City of Garden Grove

Action Plan Draft

for the Use of HUD Funds

July 1, 2016 – June 30, 2017

Prepared by the Community Development Department
of the City of Garden Grove

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Executive Summary

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

1. Introduction

The Consolidated Plan/Annual Action Plan

The City of Garden Grove 2015-2020 Consolidated Plan is a planning document that identifies and develops a strategy to address critical housing and community development needs that can be addressed through federal funding sources, including Community Development Block Grants, HOME Investment Partnership Act funds, and Emergency Solutions Grants.

To implement the Consolidated Plan and address the adopted priorities, each year the City prepares an annual Action Plan to more specifically identify financial resources, priority programs, and goals and objectives for the fiscal year.

The Consolidated Plan and Action Plan was prepared using the eConPlanning Suite system developed by the U.S. Department of Housing and Urban Development (HUD). The system prescribes the structure and contents of this document, following HUD's Consolidated Planning regulations

This Action Plan covers the period beginning July 1, 2016 through June 30, 2017 and focuses on the use of the three federal funding resources—CDBG, HOME, and ESG— described below.

Community Development Block Grants (CDBG): The primary objective of this program is to develop viable urban communities by providing decent housing, a suitable living environment, and economic opportunities, principally for persons of lower income. CDBG funds are relatively flexible and can be used for a wide range of activities, including housing rehabilitation, homeownership assistance, lead-based paint detection and removal, acquisition of land and buildings, construction or rehabilitation of public facilities (including shelters for the homeless and infrastructure), removal of architectural barriers to housing needs, public services, rehabilitation of commercial or industrial buildings, and loans or grants to businesses. The City of Garden Grove's annual entitlement of CDBG funds is $1,931,623.

HOME Investment Partnership Act (HOME): The HOME program provides federal funds for the development and rehabilitation of affordable rental and ownership housing for low- and moderate-income households. The program gives local governments the flexibility to fund a wide range of affordable housing activities through housing partnerships with private industry and non-profit organizations. HOME funds can be used for activities that promote affordable rental housing and homeownership by low- and moderate-income households, including building acquisition, new

construction and reconstruction, moderate or substantial rehabilitation, homebuyer assistance, and tenant-based rental assistance. The City of Garden Grove's annual entitlement of HOME funds is $485,556.

Emergency Solutions Grant (ESG): The ESG program provides homeless persons with basic shelter and essential supportive services, including rehabilitating or remodeling a building used as a new shelter, operations and maintenance of a homeless facility, essential supportive services, and homeless prevention. The City of Garden Grove's annual allocation of ESG funds is $174,448.

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.

This Consolidated Plan has established the following objectives over the life of the Plan (Program Years 2015-2010):

- Expand the City's affordable housing inventory by 50 units through new construction of affordable units for lower income households and 50 units through acquisition/rehabilitation of affordable units for lower income households.
- Provide rehabilitation assistance to 42 single-family homes for seniors.
- Provide rental assistance to 20 very low- and extremely low-income households through the TBRA program.
- Assist 2,500 persons with homelessness-related issues
- Improve the safety of 7,500 Garden Grove residents.
- Assist 3,000 persons through the provision of community services.

3. Evaluation of past performance

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

The City of Garden Grove continually strives to improve its performance and that of its funded agencies. During the period 2015-2016, the City invested the following in the community to meet the goals and objectives outlined in the 2015-2020 Consolidated Plan:

- **$4.1 million 2015**

CDBG, HOME and ESG funds were targeted in four primary areas:

1. Development of decent and affordable housing;

2. Provision of community and supportive services;
3. Improvement of public facilities and infrastructure; and
4. Expansion of economic opportunities and anti-poverty activities.

The performance of programs and systems are evaluated on a regular basis through Consolidated Annual Performance and Evaluation Reports (CAPERs). A more detailed summary of the City's evaluation of past performance in previous Consolidated Annual Performance and Evaluation Reports (CAPERs) can be viewed on the City's website at www.ci.garden-grove.ca.us/commdev/neighborhoodimprovement.

4. Summary of Citizen Participation Process and consultation process

Summary from citizen participation section of plan.

