Executive Summary

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

1. Introduction

As a recipient of federal funds from the U.S. Department of Housing and Urban Development (HUD), the City of Escondido is required to prepare and submit a Consolidated Plan every five years. The City’s current Consolidated Plan was approved in 2015 and amended in 2016. It covers the five-year period from 2015 through 2019 and applies to the following three federal grant programs:

- Community Development Block Grant (CDBG)
- HOME Investment Partnerships Grant (HOME)
- Emergency Solutions Grant (ESG)

The Consolidated Plan is a document developed through a collaborative process whereby Escondido stakeholders have helped identify community improvement needs and priorities to address federal grant funds and other available resources. To ensure the maximum participation of the community’s residents and to comply with the City’s HUD approved Citizen Participation Plan the City implemented an extensive process that included surveys, community meetings, and public hearings. Through this
process, the residents of Escondido participated in a multitude of opportunities to shape the priorities and strategies of the Consolidated Plan and the Substantial Amendment to the Consolidated Plan.

The Annual Action Plan for Fiscal Year (FY) 2019-2020 (the fifth year of the Consolidated Planning period) includes activities the City will undertake to address its priority needs and objectives as outlined in the 2015-2019 Amended Five Year Consolidated Plan. These activities will be undertaken with the FY 19-20 CDBG, HOME, and ESG program funds. The amounts are $1,824,482, $596,821 and $152,010 respectively. All activities proposed for FY 2019-2020 meet one of the following three national objectives:

- Activities which benefit low and moderate income persons;
- Activities which aid in the prevention or elimination of slums or blight; and
- Activities that are designated as having a particular urgency.

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 city has extensive housing and community development needs, and CDBG, HOME and ESG funds are not sufficient to address all the needs of the city. The City will use CDBG, HOME and ESG funds, in conjunction with other funding as it becomes available, to coordinate projects and services to meet the objectives of all programs. The identified needs are increasing homeownership opportunities; conserving the supply of existing owner housing; expanding the stock of affordable rental housing; increasing the length of stay in rental housing; providing youth educational and recreational programs; increasing livability of neighborhoods; assisting homeless persons, supporting senior services, economic development, and implementing ADA improvements where feasible.

The associated goals and priorities identified include:

**CDBG Priority:** Youth   **Goal:** Providing educational and recreational programs

**CDBG Priority:** Neighborhood revitalization   **Goal:** Improve the livability of neighborhoods

**CDBG Priority:** Homeless services   **Goal:** Support homeless shelter and other services when feasible

**CDBG Priority:** ADA improvements   **Goal:** Incorporate ADA assessable features in all CDBG public improvement projects and address public facility needs as they are identified
CDBG Priority: Economic Development  Goal: Support adult education and training

CDBG Priority: Senior Assistance  Goal: Support Senior Services

HOME Priority: Increasing homeownership opportunities.  Goal: Increase number of homeowners

HOME Priority: Conserving the supply of existing owner housing.  Goal: Assist with rehabilitation of existing units.

HOME priority: Expanding the stock of affordable rental housing.  Goal: Provide additional affordable rental units.

HOME priority: Increasing the length of stay in rental housing.  Goal: Assist quality affordable rental units.

ESG Priority: Engagement of homeless persons including homeless prevention, rapid rehousing, emergency shelter, and homeless youth.  Goal: Housing relocation and stabilization services.

3. Evaluation of past performance

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

As the fourth year of the Consolidated Plan period (2015-2019) draws to an end, the City of Escondido anticipates meeting most of the housing-related goals established for increasing homeownership opportunities, expanding the stock of rental housing, conserving the supply of existing owner housing, and increasing the stay in rental housing. For the Consolidated Plan period the City projected that we would assist 180 persons with rental assistance. 122 were assisted in the first three years of the plan. We estimated that we would assist 11 homeowners with new housing during the Plan period and we assisted all 11 in the first three years. We estimated that we would assist 5 first-time homebuyers with downpayment assistance and assisted 4 in the first three years. We projected that we would construct 23 affordable rental units and rehabilitate 53 affordable rental unit in five years. In the first three years we constructed 32 new units (using redevelopment funds) and rehabilitated 58 rental units (43 using HOME funds). Lastly, we estimated that we would assist 45 homeowners with rehabilitation, when we actually assisted four in the first three years using state grant funds.

The City anticipates meeting the goals established for providing educational and recreational activities, improving the livability of neighborhoods, supporting adult education and training, and supporting senior services. The city has increased support of homeless services using both federal and local funds, and anticipates meeting established goals. The City plans to diligently continue working towards meeting or exceeding its Five Year Consolidated Plan goals of providing affordable housing, public service activities, and neighborhood revitalization projects to lower income residents.
The City's Annual Action Plans and Consolidated Annual Performance and Evaluation Reports (CAPERs) have provided many details about the innovations, projects and programs completed by the City over the past several years (documents may be viewed and/or downloaded from the City's website).

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

Summary from citizen participation section of plan.

The City of Escondido follows the Citizen Participation Plan included as part of the 2015-2019 Consolidated Plan, and amended in 2017. Community based organizations and residents were notified of the meetings and were encouraged to participate in the development/review of the FY 2019-2020 One Year Action Plan. Two public hearings were held, one on March 20, 2019, to discuss priorities and the allocation process, and the other on May 22, 2019, to discuss specific programs. Additional community meetings were held on March 7 and April 25. Notices were published in English and Spanish two weeks in advance of the hearings and the Draft Action Plan was available for public review and comment for a 30 day period prior to the second meeting.

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.

There were 12 attendees at the Community Meeting held on March 7, 2019. Comments included wanting additional pocket parks in residential areas and addressing homelessness/public health throughout the City. Residents also spoke in favor of infrastructure improvements. There were 20 attendees at the community meeting held on April 25, 2019.

At the first public hearing held on March 20, 2019, there were no speakers from the public. At the second public hearing, held on May 22, 2019 and continued on June 5, 2019, there were several speakers related to the proposed CDBG/ESG allocation, including a representative from each of the outside services proposed to be funded (excluding the Legal Aid Society of San Diego). The speakers discussed the benefits of the requests and none of the speakers objected to the City's allocation plan or process.

No public comments were received during the 2019-2020 Action Plan process relating to the HOME program or the HOME allocation.
6. **Summary of comments or views not accepted and the reasons for not accepting them**

All comments or views from the public are accepted, reviewed, and incorporated into the FY 19-20 Action Plan.

7. **Summary**

Each year, the City of Escondido is required to prepare an Action Plan specifying how resources will be allocated to address the priorities established in the Consolidated Plan. The FY 2019-2020 One-Year Action Plan specifies how CDBG, HOME and ESG funds will be allocated to achieve the community development and affordable housing priorities of the 2015-2019 Consolidated Plan.

The FY 2019-2020 Action Plan covers the fifth year in the City's FY 2015-2019 Consolidated Plan period. The Five-Year Consolidated Plan and the One-Year Action Plan are required as part of the application and planning processes for the three formula-based federal housing and community development programs: Community Development Block Grant (CDBG), HOME Investment Partnerships Program (HOME), and Emergency Solutions Grants (ESG).
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.

<table>
<thead>
<tr>
<th>Agency Role</th>
<th>Name</th>
<th>Department/Agency</th>
</tr>
</thead>
<tbody>
<tr>
<td>Lead Agency</td>
<td>Escondido</td>
<td></td>
</tr>
<tr>
<td>CDBG Administrator</td>
<td>Escondido</td>
<td>Housing and Neighborhood Services Division</td>
</tr>
<tr>
<td>HOPWA Administrator</td>
<td></td>
<td></td>
</tr>
<tr>
<td>HOME Administrator</td>
<td>Escondido</td>
<td>Housing and Neighborhood Services Division</td>
</tr>
<tr>
<td>ESG Administrator</td>
<td>Escondido</td>
<td>Housing and Neighborhood Services Division</td>
</tr>
<tr>
<td>HOPWA-C Administrator</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Table 1 – Responsible Agencies

Narrative (optional)

The Housing and Neighborhood Services Division of the Community Development Department is responsible for administering the City of Escondido’s CDBG, HOME, and ESG programs, allocations and budgets.

Consolidated Plan Public Contact Information

Karen Youel kyouel@escondido.org  (760) 839-4518  CDBG and ESG

Kristina Owens kowens@escondido.org  (760) 839-4519   HOME
1. Introduction

The City's outreach and consultation strategies included the formation of community outreach partnerships with housing services and mental health providers, workforce developers, community advocates, and others over the past few years.

In the development of the FY 2019-2020 Action Plan the City conducted two public hearings: March 20, to review and reaffirm priorities of the Consolidated Plan and approve an allocation process; and May 22, to approve the CDBG/ESG/HOME allocations and approve the budget for submittal. In addition to the two public hearings the City outreached to the neighborhoods and their leaders, notified community based organizations and local agencies, and posted the draft Action Plan on its website. A Community Meeting was held on March 7 to describe the process, solicit input from the community at large, and share in the Action Plan developments. A second Community Meeting was held on April 25 to review the applications that had been received as part of the CDBG and ESG RFP process.

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(l))

The City of Escondido has long been committed to fostering relationships with local community groups. Several nonprofit organizations in the community have been working with the City to manage projects and programs that assist lower income residents. A variety of support services in the areas of education, job-training, homeless and senior and youth services augment the City's efforts in these areas.

Results of the community forums and surveys were published and reported publicly to the City of Escondido City Council. Each segment of the community outreach and planning process was transparent to ensure the public knew their input was being collected, reviewed, and considered.

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.

HUD charges communities that receive funds under the Homeless Continuum of Care (CoC) Program of the Homeless Emergency Assistance and Rapid Transition to Housing Act (HEARTH) with specific responsibilities.
The Regional CoC (the Regional Task Force for the Homeless-RTFH) includes all of the geography within the County of San Diego, including 18 incorporated cities and all unincorporated areas. This area also includes several Public Housing Authorities and the ESG, CDBG, HOPWA, HOME and Veteran Administration service areas.

The RTFH meets periodically to identify gaps in homeless services, establish funding priorities, and to pursue an overall systematic approach to address homelessness. These are public meetings in which the community of providers and stakeholders are welcome to attend and provide comment. The City is represented on the RTFH general membership by staff of the Housing and Neighborhood Services Division. Through regular attendance and participation in the RTFH general meetings and quarterly specialized meetings, the City consults with the RTFH to develop cooperative plans and strategies to leverage resources to provide homeless services, and is informed of changes in local goals, objectives and performance measures.

**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**

Consultations with the Regional CoC, the Regional Task Force for the Homeless (RTFH), help allocate ESG funds by assisting the City with coordinating the prioritization and use of resources with local needs. Through this process, the City is able to design programs that are consistent with applicable federal and local standards while distributing funds in an efficient manner and responding to specific conditions in the jurisdiction. Further, ESG jurisdictions inclusive of the City, created a Regional CoC ESG Policy and Operations Guide which lays out federal, state and local standards, policies and regulations for ESG, along with local jurisdictions’ standards and policies.

The RTFH assists in setting standards for what outcomes homeless programs should accomplish during their contract period. Consultations with the Regional CoC allow for an open dialog to discuss how to establish performance measures that benefit the broader goals of the region. In doing so, the City is informed of the standards that ESG funds demand, as well as other best practice outcomes and is able to incorporate these goals when negotiating contracts with sub-recipients.

A Homeless Management Information System (HMIS) is essential to efforts to coordinate client services and inform community planning and public policy. Analysis of information gathered through HMIS is critical to the preparation of periodic accounting of homelessness in the San Diego region. The CoC implemented a new HMIS system in FY 2018-2019, including training of sub-recipients of City ESG funds.
In January 2017, the RTFH formally merged with the regional Continuum of Care (CoC) to strengthen the collective impact. Leveraging the comprehensive resources of the CoC, the new RTFH has become a singular organization, which administers the HMIS and CES systems for the region and sets a uniform standard for all agencies to gather information for HUD reporting and local homeless strategies. All ESG funded organizations enter information to the HMIS system.

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

<table>
<thead>
<tr>
<th></th>
<th>Agency/Group/Organization</th>
<th>ESCONDIDO EDUCATION COMPACT</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Agency/Group/Organization Type</td>
<td>Services-Children</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Services-homeless</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Services-Education</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Services-Employment</td>
</tr>
<tr>
<td></td>
<td>What section of the Plan was addressed by</td>
<td>Homelessness Needs - Unaccompanied youth</td>
</tr>
<tr>
<td></td>
<td>Consultation?</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</td>
<td>Housing and Neighborhood Services staff continually keep an open dialogue with Escondido Education COMPACT. Stakeholder meetings are held throughout the year to discuss community needs, areas for improved coordination, and how to further increase youth advocacy.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th></th>
<th>Agency/Group/Organization</th>
<th>Alliance for Regional Solutions</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Agency/Group/Organization Type</td>
<td>Services - Housing</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Services-Elderly Persons</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Services-homeless</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Services-Employment</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Regional organization</td>
</tr>
<tr>
<td></td>
<td>What section of the Plan was addressed by</td>
<td>Homeless Needs - Chronically homeless</td>
</tr>
<tr>
<td></td>
<td>Consultation?</td>
<td>Homeless Needs - Families with children</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Homelessness Needs - Veterans</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Homelessness Needs - Unaccompanied youth</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Homelessness Strategy</td>
</tr>
<tr>
<td></td>
<td>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</td>
<td>The Alliance for Regional Solutions meets on a regular basis to share resources and news around the region. The City of Escondido participates in the Alliance as a Board Member and also attends general meetings as part of the consultation process.</td>
</tr>
<tr>
<td></td>
<td>Agency/Group/Organization</td>
<td>INTERFAITH COMMUNITY SERVICES</td>
</tr>
<tr>
<td>---</td>
<td>--------------------------</td>
<td>--------------------------------</td>
</tr>
<tr>
<td></td>
<td>Agency/Group/Organization Type</td>
<td>Services-homeless</td>
</tr>
</tbody>
</table>
|   | What section of the Plan was addressed by Consultation? | Homeless Needs - Chronically homeless  
Homeless Needs - Families with children  
Homelessness Needs - Veterans  
Homelessness Needs - Unaccompanied youth  
Homelessness Strategy |
|   | Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination? | The City of Escondido continually reaches out to Interfaith Community Services through monthly progress reports, formal and informal dialogue, and email correspondence regarding the homeless priority and areas in need of improvement. |
|   | Agency/Group/Organization | City of Escondido |
|   | Agency/Group/Organization Type | Services-Children  
Services-Elderly Persons  
Services-Education  
Other government - Local |
|   | What section of the Plan was addressed by Consultation? | Senior Services and Youth |
|   | Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination? | There is on-going discussion with the Older Adult Services Division and the Community Services Department staff to determine senior assistance and youth needs throughout the year. As a result of these discussions, the City has increased funding for the seniors programs, specifically Senior Transportation and Senior Nutrition, due to rising costs and raising demand. |
|   | Agency/Group/Organization | LEGAL AID SOCIETY OF SAN DIEGO INC |
|   | Agency/Group/Organization Type | Service-Fair Housing |
What section of the Plan was addressed by Consultation?

<table>
<thead>
<tr>
<th>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Housing Need Assessment</td>
</tr>
<tr>
<td>There is on-going discussion with Legal Aid Society of San Diego to determine the need for fair housing services and how to address those needs through the Action Plan as well as the Analysis of Impediments. The City continually works with Legal Aid Society throughout the year to coordinate multiple events such as Fair Housing Month, Fair Housing workshops within the City, and the Annual Fair Housing Conference.</td>
</tr>
</tbody>
</table>

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

The City aims at reaching out to all agency types.

