborhood Preservation and Housing Assistance functions. Because Housing and Community Development/Homeless Prevention must make recommendations on compliance matters, it is separate from direct control of either of the other functions identified below. It also conducts the Annual Application Review process that is the competitive evaluation process by which Federal funding is allocated to special projects.

The Housing and Community Development/Homeless Prevention oversees housing community development and homeless activities, such as public infrastructure, housing rehabilitation, community development, preservation and improvement activities, affordable rental housing, homeless prevention and homeownership activities, support of CoC activities through the administration of subrecipient contracts and loans funded through the CDBG, HOME, ESG, and Supportive Housing Grants programs.

The cities of Brea, Cypress, Dana Point, Laguna Beach, Laguna Hills, Laguna Woods, La Palma, Los Alamitos, Seal Beach, Stanton, and Villa Park participate in the County program and are responsible for

delivering specific programs and activities in their communities. The cities of Aliso Viejo, Placentia and Yorba Linda are participating as Metro cities and are responsible for delivering specific programs and activities in their communities.

Nonprofit organizations play a vital role in implementing the Annual Action Plan. Nonprofit organizations form a network of resources that address a wide variety of housing and community development needs. These organizations provide a valuable link between the population in need of assistance and the pool of resources available. These organizations are awarded entitlement funds through a competitive evaluation process. The County works with numerous nonprofit organizations annually.

Private sector participants may include lending institutions and for-profit development entities. Lending institutions may be the source of low-cost loans for affordable housing and rehabilitation projects. Developers are the primary providers of the housing stock and are encouraged to participate in low-income housing in a variety of ways, including through density bonuses and participation in the Low-Income Housing Tax Credit (LIHTC) program.

**Discussion:**

See discussions above.

## Program Specific Requirements

### AP-90 Program Specific Requirements – 91.220(I)(1,2,4)

#### Introduction:

The following describes other program-specific requirements.

#### **Community Development Block Grant Program (CDBG) Reference 24 CFR 91.220(I)(1)**

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out.

1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed	0
2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan.	0
3. The amount of surplus funds from urban renewal settlements	0
4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan	0
5. The amount of income from float-funded activities	0
<b>Total Program Income:</b>	<b>0</b>

#### **Other CDBG Requirements**

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	100.00%

**HOME Investment Partnership Program (HOME)**  
**Reference 24 CFR 91.220(I)(2)**

1. A description of other forms of investment being used beyond those identified in Section 92.205 is as follows:

FY 2017-2018 HOME funds will be used primarily for the development of affordable housing.

2. A description of the guidelines that will be used for resale or recapture of HOME funds when used for homebuyer activities as required in 92.254, is as follows:

The County had previously provided homebuyer assistance using HOME funds and CDBG funds are used to operate a Neighborhood Preservation Program for housing rehabilitation assistance. As a condition of receiving HOME and CDBG grant or loan funds, the County requires the applicant to enter into a covenant agreement that is recorded against the property and runs with the land. The agreement contains a recapture restriction stipulating that during the affordability period if the unit is sold, the grant or loan must be paid in full.

The County offers Mortgage Assistance Program (MAP) loans to assist eligible low income first-time homebuyers on a first-come, first-serve basis to purchase their own decent affordable houses in the unincorporated areas of Orange County and in certain participating Cities within the County. Mortgage Assistance Program loans provide eligible first-time homebuyers part of the purchase price of their home to bridge the gap between the total purchase price of the home and the home buyer's down payment, closing costs and 1st mortgage. Eligible first time homebuyer's annual income must not exceed 80% of the Area Median Income (AMI). The total sales prices for a HOME funded property shall not exceed the maximum HOME purchase price for Orange County. All applicants must attend a homebuyer education workshop. Borrowers must qualify for and obtain first mortgage loan from a participating lender. Potential homebuyers may obtain additional information on the County of Orange/OC Community Services' website which links to the administrator for the County's MAP Program.

In accordance with the requirements of the HOME Program (24 CFR Part 92), these properties assisted with HOME funds are subject to affordability restrictions. Since in all cases the County's Mortgage Assistance Program provides HOME direct assistance to eligible first time home buyers in the form of loans, all homebuyers that receive a MAP loan have received direct HOME assistance. Therefore, the County uses recapture provisions to enforce the HOME affordability requirements in its homebuyer program, and does not use resale provisions.

Borrowers must occupy the Property as Borrower's principal place of residence for thirty (30) years from the date the loan is made. Prior to the 30th year, Borrower has the right to prepay the outstanding principal amount of the loan plus the simple interest that is due. If Borrower prepays the original amount of the loan plus simple interest, the Deed of Trust and the requirement that

Borrowers must occupy the Property as Borrower's principal place of residence will no longer be in effect.

Mortgage Assistance Program loans from the County are deferred loans. This means that Borrowers do not have to make any payments on the loan for 30 years, provided the Borrower owns and occupies the home and does not violate any of the terms of the Mortgage Assistance Program loan. The loan carries a simple interest rate of three percent (3%). Thirty (30) years from the date the loan is made, the Borrower will be required to repay the principal amount of the loan (direct HOME subsidy) plus all accrued interest.

3. A description of the guidelines for resale or recapture that ensures the affordability of units acquired with HOME funds? See 24 CFR 92.254(a)(4) are as follows:

During the thirty-year affordability period, if the Borrower is going to transfer all or any part of the property (either voluntarily through a sale, or involuntarily through a foreclosure or similar transaction), it must notify the County, in advance and in writing and receive the County's written approval. At transfer, the Borrower will be required to repay the loan with the net proceeds of sale/distribution of proceeds at foreclosure. If there are insufficient net proceeds for the County to recapture the loan plus interest, the County will recapture the full amount of net proceeds available and the loan will be considered satisfied. Net proceeds are the sales price of the home minus the first mortgage repayment and any applicable closing costs.

Certain transfers are **not** permitted, including transfers: (i) by a Borrower to an existing spouse or domestic partner who is also an obligor under the Note; (ii) by a Borrower to a spouse or domestic partner where the spouse or domestic partner becomes the co-owner of the Property; (iii) between spouses as part of a marriage dissolution proceeding; (iv) to an existing spouse or domestic partner of Borrower by devise or inheritance following the death of Borrower; (v) by Borrower into an inter vivos trust in which Borrower is the beneficiary; (vi) by deed of trust or imposition of a lien subordinate to the Deed of Trust or (vii) refinance of the First Mortgage or any CalHFA Mortgages, meeting the requirements of Section 11 of the Promissory Note.

Mortgage Assistance Program loans are repaid per the terms of a Promissory Note which is secured by a Deed of Trust. In addition, the County executes a Borrower Disclosure Statement with the Borrower, in order to convey all the HOME requirements that apply during the affordability period (principal residence, recapture requirements, default).

The County will conduct yearly monitoring to insure that Borrowers are in compliance with the terms of their Mortgage Assistance Program loan, including, but not limited to, the requirement that Borrowers use the home as their principal place of residence. In the event of noncompliance during the period of affordability by the Borrower under the terms of the Mortgage Assistance Program loan or their First Mortgage loan, the total amount of the Borrower's Mortgage Assistance Program

loan and simple interest owed shall immediately become due and payable. Noncompliance occurs when an owner (1) vacates the unit or rents the unit to another household or, (2) sells the home without the County receiving recaptured funds due at time of sale.

In the event of noncompliance with the affordability requirements, or default on any loan terms, all outstanding principal plus simple interest is due and immediately payable. If the Borrower is unable to repay the loan when due, an additional financial penalty may be imposed by the County per the terms of the Borrower's Promissory Note.