During its development, the Action Plan was discussed in a publicly noticed NICC meeting where opportunity for public comment is always provided. The draft plan was made available for public review between March 7, 2016 and April 12, 2016 on the City's website. Paper copies were made available for review at all public libraries and family resource centers. A public hearing was held on March 7, 2016 to solicit public comments on the Draft 2016-17 Action Plan. Finally, the Plan was provided to the City Council on April 12, 2016, where the opportunity for public comment was provided. All meeting locations were accessible to persons with disabilities. The public review period and public meetings/hearings for the Draft 2016-17 Action Plan was noticed in Orange County News (English) on February 26, 2016, Viet Bao (Vietnamese) on February 26, 2016 and in Unidos (Spanish) on March 4, 2016.

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.

This section will be updated at the conclusion of the Public Review period.

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

This section will be updated at the conclusion of the Public Review period.

7. Summary

The City of Garden Grove has undertaken diligent and good faith efforts to outreach to all segments of the community that may benefit from the CDBG, ESG, and HOME programs. The City of Garden Grove will continue to concentrate its resources for maximum impact and strive to address the needs, priorities, and goals identified in the 2015-2020 Consolidated Plan and the 2016-2017 Action Plan.

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.

Agency Role	Name	Department/Agency
CDBG Administrator	GARDEN GROVE	Community Development Department
HOME Administrator	GARDEN GROVE	Community Development Department
ESG Administrator	GARDEN GROVE	Community Development Department

Table 1 – Responsible Agencies

Narrative (optional)

The City's CDBG, HOME, and ESG programs are administered by the City of Garden Grove Community Development Department, Neighborhood Improvement Division.

Program Descriptions

The Community Development Block Grant (CDBG) program was initiated by the Housing and Community Development Act (HCDA) of 1974. The primary objective of the program is to develop viable urban communities by providing decent housing, a suitable living environment, and economic opportunities, principally for persons of low and moderate income. Regulations governing the CDBG program also require that each activity undertaken with CDBG funds meet one of the following three broad national objectives:

- Benefit low- and moderate-income persons
- Aid in the prevention or elimination of slums and blight
- Meet other community development needs having a particular urgency

The HOME Investment Partnership (HOME) program was created by the 1990 National Affordable Housing Act. The HOME program provides federal funds for the development and rehabilitation of affordable rental and ownership housing for low- and moderate-income households, replacing a series of programs previously funded by HUD. The program gives the grantee flexibility to fund a wide range of affordable housing activities through housing partnerships with private industry and non-profit organizations.

The Emergency Solutions Grant (ESG) program provides homeless persons with basic shelter and essential supportive services. ESG funds can be used for a variety of activities, including rehabilitation or remodeling of a building used as a new shelter, operations and maintenance of a homeless facility, essential supportive services, and homeless prevention.

Consolidated Plan Public Contact Information

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AP-10 Consultation – 91.100, 91.200(b), 91.215(l)

1. Introduction

As part of this Consolidated Plan development, the City undertook a comprehensive outreach program to solicit input from residents and beneficiaries of entitlement programs, and to consult with elected officials, City departments, and various organizations, agencies, and service providers to inform and develop the priorities and strategies contained in the Garden Grove 2015-2020 Consolidated Plan. The City has continued to keep these lines of communications open during the preparation of the 2016-2017 Action Plan.

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

The Garden Grove 2015-2020 Consolidated Plan was prepared using input from City residents, City staff, community-based organizations, and service providers. The City's outreach and consultation for the Consolidated Plan included direct coordination, a community workshop, a community survey, and public hearings regarding the Consolidated Plan and its programs. Almost 80 public and assisted housing providers and developers, private and governmental, health, mental health, service agencies and stakeholders that utilize funding for eligible activities, projects, and programs were directly contacted and invited to participate in the Consolidated Plan process for Garden Grove. The City continuously accepts comments and input from these organizations and considered this information in the preparation of the 2016-2017 Action Plan.

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.