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

<table>
<thead>
<tr>
<th>Name of Plan</th>
<th>Lead Organization</th>
<th>How do the goals of your Strategic Plan overlap with the goals of each plan?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Continuum of Care</td>
<td>Regional Taskforce on the Homeless (San Diego Regional CoC)</td>
<td>The City aligns its Action Plan goals as it relates to homelessness and housing needs with the RTFH.</td>
</tr>
</tbody>
</table>

Table 3 – Other local / regional / federal planning efforts

Narrative (optional)

In addition to consulting with the CoC, the City of Escondido also participates in the Alliance for Regional Solutions. This group brings together local governments, providers, non-profits and funders to discuss issues surrounding homelessness and hunger in North County.
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

The City of Escondido began its citizen participation and consultation process for the 19-20 Action Plan on March 6, 2019, with the public notice and availability of the FY 2019-2020 Action Plan proposed funding strategy. On March 7, 2019, a Community Meeting was held at City Hall to obtain information about the community’s needs. A second Community Meeting was held on April 25. Public hearings were held on March 20 and May 22, 2019 (continued on June 5, 2019), at City Council chambers to allow public involvement in the plan development process and comments on the proposed budget. In compliance with Federal regulations, the proposed FY 2019-2020 Annual Action Plan and Budget was available for citizen review and comment for 30 days prior to the City Council public hearing. Information regarding the dates, times, and locations for the public hearings as well as anticipated program resources were published in the San Diego Daily Transcript, the local paper of general circulation, a minimum of two weeks prior to the scheduled public hearings. All public notices included information regarding the location and instructions on obtaining interpreters for the deaf. A bilingual staff person was also in attendance to provide translating services. Additional information about upcoming meetings was published via press releases on the City website and announcements in the Neighborhood News e-newsletter. Throughout the citizen participation process, public and private agencies were consulted and given opportunities to provide input and apply for funding.

Community based organizations, neighborhood groups, and local agencies were notified via-email of the upcoming FY 19-20 Action Plan and were invited to participate in its development. Additional notifications and latest information regarding the Action Plan were posted on the City website.

The citizen participation process allowed the City to receive feedback and comments on its current and future Action Plan. All comments and questions received allowed staff to improve the overall process and keep citizen concerns in mind when making decisions.
## Citizen Participation Outreach

<table>
<thead>
<tr>
<th>Sort Order</th>
<th>Mode of Outreach</th>
<th>Target of Outreach</th>
<th>Summary of response/attendance</th>
<th>Summary of comments received</th>
<th>Summary of comments not accepted and reasons</th>
<th>URL (If applicable)</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Public Meeting</td>
<td>Non-targeted/broad community Low-Mod populations</td>
<td>(March 7, 2019) 12 members of the public attended the Community Meeting. Concerns included the need for additional pocket parks, community safety and homelessness, and support for infrastructure projects.</td>
<td>No Comments or responses given by the general public</td>
<td>n/a</td>
<td></td>
</tr>
<tr>
<td>2</td>
<td>Newspaper Ad</td>
<td>Non-targeted/broad community</td>
<td>N/A (14 day notice March 6)</td>
<td>No comments or responses given by the general public</td>
<td>n/a</td>
<td></td>
</tr>
</tbody>
</table>

Annual Action Plan

2019

OMB Control No: 2506-0117 (exp. 06/30/2018)
<table>
<thead>
<tr>
<th>Sort Order</th>
<th>Mode of Outreach</th>
<th>Target of Outreach</th>
<th>Summary of Response/Attendance</th>
<th>Summary of Comments Received</th>
<th>Summary of Comments Not Accepted and Reasons</th>
<th>URL (If Applicable)</th>
</tr>
</thead>
<tbody>
<tr>
<td>3</td>
<td>Public Hearing</td>
<td>Non-targeted/broad community</td>
<td>There were no speakers from the public.</td>
<td>(March 20 Public Hearing) The City Council discussed the existing Con-Plan priorities and current needs.</td>
<td>n/a</td>
<td></td>
</tr>
<tr>
<td>4</td>
<td>Internet Outreach</td>
<td>Non-targeted/broad community</td>
<td>N/A</td>
<td>No comments or responses given by the general public</td>
<td>n/a</td>
<td><a href="https://www.escondido.org">https://www.escondido.org</a></td>
</tr>
<tr>
<td>5</td>
<td>Neighborhood Leadership Forum</td>
<td>Neighborhood Groups within the CDBG eligible areas</td>
<td>Leadership of the neighborhood groups within CDBG eligible areas (April 26)</td>
<td>no comments were received</td>
<td>n/a</td>
<td></td>
</tr>
<tr>
<td>Sort Order</td>
<td>Mode of Outreach</td>
<td>Target of Outreach</td>
<td>Summary of response/attendance</td>
<td>Summary of comments received</td>
<td>Summary of comments not accepted and reasons</td>
<td>URL (If applicable)</td>
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</tr>
<tr>
<td>6</td>
<td>Newspaper Ad</td>
<td>Non-English Speaking - Specify other language: printed in English and Spanish</td>
<td>N/A (30 day notice April 22)</td>
<td>No comments received.</td>
<td>N/A</td>
<td></td>
</tr>
<tr>
<td>7</td>
<td>Public Hearing</td>
<td>Non-targeted/broad community</td>
<td>May 22 Public Hearing (continued to June 5)</td>
<td>No comments received</td>
<td>N/A</td>
<td></td>
</tr>
</tbody>
</table>

Table 4 – Citizen Participation Outreach

**Expected Resources**

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

**Introduction**

The City of Escondido is a CDBG entitlement jurisdiction and a HOME participating jurisdiction. Escondido received an annual allocation of $1,824,482 in CDBG funds, $596,821 in HOME funds and $152,010 in Emergency Solutions Grant (ESG) funds for FY 2019-2020.

Program income received from the repayment of Rehabilitation (CDBG) loans will automatically be reprogrammed for activities for programs from which the funds were originally provided to the extent possible. If additional program income funds are received that are not automatically reprogrammed, specific projects will be identified during the Action Plan process. HOME program income will be used
for HOME-eligible activities.

### Anticipated Resources

<table>
<thead>
<tr>
<th>Program</th>
<th>Source of Funds</th>
<th>Uses of Funds</th>
<th>Expected Amount Available Year 1</th>
<th>Expected Amount Available Remainder of ConPlan</th>
<th>Narrative Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>CDBG</td>
<td>public - federal</td>
<td>Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services</td>
<td>Annual Allocation: $1,824,482 Program Income: $0 Prior Year Resources: $0 Total: $1,824,482</td>
<td>CDBG allocations will be received and spent for eligible projects as listed in the Action Plan and Consolidated Plan. The City does not expect to receive program income nor does it anticipate using prior year resources.</td>
<td></td>
</tr>
<tr>
<td>Program</td>
<td>Source of Funds</td>
<td>Uses of Funds</td>
<td>Expected Amount Available Year 1</td>
<td></td>
<td></td>
</tr>
<tr>
<td>---</td>
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<td>---</td>
</tr>
<tr>
<td>HOME</td>
<td>public - federal</td>
<td>Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA</td>
<td>$596,821</td>
<td>$100,000</td>
<td>$0</td>
</tr>
<tr>
<td>ESG</td>
<td>public - federal</td>
<td>Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing</td>
<td>$152,010</td>
<td>$0</td>
<td>$0</td>
</tr>
</tbody>
</table>
The housing needs in Escondido far exceed available HOME funding. Many of the housing programs/projects to be undertaken by the City will be leveraged with a variety of funding sources, including State grants, Successor Housing Agency repayments, and other available funding sources. The HOME program requires that for every HOME dollar spent, the City must provide a 25 percent match with non-federal funds. The City has no current match obligation since we have been oversubscribed in our match obligation for several years. The City is currently matched over $2,000,000 over the requirement. The City still strives to obtain as much additional funding for housing projects as possible.

The City of Escondido became the Successor Housing Agency when redevelopment agencies were dissolved by the State of California in 2012. No new funds will become available, but the City has responsibility for any assets and the housing loan portfolio, which may generate income as loans are paid. Currently it is anticipated that the City’s rental subsidy program for very-low income seniors and disabled persons will continue to be funded with these funds. Future funding of the program is uncertain. Additional SHA funds will be leveraged for affordable housing purposes.

The City was awarded two CalHome grants, totaling $1.9M, to establish an owner-occupied rehabilitation program beginning in FY 15-16. The program was successful and the City anticipated funding this program for a total of three years. However, the program was ended by the State in September 2017.

The City encourages and supports the use of Low Income Housing Tax Credits for developers of affordable housing utilizing new construction or acquisition/rehabilitation. Tax credits remain a substantial source of local affordable housing funding.

**Emergency Solutions Grant (ESG)**

Interfaith will continue to satisfy its match requirements by providing the services of its Housing Services Coordinator through private agency funds and through HUD COC funds. Interfaith is currently under contract with the County of San Diego to operate State ESG programs and is in its first year of operating HOME NOW, a HUD-funded Rapid Re-housing project. Interfaith will leverage the City ESG funds for shelter operations and homeless prevention with non-federal shelter and rapid rehousing funds. The City will match ESG administration funds using Successor Housing Agency funds to address homeless issues in our community.
If appropriate, describe publically owned land or property located within the jurisdiction that may be used to address the needs identified in the plan

The City does not own any land or property that will be used to address housing-related needs during the term of the Plan.

Discussion

See above for discussion.
## Annual Goals and Objectives

### AP-20 Annual Goals and Objectives

#### Goals Summary Information

<table>
<thead>
<tr>
<th>Sort Order</th>
<th>Goal Name</th>
<th>Start Year</th>
<th>End Year</th>
<th>Category</th>
<th>Geographic Area</th>
<th>Needs Addressed</th>
<th>Funding</th>
<th>Goal Outcome Indicator</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Increase number of homeowners</td>
<td>2015</td>
<td>2019</td>
<td>Affordable Housing</td>
<td>City of Escondido</td>
<td>Increasing homeownership opportunities</td>
<td>HOME: $25,000</td>
<td>Homeowner Housing Added: 0 Household Housing Unit Direct Financial Assistance to Homebuyers: 1 Households Assisted</td>
</tr>
<tr>
<td>2</td>
<td>Provide additional affordable rental units</td>
<td>2015</td>
<td>2019</td>
<td>Affordable Housing</td>
<td>City of Escondido</td>
<td>Expand stock of affordable rental housing</td>
<td>HOME: $512,616</td>
<td>Rental units rehabilitated: 6 Household Housing Unit</td>
</tr>
<tr>
<td>3</td>
<td>Assist with rehabilitation of existing owner units</td>
<td>2015</td>
<td>2017</td>
<td>Affordable Housing</td>
<td>City of Escondido</td>
<td>Conserve the supply of of existing owner housing</td>
<td>HOME: $0</td>
<td>Homeowner Housing Rehabilitated: 0 Household Housing Unit</td>
</tr>
<tr>
<td>4</td>
<td>Homeless prevention via rental assistance</td>
<td>2015</td>
<td>2019</td>
<td>Affordable Housing</td>
<td>City of Escondido</td>
<td>Increase length of stay in rental housing</td>
<td>HOME: $0</td>
<td>Tenant-based rental assistance / Rapid Rehousing: 0 Households Assisted</td>
</tr>
<tr>
<td>5</td>
<td>Support education and recreation opportunities</td>
<td>2015</td>
<td>2019</td>
<td>Non-Housing Community Development</td>
<td>City of Escondido</td>
<td>Youth</td>
<td>CDBG: $55,000</td>
<td>Public service activities for Low/Moderate Income Housing Benefit: 1603 Households Assisted</td>
</tr>
</tbody>
</table>

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OMB Control No: 2506-0117 (exp. 06/30/2018)
<table>
<thead>
<tr>
<th>Sort Order</th>
<th>Goal Name</th>
<th>Start Year</th>
<th>End Year</th>
<th>Category</th>
<th>Geographic Area</th>
<th>Needs Addressed</th>
<th>Funding</th>
<th>Goal Outcome Indicator</th>
</tr>
</thead>
<tbody>
<tr>
<td>6</td>
<td>Support senior services</td>
<td>2015</td>
<td>2019</td>
<td>Non-Housing Special Needs</td>
<td>City of Escondido</td>
<td>Senior Assistance</td>
<td>CDBG: $128,720</td>
<td>Public service activities other than Low/Moderate Income Housing Benefit: 1253 Persons Assisted</td>
</tr>
<tr>
<td>7</td>
<td>Improve the livability of neighborhoods</td>
<td>2015</td>
<td>2019</td>
<td>Non-Housing Community Development</td>
<td>City of Escondido</td>
<td>Neighborhood Revitalization</td>
<td>CDBG: $1,230,867</td>
<td>Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit: 20000 Households Assisted Public service activities for Low/Moderate Income Housing Benefit: 6200 Households Assisted</td>
</tr>
<tr>
<td>8</td>
<td>Support adult education and job training</td>
<td>2015</td>
<td>2019</td>
<td>Non-Housing Community Development</td>
<td>City of Escondido</td>
<td>Economic Development</td>
<td>CDBG: $0</td>
<td>Jobs created/retained: 0 Jobs Other: 0 Other</td>
</tr>
<tr>
<td>9</td>
<td>Support homeless services</td>
<td>2015</td>
<td>2019</td>
<td>Homeless Non-Housing Special Needs</td>
<td>City of Escondido</td>
<td>Homelessness</td>
<td>CDBG: $45,000</td>
<td>Homeless Person Overnight Shelter: 180 Persons Assisted</td>
</tr>
<tr>
<td>10</td>
<td>Incorporate ADA assessable features</td>
<td>2015</td>
<td>2019</td>
<td>Non-Housing Community Development</td>
<td>City of Escondido</td>
<td>ADA Improvements</td>
<td>CDBG: $0</td>
<td>Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 0 Persons Assisted Other: 0 Other</td>
</tr>
</tbody>
</table>

Annual Action Plan
2019
<table>
<thead>
<tr>
<th>Sort Order</th>
<th>Goal Name</th>
<th>Start Year</th>
<th>End Year</th>
<th>Category</th>
<th>Geographic Area</th>
<th>Needs Addressed</th>
<th>Funding</th>
<th>Goal Outcome Indicator</th>
</tr>
</thead>
</table>

**Table 6 – Goals Summary**

**Goal Descriptions**

1. **Goal Name**: Increase number of homeowners  
   **Goal Description**: Provide direct assistance to first-time, low-income homebuyers for down payment or closing cost assistance. Provide new, affordable ownership housing for low-income homebuyers.

2. **Goal Name**: Provide additional affordable rental units  
   **Goal Description**: Provide additional rental units, including for families, through new construction or acquisition/rehabilitation of existing residential units. Units are affordable to extremely-low, very-low and low-income households.

3. **Goal Name**: Assist with rehabilitation of existing owner units  
   **Goal Description**: Assist in rehabilitation of owner-occupied single-family residences and mobilehomes for low-income households.

4. **Goal Name**: Homeless prevention via rental assistance  
   **Goal Description**: Rental assistance payments to very low income seniors and disabled persons in apartments and mobilehomes.
<table>
<thead>
<tr>
<th></th>
<th>Goal Name</th>
<th>Goal Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>5</td>
<td>Support education and recreation opportunities</td>
<td>Develop subsidized and related youth education/recreational opportunities. This year this includes Learn to Swim, San Diego Children's Museum, Voices for Children and the Boys and Girls Club.</td>
</tr>
<tr>
<td>6</td>
<td>Support senior services</td>
<td>Develop and implement a flexible, integrated transportation system in Escondido to support the individual needs of frail, low-income seniors. Provide core services such as in-home care and meal delivery, to reduce transportation needs.</td>
</tr>
<tr>
<td>7</td>
<td>Improve the livability of neighborhoods</td>
<td>Prioritize needs and complete phased infrastructure based on input from residents, property owners, and business owners. Respond and complete minor neighborhood revitalization projects based on resident requests. Increase resident participation and education in property enhancement and beautification strategies.</td>
</tr>
<tr>
<td>8</td>
<td>Support adult education and job training</td>
<td>Develop and implement business and leadership training programs for area residents to increase family income. Explore and develop programs for employers and/or employees to increase residents' access to livable wage jobs in Escondido.</td>
</tr>
<tr>
<td>9</td>
<td>Support homeless services</td>
<td>Develop and maintain active partnerships with public and private agencies, and other local policy makers to explore options for expanding/improving homeless services and other related essential services in the region. And focusing on homeless youth as this population continues to rise within the City and region.</td>
</tr>
<tr>
<td>10</td>
<td>Incorporate ADA assessable features</td>
<td>Incorporate ADA assessable features in all CDBG public improvement projects and address public facility needs as they are identified.</td>
</tr>
<tr>
<td>11</td>
<td>Homeless Prevention and Rapid Rehousing</td>
<td>Assistance to homeless youth, individuals, and families through street outreach, homeless prevention, rapid re-housing, emergency shelter, and HMIS services.</td>
</tr>
</tbody>
</table>
Projects

AP-35 Projects – 91.220(d)

Introduction

The City of Escondido Housing and Neighborhood Services Division will serve as the lead agency in the administration of all CDBG, HOME and ESG projects and funds proposed in this plan. The City will contract with local nonprofit agencies and organizations to administer public services and fair housing activities in addition to administering some projects directly. Contract agencies (subrecipients) will be responsible for program implementation while contract performance will be monitored by the City of Escondido staff. The majority of projects and programs will be administered by City staff directly.