4. Plans for using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds along with a description of the refinancing guidelines required that will be used under 24 CFR 92.206(b), are as follows:

This plan does not include use of HOME funds to refinance existing debts for multifamily housing.

**Emergency Solutions Grant (ESG)  
Reference 91.220(l)(4)**

1. Include written standards for providing ESG assistance (may include as attachment)

Included is the draft standards developed by the jurisdictions. ESG entitlement jurisdictions will utilize assessment and evaluation instruments developed in consultation with local ESG recipients in the County (i.e. Santa Ana, Garden Grove and Anaheim) that have been meeting on a regular basis to standardize the monitoring forms and process to minimize any duplication of efforts and to better align values and priorities. The County will ensure the ongoing effectiveness of the program's design and standards. In addition, the County will ensure that subrecipients comply with eligibility and verification requirements including HMIS.

ESG and CoC Coordination & Collaboration

In collaboration with other ESG service providers, these written standards have been developed by ESG grantees within Orange County, including Housing and Community Development and Homeless Prevention, the City of Anaheim, City of Garden Grove, City of Santa Ana and CoC. This collaboration allows for input on the standards and implementation process developed by organizations that directly provide homeless and housing services, Rapid Re-housing (R/R), and Homelessness Prevention (HP). *The ESG Written Standards are expected to be adopted by the CoC Board, and City ESG recipients.* These written standards will be reviewed and revised at least annually, or as needed, to continue to build upon and refine this document.

In addition, subrecipients are required to develop and implement written policies and procedures in compliance ESG regulations and program objectives.

2. If the Continuum of Care has established centralized or coordinated assessment system that meets HUD requirements, describe that centralized or coordinated assessment system.

Provided are the current standards utilized by subrecipient which also meet HUD requirements. Provisions in the CoC Program interim rule at 24 CFR 578.7(a)(8) require that CoCs establish a Centralized or Coordinated Assessment System (CES). (HUD uses the terms coordinated entry and coordinated entry process instead of centralized or coordinated assessment system to help avoid the implication that CoCs must centralize the assessment process, and to emphasize that the process is easy for people to access, that it identifies and assesses their needs, and makes prioritization decisions based upon needs). HUD's primary goals for coordinated entry processes are that assistance be allocated as effectively as possible and that it be easily accessible no matter where or how people present. Most communities lack the resources needed to meet all of the needs of people experiencing homelessness.

211OC facilitates the CES in partnership with Housing and Community Development/Homeless Prevention and the Continuum of Care. CES creates a single point of entry, follows a standardized entry protocol and prioritization for placement policy (Prioritization for Permanent Supportive Housing Opportunities Policy, #CE-CA602-15-001 approved by the Commission to End Homelessness, July 31, 2015) and utilizes a single, standardized assessment tool to screen applicants for available programs throughout Orange County.

At this time, the CoC has implemented Coordinated Entry for Permanent Supportive Housing and Rapid Rehousing. The process is underway to have a compliant CES process by HUD's deadline of January 23, 2018.

3. Identify the process for making sub-awards and describe how the ESG allocation available to private nonprofit organizations (including community and faith-based organizations).

The County has already aligned its funding to align with the priorities in the County's Ten Year Plan and to fill gaps in the system of care. As an Urban County, the County of Orange coordinates with its local participating cities on policies on funding. The funding for emergency shelter has been established as a high priority regionally and in the Ten Year Plan and as such these funds have been allocated following the County's FAPP which is a public document.

4. If the jurisdiction is unable to meet the homeless participation requirement in 24 CFR 576.405(a), the jurisdiction must specify its plan for reaching out to and consulting with homeless or formerly homeless individuals in considering policies and funding decisions regarding facilities and services funded under ESG.

Since 1998, the County of Orange has had a comprehensive, coordinated, and regional Continuum of Care strategy that includes participation of all 34 cities in Orange County, County Agencies, the County's homeless housing and service providers, and other community groups, including non-profits, local governmental agencies, faith-based organizations, the homeless and formerly homeless, interested business leaders, schools and other stakeholders to identify the gaps and unmet needs of the County's homeless. Homeless needs and priorities continue to be identified through the County's Continuum of Care system. The Ten Year Plan and the implementation groups formed are public and inclusive to participation of all stakeholders including homeless and formerly homeless individuals. In addition, the CoC consults with and engages homeless individuals to participate in the Point and Time Count and Survey of the homeless and the implementation Groups of the Commission to End Homelessness.

5. Describe performance standards for evaluating ESG.

The County will continue to use the outcome standards indicated in the Consolidated Plan as a preliminary performance standard and will continue to review these standards in consultation with the CoC to determine their appropriateness in measuring the performance of the ESG program.

Besides regular site visits to provide technical assistance to subrecipients, all projects/programs funded by Housing and Community Development/Homeless Prevention are monitored throughout the fiscal year for performance and compliance.

See discussions above.

## Citizen Participations Comments

No public comments were received.

**AFFIDAVIT OF PUBLICATION**

**I am a citizen of the U.S., over the age of 18, resident of Orange County and not a party to the action upon which publication is being made.**

**My business address is**

**1300 South Grand Ave, Santa Ana, CA 92705. I ordered publication of the attached notice. Said notice has been ordered to be published in the OC Register (English), Unidos (Spanish), Nguoi Viet (Vietnamese), newspapers, of general circulation in the County of Orange, to be published on the following date:**

**March 14, 2016 (OC Register)**

**March 15, 2017 (Nguoi Viet)**

**March 17, 2017 (Unidos)**

**I declare under penalty of perjury that the foregoing is true and correct. Executed at Santa Ana, California on April 11, 2017.**

**By: Craig Fee  
(Print name)**

  
\_\_\_\_\_

**NOTICE OF PUBLIC HEARING  
DRAFT FY 2017-18 ANNUAL ACTION PLAN  
OC COMMUNITY SERVICES**

NOTICE IS HEREBY GIVEN that the Orange County, Board of Supervisors has scheduled a public hearing to consider the Annual Action Plan (AAP) Draft for Fiscal Year 2017-18. The hearing is conducted to receive public comments and to acquire adoption of the subject documents.

**DATE OF HEARING:** Tuesday, May 9, 2017

**TIME OF HEARING:** 9:30 a.m. or as soon thereafter as possible

**LOCATION OF HEARING:** Orange County Board of Supervisors Hearing Room  
Hall of Administration  
10 Civic Center Plaza  
Santa Ana, CA 92701

The Annual Action Plan (AAP) is an all-encompassing document that provides a basis and strategy for the annual use for all federal funds granted to the Urban County of Orange by the U.S. Department of Housing and Urban Development (HUD) under the Community Development Block Grant (CDBG), Home Investment Partnership (HOME), and Emergency Solutions Grant (ESG) programs. The AAP also addresses related local funding received by Housing & Community Development & Homeless Prevention (i.e. Operating Reserve, 15U Housing Funds, and Housing Successor Agency (HSA)). The AAP indicates preliminary awards based on estimated HUD funds for FY 2017-18. These appropriations support public facilities and improvements, public services, housing rehabilitation, and affordable housing development activities that benefit low-and moderate-income households.

**INVITATION TO BE HEARD:** Notice is hereby further given to provide the public a 30-day review period beginning **March 13, 2017 and ending April 12, 2017** to submit any concerns and/or comments. All persons either favoring or opposing the Annual Action Plan are invited to present their views in writing or before the Board of Supervisors.