The County of Orange Department of Housing and Community Services (HCS) coordinates a countywide Continuum of Care (CoC) system in response to the ongoing homeless needs in the region. Consistent with the objectives of the countywide CoC, the City of Garden Grove's Neighborhood Improvement Division has developed several strategies to address homelessness in the City. Some of the tasks recently undertaken by the City include:

- assisting with the Point in Time Survey conducted by the County of Orange
- development of a brochure for homeless persons that includes an inventory of local community resources
- meetings with local Homeless Committee Activists, including ALMMA (Association of Local Missions & Ministries in Action) to explore potential locations in the community for homeless to shower, store items and use as a permanent address to obtain assistance

- coordination with Coast to Coast to work towards a partnership between all agencies coast to coast

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

The Orange County ESG grantees (County of Orange, City of Anaheim, City of Garden Grove, and the City of Santa Ana) have developed the Orange County ESG Collaborative as a unified approach to requesting, reviewing and funding ESG subrecipients. This collaborative approach has streamlined the application and review process and allowed the grantees to better understand the impacts of funding decisions. Future Collaborative efforts will include unified invoice and monitoring forms and other actions to better serve our homeless and at-risk of homeless families.

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

Table 2 – Agencies, groups, organizations who participated

1	**Agency/Group/Organization**	211 ORANGE COUNTY
	Agency/Group/Organization Type	Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-Victims of Domestic Violence Services-homeless Services-Health Services-Education Services-Employment Service-Fair Housing Services - Victims
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Strategy Market Analysis Economic Development Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	This organization provided direct input, helped to identify priority needs in the community, and participated in a community workshop for the Garden Grove 2015-2020 Consolidated Plan on December 1, 2014.

2	**Agency/Group/Organization**	HELPING OTHERS PREPARE FOR ETERNITY
	Agency/Group/Organization Type	Services-Children Services-Victims of Domestic Violence Services-Health Services-Education Services-Employment
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Non-Homeless Special Needs Market Analysis Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	This organization provided direct input, helped to identify priority needs in the community, and participated in a community workshop for the Garden Grove 2015-2020 Consolidated Plan on December 1, 2014.
3	**Agency/Group/Organization**	Garden Grove Community Arts Society
	Agency/Group/Organization Type	Services-Children
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	This organization provided direct input, helped to identify priority needs in the community, and participated in a community workshop for the Garden Grove 2015-2020 Consolidated Plan on December 1, 2014
4	**Agency/Group/Organization**	Illumination Foundation
	Agency/Group/Organization Type	Services-homeless

	What section of the Plan was addressed by Consultation?	Housing Need Assessment 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?	This organization provided direct input, helped to identify priority needs in the community, and participated in a community workshop for the Garden Grove 2015-2020 Consolidated Plan on December 1, 2014
5	**Agency/Group/Organization**	Garden Grove United Methodist Church
	Agency/Group/Organization Type	Community Church
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	This organization provided direct input, helped to identify priority needs in the community, and participated in a community workshop for the Garden Grove 2015-2020 Consolidated Plan on December 1, 2014
6	**Agency/Group/Organization**	Association of Local Missions and Ministries for Action
	Agency/Group/Organization Type	Housing Services-homeless Regional organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment 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?	This organization provided direct input, helped to identify priority needs in the community, and participated in a community workshop for the Garden Grove 2015-2020 Consolidated Plan on December 1, 2014
7	**Agency/Group/Organization**	OC Autism
	Agency/Group/Organization Type	Services-Children Services-Persons with Disabilities Services-Health
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	This organization provided direct input, helped to identify priority needs in the community, and participated in a community workshop for the Garden Grove 2015-2020 Consolidated Plan on December 1, 2014

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

The City advertised the opportunities to participate in the Consolidated Plan process and distributed invitation letters to almost 80 agencies representing a broad range of local service providers, community groups, and organizations, and encouraged them to participate in the 2015-2020 Consolidated Plan. The City used a variety of outreach methods to solicit participation. No specific types of relevant agencies were excluded from the process.