Projects

<table>
<thead>
<tr>
<th>#</th>
<th>Project Name</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Homebuyer Entry Loan Program</td>
</tr>
<tr>
<td>2</td>
<td>Housing Development</td>
</tr>
<tr>
<td>3</td>
<td>HOME administration</td>
</tr>
<tr>
<td>4</td>
<td>CHDO set-aside and administration</td>
</tr>
<tr>
<td>6</td>
<td>CDBG Admin</td>
</tr>
<tr>
<td>7</td>
<td>Public Services</td>
</tr>
<tr>
<td>8</td>
<td>Street Improvements</td>
</tr>
<tr>
<td>9</td>
<td>Fair Housing</td>
</tr>
<tr>
<td>10</td>
<td>Neighborhood Revitalization</td>
</tr>
<tr>
<td>11</td>
<td>HESG19 Escondido</td>
</tr>
</tbody>
</table>

Table 7 - Project Information

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

Allocation priorities for HOME, CDBG and ESG funds are made based on the Housing Needs Assessment and Market Analysis and the Community Needs Assessment process in the 2015-2019 Consolidated Plan. The main obstacle to addressing underserved housing needs is the high cost of housing and reduced funding sources. Community needs identified at the Community Meeting and at the City Council hearing to affirm priorities also will be considered.
### Project Summary

<table>
<thead>
<tr>
<th>Project Name</th>
<th>Homebuyer Entry Loan Program</th>
</tr>
</thead>
<tbody>
<tr>
<td>Target Area</td>
<td>City of Escondido</td>
</tr>
<tr>
<td>Goals Supported</td>
<td>Increase number of homeowners</td>
</tr>
<tr>
<td>Needs Addressed</td>
<td>Increasing homeownership opportunities</td>
</tr>
<tr>
<td>Funding</td>
<td>HOME: $25,000</td>
</tr>
<tr>
<td>Description</td>
<td>Provide a low interest loan which can be used toward the down payment or closing costs for first time homebuyers.</td>
</tr>
<tr>
<td>Target Date</td>
<td>6/30/2020</td>
</tr>
<tr>
<td>Estimate the number and type of families that will benefit from the proposed activities</td>
<td>One low income household assisted to purchase a home.</td>
</tr>
<tr>
<td>Location</td>
<td>Citywide.</td>
</tr>
<tr>
<td>Planned Activities</td>
<td>Provide down payment or closing cost assistance to low income first time homebuyers.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Project Name</th>
<th>Housing Development</th>
</tr>
</thead>
<tbody>
<tr>
<td>Target Area</td>
<td>City of Escondido</td>
</tr>
<tr>
<td>Goals Supported</td>
<td>Increase number of homeowners</td>
</tr>
<tr>
<td></td>
<td>Provide additional affordable rental units</td>
</tr>
<tr>
<td>Needs Addressed</td>
<td>Increasing homeownership opportunities</td>
</tr>
<tr>
<td></td>
<td>Expand stock of affordable rental housing</td>
</tr>
<tr>
<td>Funding</td>
<td>HOME: $512,616</td>
</tr>
<tr>
<td>Description</td>
<td>Provide affordable rental and owner housing development through new construction or acquisition/development.</td>
</tr>
<tr>
<td>Target Date</td>
<td>6/30/2020</td>
</tr>
<tr>
<td><strong>Estimate the number and type of families that will benefit from the proposed activities</strong></td>
<td>Assist to rehabilitate a 6-unit affordable residential structure to ensure long-term affordability.</td>
</tr>
<tr>
<td>---</td>
<td>---</td>
</tr>
<tr>
<td><strong>Location Description</strong></td>
<td>Citywide</td>
</tr>
<tr>
<td><strong>Planned Activities</strong></td>
<td>Affordable rental housing development consisting of new construction or acquisition/development to be determined through the review of an RFP process. Rehab 6 residential units.</td>
</tr>
</tbody>
</table>

**3**

<table>
<thead>
<tr>
<th><strong>Project Name</strong></th>
<th>HOME administration</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Target Area</strong></td>
<td>City of Escondido</td>
</tr>
</tbody>
</table>
| **Goals Supported** | Increase number of homeowners  
Provide additional affordable rental units |
| **Needs Addressed** | Increasing homeownership opportunities  
Expand stock of affordable rental housing |
| **Funding** | HOME: $69,680 |
| **Description** | HOME administration costs. |
| **Target Date** | 6/30/2020 |
| **Estimate the number and type of families that will benefit from the proposed activities** | N/A |
| **Location Description** | Citywide |
| **Planned Activities** | Administrative support of HOME program funds. |

**4**

<table>
<thead>
<tr>
<th><strong>Project Name</strong></th>
<th>CHDO set-aside and administration</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Target Area</strong></td>
<td>City of Escondido</td>
</tr>
</tbody>
</table>
| **Goals Supported** | Increase number of homeowners  
Provide additional affordable rental units |
<table>
<thead>
<tr>
<th>Needs Addressed</th>
<th>Increasing homeownership opportunities Expand stock of affordable rental housing</th>
</tr>
</thead>
<tbody>
<tr>
<td>Funding</td>
<td>HOME: $89,525</td>
</tr>
<tr>
<td>Description</td>
<td>Mandatory CHDO set-aside and administrative costs associated with potential new project development.</td>
</tr>
<tr>
<td>Target Date</td>
<td>6/30/2020</td>
</tr>
<tr>
<td>Estimate the number and type of families that will benefit from the proposed activities</td>
<td>N/A</td>
</tr>
<tr>
<td>Location Description</td>
<td>Citywide</td>
</tr>
<tr>
<td>Planned Activities</td>
<td>Mandatory CHDO set-aside and administrative costs associated with potential new project development. Projects to be determined through review of an RFP process.</td>
</tr>
</tbody>
</table>

5

<table>
<thead>
<tr>
<th>Project Name</th>
<th>CDBG Admin</th>
</tr>
</thead>
<tbody>
<tr>
<td>Target Area</td>
<td>City of Escondido</td>
</tr>
<tr>
<td>Goals Supported</td>
<td>Support education and recreation opportunities Support adult education and job training Support senior services Improve the livability of neighborhoods Support homeless services Homeless Prevention and Rapid Rehousing</td>
</tr>
<tr>
<td>Needs Addressed</td>
<td>Youth Neighborhood Revitalization Senior Assistance Homelessness Homeless Prevention and Rapid Rehousing</td>
</tr>
<tr>
<td>Funding</td>
<td>CDBG: $330,850</td>
</tr>
<tr>
<td>Description</td>
<td>General administration of the CDBG program. Staff costs for compliance, reporting, financial management, and program monitoring.</td>
</tr>
<tr>
<td>Target Date</td>
<td>6/30/2020</td>
</tr>
</tbody>
</table>

Annual Action Plan
2019

OMB Control No: 2506-0117 (exp. 06/30/2018)
<table>
<thead>
<tr>
<th><strong>Location</strong></th>
<th><strong>Citywide</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Planned Activities</strong></td>
<td>Staff time, administration, compliance, reporting, financial management, and program monitoring.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Project Name</th>
<th>Public Services</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Target Area</strong></td>
<td>City of Escondido</td>
</tr>
</tbody>
</table>
| **Goals Supported** | Support education and recreation opportunities  
                     Support senior services  
                     Improve the livability of neighborhoods  
                     Support homeless services |
| **Needs Addressed** | Youth  
                     Neighborhood Revitalization  
                     Senior Assistance  
                     Homelessness |
| **Funding** | CDBG: $273,670 |
| **Description** | It is estimated that the city will use CDBG funds for public services that will provide a new service or a quantifiable increase in the level of a service. The City will contract with local non-profit agencies and organizations to administer public services in low-income areas in addition to administering some projects directly. |
| **Target Date** | 6/30/2020 |
| **Estimate the number and type of families that will benefit from the proposed activities** | These activities are anticipated to assist 2,256 households and 180 homeless individuals. |
| **Location Description** | Citywide |
Planned Activities  

**Youth:** 1. Learn to Swim, $15,000. This activity is sponsored by the City of Escondido, Parks and Recreation Division. Lessons are available at Washington Park Pool, 501 N Rose St, Escondido, CA 92027 and James A. Stone Pool, 131 Woodward Ave, Escondido, CA 92025  
2. San Diego Children's Discovery Museum, $5,000. The museum will provide memberships, school field trip workshops, mobile museum workshops, and after school enrichment services. 320 N Broadway 92025  
3. Voices for Children, $10,000. Advocacy services are provided to Escondido foster youth through individual assessment and case liaison programs.  

**Seniors:** 4. Senior Transportation, $34,610. This activity is sponsored by the City of Escondido, Adult Services Division. The Senior Transportation Program, which provides transportation service to and from the Escondido Senior Center allows seniors access to not only healthy meals, but to free educational workshops, social activities and exercise programs also offered by the Senior Nutrition Program. 210 East Park Ave, Escondido, 92025  
5. Senior Nutrition, $56,110. This activity is sponsored by the City of Escondido, Adult Services Division. This program provides lunch time meals to seniors Monday through Friday from 11:30 am to 12:15 pm at the Park Avenue Cafe at a discounted price. 210 East Park Ave., Escondido, 92025.  
6. Senior Care, $ 13,000. This activity is sponsored by the City of Escondido, Adult Services Division. This program supports the independence of seniors by assisting them with resources and by encouraging them to resolve their issues themselves. The Senior Care program provides client services including legal, counseling, and financial. 210 East Park Ave., Escondido, 92025.  
7. Meals-on-Wheels, $25,000. This activity is sponsored by the Meals on Wheels, Greater San Diego, Inc. This program provides in home meal delivery to extremely low and low income seniors in Escondido  

**Homeless:** 8. Alliance for Regional Solutions (Bridge Housing), $ 45,000. The Bridge Housing network services homeless men and women year round. Funds will be used for
shelter operations. 550 W. Washington Ave., Escondido, 92025

**Neighborhood Revitalization**: 9. Neighbor to Neighbor, $44,950. This activity supports the city's most vulnerable neighborhoods through neighborhood clean-ups, block parties, leadership trainings, neighborhood group meetings, and other neighborhood organization efforts in low income neighborhoods.

10. Neighborhood Improvement Planning Program, $25,000. This program will plan future CDBG Neighborhood Revitalization projects to determine if the projects are feasible and the beneficiaries are eligible, and will include cost estimates and project milestones.

<table>
<thead>
<tr>
<th>Project Name</th>
<th>Street Improvements</th>
</tr>
</thead>
</table>
| **Target Area** | Neighborhood Groups  
City of Escondido |
| **Goals Supported** | Improve the livability of neighborhoods |
| **Needs Addressed** | Neighborhood Revitalization |
| **Funding** | CDBG: $820,917 |
| **Description** | Street improvement projects include new curbs, gutters, retaining walls, sidewalks, street lights, and new surfacing of the streets. |
| **Target Date** | 6/30/2020 |
| **Estimate the number and type of families that will benefit from the proposed activities** | These activities are anticipated to benefit approximately 20,000 households. |
| **Location Description** | Citywide |
| Planned Activities | 1. Old Escondido Lighting Project, $380,917. The first phase of a project to install historic style pedestrian lighting in the Old Escondido Neighborhood. The first phase focuses on Juniper St between 2nd Avenue and 10th Avenue.  
2. Street Light LED Retrofit Program, $100,000. Continuation of the Street Light LED retrofit program in CDBG-eligible areas to provide better lighting quality.  
3. Sidewalk Infill Program, $150,000. Provide safe pedestrian travel and improve walkability in CDBG-eligible areas.  
4. Ballfield Light Retrofit Program, $190,000. Conversion of existing baseball field lighting at Jesmond Dene Park to improve lighting quality. |

<p>| Project Name | Fair Housing |
| Target Area | City of Escondido |
| Goals Supported | Improve the livability of neighborhoods |
| Needs Addressed | Neighborhood Revitalization |
| Funding | CDBG: $34,045 |
| Description | Fair housing outreach, education, testing, counseling, mediation, referrals, investigation, and litigation services. |
| Target Date | 6/30/2020 |
| Estimate the number and type of families that will benefit from the proposed activities | This activity is anticipated to provide assistance and education to 320 individuals. |
| Location Description | Citywide |
| Planned Activities | Legal Aid Society of San Diego. LASSD will provide fair housing testing within the City’s CDBG eligible areas, conduct an annual fair housing workshop at the City, and assist the City with its goals and objectives resulting from the Analysis of Impediments (Assessment of Fair Housing). In addition to those services, LASSD will also provide outreach, counseling, mediation, referrals, investigation, and litigation services involving fair housing concerns. |</p>
<table>
<thead>
<tr>
<th><strong>Project Name</strong></th>
<th>Neighborhood Revitalization</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Target Area</strong></td>
<td>Neighborhood Groups</td>
</tr>
<tr>
<td></td>
<td>City of Escondido</td>
</tr>
<tr>
<td><strong>Goals Supported</strong></td>
<td>Improve the livability of neighborhoods</td>
</tr>
<tr>
<td><strong>Needs Addressed</strong></td>
<td>Neighborhood Revitalization</td>
</tr>
<tr>
<td><strong>Funding</strong></td>
<td>CDBG: $365,000</td>
</tr>
<tr>
<td><strong>Description</strong></td>
<td>Improve the livability of Neighborhoods through education, outreach, and the beautification/enhancement of neighborhoods.</td>
</tr>
<tr>
<td><strong>Target Date</strong></td>
<td>6/30/2020</td>
</tr>
<tr>
<td><strong>Estimate the number and type of families that will benefit from the proposed activities</strong></td>
<td>These activities are anticipated to benefit 60,000 persons and 800 households.</td>
</tr>
<tr>
<td><strong>Location Description</strong></td>
<td>Citywide</td>
</tr>
</tbody>
</table>
Planned Activities

Code Enforcement, $115,000. Code enforcement in commercial areas of CDBG-eligible census tracts to address code issues relating to business licensing, illegal signage and other appearance and compliance issues generally associated with commercial areas.

Grants to Blocks, $60,000. Small grant program focused on neighborhood beautification/right-of-way enhancement mini grants associated with street improvement projects.

Project Neat, $50,000. Improves the appearance and safety of neighborhoods through mediation, education and fostering relationships with neighbors. Staff works with Escondido residents to resolve potential code compliance issues, mostly with regard to yard maintenance and other appearance-related issues before they reach the level of code enforcement cases.

Graffiti Removal, $115,000. Graffiti removal, on private property, in qualifying low income census tracts. CDBG funds can be used to remove graffiti from private homes, garages, fences and exterior surfaces or privately owned businesses.


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<table>
<thead>
<tr>
<th>Project Name</th>
<th>HESG19 Escondido</th>
</tr>
</thead>
<tbody>
<tr>
<td>Target Area</td>
<td>City of Escondido</td>
</tr>
<tr>
<td>Goals Supported</td>
<td>Support homeless services</td>
</tr>
<tr>
<td></td>
<td>Homeless Prevention and Rapid Rehousing</td>
</tr>
<tr>
<td>Needs Addressed</td>
<td>Homelessness</td>
</tr>
<tr>
<td>Funding</td>
<td>ESG: $152,010</td>
</tr>
<tr>
<td>Description</td>
<td>Funds for emergency shelter, homeless prevention and program administration.</td>
</tr>
<tr>
<td>Target Date</td>
<td>6/30/2020</td>
</tr>
<tr>
<td>Estimate the number and type of families that will benefit from the proposed activities</td>
<td>275 homeless persons with a priority of seniors and youth. 25 served through homelessness prevention, via rental assistance and referrals to resources.</td>
</tr>
<tr>
<td>Location Description</td>
<td>Citywide</td>
</tr>
<tr>
<td>Planned Activities</td>
<td>Emergency shelter operations funding. Homeless prevention via rental assistance and referrals to resources.</td>
</tr>
</tbody>
</table>
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

**HOME.** The City of Escondido does not distribute HOME allocations for housing programs and projects geographically. Available allocations are spent citywide and geography generally does not play a part. There are areas of focus, including areas in the older, central core of the City, although no specific target areas have been established to focus the spending of HOME funds, and they are available throughout the City.