During the 30-day review and comment period, electronic links to the draft FY 2017-18 Annual Action Plan are available on the Orange County Library's website at [www.ocpl.org](http://www.ocpl.org) and on the Housing & Community Development & Homeless Prevention's website at [www.occommunityservices.org/hcd](http://www.occommunityservices.org/hcd). In addition, the Public Notice is posted under the Public Notice link. Upon request, copies will be made available at Housing & Community Development & Homeless Prevention's office located at 1300 S. Grand, Building B, 3<sup>rd</sup> Floor, Santa Ana, CA 92705, during normal business hours: Monday thru Friday (8:00 AM to 5:00 PM).

Written comments must be postmarked by April 12, 2017 and addressed to Housing & Community Development & Homeless Prevention, 1300 S. Grand, Building B, 3<sup>rd</sup> Floor, Santa Ana, CA 92705, Attention: Mr. Craig Fee or e-mail [craig.fee@occr.ocgov.com](mailto:craig.fee@occr.ocgov.com). All written comments received will be considered by Orange County prior to the scheduled public hearing. For further information email or call Craig Fee at (714) 480-2996.

Craig Fee, Manager  
Community Development

This Notice will be published and translated in the following newspapers:

- *March 13, 2017 - OC Register and Nguoi Viet*
- *March 15, 2017 - Unidos*

# Grantee Unique Appendices

## ESG Written Standards

## **Emergency Solutions Grant (ESG)**

**Reference 24 CFR 576.400. 91.220**

### **Emergency Solutions Grant Standards**

The County of Orange, through the Orange County Community Services (OCCS), is responsible for coordinating and implementing the ESG Orange County Collaborative. The Emergency Solution Grant (ESG) regulations, the Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act, and the Continuum of Care (CoC) Program Interim Rules state that the CoC, in consultation with recipients of ESG program funds within the geographic area, must:

- (1) Establish and consistently follow written standards for providing CoC assistance;
- (2) Establish performance targets appropriate for population and program type; and
- (3) Monitor recipient and sub-recipient performance.

Pursuant to the Code of Federal Regulations 24 CFR Part 578, OCCS in coordination with the ESG jurisdictions and the CoC has developed the following written standards. These standards will apply to all projects and activities that receive County ESG funding. These are intended as basic minimum standards to which subrecipients can make additions and/or enforce more stringent standards applicable to their own projects. In addition, all projects must comply with the funding process under which the project was originally awarded and the HEARTH Act. All programs that receive ESG funding are required to abide by these written standards.

#### **Overview of HEARTH Act**

- Approved on May 20, 2009, and amended the McKinney-Vento Homeless Assistance Act.
- Amendments allow for increased flexibility in who may be served and what activities may be carried out.
- Consolidates three separate homeless assistance programs administered by the United States Department of Housing and Urban Development (HUD) under the McKinney-Vento Homeless Assistance Act into a single grant program and creates the ESG Program and the Rural Housing Stability Assistance Program (RHSP).
- Change of focus from homeless shelter to homelessness prevention.

#### **ESG and CoC Coordination & Collaboration**

In collaboration with other ESG service providers, these written standards have been developed by ESG grantees within Orange County, including OCCS, the City of Anaheim, City of Garden Grove, City of Santa Ana and CoC. This collaboration allows for input on the standards and implementation process developed by organizations that directly provide homeless and housing services, Rapid Re-housing (R/R), and Homelessness Prevention (HP). *The ESG Written Standards have been adopted/approved by the CoC Board, Commission to End Homelessness Board,, and City ESG recipients.* These written standards will be reviewed and revised at least annually, or as needed, to continue to build upon and refine this document.

## Housing First Model

HUD encourages all ESG grantees and subrecipients, as well as the COC, to implement a “housing first” approach when providing assistance. The housing first approach prioritizes rapid placement and stabilization in permanent housing; it does not have service participation requirements or preconditions (such as sobriety or a minimum income threshold).

Transitional housing and supportive services only projects may also be considered to utilize the housing first approach, if they operate with low-barriers, work to quickly move people into permanent housing, do not require participation in supportive services, and do not require any preconditions for moving into transitional housing.

## Universal Assessment

All individuals will be first be assessed using a Pre-Screening Tool. The Pre-Screening Tool serves as a triage tool to determine if the individual or family may be diverted, need prevention assistance, or need be to further assessed to determine what is the best housing intervention for them. If the individual is determined to need further assessed a comprehensive, universal assessment tool called the Vulnerability Index Service Prioritization Decision Assistance Tool (VI-SPDAT) version 2 for Individuals and Families is utilized. This tool guarantees that an individual or family’s level of need and eligibility determination are made in an informed, reasonable, and objective manner.

## Homeless Management Information System

All subrecipients are required to participate in the Homeless Management Information System (HMIS) per the ESG and CoC Interim Rule (24 CFR 576 and 578). HMIS provides an opportunity to document homelessness and helps to ensure coordination between service providers while avoiding duplication of services and client data.

## Reporting – Coordinated Entry System

- The HEARTH Act makes HMIS participation a statutory requirement for ESG recipients and subrecipients. The subrecipients work with the Continuum of Care to ensure the screening, assessment, and referral of program participants are consistent with the written standards.
- The subrecipient will ensure that data on all persons served and all activities assisted under ESG are entered into a community-wide HMIS in the area in which those persons and activities are located.
- Victim service providers cannot, and Legal Services Organizations may choose to not participate in HMIS. Providers that do not participate in HMIS must use a comparable database that produces unduplicated, aggregate reports instead.
- Eligible Cost include, but not limited to the following:
  - *Hardware, Equipment and Software Costs*
  - *Staffing: Paying salaries for operating HMIS*
  - *Training and Overhead- Technical support, leasing space, and utilities for space used by HMIS staff*

### Comparable Database for Victim Services

If the sub-recipient is a victim services or a legal services provider that use a comparable database, it may use ESG funds to establish and operate a comparable database that collects client-level data over time and generates unduplicated aggregate reports based on the data. Information entered into a comparable database must be provided to the HMIS Lead, upon request.

### Data Sharing Requirement

Data sharing is a multi-directional sharing relationship between multiple organizations. In order to systematically share data, the participating agencies must jointly establish a data sharing network formalized by the execution of guidelines, with the understanding they agree to future updates to the guidelines made by the HMIS Lead.

### ESG Agreements

The ESG recipient enters into an agreement with ESG subrecipients. In general, these subrecipient agreements define:

- Key program components or activities (including benchmarks for success);
- Level of ESG funding;
- Anticipated source and amount of matching funds (24CFR 576.201) contributed by the subrecipient;
- Applicable laws and regulations; and
- Documentation or reporting requirements.

### Expenditure Limits

Funds used for street outreach and emergency shelter activities will be limited to the greater of:

- 60 percent of the jurisdiction's total current fiscal year (FY) grant for ESG; or
- The amount of FY 2010 ESG grant funds that were committed to street outreach and emergency shelter.

### Matching Funds Requirements

- The subrecipient must make matching contributions to supplement the recipient's ESG program in an amount that equals the amount of ESG funds provided by HUD.
- Matching contributions may be obtained from any eligible source, including any Federal source other than the ESG program, as well as state, local, and private sources. Additional requirements apply to matching contributions from a Federal source of funds.
- Matching contributions must be provided after the date that HUD signs the grant agreement.