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

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	County of Orange	The Orange County Point-in-Time count informed homeless data in the Consolidated Plan. The Orange County Ten-Year Plan to End Homelessness strategic plan is closely aligned with the goals of the CoC. Garden Grove is an administering agency for CoC and ESG funds in addition to the City's CDBG and HOME allocations.
City of Garden Grove Housing Element (2014-2021)	City of Garden Grove Community Development Department	The Housing Element serves as a policy guide to help the City meet existing and future housing needs. Both the Consolidated Plan and the Housing Element share common goals that address housing-related issues in the community.
Garden Grove CIP FY2014/15 to 2018/19	City of Garden Grove Public Works Department	The Consolidated Plan is aligned with the City's Capital Improvement Plan (CIP), which identifies projects to address infrastructure issues and prioritizes public infrastructure investments.

Table 3 – Other local / regional / federal planning efforts

Narrative (optional)

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

This Consolidated Plan has been developed through a collaborative process that included participation by residents, service providers, and City staff. The following methods were used to solicit public input.

A community workshop was held on December 1, 2014 in conjunction with a Neighborhood Improvement and Conservation Commission (NICC) meeting. In addition to interested residents and NICC commissioners, the City invited service providers and representatives from surrounding jurisdictions to attend the workshop and discuss local issues and needs relating to housing and community development in Garden Grove. The workshop included an overview of the Consolidated Plan process and summary of past and projected funding resources for the City. In order to identify priority needs for the 2015-2020 planning period, the workshop included discussions and exercises related to the types of projects and programs that can be funded and recent projects.

A community survey, which assessed housing and community development needs, was distributed throughout the community. Paper formats of the surveys were made available in English, Spanish, and Vietnamese, and were distributed at community resource centers, libraries, City Hall public counters, at the Garden Grove Housing Authority, and at the community workshop. In addition, the survey was available in electronic format via the City's website and Facebook page, and was emailed to local service providers.

The Draft Action Plan will be available for public review beginning March 7, 2016 and ending April 12, 2016. The Draft Plan will be available on the City's website and at Garden Grove City Hall (11222 Acacia Parkway), the Garden Grove Regional Library (11200 Stanford Avenue), Community Meeting Center (11300 Stanford Avenue), and Chamber of Commerce (12866 Main Street #102).

On March 7, 2016, the draft Action Plan will be reviewed as part of a regular NICC meeting.

On April 12, 2016, the City Council will conduct a public hearing to consider the Action Plan.

A public notice regarding the meeting March 7, 2016 and the April 12, 2016 meetings will be advertised in the local newspapers. Public meetings and hearings were publicized adequately and held at times and locations convenient to the community. The location of hearings at the Garden Grove Community Meeting Center and Courtyard Center are accessible to persons with physical disabilities.

Summaries of the public comments, meeting minutes and copies of public notices will be included in Appendix A.

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Public Meeting	Non-targeted/broad community	Will be updated following the meeting	See Appendix A	Will be updated following the meeting	
2	Public Hearing	Non-targeted/broad community	Will be updated following the meeting	See Appendix A	Will be updated following the meeting	
3	Newspaper Ad	Non-targeted/broad community	Will be updated following the meeting	See Appendix A	Will be updated following the meeting	
4	Newspaper Ad	Non-English Speaking - Specify other language: Vietnamese	Will be updated following the meeting	See Appendix A	Will be updated following the meeting	
5	Newspaper Ad	Non-English Speaking - Specify other language: Spanish	Will be updated following the meeting	See Appendix A	Will be updated following the meeting	

Table 4 – Citizen Participation Outreach

Expected Resources

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

Introduction

For the one-year period covering July 1, 2016 through June 30, 2017, the City has planned for the following allocations:

- $1,931,623 in CDBG funds
- $485,556 in HOME funds
- $174,448 in ESG funds

Garden Grove does not receive funding under the Housing Opportunities for Persons with AIDS (HOPWA) programs. In recent years, the levels of CDBG and HOME funds for Garden Grove have been primarily trending downward. In estimating the amounts of funding available over this Action Plan period, the City took a conservative approach to assume an annual reduction of five percent.