**CDBG.** The City of Escondido currently has 18 priority Neighborhood Groups that are low-to-moderate income, are older, and are located either in-or-around the central core of the City. Assistance is directed to these 18 Neighborhood Groups and to other CDBG eligible areas within the City.

**ESG.** The City of Escondido does not distribute ESG allocations for programs and projects geographically. Funds are spent on clients within the City that are homeless or at risk of homelessness.

### Geographic Distribution

<table>
<thead>
<tr>
<th>Target Area</th>
<th>Percentage of Funds</th>
</tr>
</thead>
<tbody>
<tr>
<td>Neighborhood Groups</td>
<td></td>
</tr>
<tr>
<td>City of Escondido</td>
<td>100</td>
</tr>
</tbody>
</table>

Table 8 - Geographic Distribution

### Rationale for the priorities for allocating investments geographically

Available CDBG allocations are spent citywide in CDBG eligible areas, on neighborhood groups, and on low-to-moderate income persons. There are areas of focus, including areas in the older, central core of the City such as the neighborhood groups, although no specific target areas have been established to focus the spending of CDBG funds.

Available ESG allocations are spent within the City of Escondido assisting homeless individuals and families based on evaluations in accordance with the CoC’s centralized and coordinated assessment.
requirements.

Discussion

See above discussion.
Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

<table>
<thead>
<tr>
<th>One Year Goals for the Number of Households to be Supported</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
</tr>
<tr>
<td>Homeless</td>
</tr>
<tr>
<td>Non-Homeless</td>
</tr>
<tr>
<td>Special-Needs</td>
</tr>
<tr>
<td>Total</td>
</tr>
</tbody>
</table>

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

<table>
<thead>
<tr>
<th>One Year Goals for the Number of Households Supported Through</th>
</tr>
</thead>
<tbody>
<tr>
<td>Rental Assistance</td>
</tr>
<tr>
<td>The Production of New Units</td>
</tr>
<tr>
<td>Rehab of Existing Units</td>
</tr>
<tr>
<td>Acquisition of Existing Units</td>
</tr>
<tr>
<td>Total</td>
</tr>
</tbody>
</table>

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

Discussion

It is anticipated that 180 homeless individuals will be assisted through CDBG-funded assistance to a bridge shelter.

In the 5th year of the Consolidated Plan, the City plans to extend the long-term affordability of 6 rental units, through redevelopment. The City also plans to provide an amount of rental assistance to 34 very-low income seniors/disabled persons, and provide down payment assistance to 1 first-time homebuyer. Funding for these accomplishments will be a combination of HOME funds and other available, affordable housing funding.
AP-60 Public Housing – 91.220(h)

Introduction

There is no public housing located in the City of Escondido and the City of Escondido is not a Public Housing Authority. The Housing Authority of the County of San Diego (HACSD) is the Housing Authority which administers public housing and the Housing Choice Voucher Program for Escondido residents.

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

The public housing needs in the City of Escondido are addressed by the Housing Authority of the County of San Diego (HACSD). The City supports the HACSD in their efforts to address the needs of low-income households in Escondido.

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

Although the City of Escondido is not a Public Housing Authority, the HACSD represents residents of Escondido. The HACSD has established a public housing resident advisory board for county public housing developments and the Section 8 Housing Choice Voucher Program participants. The board meets regularly to discuss program issues and recommendations.

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

N/A - The HACSD is not designated as troubled.

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

Introduction

Homeless and homeless prevention services are identified as a high priority need in the FY 2015 - FY 2019 Consolidated Plan. The City anticipates expending approximately $45,000 of its CDBG annual allocation on homeless and homeless prevention services during FY 19-20. Additional CDBG funds may also be used to support further homeless opportunities for the at-risk homeless through the Regional Continuum of Care.

The City also anticipates expending approximately $152,010 of its Emergency Solutions Grant funds during FY 19-20 to assist in homeless activities within the City. For FY 19-20 the City has prioritized the engagement of youth, individuals, and families through essential services, rapid re-housing, homeless prevention, and emergency shelter.

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

Although the majority of homeless individuals in Escondido lived in Escondido before becoming homeless, a number of homeless individuals come to the City Escondido because of the public services offered within the city. As a service hub in the North County area, Escondido participates in the Regional Continuum of Care (now known as the Regional Task Force for the Homeless), comprising of many other San Diego cities and the County of San Diego, non-profit service providers, and stakeholders. The RTFH coordinates and oversees the application process, and develops and vets programs to address issues regarding homelessness in the region. The RTFH also oversees the collection of regional homeless data, identifies gaps in services, and leads strategic planning initiatives to move people from homelessness to permanent housing. The City will continue to work with the RTFH as staffing and resources allow to support services and apply for funding to address (and end) homelessness in our region.

Addressing the emergency shelter and transitional housing needs of homeless persons

For FY 2019-2020, the City plans to allocate CDBG funding to the Bridge Housing Network. Through a regional collaboration (Alliance for Regional Solutions), the Bridge Housing Network provides safe shelter, working with community members to secure safe, sustainable housing, while simultaneously offering a comprehensive array of support services to pave a concrete pathway towards self sufficiency
and stable housing. To accomplish such goals the Bridge Housing Network will provide:

- A safe environment for homeless individuals

- Access to a Case Manager to work on housing and income goals

- Access to support services to enhance the ability to be self sufficient

- Participant referrals to the CoC Coordinated Entry System which connects the most vulnerable to available rapid re-housing and permanent housing resources.

**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 City's one year goal and actions for ending homelessness include expending Emergency Solutions Grant Funds towards helping homeless persons transition to permanent housing and independent living.

Further discussion provided above.

**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.**

Key elements to homeless prevention is employment development and mental health. The goal is enhance a person's ability to obtain and keep a job so that they are able to make an adequate income to be self sufficient while sustaining their mental health. The City works diligently to expand and conserve its affordable housing inventory, especially affordable rental housing that benefits the extremely low
and low income households who are most at risk of becoming homeless.

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

Introduction:

In Escondido, as in much of the rest of the State, the greatest barriers to affordable housing continue to be cost and supply. Although the drop in home prices ten years ago opened up some owner and rental opportunities, rising prices of ownership housing and rising rents over the past few years have again impacted the affordability of housing in Escondido and the surrounding area. San Diego County saw annual rent increases averaging 4% between 2010 and 2016 with an increase of 8% between 2015-2016. The increase was 5.74% between 2017-2018. The homeownership rate and the rate of housing cost burden identified in the 2015-2019 Consolidated Plan demonstrate the need for affordable housing opportunities in Escondido. The city plans to use available funding to provide assistance to first-time homebuyers and provide additional affordable housing to help mitigate some of the barriers to affordable housing. In addition, the Zoning Code will continue to be evaluated to determine if amendments are needed to implement state law or facilitate affordable and special needs housing.

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

The City of Escondido continues to experience barriers to affordable housing as identified in the Consolidated Plan, including governmental constraints, and especially market conditions, lack of funding sources, and land and construction costs. Many barriers to affordable housing are not controlled by the City, including land and construction costs, state/federal government constraints and available funding sources. The City does have the ability to introduce actions to minimize the influence of local governmental constraints on affordable housing, however. During the upcoming Action Plan period the City of Escondido plans to continue review of the Zoning Code to see if there are any additional changes that need to be made to implement goals established in the 2013 Housing Element, be consistent with State law, or remove a barrier to affordable housing. Many amendments to the Zoning Code have already been completed during the current Consolidated Plan period. These include an amendment that permits year round homeless shelters by right without discretionary review in at least one zoning designation; an amendment that facilitates senior housing by permitting senior housing by right where housing is permitted; and an amendment that defines transitional/supportive housing units as required by state law and permits them where residential units are otherwise permitted. The Accessory Dwelling Unit ordinance of the Zoning Code was amended to make it easier to construct ADUs, and the density bonus regulations were amended to be in conformance with state law, providing additional
opportunities for low and moderate income households.

The City also completed work on an area plan, the South Centre City Area Plan, in the central portion of the City to better facilitate higher density and transit-oriented residential development, potentially including affordable residential development, multi-family and mixed-use development.

The City plans to use its HOME allocation to provide for more accessible, affordable housing, through assistance to first-time homebuyers and provision of additional affordable units, leveraging it when possible with additional sources of funding. The City continues to review the development process, including environmental requirements, fees, and development standards/processes to discover any ways to further streamline the process, particularly for residential developments.

**Discussion:**

The city plans to use available funding to provide assistance to first-time homebuyers and provide additional affordable housing to help mitigate some of the barriers to affordable housing, as described above.
AP-85 Other Actions – 91.220(k)

Introduction:

Priority needs established in the FY 2015-2019 Amended Five-year Consolidated Plan, which establishes the objectives and outcomes in the FY 2019-2020 One-Year Action Plan, are:

- Support youth education and recreation opportunities
- Neighborhood revitalization
- Homeless services
- ADA improvements
- Support senior services
- Economic development
- Increasing homeownership opportunities
- Conserving the supply of existing owner housing
- Expanding the stock of affordable rental housing
- Increasing the length of stay in rental housing

Actions planned to address obstacles to meeting underserved needs

The City plans to provide affordable housing to low income residents of the community while overcoming any obstacles that can be addressed.

The major obstacle to meeting the underserved housing needs in Escondido is funding. Since the loss of the City’s main affordable housing funding source, redevelopment funds, in 2011/2012, the number of beneficiaries of the City’s housing programs has been reduced. To meet the goal of assisting as many low-income households as possible, the City will continue to seek alternative funding sources where possible to replace those lost or reduced, and continue as many as many programs as possible.

The City’s first-time homebuyer program is an important tool in increasing homeownership among lower income households. Response to the program by lenders and homebuyers has generally been good in the past, although the ability of homebuyers to qualify has decreased in recent years. Requirements of the program are periodically reviewed to ensure participation and responsible use of the funds. The HUD maximum purchase price of a single-family residence in the area was recently adjusted, which impacts the ability to qualify. However, the maximum is still typically lower than the price of available housing stock. Obstacles exist in the ongoing success of this program, including the price of housing in the City, the amount of available housing stock, and the income levels of those able to qualify for a mortgage. City staff recently met with real estate industry representatives to gather information about how the program is working and changes they suggest making to the
program for better success. Staff evaluated the comments and ideas presented to determine which, if any, can be incorporated into the program, without putting the funding or the program at risk. We will continue to evaluate the program and any changes that can be made to make it more successful.

Other actions the City plans to address obstacles to meeting underserved needs include:

**Program Development, Directing Investment and Influencing Outcomes:** In an effort to proactively direct critical HUD resources and make demonstrable progress toward achieving the Consolidated Plan Goals, the City has outlined the allocation of CDBG funds for fiscal years 2015–2019.

**Leverage and Geographic Targeting:** Within the context of the City’s three HUD Programs, leverage refers to combining entitlement funds with other local, state, and federal financial resources together in order to maximize the yield and benefits of the City’s HUD Programs.

**Increasing Administrative Efficiencies:** The Housing and Neighborhood Services Division of the City ensures that the City is in compliance with all rules and regulations associated with all HUD entitlement grants: CDBG, HOME, and ESG. During the current Consolidated Plan period, the City is focused on developing and implementing ways to increase operational efficiencies of HUD Programs through enhanced coordination, technical assistance, and effective oversight.

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

When the affordability period of an existing affordable housing project is nearing the end, the City works with the owners of the project to try to extend the regulatory agreements and affordability period, maintaining the City’s affordable housing stock. The city has several options available to try to help preserve affordability, including refinancing an existing mortgage and providing incentives to the owner. In addition, the City will encourage owners completing their Section 236 loan to convert project-based voucher assistance to tenant-based voucher assistance. During FY 19-20 the City will continue efforts to assist Las Casitas I, a six-unit affordable residential project, to maintain affordability with loans to rehabilitate the structures.

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

HUD requires all CDBG and HOME funded activities be in compliance with HUD’s lead-based paint regulations. The City of Escondido is committed to addressing lead-based paint hazards. Federal law requires lead-based paint disclosure and education prior to leasing, renting, selling or purchasing most pre-1978 housing. The City will follow disclosure and warning requirements about lead-based paint, including incorporation of the “Protect Your Family from Lead in Your Home” pamphlet in all applicable
housing programs. The City will conduct required lead-based paint related activities for all HOME funded activities under Title X regulations, such as notification, paint testing, risk assessment, hazard reduction or abatement and clearance. All abatement activities will be performed by a certified professional. The City also will send staff to EPA-compliant lead-based paint hazard training.

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

The City will continue to implement its five-year strategy to help reduce the number of poverty-level families. The anti-poverty strategy utilizes existing job training and social service programs to increase employment marketability, household income, and housing options. In the past, the City's anti-poverty strategy also included direct economic development activities that focus on job creation and retention, particularly in the downtown area. In addition to implementing the five-year strategy and focusing development activities in the urban core, the City of Escondido will continue its efforts to coordinate a unified effort with other agencies and non-profits to reduce the number of poverty-level families through economic development and job training programs.

**Actions planned to develop institutional structure**

Housing and community development programs in the City of Escondido will be implemented by an institutional structure that includes public institutions, nonprofit organizations, and private industry. The institutional capacity of these agencies include people and resources to assist in the development, implementation and monitoring of housing and community development programs. The City's Housing and Neighborhood Services Division has the primary responsibilities of carrying out affordable housing programs, implementing HOME program requirements, administering the CDBG programs, and administering the ESG program. Although City staffing levels have been reduced, staff continues to work hard to coordinate applications and reviews to make the best use of all available federal funding.

The Community Development Department offers applicants of development proposals an opportunity to meet with members of City staff to review the development process, prior to application submittal. Necessary information and technical assistance is offered prior to application submittal. These "pre-application" meetings are free of charge. Additionally, representatives of several City departments meet weekly to review both submitted applications and those that an applicant has not yet submitted, to offer comments on use, design and code compliance. This Staff Development Committee assists applicants processing projects by offering comments and requests for modifications.
in a timely and cohesive manner.

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

In order to enhance coordination between all parties, staff have been working on updating a current list of public agencies, non-profit groups, housing providers, community and neighborhood groups, and affordable housing advocates. After completion of the most recent Consolidated Plan, staff continues to periodically consult with the various providers, groups and other stakeholders to discuss needs, activities, and progress. Staff currently participates in the following regional committees: SANDAG Regional Housing Workforce Group, Regional Task Force on the Homeless, San Diego Regional Alliance for Fair Housing (SDRAFFH), Alliance for Regional Solutions, and the Community Development Block Grant Administrators meeting. Staff will continue to be involved in various community groups involved in all aspects of community development, services and housing. Staff will also continue to assist developers and community organizations that assist the City in the provision of affordable housing and services, and encourage collaboration between non-profit agencies, housing providers and government agencies to help achieve the goals of the Consolidated Plan.

The City of Escondido is a general/board member with the Alliance for Regional Solutions - North County which collaborates with public / private housing and social service agencies with the goal of working together to ensure that current and emerging human needs are met for the greater good of the region.

The City benefits from a strong jurisdiction and region-wide network of housing and community development partners, such as the County, RTFH, and the Alliance for Regional Solutions.