### Uniform Administrative Requirements

The use of ESG funding is subject to the applicable requirements of 2 CFR Part 200, *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards*. The purpose of 2 CFR Part 200 is to streamline the Federal Government's guidance on administrative requirements to more effectively focus Federal resources on improving performance and outcomes, while ensuring the financial integrity of the Federal programs in partnership with non-federal stakeholders (e.g., grantees and sub-recipients). 2 CFR Part 200 supersedes, consolidates, and streamlines requirements from eight (8) OMB Circulars: A-21, A-87, A-89, A-

102, A-110, A-122, A-133, and A-50. Subrecipients are required to maintain an acceptable general accounting system. A subrecipient's general accounting system must include:

- Independent Single Audit (OMB 2 CFR Part 200.514) All ESG sub-recipients that expend more than \$750,000 of Federal funds (include all Federal sources) in a single year must have a single audit conducted. Copies of the Single Audit must be sent to the County as well as HUD.
- All records must be maintained for a minimum of four (4) years.

### Financial Management

Grantees and subrecipients in the ESG program must ensure compliance with regulations and requirements pertaining to the following key areas of financial management outlined in Financial Management Systems (24CFR 85.20 and 24CFR 84.20-28) for the following areas:

- Usage of funds
- Internal controls
- Cash management
- Procurement Property
- Audits
- Required funding match
- Budget controls
- Accounting controls
- Asset controls

### Documentation of Homelessness

ESG sub-recipients are required to maintain adequate documentation of homelessness status to determine eligibility of persons served by the ESG program.

- A copy of this documentation must be maintained by the subrecipient in the client's or participant's file. Documentation includes 3-day notice to pay or quit, public agency written verification of homelessness, or self-certification of homelessness are examples of required proof to require and maintain in client file.

### Qualifications of Homelessness

A person is considered homeless only when he/she resides in one of the following places:

- In places not meant for human habitation such as a car, park, sidewalk, an abandon building, or on the street;
- In an emergency shelter;
- In transitional or supportive housing for homeless persons who originally came from the streets or emergency shelter; or
- In any of the above but is spending a short time (up to 30 consecutive days) in a hospital or other institution.

### Monitoring and Site Visits

Monitoring can take a number of forms and can include review of progress reports, telephone consultation, and performance on-site assessments. The three basic goals for oversight and monitoring of the progress and performance of ESG grantees/recipients include:

- Ensure that ESG funds are used effectively to assist homeless individuals and families and that the basic ESG program goals are met;

- Ensure compliance with ESG regulations and program requirements in the usage of funds and in carrying out program activities; and
- Enhance and develop the management capacity of grantees or recipients.

#### Participation of Homeless Persons in Policy-Making and Operations

Pursuant to 24 CFR 576.405, recipients of ESG funds must provide for the participation of not less than one homeless or formerly homeless persons in a policy-making function within the subrecipient's organization. If the recipient is unable to meet this requirement, they must instead develop and implement a plan to consult with homeless or formerly homeless persons in a policy-making function regarding any facilities, services, or other assistance that received funding under ESG. All subrecipients of ESG funds are required to involve or encourage involvement of participants in the operation of an ESG-funded program or facility.

#### Termination of Assistance 24 CFR 576.402:

Assistance provided through ESG-funded activities to program participants that violate program requirements may be terminated. Written procedures must describe the specific program requirements and the termination, grievance, or appeal processes; this should include the procedures for a participant to request a hearing regarding the termination of their assistance. The federal regulation at 24 CFR 576.402 describes the termination provision:

(a) If a program participant violates program requirements, the recipient or subrecipient may terminate the assistance in accordance with a formal process established by the recipient or subrecipient that recognizes the rights of individuals affected. The recipient or subrecipient must exercise judgment and examine all extenuating circumstances in determining when violations warrant termination so that a program participant's assistance is terminated only in the most severe cases.

(b) Program participants receiving rental assistance or housing relocation and stabilization services. To terminate rental assistance or housing relocation and stabilization services to a program participant, the required formal process, at a minimum, must consist of:

- (1) Written notice to the program participant containing a clear statement of the reason(s) for termination;
- (2) A review of the decision, in which the program participant is given the opportunity to present written or oral objections before a person other than the person (or a subordinate of that person) who made or approved the termination decision; and
- (3) Prompt written notice of the final decision to the program participant.

(c) Ability to provide further assistance. Termination under this section does not bar the recipient or subrecipient from providing further assistance at a later date to the same family or individual.

#### Reimbursement Responsibilities

Subrecipients will be responsible to submit reimbursement request, on a monthly basis, for eligible and reasonable expenditures. The following may be included in the reimbursement request. Specific items may vary from jurisdiction to jurisdiction and will be detailed in contracts:

- Request cover page and summary page

- Cancelled checks, bank statements, electronic payment receipts, etc.
- Invoice, bill, contract, lease, etc. (*late charges are not eligible*)
- HMIS reporting

Fina

I reimbursement request must be submitted no later than the date specified in the ESG subrecipient agreement.

Five ESG Program Components

The table below compares the two types of eligible ESG clients and which of the five ESG funding components each client group may receive:

Component	Those who are Homeless	Those who are at risk of Homelessness
1. Street Outreach	X	
2. Emergency Shelter	X	
3. Homelessness Prevention		X
4. Rapid Re-housing	X	
5. Homeless Management Information System (HMIS)	X	X

**Standards for Programs Components**

**1. Street Outreach**

Eligible Participants: “Unsheltered” individuals and families, meaning those who qualify under paragraph (1) (i) of the definition of “homeless.”

Eligible Activities: Essential services to eligible participants provided on the street or in parks, abandoned buildings, bus stations, campgrounds, and in other such settings where unsheltered persons are staying. Staff salaries related to carrying out street outreach activities is also eligible.

Eligible Costs:

Standards for targeting and providing essential services related to Street Outreach include:

- Engagement  
Activities to locate, identify, and build relationships with unsheltered homeless people for the purpose of providing immediate support, intervention, and connections with homeless assistance programs and/or mainstream social services and housing programs.
- Case Management  
Assessing housing needs, and arranging/coordinating/monitoring the delivery of individualized services.
- Emergency Health Services  
Outpatient treatment for urgent medical conditions provided by licensed medical professionals in community-based settings (e.g., streets, parks, and campgrounds) to eligible participants unwilling or unable to access emergency shelter or health care facility.

- Emergency Mental Health Services

Outpatient treatment for urgent mental health conditions provided by licensed professionals in community-based settings (e.g., streets, parks, and campgrounds).

- Transportation

Travel by outreach workers, social workers, medical professionals or other service providers during the provision of eligible street outreach services.

- Services to Special Populations

Address the special needs of homeless youth, victims of domestic violence and related crimes/threats, and/or people living with HIV/AIDS who are literally homeless.

## 2. Emergency Shelter

### Eligible Participants:

Eligible Participants are individuals and families who are homeless.

### Eligible Activities:

ESG funds may be used to provide essential services to persons in emergency shelters, major renovation of an emergency shelter, or conversion of a building into an emergency shelter, and shelter operating costs. Staff costs related to carrying out emergency shelter activities is also eligible.

### Eligible Costs:

Overview of eligible costs include:

#### A. Essential Services

Eligible costs to provide essential services to individuals and families who are in an emergency shelter are as follows:

- Case Management
- Life Skills Training
- Child Care
- Education Services
- Employment Assistance and Job Training
- Outpatient Health Services
- Legal Services
- Mental Health Services
- Substance Abuse Treatment Services
- Transportation
- Services for Special Populations

**Note:** Emergency Shelter agencies must include in their policies and procedures the process of admission, diversion, referral and discharge including standards regarding length of stay and safeguards to meet the safety and shelter needs of special populations and individuals, and families who have the highest barriers to housing and are likely to be homeless the longest.