In terms of program income, the City anticipates an unsteady stream of program income over the course of this Action Plan. During the past five years, the level of program income received varied from $30,000 in one year to over $90,000 in another. Program income received from the repayment of Rehabilitation (CDBG and HOME) and First-Time Homebuyer (HOME) loans will automatically be re-programmed for loan activities in those same or similar 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.

Priority Table

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Reminder of ConPlan $	Narrative Description
			Annual Allocation: $	Program Income: $	Prior Year Resources: $	Total: $		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	1,931,623	0	64,319	1,995,942	4,894,446	The amount of CDBG funds available during the planning period is based on actual funds available.
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	485,556	9,450	1,335,959	1,830,965	1,321,540	The amount of HOME funds available during the planning period is based on actual funds available.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Reminder of ConPlan $	Narrative Description
			Annual Allocation: $	Program Income: $	Prior Year Resources: $	Total: $		
ESG	public - federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing	174,448	0	0	174,448	443,785	The amount of ESG funds available during the planning period is based on actual funds available.

Table 5 - Expected Resources – Priority Table

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

As is the case for many communities across the nation, the housing and community development needs in Garden Grove surpass the funding available to meet those needs. Therefore, effective and efficient use of limited funds is crucial, and leveraging of multiple funding sources is often necessary to achieve housing and community development objectives. Most activities to be pursued by the City with CDBG, HOME, and ESG funds will be leveraged with a variety of funding sources, including grants from state, federal, and local governments, private foundations, capital development funds, general funds, private donations of funds or services, and various other funding sources. For new construction, substantial rehabilitation, and acquisition of affordable housing, the City encourages the use of Low Income Housing Tax Credits.

Federal match requirements apply to the City's HOME and ESG funds. The HOME program requires that for every HOME dollar spent, the City must provide a 25% match with non-federal dollars. HUD allows the City to use various resources to meet this match requirement. According to HOME program guidelines, no more than 25% of the City's match liability for any one year can be met through loans to housing projects, but

amounts in excess of that may be banked as match credit for future years. The City has an excess of match funds from previous years.

The ESG program requires that for each dollar of the City's ESG grant in any given year, the City must provide a 100% match with non-federal dollars. Garden Grove will continue to require its ESG partners to leverage non-federal funds and report their successes with each quarterly performance report.

The Garden Grove Housing Authority provides rental subsidies for eligible low-income (50% MFI) families. The Section 8 Rental Assistance Program is funded by federal grants through the Department of Housing and Urban Development. The Housing Authority provides assistance to over 2,300 low-income families. The funding level for this program is determined annually by Congress. Currently funding is approximately $28.5 million per year.

The Garden Grove Housing Authority also administers a Family Self-Sufficiency Program, which assists housing participants in achieving economic self-sufficiency through education, training, and employment. Approximately 292 very low-income families are involved in the program, which currently is funded at approximately $94,000 per year.

CalHome Grants are given to local public agencies and nonprofit developers to assist individual households through deferred-payment loans. The grants are given to local public agencies or nonprofit corporations for first-time homebuyer down payment assistance, home rehabilitation, acquisition and rehabilitation, homebuyer counseling, self-help mortgage assistance programs, or technical assistance for self-help homeownership. In 2014, the City was awarded $1 million in state funds to be used for various housing assistance programs. The City will use the funds to provide rehabilitation loans and mortgage assistance for mobile homes to low income households in the City, augmenting the current programs funded with CDBG and HOME monies.

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

In the past, the City has utilized CDBG funds to acquire properties to address community development needs. The City has a long-term goal to establish a new fire station in the Harbor Boulevard area. Given the high cost of land, it will take quite some time to acquire enough funds to accomplish this goal. Depending on the availability of funds, the City will work towards acquisition of parcels along Harbor Boulevard to provide a site for a new fire station.

Discussion

See responses to questions above.