**Discussion:**

Please see the above for further discussion.
Program Specific Requirements
AP-90 Program Specific Requirements – 91.220(l)(1,2,4)

Introduction:

Community Development Block Grant Program (CDBG)
Reference 24 CFR 91.220(l)(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
Total Program Income: 0

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(l)(2)

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

None.
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 City does not currently have any projects with recapture restrictions. The City of Escondido would impose recapture requirements that comply with the HOME Final Rule, 24 CFR 92.254. If a property that is assisted with HOME funds is no longer owner-occupied, is refinanced or is sold, the HOME loan becomes due. Recapture provisions limit the amount to be recaptured to the net proceeds of the sale (sales price minus loan repayment -other than HOME funds - and closing costs). This applies to all units regardless of nature of sale. Recapture funds are re-invested by the City into HOME-eligible activities.

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:

The City of Escondido imposes recapture requirements that comply with the HOME Final Rule, 24 CFR 92.254. If a property that is assisted with HOME funds is no longer owner-occupied, is refinanced or is sold during the first ten years, the homeowner is responsible for repaying the entire principal amount plus interest to the City. Since the maximum amount loaned in the first-time homebuyers program is the lesser of $25,000 or 5 percent of the purchase price, the required affordability period of 24 CFR 92.254(a)(4) is ensured. Interest is forgiven after ten years, but repayment of principal is still required. Recapture funds are re-invested by the City into the HELP first-time homebuyer program, housing development or other HOME-eligible activities.

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:

None

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

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

Written standards for providing ESG assistance is provided as an attachment in the "Unique Appendices" section.

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

The San Diego Continuum of Care, known as the Regional Task Force on the Homeless (RTFH), uses a coordinated assessment system as directed by HUD. The system uses an assessment tool that scores individuals based on their needs and vulnerability to ensure that regional programs give priority to chronically homeless individuals and families who are at-risk by remaining un-housed.

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 City conducts an open and competitive Request for Proposal (RFP) process for making awards. RFPs are publicly announced on the City website and through email to members of its mailing list.

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.

The City does not have homeless or formerly homeless people on its City Council which is the final approval authority for the City. However, the City does consult with the Regional Continuum of Care which has formerly homeless individuals as members. Subcontractors who administer the shelters and the homeless prevention programs have formerly homeless individuals in their organizations who help shape policies and make decisions about services and programs that receive ESG funding.

5. Describe performance standards for evaluating ESG.

The City has adopted performance standards for Homeless Prevention and Rapid Re-housing that are in line with the Continuum of Care. These standards include: rapidly re-housing clients into permanent housing within 30 days after determination of eligibility; retaining this housing for at least six months; attaining or maintaining income while in permanent housing.
Attachments
Citizen Participation Comments

City of Escondido
CITIZEN PARTICIPATION PLAN

Citizen participation is a priority for the City of Escondido. The City of Escondido receives an annual entitlement of Community Development Block Grant (CDBG), HOME Investment Partnership (HOME), and Emergency Solutions Grant (ESG) funds from the U.S. Department of Housing and Urban Development (HUD) for housing and community development activities to assist low-income persons. In accordance with the Grant, the City must create a 5-Year Consolidated Plan (Consolidated Plan) that addresses affordable housing and community development needs, submit an Annual Action Plan (Annual Plan) to outline spending and activities for the corresponding program years, and provide a Consolidated Annual Performance and Evaluation Report (CAPER) to evaluate the City’s accomplishments and use of CDBG, HOME and ESG funds as well conduct an Assessment of Fair Housing (AFH) every five years.

The following Citizen Participate Plan (CPP) meets HUD standards for:

- Involvement of community members in the public participation process, including public hearings and public comment periods.
- Opportunities for involvement of affected persons and other concerned citizens in the planning process.
- Transparency of the planning process and freedom of access to the draft Plan.
- Public’s submission of comments and the standards for the grantee’s response.
- Continuity of participation throughout all stages of the Plan’s development.

Objectives
The primary goal of the CPP is to solicit views and recommendations from members of the community, organizations, and other interested parties and to incorporate the views and recommendations in the decision making process. To accomplish this goal, the CPP mandates that the City will:

- Encourage participation from residents in the development and preparation of the Consolidated Plan, Annual Plan, AFH, substantial amendments to these plans, and the CAPER.
- Encourage the involvement by low and moderate income persons, particularly those who reside in CDBG-eligible neighborhoods, areas designated for revitalization, areas designated as a slum and blighted, people with disabilities, racial and ethnic minorities, Non-English speaking and limited English proficient (LEP) persons, and residents of public and assisted housing developments in the development of the Consolidated Plan and AFH.
- Encourage participation from Continuums of Care, businesses, developers, nonprofit organizations, philanthropic organizations, community-based and faith-based organizations, resident advisory boards, resident councils, and resident management corporations during the development and implementation of the Consolidated Plan and AFH.
- Provide residents reasonable and timely access to information, meetings, and records.
• Provide residents the opportunity to review, offer input and feedback regarding the use of CDBG, HOME, and ESG funds and the AFH, and comment on the CAPER.

• Provide assistance for non-English-speaking and LEP persons upon advance request, provided such services are available.

• Use comprehensive techniques to encourage and measure public participation and review program performance.

• Reasonable accommodations will be provided for those with disabilities upon advance request.

Reviews/Recommendations

Staff reviews proposals and make recommendations to the City Council concerning funding for social services, affordable housing projects, homeless initiatives, and capital improvement projects. City Council meetings are open to the public and available for viewing on the City website. City Council agendas are posted 72 hours prior to a meeting and available on the City’s website and at City Hall, 201 N. Broadway.

During the Development of the Consolidated Plan, Annual Plans, and Assessments of Fair Housing:

• The City will make a concerted effort to notify residents, social service providers, business groups, nonprofit organizations, community and faith based organizations, and community boards and other interested organizations of the development of the Consolidated, Annual Plans, and AFH through mailings, including electronic mail, online postings, and notices in the newspaper.

• The City will issue a Notice of Funding Availability/Request for Proposals inviting proposals for CDBG, HOME and ESG activities. Upon request, the City will provide technical assistance to groups representing low-moderate income persons to develop proposals for eligible activities and comment on the AFH.

• The City will make available any HUD-provided data and other supplemental information the grantee plans to incorporate into its AFH at the start of the public participation process (or as soon as feasible after).

• Prior to adoption of the Plan(s), the City will make available the estimated amount of CDBG, HOME, and ESG funding that it expects to receive, the activities that may be undertaken, the estimated amount of funds that will be used to benefit low-moderate income persons, and any activities that may result in displacement.

• The City will publish a summary of the proposed Plan(s) and/or AFH in the newspaper and have it available on the City’s website for a period of ten days prior to a public meeting. The summary will describe the contents and purpose of the Plan(s) and/or AFH and include a list of the locations where they may be examined. The Plan(s) and/or AFH will be available for review at Escondido City Hall, on the City’s website, and at the
Escondido Public Library. The City will provide a reasonable number of free copies to citizens and groups upon request.

Public Hearings

- The City will conduct at least two public hearings each year to obtain residents’ views regarding housing and community development needs, proposed allocation of CDBG and ESC funds, strategies and actions taken to affirmatively further fair housing, and approve program/funding activities. The City will conduct at least one public hearing each year regarding the proposed allocation of HOME funds. HOME funds will be conditionally committed to an affordable housing development only after a public hearing to discuss the project.

- The City will conduct at least one public hearing during the development of the AFH prior to publishing the AFH for public comment. The public hearing must be held prior to formulating the Consolidated Plan.

- The City will conduct at least one public hearing during the development of the Consolidated Plan prior to publishing the Consolidated Plan for public comment.

- The City will receive and consider comments concerning the Plan(s) and/or AFH for period of not less than 30 days. All comments received, in writing or orally at a public meeting, will be considered in preparing the final Plan(s) and/or AFH. A summary of the comments or views, including those not accepted and the reasons, shall be attached to the final Plan(s) and/or AFH.

- Public notices, excluding the CAPER, will be published at least ten days prior to a hearing. Notices will include the date, time, location, and summary of the proposed action to help facilitate informed comments. Notices will be published in the newspaper and announced on the City’s website.

Amendments to the Consolidated Plan, Annual Plans, and Assessments of Fair Housing

The City will amend its approved Plan(s) whenever it makes one of the following decisions:

- To carry out an activity not previously described in the Annual Plan using funds covered by the Consolidated Plan, including program income.
- To substantially amend the purpose, scope, location, or beneficiaries of an activity.
- To substantially amend the allocation priorities or the method of distributing funds.

A substantial amendment is defined as the following:

- An addition, modification, or elimination of a Consolidated Plan goal;
- An addition of a new activity not previously identified in the Annual Plan; or
- A change that affects the funding level of more than $25,000 for projects budgeted at $100,000 or less, or greater than 25 percent of projects budgeted at more than $100,000.

Substantial amendments must be authorized by the City Council and will be available on the City’s website and through public notices in the newspaper. Minor changes and/or corrections may be made, so long as the changes do not constitute a substantial amendment. Minor changes, including but not limited to modifications of goal outcome indicators, shall not be considered a substantial amendment and do not require public review or a public hearing.
• The City will receive and consider comments concerning substantial amendments and/or AFH revisions for period of not less than 30 days. All comments received, in writing or orally at a public meeting, will be considered in preparing the final Plan(s) and/or AFH. A summary of the comments or views, including those not accepted and the reasons, shall be attached to the final Plan(s) and/or AFH.

• Public notices will be published at least ten days prior to the hearing. Notices will include the date, time, location, and summary of the proposed action to help facilitate informed comments.

Consolidated Annual Performance and Evaluation Reports (CAPERs)

The City will prepare an annual CAPER to evaluate the progress of the Consolidated Plan and to review accomplishments for the previous program year.

• A comment period of not less than 15-days will be provided. All comments received, in writing or orally, will be included in the final submission to HUD.

Access to Information and Records

• Any citizen, organization, or other interested party may submit written requests for information regarding the Consolidated Plan, Annual Plans, AFH, and CAPER, including the City’s use of funds under the CDBG, HOME, and ESG programs and the benefit to low-moderate income residents during the preceding five years.

• This Citizen Participation Plan, the Consolidated Plan, the current Annual Plan, the current AFH, the current CAPER, and any substantial amendments to these plans will be available for public review at City Hall, 201 N. Broadway and on the City’s website.

Comment and Complaint Process

The City will consider any comments from citizens received in writing or orally at public hearings in preparing this Citizen Participation Plan, the Consolidated Plan, Annual Plans, CAPERs, AFH, and/or substantial amendments to these plans. A summary of all comments will be attached and submitted to HUD.

The City will respond to written complaints received relating to the Consolidated Plan, Annual Plans, AFH, CAPERs, and/or substantial amendments. Written complaints must describe the objection and provide contact information of the complainant. The City will respond to complaints within 15 working days of receiving the written complaint, acknowledging the letter and identifying a plan of action, if necessary.
City of Escondido
Housing & Neighborhood Services Division

Emergency Solutions Grant
Written Standards for Provisions of ESG Assistance
STANDARDS FOR THE PROVISION OF ESG ASSISTANCE

The City of Escondido, in accordance with Department of Housing and Urban Development guidelines, developed standard policies and procedures for evaluating individuals' and families' eligibility for Assistance under Emergency Solutions Grant (ESG).

Evaluations. Per 24 CFR 576.401 the City and ESG sub-recipients must conduct an initial evaluation to determine each individual or family's eligibility for ESG assistance and the amount and types of assistance the individual or family needs to regain stability in permanent housing. These evaluations must be conducted in accordance with the centralized or coordinated assessment requirements set forth under §576.400(d).

Re-evaluations. The City and ESG sub-recipients must re-evaluate the program participant’s eligibility and the types and amounts of assistance the participant needs; not less than once every 3 months for program participants receiving homeless prevention assistance and not less than once annually for program participants who are receiving rapid re-housing assistance. At the City and sub-recipient's discretion, re-evaluations may be conducted more frequently than required by 24 CFR 576.401 and may also be incorporated into the case management process for homeless prevention and rapid re-housing participants – See 24 CFR 576.401(e)(i). Regardless of which timeframe is used, re-evaluations, must at minimum, establish that:

The program participant does not have an annual income that exceeds 30 percent of median family income for the area, as determined by HUD; and the program participant lacks sufficient resources and support networks necessary to retain housing without ESG assistance. To determine if an individual or family is income eligible, the City or subrecipient must examine an individual or family's annual income to ensure that it does not exceed the most current area income limits posted on the Department of Housing and Urban Development’s webpage “ESG: Emergency Solutions Grants Program” https://www.hudexchange.info/resource/4018/2011-hud-median-income-limits-30/.

RAPID RE-HOUSING AND HOMELESS PREVENTION

ESG funds may be used to provide housing relocation and stabilization services and short-and/or medium term rental assistance as necessary to help a homeless individual or family move as quickly as possible into permanent housing and achieve stability in that housing. This assistance is referred to as rapid re-housing assistance.

ESG funds may be used to provide housing relocation and stabilization services and short-and/or medium term rental assistance as necessary to prevent an individual or family from moving into an emergency shelter or another place described in paragraph (1) of the homeless definition in 24 CFR 576.2.

Policies and procedures for determining and prioritizing which eligible families and individuals will receive homelessness prevention assistance and which eligible families and individuals will receive rapid
re-housing assistance will consist of a waiting list for potentially eligible clients and those who most likely benefit from the program.

Through the use of a screening and assessment process, program eligibility will be assessed by thoroughly exploring a family’s or individual’s situation and pinpointing their unique housing and service needs. Based upon the assessment, families and individuals should be referred to the kinds of housing and services most appropriate to their situations and need (i.e. access all available services to increase self-sufficiency).

Once in place, a centralized or coordinated assessment system will help to better match individuals and families with the most appropriate assistance. Under homelessness prevention assistance, funds are available to persons below 30% of Area Median Income (AMI), who are homeless or at risk of becoming homeless. ESG funds can be used to prevent an individual or family from becoming homeless and/or regain stability in current housing or other permanent housing. Rapid re-housing funding will be available to those who are literally homeless to ultimately move into permanent housing and achieve housing stability. Homeless prevention and rapid re-housing assistance must be provided in accordance with the housing relocation and stabilization services requirements in 24 CFR 576.105, and the short- and medium-term rental assistance requirements in 24 CFR 576.106.

The amount each program participant must pay will be based on the following:

- Rental assistance cannot be provided for a unit unless the rent for that unit is at or below the Payment Standard, established by the City using HUD’s published Fair Market Rents for the San Diego Region. A complete listing of the Fair Market Rent for San Diego can be found at the following website: http://www.huduser.org/portal/datasets/fmr.html
- 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. See 24 CFR 574.320.
- The rental unit must meet minimum habitability standards found at 24 CFR 576.403.
- There must be a rental assistance agreement and lease between property manager and tenant as well as the owner of property and the City or ESG sub-recipient.
- No rental assistance may be made to an individual or family that is receiving rental assistance from another public source for the same time period.
- Rental assistance may not be provided to a participant who is currently receiving replacement housing payments under Uniform Relocation Assistance.
- Rental assistance may be available for Project Based Rental Assistance, based on availability of funding and vacant units.

Short-term and medium-term rental assistance. 24 CFR 576.106 (e) Rental assistance agreement. The City’s or its ESG sub-recipients may make rental assistance payments only to an owner with whom the sub-recipient has entered into a rental assistance agreement. The rental assistance agreement must set forth the terms under which rental assistance will be provided, including the requirements that apply under this section. The rental assistance agreement must provide that, during the term of the agreement, the owner must give the sub-recipient a copy of any notice to the program participant to vacate the housing unit, or any complaint used under state or local law to commence an eviction action.
against the program participant. In the event of project based assistance, the payments would go
directly to the property owner with a rental assistance agreement in place.

The City and its subrecipients must maintain standards for determining how long a particular program
participant will be provided with rental assistance and whether and how the amount of that assistance
will be adjusted over time. Currently, the period is up to 12 months.

The City and its sub-recipients may provide an ESG program participant with up to 24 months of rental
assistance during any 3-year period. The City is providing a maximum of up to 12 months of sequential
assistance that can be in the form of short-term rental assistance (for up to 3 months of rent) or
medium term rental assistance (assistance that is for more than 3 months) but not more than 12
months of rent. However, at the City and subrecipient’s discretion rental assistance will be provided in a
reasonable timeframe as evaluated by the City and its program participant within HUD regulations.