#### B. Renovation and Conversion

Eligible costs include labor, materials, tools, and other costs for renovations. When ESG funds are used for renovations, other than major rehabilitation or conversion, the minimum period of use to be maintained as a shelter for homeless individuals and families is three (3) years. If the rehabilitation costs of an emergency shelter exceeds 75 percent of the value of the building

before rehabilitation (major rehabilitation) or if the costs to convert a building into an emergency shelter exceeds 75 percent of the value of the building after the conversion, then the minimum period of use is ten (10) years, including soft costs, or conversion of a building to be used as an emergency shelter. The maximum funding allowed is **\$5,000**.

#### C. Shelter Operations

Eligible costs are the costs of maintenance necessary for the operation of an emergency shelter. In the case when no appropriate emergency shelter is available for a homeless family or individual, a hotel or motel voucher will also be considered eligible cost. Additional eligible shelter operation costs include the following:

- Maintenance (including minor and/or routine repairs)
- Food
- Insurance
- Rent
- Furnishings
- Security
- Supplies necessary for the operation of the emergency shelter
- Fuel
- Utilities
- Equipment

### 3. **Homelessness Prevention**

#### Eligible Participants:

The purpose of Homelessness Prevention is to prevent persons from becoming homeless in a shelter or an unsheltered situation. Funding may also be used to help such persons regain stability in their current housing or other permanent housing. Eligibility for services applies to individuals and families who are *at imminent risk, or at risk, of homelessness*, meaning those who qualify under paragraph (2) and (3) of the homeless definition or those who qualify as at risk of homelessness. Individuals and families must have an income at, or below, 30% of median family income for the area (AMI).

#### Eligible Activities:

Eligible activities include the following:

- Housing Relocation and Stabilization Services
- Short- and Medium-Term Rental Assistance

### 4. **Rapid- Rehousing**

#### Eligible Participants:

The purpose of Rapid Re-housing is to serve participants who meet the criteria under paragraph (1) of the “homeless” definition in 24 CFR Part 576.2 or who meet the criteria under paragraph (4) of the “homeless” definition and live in an emergency shelter or other place described in paragraph (1) of the “homeless” definition.

Subrecipients must maintain standards to help homeless persons living on the streets or in an emergency shelter transition as quickly as possible into permanent housing, and then, to help such persons achieve stability in that housing.

Eligible participants are individuals and families that are literally homeless currently living in an emergency shelter or place not meant for human habitation.

Eligible Activities:

Eligible activities include the following services:

- Housing Relocation and Stabilization Services
- Short- and Medium-Term Rental Assistance

**Housing Relocation and Stabilization Services**

The following guidelines apply to both Rapid-Rehousing and Homelessness Prevention.

FINANCIAL ASSISTANCE	SUPPORTIVE SERVICES
Moving costs	Housing search & placement
Rent application fees	Housing Stability Case Management
Last month's rent	Mediation
Utility payments –up to 24 months of payments per program participant (including up to 6 months arrears per service)	Credit repair
Security deposit –equal to no more than 2 months’ rent	Legal Services
Standard utility deposits	

**Short- and Medium-Term Rental Assistance:** Rapid Re-housing/Homelessness Prevention

TYPES OF RENTAL ASSISTANCE	LENGTH OF ASSISTANCE
Short Term Rental Assistance	Up to 3 months
Medium Term Rental Assistance	4 to 24 months
Payment of Rental Arrears	One-time payment for up to 6 months of arrears including late fees.

Lease Requirements 24.CFR 576.107(5)

In compliance with HUD requirements, EDA clarifies that to be in permanent housing, the program participant must be the tenant on a lease for a term of at least one year that is renewable and can only be terminated for cause. The lease must be renewable for terms that are a minimum of one month long. HUD has determined that requiring a lease for a term of at least one year that is renewable and terminable only for cause can assist program participants in obtaining stability in housing, even when the rental assistance is temporary.

## **PERFORMANCE STANDARDS**

The ESG grantee must describe the performance standards for evaluating ESG activities which must be developed in consultation with the Continuum of Care.

Based on standards and goals of the local Continuum of Care, the Orange County ESG Collaborative is proposing the following performance standards for the Emergency Solutions Grant:

### Performance Measures for Homelessness Prevention

- a. A reduction in the number of homeless individuals and families seeking emergency shelter services.
- b. Expected Outcome: At least 35% of participants assisted will remain in permanent housing six (6) months after the last assistance was provided under ESG.

### Performance Measures for Homeless Rapid Re-Housing

- a. A reduction in the reoccurrence of homelessness for individuals and families who exit the shelter system.
- b. Expected Outcome: At least 35% of participants assisted will remain in permanent housing six (6) months after the last assistance provided under ESG.

## **EVALUATION OF ELIGIBILITY**

Standard Policies and Procedures for evaluating individuals' and families' eligibility for assistance under Emergency Solutions Grant (ESG).

### Building on Established Homeless Prevention or Rapid Re-housing (HPRP) Policies and Procedures

The policies and procedures were originally established based on the provisions of HPRP assistance. The policies and procedures have been modified based upon the checklist of required elements set forth in 24 CFR 576.400 (e)(1) and (e)(3), (91.220 (l)(4)(vi)) and in collaboration with CoC standards will be adopted.

### Centralized Pre-Screening and Assessment Available at Multiple Locations

The County of Orange Continuum of Care (CoC) through their Coordinated Entry System (CES) establishes the list of prioritized individuals and available units. Participating agencies are responsible for engaging homeless individuals and families through the use of outreach/in-reach and a standardized vulnerability assessment and intake process that provides referrals to the CES. CES places priority on those who are at highest risk with the most appropriate intervention **rather than** a "first come, first served" approach.

Individuals and families applying for ESG assistance must complete the Pre-Screening Tool as described in the Universal Assessment section. The Pre-Screening Tool may be completed via phone, online, or at established locations, including emergency shelter locations. Dependent on the results of the Pre-Screening Tool and VI-SPDAT, individuals and families will be scheduled an appointment with a case manager for to do an initial consultation and begin eligibility determination.

## Basic Eligibility Requirements

- Initial Consultation & Eligibility Determination: The applicant(s) must receive at least an initial consultation and eligibility assessment with a case manager or other authorized representative who can determine eligibility and appropriate type of assistance.
- ESG clients must meet one of the following definitions of homelessness:
  1. Literally homeless
  2. At imminent risk of homelessness
  3. Homeless under Federal Statutes
  4. Fleeing/attempting to flee domestic violence
- Income: The household's total annual income must be below 30 percent of the median family income for the area (AMI)
- Housing Status: Case files must document the current housing status of the household at application. Housing status will be verified through third party verification whenever possible. Self-certification of housing status will be considered on a case by case basis.
- Orange County Residency: All households receiving HPRP assistance under ESG must be residents of Orange County at time of application.
- Unidentifiable financial resources and/or support networks: In order to receive ESG rental financial assistance, applicants must also demonstrate the following:
  1. No appropriate subsequent housing options have been identified;
  2. The household lacks the financial resources to obtain immediate housing or remain in its existing housing; and
  3. The household lacks support networks needed to obtain immediate housing or remain in its existing housing.

## **POLICIES AND PROCEDURES FOR PROGRAM COORDINATION**

Policies and Procedures for coordination among emergency shelter providers, essential service providers, homelessness prevention and rapid re-housing assistance providers, other homeless assistance providers, and mainstream service and housing providers.

The ESG program requires coordination among participating agencies. All ESG subrecipients in Orange County are experienced homeless providers with a demonstrated track record in fiscal management and the provision of housing and supportive services targeted to homeless households. Additionally, the project administration agreement with ESG subrecipients will require coordination among agencies receiving ESG funds to administer Emergency Shelter, essential services, Homelessness Prevention, Rapid Re-housing services, and related assistance, and access to mainstream services and housing providers for clients.