The maximum amount of rental assistance provided, or family’s level of responsibility for rent payments,
over time, shall be determined by the City and its subrecipient and shall be reflective of the individual or
family’s need for rental assistance and the level of financial resources available to the ESG program
participant.

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 the 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 participants receives assistance, or the maximum
number of times the program participants may receive assistance.

Subject to the general conditions under 24 CFR 576.103 and 24 CFR Part 576.104, subrecipients may use
ESG funds to pay housing owners, utility companies, and other third parties for some or all of the
following costs, as allowed under 24 CFR 576.105:

- Security deposits
- Last month’s rent
- Utility deposits
- Utility payments
- Moving costs

**Housing relocation and stabilization costs.** 24 CFR 576.105 (c). ESG sub-recipients shall determine the
type, maximum amount and duration of housing stabilization and/or relocation services for individuals
and families who are in need of homeless prevention or rapid re-housing assistance through the initial
evaluation, re-evaluation and ongoing case management processes.

**EMERGENCY SHELTER**

The term Emergency Shelter per 24 CFR Part 576.2 means “any facility, the primary purpose of which is
to provide a temporary shelter for the homeless in general or for specific populations of the homeless

Attachment A, Amended Consolidated Plan FY 15-19 | Page 4
and which does not require occupants to sign leases or occupancy agreements.” This definition excludes transitional housing. However, projects that were funded as emergency shelter (shelter operations) under the FY 2010 Emergency Shelter Grants program may continue to be funded under the emergency shelter component under the Emergency Solutions Grants program, regardless of whether the project meets the revised definition.

**Admission, Diversion, Referral and Discharge.** ESG sub-recipients must conduct an initial evaluation of all individuals or families to determine if they should be admitted to an emergency shelter, diverted to a provider of other ESG funded components (e.g. rapid re-housing or homeless prevention assistance) and/or referred for other mainstream resources.

ESG sub-recipients must determine that individuals and families meet criteria including the Homeless Definition and rate the individual or family’s vulnerability to ensure that only those individuals or families that have the greatest need for emergency shelter assistance receive ESG funded assistance.

ESG sub-recipients must also reassess emergency shelter participants, on an ongoing basis, to determine the earliest possible time that they can be discharged to permanent housing.

**Safety and Shelter Needs of Special Populations.** ESG funds may be used to provide services for homeless youth, victim services, and services for people living with HIV/AIDS, so long as the costs of providing these services are eligible under the regulations for the emergency shelter component found at 24 CFR Part 576.102.

Consistent with ESG recordkeeping and reporting requirements found at 24 CFR Part 576.500, ESG sub-recipients must develop and apply written policies to ensure the safety of program participants through the following actions:

- All records containing personally identifying information (as defined in HUD’s standards for participation, data collection, and reporting in a local HMIS) of any individual or family who applies for and/or receives ESG assistance will be kept secure and confidential
- The address or location of any domestic violence, dating violence, sexual assault, or stalking shelter project assisted under the ESG will not be made public, except with written authorization of the person responsible for the operation of the shelter.
- The address or location of any housing of a program participant, including youth, individuals living with HIV/AIDS, victims of domestic violence, dating violence, sexual assault, and stalking; and individuals and families who have the highest barriers to housing will not be made public, except as provided under a preexisting privacy policy of the sub-recipient and consistent with state and local laws regarding privacy and obligations of confidentiality.
- ESG sub-recipients must adhere to the following ESG shelter and housing standards found at 24 CFR Part 576.403 to ensure that shelter and housing facilities are safe, sanitary, and adequately maintained:

  **Lead-Based Paint Requirements.** The Lead-Based Paint Poisoning Prevention Act applies to all shelters assisted under ESG program and all housing occupied by program inspection on all units receiving assistance under the rapid re-housing AND homelessness prevention components if the unit was built before 1978 and a child under age of six or a pregnant woman resides in the unit.
Structure and Materials. The shelter building shall throughout be structurally sound to protect residents from the elements and not pose any threat to health and safety of the residents.

Access. The shelter must be accessible, and there shall be a second means of exiting the facility in the case of emergency or fire.

Space and Security. Each resident shall have adequate space and security for themselves and their belongings. Each resident must have an acceptable place to sleep.

Interior Air Quality. Each room or space within the shelter/facility must have a natural or mechanical means of ventilation. The interior air should be free of pollutants at a level that might threaten or harm the health of residents.

Water Supply. The shelter’s water supply shall be free of contamination.

Sanitary Facilities. Each resident shall have access to sanitary facilities that are in proper operating condition. These facilities shall be able to be used in privacy, and be adequate for personal cleanliness and the disposal of human waste.

Thermal Environment. The shelter/facility must have any necessary heating/cooling facilities in proper operating condition.

Illumination and Electricity. The shelter/facility should have adequate natural or artificial illumination to permit normal indoor activities and support health and safety. There should be sufficient electrical sources to permit the safe use of electrical appliances in the shelter.

Food Preparation. Food preparation areas, if any, should contain suitable space and equipment to store, prepare and serve food in a safe and sanitary manner.

Sanitary Conditions. The shelter should be maintained in a sanitary condition.

Fire Safety-Sleeping Areas. There shall be at least one working smoke detector in each occupied unit of the shelter facility. In addition, smoke detectors should be located near sleeping areas where possible. The fire alarm system should be designed for a hearing-impaired resident.

Fire Safety-Common Areas. All public areas of the shelter must have at least one working smoke detector.

Policies and procedures for assessing, prioritizing, and reassessing individuals’ and families’ needs for essential services related to emergency shelter 24 CFR 576.102.

- ESG funds may be used to provide essential services to individuals and families who are in an emergency shelter. Essential services for participants of emergency shelter assistance can include case management, child care, education services, employment assistance and job training, outpatient health services, legal services, life skills training, mental health services, substance abuse treatment services, transportation, and services for special populations.
- ESG sub-recipients are responsible to assess an individual or family’s initial need for emergency shelter and must re-assess their need on an ongoing basis to ensure that only those individual or families with the greatest need receive ESG funded emergency shelter assistance.
- Based on the CoC’s centralized or coordinated assessment system, ESG recipients shall be required to use that system to help determine an individual or family’s need for emergency shelter or other ESG funded assistance.
- CoC’s Policies and Procedures is encouraged for coordination among emergency shelter providers, essential service providers, homelessness prevention and rapid re-housing assistance providers, other homeless assistance providers, and mainstream services and housing providers.
• Coordination to assist the homeless and prevent homelessness will come from the leadership of the statewide Continuum of Care. The City will maintain active engagement and membership in the statewide CoC or local homeless coalition. The CoC will further engage and coordinate resources amongst other entities to improve current programs and funding.

STREET OUTREACH

Per 24 CFR 576.401 and 24 CFR 576.500 the City and ESG sub-recipients must conduct an initial evaluation to determine each individual or family's eligibility for street outreach essential services. These evaluations must be conducted in accordance with the centralized or coordinated assessment requirements set forth under §24 CFR 576.400(d).

Street outreach costs are limited to the costs of: providing essential services necessary to reach out to unsheltered homeless people; connecting unsheltered homeless people with emergency shelter, housing, or critical services; and providing urgent, non-facility-based care to unsheltered homeless people who are unwilling or unable to access emergency shelter, housing, or an appropriate health facility 24 CFR 576.101(a).

Engagement. The costs of activities to locate, identify, and build relationships with unsheltered homeless people and engage them for the purpose of providing immediate support, intervention, and connections with homeless assistance programs and/or mainstream social services and housing programs.

These activities consist of making an initial assessment of needs and eligibility; providing crisis counseling; addressing urgent physical needs, such as providing meals, blankets, clothes, or toiletries; and actively connecting and providing information and referrals to programs targeted to homeless people such as mainstream social services and housing programs, including emergency shelter, transitional housing, community-based services, permanent supportive housing, and rapid re-housing programs. 24 CFR 576.101(a)(1).

Case Management. The City or its subrecipient are limited to the cost of assessing housing and service needs, arranging, coordinating, and monitoring the delivery of individualized services to meet the needs of the program participant. Eligible services and activities related to case management are as follows: using the centralized or coordinated assessment system as required under 24 CFR 576.400(d); conducting the initial evaluation required under 24 CFR 576.401(a), including verifying and documenting eligibility; 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; and developing an individualized housing and service plan, including planning a path to permanent housing stability, 24 CFR 576.101(a)(2)

Emergency Health Services. Use of ESG funds are used for emergency health services costs are limited to direct outpatient treatment of medical conditions (as listed under 24 CFR 576.101(a)(3)) that are provided.
a. by licensed medical professionals operating in community-based settings, including streets, parks, and other places where unsheltered homeless people are living, and
b. only to the extent that other appropriate health services are inaccessible or unavailable within the area

Emergency Mental Health Services. Use of ESG funds for emergency mental health services the costs are limited to the costs associated with direct outpatient treatment (as listed under 24 CFR 576.101(a)(4)) that is provided:

a. by licensed professionals of mental health conditions operating in community-based settings including streets, parks, and other places where unsheltered people are living, and
b. only to the extent that other appropriate health services are inaccessible or unavailable within the area

Eligible costs are the direct outpatient treatment by licensed professionals of mental health conditions operating in community-based settings, including streets, parks, and other places where unsheltered people are living. ESG funds may be used only for these services to the extent that other appropriate mental health services are inaccessible or unavailable within the community.

Mental health services are the application of therapeutic processes to personal, family, situational, or occupational problems in order to bring about positive resolution of the problem or improved individual or family functioning or circumstances 4 CFR 576.101(a)(4) (iv). Eligible treatment consists of crisis interventions, the prescription of psychotropic medications, explanation about the use and management of medications, and combinations of therapeutic approaches to address multiple problems.

Transportation. Where ESG funds are used for transportation the costs are limited to the following eligible costs:

a. the transportation costs of travel by outreach workers, social workers, medical professionals, or other service providers, that travel took place during the provision of services eligible under this section; and the costs of transporting unsheltered people to emergency shelters or other service facilities are also eligible. The costs include the following:
   • The cost of a program participant’s travel on public transportation;
   • If service workers use their own vehicles, mileage allowance for service workers to visit program participants;
   • The cost of purchasing or leasing a vehicle for the recipient or subrecipient in which staff transports program participants and/or staff serving program participants, and the cost of gas, insurance, taxes and maintenance for the vehicle; and
   • The travel costs of recipient or subrecipient staff to accompany or assist program participants to use public transportation.

Minimum Period of Use. Per 24 CFR 576.101(b) the City or its ESG subrecipient will ensure that outreach services are provided to unsheltered homeless individuals and families for at least the period during which ESG funds are provided (e.g., the length of the subrecipient agreement).

Attachment A, Amended Consolidated Plan FY 15-19 | Page 8
**Maintenance of Effort:** The City or its subrecipient will not use ESG funds to replace local government funding of street outreach services unless HUD determines that the unit of general purpose was in a severe financial deficit according to the guidelines 24 CFR 576.101(c).

Upon the City’s request, HUD will determine whether the unit of general purpose local government is in a severe financial deficit, based on the City’s demonstration of each of the following:

- The average poverty rate in the unit of general purpose local government’s jurisdiction was equal to or greater than 125 percent of the average national poverty rate, during the calendar year for which the most recent data are available, as determined according to information from the U.S. Census Bureau.
- The average per-capita income in the unit of general purpose local government’s jurisdiction was less than 75 percent of the average national per capita income, during the calendar year for which the most recent data are available, as determined according to information from the Census Bureau.
- The unit of general purpose local government has a current annual budget deficit that requires a reduction in funding for services for homeless people. The unit of general purpose local government has taken all reasonable steps to prevent a reduction in funding of services for homeless people. Reasonable steps may include steps to increase revenue generation, steps to maximize cost savings, or steps to reduce expenditures in areas other than services for homeless people.
Grantee SF-424's and Certification(s)

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## Application for Federal Assistance SF-424

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<td>12. Funding Opportunity Number:</td>
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<td>15. Competition Identification Number:</td>
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<td>14. Areas Affected by Project (Cities, Counties, States, etc.):</td>
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Attach supporting documents as specified in agent instructions.
Application for Federal Assistance SF-424

16. Congressional Districts Or:
   a. Applicant: [Space] [Space]
   b. Program/Project: [Space]

[Attach an additional list of Program/Project Congressional Districts if needed.]

17. Proposed Project:
   a. Start Date: [yy/mm/dd]
   b. End Date: [yy/mm/dd]

18. Estimated Funding ($):
   a. Federal: [1,234,456.78]
   b. Applicant: [Space]
   c. State: [Space]
   d. Local: [Space]
   e. Other: [Space]
   f. Program Name: [Space]
   g. TOTAL: [1,234,456.78]

19. Is Application Subject to Review By State Under Executive Order 12372 Process?
   a. This application was made available in the State under the Executive Order 12372 Process for review on [Space]
   b. Program is subject to E.O. 12372 but has not been solicited by the State for review [Space]
   c. Program is not covered by E.O. 12372 [X]

20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)
   a. Yes [ ] No [X]

If "Yes," provide explanation and status:
   [Attachment] [Notice Provided] [Work in Progress]

21. By signing this application, I certify (1) to the statements contained in the list of certifications and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 23, Section 1001)

[Signature]

** I AGREE **

* The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

Authorized Representative:
   First Name: [Space]
   Middle Name: [Space]
   Last Name: [Space]
   Title: [Space]
   [Line]
   [Signature]
   [Date Signed] 5-9-19

OMB Control No: 2506-0117 (exp. 06/30/2018)
Application for Federal Assistance SF-424

1. Type of Submission:
   - [ ] Request
   - [X] Application
   - [ ] Continuation
   - [ ] Other (specify)
   - [ ] Partial

2. Date Received

3. Applican identifier:
   - [ ] [ ]

4. Federal Entity Identifier

5. State Use Only:
   - [ ]
6. Data Received by State

7. State Application Identifier

8. APPLICANT INFORMATION:
   - [ ]

9. Legal Name

10. Entity/Taxpayer Identification Number (EIN/TIN)

11. Organizational DUNS

12. Address:

   a. Street

   b. City

   c. State

   d. Zip Code

13. Organization's Unit:

   a. Department Name

   b. Organization Name

   c. Organization Type

14. Name and Contact Information of Person to be Contacted on Matters Involving this Application:

   a. Title

   b. First Name

   c. Last Name

   d. Telephone Number

   e. E-mail

Annual Action Plan
2019

OMB Control No: 2506-0117 (exp. 06/30/2018)
**Application for Federal Assistance SF-424**

9. Type of Applicant 1: Select Applicant Type:
   - [ ] City or Town Council
   - [ ] Mayor's Office
   - [ ] Other (specify): ______________

10. Name of Federal Agency:
    [ ] Department of Housing and Urban Development

11. Catalog of Federal Domestic Assistance Number:
    - [ ] 4.01
    - [ ] CFDA Title:
      - [ ] Emergency schlloalistic Grant Program

12. Funding Opportunity Number:
    - [ ] Title:
      - [ ]

13. Competition Identification Number:
    - [ ] Title:
      - [ ]

14. Area Affected by Project (Cities, Counties, States, etc.):
    - [ ] Add Additional Location: ______________

15. Descriptive Title of Applicant's Project:
    - [ ] First Project: ______________
      - [ ] Add Additional: ______________

Add all required forms as specified in agency instructions.

[ ] Add Additional

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**Annual Action Plan**

2019

OMB Control No: 2506-0117 (exp. 06/30/2018)
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Annual Action Plan

2019

OMB Control No: 2506-0117 (exp. 06/30/2018)
Application for Federal Assistance SF-424

16. Congressional Districts Of:
   a. Applicant: [Redacted]
   b. Program# Project: [Redacted]

17. Proposed Project:
   a. Start Date: [Redacted]
   b. End Date: [Redacted]

18. Estimated Funding ($):
   a. Federal
   b. Applicant
   c. State
   d. Local
   e. Other
   f. Program Income
   g. TOTAL

19. Is Application Subject to Review By State Under Executive Order 12372 Process?
   a. This application was made available to the State under the Executive Order 12372 Process for review
   b. Program is subject to C.O. 12372 but has not been selected by the State for review
   c. Program is not covered by E.O. 12372

20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)
   a. Yes
   b. No

21. I certify that the statements contained in this application are true, complete and accurate to the best of my knowledge. I also provide the required assurances and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 21, Section 1601)

   I AGREE

   * The list of certifications and assurances, or an internet site where you may view this list, is contained in the announcement or agency's reference.