### Participation in the Continuum of Care

ESG funded agencies have easy access to membership in the Continuum of Care. The Continuum of Care has member organizations including homeless service providers, veteran service representatives, churches, and government organizations. The Continuum of Care meets on a regular basis and shares information about services among participating agencies. For meeting information you may access the CoC Master Calendar at <http://ocpartnership.net/content/mastercalendar.html>.

### Required Client Information and Referrals

To further facilitate collaboration and information sharing, ESG funded agencies will be required to provide the following information and referrals to ESG program participants:

- 2-1-1 hotline for social services
- Social security benefits
- Cal-Works and other income security programs provided by the Orange County Social Service Agency (SSA)
- Cal-Fresh, federally known as Supplemental Nutritional Assistance Program (SNAP)
- Low Income Energy Assistance Programs
- Affordable housing information
- Employment assistance and job training programs
- Health care and mental health services
- Services for victims of domestic violence
- Veteran services
- Specialized services such as legal services and credit counseling

### **POLICIES AND PROCEDURES FOR DETERMINING ASSISTANCE AND PRIORITIZATION**

Policies and Procedures for determining and prioritizing which eligible families and individuals will receive Homelessness Prevention assistance and which eligible families and individuals that will receive Rapid Re-housing assistance.

Once it is determined that the household meets the basic eligibility guidelines noted above, the household will be assessed for the appropriate form(s), level, and duration of financial assistance. The results of this assessment will be formalized in a Housing/Financial Assistance Plan that is signed by both the applicant and the case manager.

#### Assistance through Homelessness Prevention

Homelessness Prevention assistance will be targeted to households who are at risk of losing their present housing and becoming homeless. While there are many people who are housed and have a great need for rental assistance, not everyone will become homeless without assistance. A risk assessment will be used to assess the household's level of crisis and prioritize those who are at greatest risk of becoming homeless. The assessment tool will include vulnerability criteria including but not limited to; income, housing history, food security, childcare, health care, life skills, and other special needs. Due to the limited amount of funding, assistance will be provided on a first come, first served basis, if the applicant meets the eligibility and risk assessment criteria.\*

#### Assistance through Re-housing

Homeless Rapid Re-housing assistance is intended for individuals or families who meet the homeless definition described in Section 103, 42 USC 11302 of the McKinney Vento Act, as amended by the HEARTH Act. While there are many homeless individuals and families in Orange County at any given night, the Rapid Re-housing assistance will be prioritized for households who are residing in emergency shelters and on the streets. Due to the limited amount of funding, assistance will be provided on a first come, first served basis, if the applicant meets the eligibility and risk assessment criteria. \*

***\* Rapid Re-housing should prioritize people with more challenges, including those with no income, poor employment prospects, troubled rental histories, and criminal records. Providers should link participants with community resources that will help them achieve longer-term stability and well-being.***

## **DETERMINING SHARE OF RENT AND UTILITY COSTS**

Standards for determining the share of rent and utilities costs that each program participant must pay, if any, while receiving Homelessness Prevention or Rapid Re-housing assistance.

### Limitations on Assistance – Homelessness Prevention

Orange County's ESG rental assistance is intended to stabilize individuals and families who have recently endured difficult financial circumstances that have led them into homelessness or who are at imminent risk of becoming homeless. For Homelessness Prevention assistance, the rental assistance consists of short term rental assistance (3 months); extended under certain circumstances to medium term rental assistance (for an additional 3 months). Client must be reassessed after every 90 days and case management on a monthly basis is **required**.

Not every individual or family in need of rental assistance is a candidate for ESG Homelessness Prevention or Rapid Re-housing assistance. ESG rental assistance is not a substitute for Section 8 rental assistance or a permanent rental subsidy, but rather a tool to help stabilize families or individuals who are at imminent risk of becoming homeless and lack any other resources to help them stabilize their housing situation. Rental assistance cannot be provided to a program participant who is already receiving rental assistance, or living in a housing unit receiving rental assistance or operating assistance through other federal, State, or local sources (CFR 576.106).

As a general rule, an individual or household should pay approximately 30% of their income towards rent. This requirement may be waived on a case-by-case basis for extreme circumstances. The ESG assistance will consist of the remaining portion of the rent.

Program participants are required to be reassessed at regular monthly intervals to monitor progress and levels of self-sufficiency. If a program participant requires assistance beyond the three month mark, the ESG rental subsidy will be reduced and the client will be required to pay a larger portion of the rent. Homelessness Prevention assistance will be based on number in household, fair market rent rate, and income.

### Limitations on Assistance – Rapid Re-housing

Under Rapid Re-housing assistance, a client's share of rent should be based on the client's ability to pay during their path to housing stabilization. Clients receiving Rapid Re-housing assistance must be re-assessed, at a minimum every 90 days, and reviewed during monthly case management. The assistance should not exceed the Fair Market Rent amount based on client household, except for the first month of assistance if client requires assistance with other re-housing expenses such as rent deposits or utility deposits. Security deposit should not exceed two times the rent.

Standards for determining the share of rent and utilities costs that each program participant must pay, if any, will be based on the following guidelines:

- 100% of the cost of rent in rental assistance may be provided to program participants. However to maximize the number of households that can be served with Rapid Re-housing resources,

it is expected that the level of need will be based on the goal of providing only what is necessary for each household to be stably housed for the long term;

- Rental assistance cannot be provided for a unit unless the rent for that unit is at or below the Fair Market Rent limit, established by HUD;
- The rent charged for a unit must be reasonable in relation to rents currently being charged for comparable units in the private unassisted market and must not be in excess of rents currently being charged by the owner for comparable unassisted units.

**Note:** Grant funds may be used for rental assistance for homeless individuals and families. Rental assistance cannot be provided to a program participant who is already receiving rental assistance, or living in a housing unit receiving rental assistance or operating assistance through other federal, State, or local sources (CFR 576.106).

For additional guidance on Rapid Re-housing program limitations refer to the Rapid Re-housing Written Standards (Appendix A).

#### Limitations on Assistance – All Clients

Due to the limited amount of funds available, the ESG assistance will not exceed Fair Market Rent per client per month in combined ESG assistance, including rent and utility payments.\* Generally, clients should be responsible for paying their own utility costs while receiving ESG rental assistance, unless they are experiencing acute financial hardship or are at risk of losing their housing due to utility shut off. Clients seeking help with utilities only may be eligible for ESG assistance if it can be documented that they will lose their housing and become literally homeless if utility assistance is not provided; however, the household still must meet other ESG eligibility requirements.

#### **DETERMINING LENGTH AND ONGOING NEED FOR RENTAL ASSISTANCE**

Standards for determining how long a particular participant will be provided with rental assistance and whether the amount of that assistance will be adjusted over time.

ESG assistance consists of short term (up to 3 months), medium term (up to 6 months), and maximum term (up to 1 year) rental assistance to allow individuals or families who have recently encountered a financial crisis that has led them into homelessness or at imminent risk of homelessness, to gain housing stabilization. Since the program consists of temporary assistance aiming at rapid stabilization of households, clients are required to contribute a portion of their income towards rent. Clients with no potential to earn income may not be suitable candidates for this type of assistance, unless other subsidies can be accessed after the ESG assistance expires.

Clients assisted under ESG Homelessness Prevention Assistance are eligible to receive the rental assistance for up to 3 months if they meet income eligibility of less than 30% of median family income for the area (AMI) during the 3 month period and comply with the case management requirements of the program. At the end of the third month, clients must be re-assessed to determine if the client's rental assistance needs to be extended for an additional 3 month period. If the ESG rental assistance is extended for an additional three (3) months, the ESG assistance will be reduced and/or adjusted over the remaining time.

Clients assisted under ESG Rapid Re-housing Assistance are eligible to receive rental and utility assistance for up to one-year if they meet income eligibility during the one-year period. Rapid Re-

housing clients **must** receive monthly case management, be evaluated at regular intervals, and be re-assessed every 90-days during the ESG assistance period. The ESG rental assistance should be reduced gradually and the client's portion of rent increased during the months of assistance.

### **DETERMINING NEED FOR HOUSING STABILIZATION AND RELOCATION SERVICES**

Standards for determining the type, amount, and duration of housing stabilization and /or relocation services to provide a program participant, including the limits, if any, on Homelessness Prevention or Rapid Re-housing assistance that each program participant may receive, such as the maximum amount of assistance; maximum number of months the program participant receives assistance; or the maximum number of times the program participant may receive assistance.

#### Transitional Housing and Rapid Re-housing

While transitional housing is technically eligible, HUD cautions recipients against using ESG Rapid Re-housing funds as a way of regularly exiting a person from transitional housing to permanent housing. It is recommended that Rapid Re-housing be used as a model for helping people move from the streets or shelter to permanent housing, not for people exiting transitional housing. Additionally, transitional housing providers should have programs designed to successfully exit people and should not use Rapid Re-housing, another form of temporary assistance, as a regular part their program design. HUD recommends this be done on a case-by-case basis, so that it is not common practice, but is provided only when necessary to prevent the program participant from going back to the streets or emergency shelter.

Please also note that program participants would need to be assessed for and determined to be eligible for ESG Rapid Re-housing assistance, in accordance with the ESG eligibility and documentation requirements. (Homeless definition in 24 CFR 576.2) This includes a requirement that the assistance be necessary to help the program participant move as quickly as possible into permanent housing and achieve stability in housing. Note that such a household would have to be exited from the transitional housing program in HMIS and entered into the ESG program in HMIS.

#### Consultation Process

The ESG subrecipients will continuously consult with the Continuum of Care to discuss the County's ESG allocation in ways that:

- Coordinate across regional entitlement jurisdictions by developing and utilizing standardized eligibility and assessment tools;
- Support federal and local goals for priority populations;
- Allow for variations in the program design that responds to the needs and resources of the jurisdiction
- Comply with eligibility and verification requirements (HMIS, housing status, homeless definitions, etc.)

The ESG program requires coordination among participating agencies. All ESG subrecipients in Orange County are experienced homeless providers with a demonstrated track record in fiscal management and the provision of housing and supportive services targeted to homeless households.

The County of Orange also consulted with the Continuum of Care on the Ten Year Plan to End

Homelessness to ensure the alignment of proposed ESG activities as they relate to the goals and strategies outlined in the plan. This joint effort has worked successfully in the past.

#### ESG Homeless Definitions

Refer to reference information located at the following:

[https://www.hudexchange.info/resources/documents/HEARTH\\_HomelessDefinition\\_FinalRule.pdf](https://www.hudexchange.info/resources/documents/HEARTH_HomelessDefinition_FinalRule.pdf)

## APPENDIX A

### Written Standards for Rapid Rehousing

#### A. Background information

In regards to rapid re-housing, § 578.7 Responsibilities of the Continuum of Care (CoC) (a) (9) of the Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act Interim Rule notes that:

“In consultation with recipients of Emergency Solutions Grants (ESG) program funds within the geographic area, establish and consistently follow written standards for providing Continuum of Care assistance. At a minimum, these written standards must include:

- Policies and procedures for evaluating individuals’ and families’ eligibility for assistance under this part;
- Policies and procedures for determining and prioritizing which eligible individuals and families will receive rapid rehousing assistance; and
- Standards for determining what percentage or amount of rent each program participant must pay while receiving rapid rehousing assistance.”

Rapid re-housing is considered permanent housing. The United States Department of Housing and Urban Development (HUD) regulatory definition of “permanent housing” states:

“The term ‘permanent housing’ means community-based housing without a designated length of stay, and includes both permanent supportive housing and rapid re-housing.”

HUD also states:

“Additionally, in the regulatory definition of ‘permanent housing,’ HUD clarifies that to be permanent housing, the program participant must be the tenant on a lease for a term of at least one year that is renewable and is terminable only for cause. The lease must be renewable for terms that are a minimum of one month long. HUD has determined that requiring a lease for a term of at least one year that is renewable and terminable only for cause, assists program participants in obtaining stability in housing, even when the rental assistance is temporary. These requirements are consistent with Section 8 requirements.”

Rapid re-housing assistance may include:

- Rental assistance;
- Case management;
- Supportive services; and
- Security deposit.

#### B. Eligible Clients

Individuals and families defined as Homeless under the following categories are eligible for rapid re-housing assistance:

## Category 1 – Literally Homeless

An individual or family who lacks a fixed, regular, and adequate nighttime residence, which includes a primary nighttime residence of:

- Place not designed for or ordinarily used as a regular sleeping accommodation (including a car, park, abandoned building, bus/train station, airport, or camping ground)
- A supervised publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state, or local government programs); or

In addition, an individual is considered homeless if he or she is being discharged from an institution where he or she has been a resident for 90 days or less and the person resided in a shelter (but not transitional housing) or place not meant for human habitation immediately prior to entering that institution.

## Category 4 – Fleeing Domestic Violence

Any individual or family who:

- Is fleeing, or is attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions that relate to violence against the individual or a family member that has either taken place within the individual's or family's primary nighttime residence or has made the individual or family afraid to return to their primary nighttime residence;
- Has no other residence; and
- Lacks the resources or support networks to obtain other permanent housing.

For information on HUD's other homeless categories, eligible for other CoC funds, visit:

[www.onecpd.info/resources/documents/HEARTH\\_HomelessDefinition\\_FinalRule.pdf](http://www.onecpd.info/resources/documents/HEARTH_HomelessDefinition_FinalRule.pdf)

Eligible clients must also meet eligibility criteria as defined in the Notice of Funding Availability (NOFA) under which the rapid re-housing program was funded.

## C. Prioritizing Rapid Rehousing

Recently, HUD provided guidance for rapid re-housing in terms of prioritizing subpopulations. HUD noted in a SNAPS In Focus: Rapid Re-Housing As a Model and Best Practice, August 6, 2014, that:

“Rapid re-housing can be effective for many populations, such as families with children, youth aging out of foster care, domestic violence survivors, single adults, and veterans, but should be targeted to those households that would not be able to get out of homelessness without the assistance. It is particularly a key strategy for achieving the Opening Doors goal of ending family, youth, and child homelessness by 2020.

Rapid re-housing should prioritize people with more challenges, including those with no income, poor employment prospects, troubled rental histories, and criminal records. Providers should link participants with community resources that will help them achieve longer-term stability and well-being.”

Recently, HUD also noted on the Rapid Re-housing Brief that:

“Rapid re-housing is an effective intervention for many different types of households experiencing homelessness, including those with no income, with disabilities, and with poor rental history. The majority of households experiencing homelessness are good candidates for rapid re-housing. The only exceptions are households that can exit homelessness with little or no assistance, those who experience chronic homelessness and who need permanent supportive housing, and households who are seeking a therapeutic residential environment, including those recovering from addiction.”

Thus, the Orange County CoC will prioritize the following subpopulations that would not be able to get out of homelessness without the assistance:

- Families with children;
- Youth aging out of foster care;
- Domestic violence survivors;
- Single adults;
- Veterans; and
- Chronically homeless individuals and families;

Each individual and family will be entered into the Orange County Coordinated Entry System (CES) which will help identify:

- Eligibility of each individual or family seeking assistance based on the individual’s or family’s current living situation; and
- The amount and type of assistance needed for the individual or family to (re)gain stability in permanent housing.