   Authorized Representative:
   First Name: [Redacted]
   Middle Name: [Redacted]
   Last Name: [Redacted]
   Title: [Redacted]
   Email: [Redacted]
   Telephone Number: [Redacted]
   Fax: [Redacted]
   * Date Signed: [Redacted]
Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate on any other aspect of this collection of information, including suggestions for reducing this burden to the Office of Management and Budget, Paperwork Reduction Project (3646-0042), Washington, DC 20503.

PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.

NOTE: Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the Funding Agency. Further, certain Federal assistance awarding agencies may require applicants to certify to certain assurances. If, in fact, this is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:

1. Has the legal authority to apply for Federal assistance and, if the awarding agency, has the institutional, managerial, and financial capability, including funds sufficient to pay the non-Federal share of project costs, to ensure proper planning, implementation, and control of project work described in this application.

2. Will give the awarding agency, the Comptroller General of the United States and in appropriate, the State, the right to examine accounts, books, papers, or documents related to the assistance and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.

3. Will not dispose of, modify, or alter the use of, or change the terms of the real property site or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title deed or leasehold interest in the real property acquired in whole or in part with Federal assistance funds to assure non-disposition during the useful life of the project.

4. Will comply with the requirements of the assistance awarding agency with regard to the drilling, review and approval of construction plans and specifications.

5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the completed work conforms with the approved plans and specifications and will furnish progress reports and such other information as may be required by the non-Federal awarding agency or State.

6. Will file and complete the work within the time frame after receipt of approval of the awarding agency.

7. Will establish safeguards to prevent employees from using their positions for a purpose that conflicts or presents the appearance of personal or organizational conflict of interest or personal gain.


10. Will comply with the Federal Election Campaign Act of 1971 (P.L. 92-318), which prohibits contribution of Federal funds to any political party.

11. Will provide and maintain adequate engineering supervision at the construction site to ensure that the completed work conforms with the approved plans and specifications and will furnish progress reports and such other information as may be required by the non-Federal awarding agency or State.

12. Will file and complete the work within the time frame after receipt of approval of the awarding agency.

13. Will establish safeguards to prevent employees from using their positions for a purpose that conflicts or presents the appearance of personal or organizational conflict of interest or personal gain.
11. I will comply, or has already complied with the requirements of Title I of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-643) which provide for fair and accurate treatment of persons displaced from property required for public purposes. These requirements apply to all interests in real property acquired for project purposes regardless of federal participation in purchases.

12. I will comply with the provisions of the Hatch Act (5 U.S.C. §§1501-1523 and 7325-7328) which limit the political activities of federal employees whose principal employment activities are funded in whole or in part with Federal funds.

13. I will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276c-7), the Copeland Act (41 U.S.C §35), the Contract Work Plan and Record Keeping Standards Act (41 U.S.C. §§35-35c) and the Contract Work Plan for Federal Facilities under Federal Assistance Subcontracts.

14. I will comply with the purchase requirements of Section 106(c) of the Flood Disaster Protection Act of 1973 (PL 93-242) which require that proposals submitted for the purchase of fire hazard areas in participating in the program and to purchase fire insurance if the total cost of insurance is $500.00 or more.

15. I will comply with environmental standards which may be prescribed pursuant to the following: (a) regulations of the Executive Order FCO 11514; (b) notification of existing facilities pursuant to EO 11709; (c) evaluation of flood hazard in flood plains in accordance with FCO 11516; (d) compliance with standards of the Coast Guard; and (e) procedures established under the Clean Air Act of 1963 (42 U.S.C. §7451 et seq.).


19. I will comply with all applicable requirements of any other Federal law, executive order, regulation, or policy governing this program.

20. I will comply with the requirements of Section 306(b) of the Trafficking Victims Protection Act (PL 107-52) which prohibits grant award recipients or sub-recipients from (1) engaging in any form of trafficking in persons during the period of time that the award is in effect; (2) furnishing a commercial service during the period of time that the award is in effect; and (3) utilizing forced labor in the performance of the award or sub-awards under the award.
ASSURANCES - CONSTRUCTION PROGRAMS

Public reporting burden for this collection of information is estimated to average 10 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of the collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0570-0142), Washington, DC 20503.

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As the duly authorized representative of the applicant, I certify that:

1. I have the legal authority to apply for Federal assistance, and the financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management, and completion of project activities as described in the application.

2. I will give the awarding agency, the Grant Officer, the General Counsel or Attorney General of the State, or other appropriate State official, access to all books, records, reports, or documents related to the assistance, and will establish a proper accounting system in accordance with generally accepted accounting standards and agency directives.

3. I will not cease or modify the use of all or change the terms of the real property title or other interest in the site and facility without permission and instructions from the awarding agency. I will report the Federally-assisted agency owner and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.

4. I will comply with the requirements of the assistance awarding agency with regard to the drafting, review, and approval of construction plans and specifications.

5. I will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the completed work conforms with the approved plans and specifications and will furnish progress reports and such other information as may be required by the assistance awarding agency of State.

6. I will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.

7. I will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or promotes the appearance of personal or organizational conflict of interest or personal gain.

8. I will comply with the Interagency Programmatic Agreement of 1970 (42 U.S.C. §§4926a-4926d) relating to policies and standards of land use systems for programs funded under one of the 10 statutes or regulations specified in Appendix A of CPV's Standards for a VIT System of Personnel Administration (O.P.M. Rev. 9-77), a copy of which is available from the Department of the Interior.

9. I will comply with the Lead-Based Paint Renovation, Repair, and Painting Program, 40 C.F.R. § 761, which prohibits the use of lead-based paint in the construction or rehabilitation of residential structures.

10. I will comply with all Federal statutes relating to non-discrimination. These include but are not limited to the following:

(a) Title VI of the Civil Rights Act of 1964 (42 U.S.C. §§962), as amended, which prohibits discrimination on the basis of race, color, or national origin;

(b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1064 and 1092a), which prohibits discrimination on the basis of sex;

(c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §§794), which prohibits discrimination on the basis of handicap;

(d) the Age Discrimination in Employment Act of 1974, as amended (29 U.S.C. §§621-634), which prohibits discrimination on the basis of age;

(e) the Equal Employment Opportunity Act of 1972, as amended (42 U.S.C. §§2000e-2, 2000e-3), which prohibits discrimination in employment; and

(f) the Age Discrimination in Employment Act of 1974, as amended (29 U.S.C. §§621-634), which prohibits discrimination on the basis of age.

I certify the information provided above is true and complete.

[Signature]
[Name]
[Position]
[Organization]
[Address]

Annual Action Plan
2019

OMB Control No: 2506-0117 (exp. 06/30/2018)
1. Will comply with the provisions of the Water Act (25 U.S.C. §§ 1501 et seq. and 7304-7328) which limit the political activities of employees whose principal employment activities are devoted in whole or in part with federal funds.

2. Will comply, as applicable, with the provisions of the Clean Air Act (42 U.S.C. § 7401 et seq.), the Safe Drinking Water Act (PL 93-523), and the Comprehensive Environmental Response, Compensation, and Liability Act (PL 99-499) regarding labor standards for federally-assisted construction subgrants.

3. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (PL 93-389), which requires residents in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and property is $10,000 or more.

4. Will comply with environmental standards which may be prescribed pursuant to the following: (a) declaration of environmentally quality control measures under the National Environmental Policy Act of 1969 (PL 91-190) and Executive Order (EO) 11988; (b) notification of environmental impacts pursuant to EO 12158; (c) development, implementation and enforcement of pollution control programs and procedures under the Clean Air Act of 1970 (PL 91-604) and the Safe Drinking Water Act of 1974 (PL 93-523); (d) development and implementation of air quality management plans under the Clean Air Act of 1970 (PL 91-604) and the Clean Water Act of 1972 (PL 92-500); (e) implementation of Federal actions to State (Clean Air Act Implementation Plans under Section 1752) and the Clean Water Act of 1972, as amended (PL 93-523); (f) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (PL 93-523); and (g) protection of endangered species under the Endangered Species Act of 1973, as amended (PL 93-205).

5. Will comply with the Wild and Scenic Rivers Act of 1968 (PL 91-304) and the Clean Air Act of 1970 (PL 91-604), which prohibits the construction of industrial facilities in areas designated as wild and scenic rivers systems.

6. Will comply with the requirements of Section 102(c) of the Endangered Species Act of 1973 (PL 93-205) regarding the protection of endangered species.

7. Will ensure that the environmental impact statement for the project is prepared in accordance with the National Environmental Policy Act of 1969 (PL 91-190) and the Council on Environmental Quality (CEQ) regulations.

8. Will ensure that all applicable federal, state, and local environmental laws and regulations are followed.

9. Will comply with the requirements of the National Environmental Policy Act (NEPA) of 1969 (PL 91-190) and the Council on Environmental Quality (CEQ) regulations.

10. Will ensure that the project is designed and constructed in accordance with the National Environmental Policy Act (NEPA) of 1969 (PL 91-190) and the Council on Environmental Quality (CEQ) regulations.

11. Will ensure that the project is designed and constructed in accordance with the Environmental Protection Agency (EPA) regulations.

12. Will ensure that the project is designed and constructed in accordance with the Occupational Safety and Health Administration (OSHA) regulations.

13. Will ensure that the project is designed and constructed in accordance with the Federal Highway Administration (FHWA) regulations.

14. Will ensure that the project is designed and constructed in accordance with the Federal Railroad Administration (FRA) regulations.

15. Will ensure that the project is designed and constructed in accordance with the Federal Aviation Administration (FAA) regulations.

16. Will ensure that the project is designed and constructed in accordance with the Federal Communications Commission (FCC) regulations.

17. Will ensure that the project is designed and constructed in accordance with the National Park Service (NPS) regulations.

18. Will ensure that the project is designed and constructed in accordance with the National Marine Fisheries Service (NMFS) regulations.

19. Will ensure that the project is designed and constructed in accordance with the Fish and Wildlife Service (FWS) regulations.

20. Will ensure that the project is designed and constructed in accordance with the Army Corps of Engineers (ACE) regulations.

21. Will ensure that the project is designed and constructed in accordance with the Bureau of Reclamation (BOR) regulations.

22. Will ensure that the project is designed and constructed in accordance with the Bureau of Land Management (BLM) regulations.

23. Will ensure that the project is designed and constructed in accordance with the Bureau of Indian Affairs (BIA) regulations.

24. Will ensure that the project is designed and constructed in accordance with the Fish and Wildlife Service (FWS) regulations.

25. Will ensure that the project is designed and constructed in accordance with the Department of Energy (DOE) regulations.

26. Will ensure that the project is designed and constructed in accordance with the Department of Transportation (DOT) regulations.

27. Will ensure that the project is designed and constructed in accordance with the Department of Agriculture (USDA) regulations.

28. Will ensure that the project is designed and constructed in accordance with the Department of Commerce (DOC) regulations.

29. Will ensure that the project is designed and constructed in accordance with the Department of Labor (DOL) regulations.

30. Will ensure that the project is designed and constructed in accordance with the Department of Health and Human Services (HHS) regulations.

31. Will ensure that the project is designed and constructed in accordance with the Department of Housing and Urban Development (HUD) regulations.

32. Will ensure that the project is designed and constructed in accordance with the Department of Justice (DOJ) regulations.

33. Will ensure that the project is designed and constructed in accordance with the Department of Veterans Affairs (VA) regulations.

34. Will ensure that the project is designed and constructed in accordance with the Department of Homeland Security (DHS) regulations.

35. Will ensure that the project is designed and constructed in accordance with the Department of Education (ED) regulations.

36. Will ensure that the project is designed and constructed in accordance with the Department of Treasury (TREAS) regulations.

37. Will ensure that the project is designed and constructed in accordance with the Department of Commerce (DOC) regulations.

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ASSURANCES - CONSTRUCTION PROGRAMS

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PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.

NOTE: The information requested on this form or included in an attached document is mandatory. Failure to provide this information may result in denial of your request or application.

OMB Control No: 2506-0117 (exp. 06/30/2018)

Annual Action Plan

2019

OMB Control No: 2506-0117 (exp. 06/30/2018)
11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-106) which provide for fair and equitable treatment of property owners displaced or whose property is acquired as a result of Federal and federally assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in such projects.

12. Will comply with the provisions of the Hatch Act (5 U.S.C. §§150d, 150f and 1524-1528) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.

13. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276c to 276e-7); the Cope Act (40 U.S.C. §§276a) and 15 U.S.C. §874; and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding labor standards for federally-assisted construction employees.

14. Will comply with flood insurance purchase requirements of Section 122(a) of the Flood Disaster Protection Act of 1973 (40 U.S.C. §170a) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurance and deductible is $10,000 or more.

15. Will comply with all Federal laws, Executive orders, rules, regulations, and policies governing the program.

16. Will comply with environmental standards which may be prescribed pursuant to the following: (a) Adoption of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11988; (b) notification of violating parties pursuant to EO 11989; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplain areas in accordance with EO 11988; (e) assurance of project noninterference with the approved state management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§451 et seq.); and (f) conformity of Federal actions to State (Clean Air) implementation Plans under Section 176(c) of the Clean Air Act of 1990, as amended (42 U.S.C. §§7401 et seq.); (g) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).


18. Will comply with the provisions of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470); (d) (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§400a-1 et seq.).

19. Will comply with the requirements of Section 1003 of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. §7104) which prohibits grant award recipients or any required subrecipients from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect; (2) Engaging in a commercial sex act during the period of time that the award is in effect; or (3) Using forced labor in the performance of the award or subawards under the award.
**ASSURANCES - NON-CONSTRUCTION PROGRAMS**

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As the duly authorized representative of the applicant, I certify that the applicant:

1. Has the legal authority to apply for Federal assistance and the institutional, managerial and financial capability including access to and the use of Federal financial assistance to allow the completion of the project described in this application.

2. Will give the awarding agency, the Comptroller General of the United States and, if applicable, the State, through any authorized representative, access to and the right to examine at reasonable times, personal or other records, data, documents or other information related to the award, and will establish and maintain a proper accounting system in accordance with generally accepted accounting standards and agency directives.

3. Will establish safeguards to protect employees from using their positions for a purpose that complements or enhances the appearance of personal or organizational political interest or personal gain.

4. Will in due time and complete the work within the applicable time frame after receipt of approval of the awarding agency.

5. Will comply with the intergovernmental Personal Police Act of 1962 (2 U.S.C. §4728-4730) relating to prescribed standards for the implementation of programs funded under the program and regulations established by the Department of Housing and Urban Development, as prescribed in the Uniform Administrative Approach to Business Operations and Authority and the Uniform Administrative Approach to Business Operations and Authority.

6. Will comply with the Federal regulations relating to nondiscrimination in all programs. These regulations are not limited to: (a) Title II of the Civil Rights Act of 1964 (28 U.S.C. §2201-2202) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §1681-1683 and 2625-2635), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (25 U.S.C. §504), which prohibits discrimination on the basis of handicap; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §1981a-1981d), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended, relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1978 (P.L. 95-347), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§225 and 872 of Title X of the Public Health Service Act of 1942 (42 U.S.C. §§279j and 290a-3), as amended, relating to nondiscrimination in the delivery of health services; and (h) Title VIII of the Housing Act of 1964 (42 U.S.C. §3601 et seq.), as amended, relating to nondiscrimination in the rental or financing of housing; (i) any other Federal regulations which require compliance, including but not limited to Federal regulations which require compliance under which application for Federal assistance is being made; and, (j) the requirements of any other nondiscrimination statute that may apply to the program.

7. Will comply or has already complied with the requirements of Title II and of the Uniform Administrative Approach to Business Operations and Authority and the Uniform Administrative Approach to Business Operations and Authority and the Uniform Administrative Approach to Business Operations and Authority and the Uniform Administrative Approach to Business Operations and Authority.