#### **D. Written Standards**

##### **Written Standard #1: Lease Agreement**

- **The program participant must be the tenant on a lease for a term of at least one year that is renewable and is terminable only for cause. The lease must be renewable for terms that are a minimum of one month long.**

On page 12 of the Preamble of the HEARTH Act Interim Rule, it states that

“HUD clarifies that to be permanent housing, “the program participant must be the tenant on a lease for a term of at least one year that is renewable and is terminable only for cause. The lease must be renewable for terms that are a minimum of one month long. HUD has determined that requiring a lease for a term of at least one year that is renewable and terminable only for cause, assists program participants in obtaining stability in housing, even when the rental assistance is temporary. These requirements are consistent with Section 8 requirements.”

## Written Standard #2: Rental Assistance and Duration of Assistance

- **Program participants may receive short-term (up to 3 months) and/or medium-term (for 3 to 24 months) tenant-based rental assistance. However, it is expected that program participants will only receive the level of assistance necessary to be stably housed for the long-term.**

§ 578.37 Program components and uses of assistance (a) (1) (ii) states that:

“Continuum of Care funds may provide supportive services, as set forth in § 578.53, and/or short-term (up to 3 months) and/or medium-term (for 3 to 24 months) tenant-based rental assistance, as set forth in § 578.51(c), as necessary to help a homeless individual or family, with or without disabilities, move as quickly as possible into permanent housing and achieve stability in that housing.”

Program providers will target program participants to receive short-term rent assistance but upon need will transition to medium-term assistance.

## Written Standard #3: Amount of Rental Assistance

- **Standards for determining the share of rent and utilities costs that each program participant must pay, if any, will be based on the following guidelines:**
  - **The maximum amount of rent that a participant will pay can be up to 100% of the rental amount;**
  - **In general, the goal will be that participants pay generally no more than 50% of their income in rent at program completion; however, in certain circumstances, on a case-by-case basis, there may be participants whose rental share may exceed 50% of the rent based on their financial circumstances and current rental market.**
  - **100% of the cost of rent in rental assistance may be provided to program participants. However, to maximize the number of households that can be served with rapid re-housing resources, it is expected that the level of need will be based on the goal of providing only what is necessary for each household to be stably housed for the long term;**
  - **The maximum number of times that a program participant may receive rental assistance is \_ .**
    - **Propose:** Participants may be eligible for rapid re-housing assistance for multiple episodes of literal homelessness based on their need. To ensure the efficient use of resources, recipients may establish a maximum amount or number of times that a program participant may receive rapid re-housing assistance.
  - **Rental assistance cannot be provided for a unit unless the rent for that unit is at or below the Fair Market Rent limit, established by HUD; and**
  - **The rent charged for a unit must be reasonable in relation to rents currently being charged for comparable units in the private unassisted market and must not be in excess of rents currently being charged by the owner for comparable unassisted units.**

§ 578.37 Program components and uses of assistance (a) (1) (ii) (F) states that a CoC

“May set a maximum amount or percentage of rental assistance that a program participant may receive, a maximum number of months that a program participant may receive rental assistance, and/or a maximum number of times that a program participant may receive rental assistance.

The recipient or sub-recipient may also require program participants to share in the costs of rent.

For the purposes of calculating rent for rapid rehousing, the rent shall equal the sum of the total monthly rent for the unit and, if the tenant pays separately for utilities, the monthly allowance for utilities (excluding telephone) established by the public housing authority for the area in which the housing is located.”

**Written Standard #5: Security Deposits including Last Month’s Rent**

- **Program participants may receive funds for security deposits in an amount not to exceed 2 months of rent.**

§ 578.51 Rental assistance (a) (2) states that:

“Grant funds may be used for security deposits in an amount not to exceed 2 months of rent. An advance payment of the last month’s rent may be provided to the landlord, in addition to the security deposit and payment of first month’s rent.”

**Written Standard #6: Receiving Rental Assistance through Other Sources**

- **Rental assistance cannot be provided to a program participant who is already receiving rental assistance, or living in a housing unit receiving rental assistance or operating assistance through other federal, State, or local sources.**

§ 578.51 Rental assistance (a) Use states that:

“Grant funds may be used for rental assistance for homeless individuals and families. Rental assistance cannot be provided to a program participant who is already receiving rental assistance, or living in a housing unit receiving rental assistance or operating assistance through other federal, State, or local sources.”

If the individual or family is already living in a housing unit receiving rental assistance, then the individual or family are not eligible for Rapid Rehousing as they do not meet Category 1 or Category 4 of Homelessness as defined by HUD.

**Written Standard #7: Case Management**

- **Program participants must meet with a case manager not less than once per month to assist the program participant in ensuring long-term housing stability.**

§ 578.37 Program components and uses of assistance (a) (1) (ii) (F) states the following requirement:

“Require the program participant to meet with a case manager not less than once per month to assist the program participant in ensuring long-term housing stability. The project is exempt from this requirement if the Violence Against Women Act of 1994 (42 U.S.C. 13925 et seq.) or the Family Violence Prevention and Services Act (42 U.S.C. 10401 et seq.) prohibits the recipient carrying out the project from making its housing conditional on the participant’s acceptance of services.”

Part of § 578.53 includes the following:

- Providing ongoing risk assessment and safety planning with victims of domestic violence; dating violence, sexual assault, and stalking;
- Using the centralized or coordinated assessment system;
- Counseling;
- Developing, securing, and coordinating services;
- Obtaining Federal, State, and local benefits;
- Monitoring and evaluating program participant progress;
- Providing information and referrals to other providers;
- Developing an individualized housing and service plan, including planning a path to permanent housing stability; and
- Conducting required annual assessment of service needs (re-evaluation).

**Written Standard #8: Supportive Services**

- **Program participants may receive supportive services as set forth in § 578.53**  
§ 578.37 Program components and uses of assistance (a) (1) (ii) states that:

“Continuum of Care funds may provide supportive services, as set forth in § 578.53, and/or short-term (up to 3 months) and/or medium-term (for 3 to 24 months) tenant-based rental assistance, as set forth in § 578.51(c), as necessary to help a homeless individual or family, with or without disabilities, move as quickly as possible into permanent housing and achieve stability in that housing.”

**Written Standard #9: Duration of Supportive Services**

- **Program participants may receive supportive services for no longer than 6 months after rental assistance stops, unless supportive services are provided through another funding source.**

§ 578.37 Program components and uses of assistance (a) (1) (ii) (F) states that the CoC, “May provide supportive services for no longer than 6 months after rental assistance stops.”

**Written Standard #10: Re-evaluation**

- **Program participants must be re-evaluated, not less than once annually, in order to determine whether program participants lack sufficient resources and support networks necessary to retain housing without Continuum of Care assistance and the types and amounts of assistance that the program participant needs to retain housing.**

§ 578.37 Program components and uses of assistance (a) (1) (ii) (E) states that the Continuum of Care

“Must re-evaluate, not less than once annually, that the program participant lacks sufficient resources and support networks necessary to retain housing without Continuum of Care assistance and the types and amounts of assistance that the

program participant needs to retain housing. The recipient or sub-recipient may require each program participant receiving assistance to notify the recipient or sub-recipient of changes in the program participant's income or other circumstances (e.g., changes in household composition) that affect the program participant's need for assistance. When notified of a relevant change, the recipient or sub-recipient must reevaluate the program participant's eligibility and the amount and types of assistance that the program participant needs.”