8. Will comply, as applicable, with provisions of the Fair Labor Standards Act (29 U.S.C. §§201-219), as amended, relating to the payment of wages to Federal award recipients and by Federal awardees, as applicable.

9. Will comply, as applicable, with provisions of the Uniform Administrative Approach to Business Operations and Authority and the Uniform Administrative Approach to Business Operations and Authority and the Uniform Administrative Approach to Business Operations and Authority.
9. Will comply, as applicable, with the protections of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-2), the Copeland Act (40 U.S.C. §§276b and 18 U.S.C. §807), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§276a-3 to 276a-33), regarding labor standards in federally-assisted construction subagreements.

10. Will comply, if applicable, with flood insurance purchase requirements of Section 102(b) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires receipt of a special flood hazard area determination in the program and to purchase flood insurance if the total cost of insurance coverage and acquisition is $10,000 or the

11. Will comply with environmental standards which may be prescribed pursuant to the following: (a) resolution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order 11988; (b) not facilitate, in violation of applicable


14. Will comply with P.L. 93-348 regarding the protection of human subjects involved in research, testing, or other activities supported by the award of assistance.

15. Will comply with the Laboratory Animal Welfare Act of 1985 (P.L. 99-336) as amended, 7 U.S.C. §§1931 et seq., relating to the care, handling, and treatment of warm-blooded animals held for research, testing, or other activities supported by the award of assistance.

16. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4851 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of housing structures.

17. Will comply with the required financial and control audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133 "Audits of States, Local Governments, and Non-Profit Organizations.

18. Will comply with all applicable requirements and other federal laws, executive orders, regulations, and policies governing this program.

19. Will comply with the requirements of section 103(g) of the Trafficking Victims Protection Act (TVPA) of 2005, as amended (22 U.S.C. §§7104(a) which prohibits or awards recipients or sub-recipients of $10,000 or more in foreign countries or outside the United States of America. The purpose of this provision is to prevent the use of funds for certain forms of trafficking in persons during the period of time that the award is in effect (1); Preventing a commercial sex act during the period of time that the award is in effect (2); Using forced labor in the performance of the award or subawards under the award.
ASSURANCES - NON-CONSTRUCTION PROGRAMS

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NOTE: These assurances may not be applicable to your project or program. If you have questions, please contact the awarding agency. Further, certain Federal regulations require that applicants certify to certain assurances. If such is the case, you will be notified.

As the duly authorized and representative of the applicant, I certify that the applicant:

1. Has the legal authority to apply for Federal assistance and the institutional managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management, and completion of the project as it is planned.

2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, through any authorized representative, access to and the right to examine all records, books, papers, or documents related to the work, and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.

3. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or permits the appearance of personal or organizational conflict of interest or personal gain.

4. Will monitor and complete the work within the applicable time frame after receipt of approval of the awarding agency.

5. Will comply with the internal control standards of the Federal government. The requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-647) which provide for a fair and equitable treatment of persons displaced from their homes will apply to all interests in real property acquired for Federal purposes regardless of Federal participation in such projects.

6. Will comply with all Federal statutes relating to nondiscrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color, or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. § 1681-1683, and 1685-1686) which prohibits discrimination on the basis of sex (see Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. § 794) which prohibits discrimination in the case of handicapped persons; (c) the Age Discrimination Act of 1975, as amended (42 U.S.C. § 6101 et seq.) which prohibits discrimination in the case of persons 40 years of age or older; (d) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-253) as amended relating to nondiscrimination on the basis of drug abuse; (e) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-518), as amended, relating to nondiscrimination on the basis of alcoholism; (f) § 5253(a) and (b)(1) of the Health Services Act of 1982 (42 U.S.C. § 2000(a) and (b)(1)) as amended, relating to confidentiality of alcohol and drug abuse patient records, (g) Title VII of the Civil Rights Act of 1964 (42 U.S.C. § 2000e) as amended, relating to nondiscrimination in the sale, rental, or financing of housing; (h) any other nondiscrimination provisions in the specific statute(s) upon which application for Federal assistance is being made, and, (i) the requirements of any other nondiscrimination statute(s) which may apply to the application.

7. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-647) which provide for a fair and equitable treatment of persons displaced from their homes.

8. Will comply, as applicable, with provisions of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-647) which provide for a fair and equitable treatment of persons displaced from their homes.

9. Will comply, as applicable, with provisions of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-647) which provide for a fair and equitable treatment of persons displaced from their homes.

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Prepared by OMA (Thru Art 22)

Annual Action Plan
2019

OMB Control No: 2506-0117 (exp. 06/30/2018)

10. Will comply, as applicable, with food insurance purchase requirements of Section 120(g) of the Flood Disaster Protection Act of 1973 (P.L. 93-254) which requires individuals in a natural flood insurance program to purchase food insurance for the total value of insurable construction and acquisition is $12,000 or more.

11. Will comply with any environmental standards which may be specified pursuant to the following: (a) inspection and enforcement of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190); and (b) notification of violation of facilities pursuant to EO 11218, (c) protection of wetlands pursuant to EO 11990, (d) evaluation of flood hazards in floodplains in accordance with EO 11988, (e) assurance of project consistency with the approved State management plan under the Coastal Zone Management Act of 1972, (d) U.S. C. §§13451 et seq.; (g) compliance of Federal actions to State Clean Air Implementation Plans under Section 175 of the Clean Air Act of 1955, as amended 42 U.S.C. §§7411 et seq.; (j) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (i) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).


14. Will comply with the Lead-Based Paint Renovation, Repair, and Painting Act (P.L. 106-354) as amended (7 U.S.C. §1581 et seq.), pertaining to the care, handling, and treatment of wastes containing lead or other hazardous materials.

15. Will comply with the Animal Welfare Act of 1995 (P.L. 104-208) as amended (7 U.S.C. §1931 et seq.) in ensuring the humane care, treatment, and handling of non-human primates used for research, teaching, or other activities supported by this award.

16. Will comply with the Lead-Based Paint Renovation, Repair, and Painting Act (PL 106-354) as amended (7 U.S.C. §1581 et seq.) in ensuring the humane care, treatment, and handling of non-human primates used for research, teaching, or other activities supported by this award.

17. Will ensure that all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.

18. Will comply with the requirements of Section 108(g) of the Farm Bill, as amended (P.L. 107-171) in ensuring the protection of endangered species, or the incidental Take of such species.

19. Will comply with the requirements of Section 108(g) of the Farm Bill, as amended (P.L. 107-171) in ensuring the protection of endangered species, or the incidental Take of such species.
Annual Action Plan
2019

OMB Control No: 2506-0117 (exp. 06/30/2018)

Assurances - Non-Construction Programs
Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the needed data, and completing and submitting the collection of information. Send comments regarding the burden estimate or any other aspect of the collection of information including suggestions for reducing the burden, to the Office of Management and Budget, Paperwork Reduction Project (0440-0040), Washington, DC 20503.

Please do not return your completed form to the Office of Management and Budget. Send it to the address provided by the sponsoring agency.

Note: Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the sponsoring agency. Further, certain Federal awarding agencies may require applicants to certify to additional assurances. If this is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:

1. Has the legal authority to apply for Federal assistance and the institutional, managerial and financial capability (including such sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of the project described in this application;

2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, through authorized representatives, access to and the right to examine all records, books, papers, or documents related to the award, and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives;

3. Will establish safeguards to prohibit employees from using their positions for purposes that constitute or present the appearance of personal or organizational conflict of interest, or personal gain;

4. Will initiate and complete the work within the applicable timeframe after receipt of approval of the awarding agency;

5. Will comply with the Intergovernmental Personnel Act of 1970 (5 U.S.C. §§751-759) relating to prescribed standards for intergovernmental personnel to be funded under one of the 19 statutes or regulations specified in Agencies of OMB's Standards for a Model System of Personnel Administration (5 C.F.R. Part 550 Subpart F);

6. Will comply with all Federal statutes relating to nondiscrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (42 U.S.C. §2000c), which prohibits discrimination on the basis of race, color, or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1001-1063 and 1381-1388), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicap; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6102); (e) the Drug Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1974 (21 U.S.C. §8451), as amended, relating to nondiscrimination on the basis of alcohol or drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment, and Rehabilitation Act of 1978 (42 U.S.C. §§3001 et seq.), as amended, relating to nondiscrimination on the basis of alcohol or drug abuse; and (g) the Civil Rights Act of 1968 (42 U.S.C. §§2000a et seq.), as amended, relating to nondiscrimination in the area of public accommodation, as affected, relating to nondiscrimination in the area of housing, or any other non-discrimination provisions in the specific statute under which application for Federal assistance is being made, and (h) the requirements of any other nondiscrimination statute which may apply to the application.

7. Will comply with the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (42 U.S.C. 4601-4611) which provides for fair and equitable treatment of persons displaced as a result of Federal-aided programs. These requirements apply to all interests in real property acquired for Federal purposes regardless of Federal or non-Federal ownership.

8. Will comply, as applicable, with provisions of the Rehabilitation Act (42 U.S.C. §§701-794 and 3404, 3501), which limits the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.

10. Will comply, if applicable, with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-394) which requires recipients in special flood hazard areas to participate in the program and to purchase flood insurance if the total cost of insurance is $10,000 or more.

11. Will comply with environmental standards which may be prescribed pursuant to the following: (a) Institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order 11992 (b) Not to locate or develop facilities pursuant to EO 11988; (c) protection of wetlands pursuant to EO 11910; (d) preservation of Floridian manatees in accordance with EO 11068; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State Plan (citizen's) Environmental Plan, under Section 178 of the Clean Air Act of 1963, as amended, (42 U.S.C. §7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1072, as amended (P.L. 93-523); and (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).


14. Will comply with P.L. 85-318 regarding the protection of human subjects involved in research, development and related activities supported by the award of assistance.

15. Will comply with the Laboratory Animal Welfare Act of 1990 (P.L. 101-544), as amended, (7 U.S.C. §§2141 et seq.) regarding the care, handling, and treatment of vertebrate animals held for research, teaching, or other activities supported by this award of assistance.

16. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §4851 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of rental structures.

17. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1984 and OMB Circular No. A-133 "Audits of States, Local Governments, and Non-Private Organizations."

18. Will comply with all applicable requirements of all other federal laws, executive orders, regulations, and policies governing this program.

19. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. §§7101 et seq.) which prohibits grant award recipients or sub-recipients from: (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect; (2) Procuring commercial sex acts during the period of time that the award is in effect or (3) Using force, coercion in the performance of the award of subawards under the award.

Annual Action Plan

2019

OMB Control No: 2506-0117 (exp. 06/30/2018)
CERTIFICATIONS

In accordance with the applicable statutes and the regulations governing the consolidated plan regulations, the jurisdiction certifies that:

Affirmatively Further Fair Housing — The jurisdiction will affirmatively further fair housing, which means it will conduct an analysis of impediments to fair housing choice within the jurisdiction, take appropriate actions to overcome the effects of any impediments identified through that analysis, and maintain records reflecting that analysis and actions in this regard.

Anti-displacement and Relocation Plan — It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, and implementing regulations at 49 CFR 24; and it has in effect and is following a residential anti-displacement and relocation assistance plan required under section 104(d) of the Housing and Community Development Act of 1994, as amended, in connection with any activity financed with funding under the CDBG or HOME programs.

Anti-Lobbying — To the best of the jurisdiction's knowledge and belief:

1. No Federal appropriated funds have been paid or will be paid, by or on behalf of, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the continuation, modification, or termination of any Federal contract, grant, loan, or cooperative agreement;

2. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, it will complete and submit Standard Form 177, "Disclosure of Lobbying," in accordance with its instructions; and

3. It will require that the language of paragraph 1 and 2 of this anti-lobbying certification be included in the award documents for all subawards at all levels (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

Authority of Jurisdiction — The consolidated plan is authorized under State and local law (as applicable) and the jurisdiction possesses the legal authority to carry out the programs for which it is seeking funding, in accordance with applicable HUD regulations.

Consistency with plan — The housing activities to be undertaken with CDBG, HOME, ESG, and HOPWA funds are consistent with the strategic plan.

Section 3 — It will comply with section 3 of the Housing and Urban Development Act of 1968, and implementing regulations at 24 CFR Part 135.

Signature: Authorized Official [Signature]
Date: 6-6-9
Specific CDBG Certifications

The Entitlement Community certifies that:

**Citizen Participation** — It has followed all requirements of 24 CFR Part 570.

**Community Development Plan** — Its one- and two-year development plan, identifies community development housing needs and specifies both short-term and long-term community development objectives that provide decent housing, expand economic opportunities primarily for persons of low and moderate income. (See CTR 24.5503 and CTR 24.6106.1.)

**Following a Plan** — It is following a correct consolidated plan (or Comprehensive Housing Affordability Strategy) that has been approved by HUD.

**Use of Funds** — It has complied with the following criteria:

1. **Maximum Feasible Priority**. With respect to activities expected to be assisted with CDBG funds, it certifies that it has developed its Action Plan so as to give maximum feasible priority to activities that benefit low and moderate income families and in the prevention or elimination of slums or blight. The Action Plan may also include activities which, while certifying that it has given maximum feasible priority for activities that benefit low and moderate income families, are not consistent with the criteria for making awards under CDBG.

2. **Overall Formula**. The aggregate use of CDBG funds, including section 108 guarantees, loans, and grants, during the period covered by the Action Plan, shall be used to principally benefit persons of low and moderate income in a manner that ensures that at least 75 percent of the amount is expended for activities that benefit such persons during the designated period.

3. **Special Assessments**. It will not attempt to recover any capital costs of public improvements assisted with CDBG funds, unless Section 108 has guaranteed funds by assessing any amount against property or mortgage that persons of low and moderate income, including any fee charged or assessment made in a condition of obtaining access to such public improvements.

However, if CDBG funds are used to pay the proportion of a fee or assessment that relates to the capital costs of public improvements (in part with CDBG funds) financed from other revenue sources, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds.

The jurisdiction will not attempt to recover any capital costs of public improvements, which were with CDBG funds, unless Section 108 has guaranteed funds by assessing any amount against property or mortgage that persons of low and moderate income, including any fee charged or assessment made in a condition of obtaining access to such public improvements.

**Executive Orders** — It has adopted and is enforcing:

1. A policy prohibiting the use of excessive force by law enforcement agencies within its
jurisdiction against any individuals engaged in non-violent civil rights demonstrations; and

2. A policy of enforcing applicable State and local laws against physically barring entrance to or exit from a facility or location which is the subject of such non-violent civil rights demonstrations within its jurisdiction.

Compliance With Anti-discrimination laws -- The plan will be conducted and administered in conformity with title VI of the Civil Rights Act of 1964 (42 USC 2000d), the Fair Housing Act (12 USC 3601-3619), and implementing regulations.

Lead-Based Paint -- Its activities concerning lead-based paint will comply with the requirements of 21 CFR Part 15, subparts A, B, D, K and R.

Compliance with Laws -- It will comply with applicable laws.

[Signature] 6-6-19
Signature/Authorized Official Date

City Manager
Title
Specific HOME Certifications

The HOME participating jurisdiction certifies that:

Tenant Based Rental Assistance -- If the participating jurisdiction intends to provide tenant-based rental assistance:

The use of HOME funds for tenant-based rental assistance is an essential element of the participating jurisdiction's consolidated plan for expanding the supply, affordability, and availability of decent, safe, sanitary, and affordable housing.

Eligible Activities and Costs -- It is using and will use HOME funds for eligible activities and costs, as described in 24 CFR § 92.205 through 92.209 and that it is not using and will not use HOME funds for prohibited activities, as described in § 92.214.

Appropriate Financial Assistance -- Before committing any funds to a project, it will evaluate the project in accordance with the guidelines that it adopts for this purpose and will not invest any more HOME funds in combination with other Federal assistance than is necessary to provide affordable housing.

Sincerely,

[Signature]
Authorized Official

[Signature]
Title

6-6-19
Date
APPENDIX TO CERTIFICATIONS

INSTRUCTIONS CONCERNING LOBBYING:

A. Lobbying Certification

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than $10,000 and not more than $100,000 for each such failure.