Annual Goals and Objectives

AP-20 Annual Goals and Objectives - 91.420, 91.220(c)(3)&(e)

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Provide Decent and Affordable Housing	2015	2020	Affordable Housing Homeless Non-Homeless Special Needs		Increase, Improve, and Preserve Affordable Housing Promote New Construction of Affordable Housing Provide Rental Assistance to Alleviate Cost Burden	CDBG: $90,995 HOME: $1,684,905	Rental units constructed: 10 Household Housing Unit Rental units rehabilitated: 10 Household Housing Unit Homeowner Housing Rehabilitated: 18 Household Housing Unit Tenant-based rental assistance / Rapid Rehousing: 20 Households Assisted
2	Promote Equal Access to Housing	2015	2020	Affordable Housing Homeless Non-Homeless Special Needs		Promote Equal Access to Housing	CDBG: $34,932	Public service activities for Low/Moderate Income Housing Benefit: 528 Households Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
3	Address the Needs of Homeless and Those At-Risk	2015	2020	Homeless		Promote Programs to Meet Homeless Needs	ESG: $161,365	Overnight/Emergency Shelter/Transitional Housing Beds added: 70 Beds Homelessness Prevention: 48 Persons Assisted Housing for Homeless added: 180 Household Housing Unit
4	Provide Community Services	2015	2020	Non-Homeless Special Needs Non-Housing Community Development		Preserve and Improve Existing Supportive Services	CDBG: $289,743	Public service activities other than Low/Moderate Income Housing Benefit: 2300 Persons Assisted
5	Promote Economic Development and Employment	2015	2020	Non-Housing Community Development		Promote Economic Development and Employment	CDBG: $1,227,880	
6	Improve Lower-Income Neighborhoods	2015	2020	Non-Homeless Special Needs Non-Housing Community Development		Address Public Facilities/Infrastructure Needs	CDBG: $1,000	

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
7	Provide for Planning and Administration Activities	2015	2020	Affordable Housing Homeless Non-Homeless Special Needs Non-Housing Community Development		Provide for Necessary Planning and Administration	CDBG: $351,392 HOME: $136,610 ESG: $13,083	

Table 6 – Goals Summary

Goal Descriptions

1	**Goal Name**	Provide Decent and Affordable Housing
	Goal Description	For FY 2016-17, the City will utilize CDBG and HOME funds to support affordable housing activities, including housing rehabilitation, new construction and acquisition/rehabilitation of affordable housing, provision of rental assistance, and substandard housing abatement.
2	**Goal Name**	Promote Equal Access to Housing
	Goal Description	For FY 2016-17, the City will use CDBG funds to support fair housing services to be provided by the Fair Housing Foundation.
3	**Goal Name**	Address the Needs of Homeless and Those At-Risk
	Goal Description	For FY 2016-17, ESG funds will be used to support local service providers focused on addressing homelessness in the community and for homeless prevention programs.

4	**Goal Name**	Provide Community Services
	Goal Description	For FY 2016-17, the City will utilize CDBG funds to support a variety of senior services, including meal provision. CDBG funds will also be used to enhance safety in lower-income neighborhoods through gang and crime suppression programs.
5	**Goal Name**	Promote Economic Development and Employment
	Goal Description	For FY 2016-2017, CDBG funds will be used for repayment of the Section 108 Loan for the Harbor Boulevard investment that collectively provided 1,200 jobs in the community. CDBG funds will also be used to further facilitate economic development activities and contribute to the City's long term goal to acquire 1 to 4 properties in the Harbor Boulevard corridor to facilitate job creation. The Outcome Indicators for this Goal are not quantifiable as funds will be used for repayment of the Section 108 Loan and for land acquisition for economic development activities.
6	**Goal Name**	Improve Lower-Income Neighborhoods
	Goal Description	For FY 2016-2017, CDBG funds will be used for acquisition of properties along Harbor Boulevard for a potential future fire station to improve the safety of the area. The Outcome Indicator for this Goal is not quantifiable as funds will be used for land acquisition for a potential future fire station.
7	**Goal Name**	Provide for Planning and Administration Activities
	Goal Description	For FY 2016-2017, the City will allocate a portion of CDBG, HOME, and ESG funds for the administration, planning, and monitoring of these programs.

Table 7 – Goal Descriptions

Estimate the number of extremely low-income, low-income, and moderate-income families to whom the jurisdiction will provide affordable housing as defined by HOME 91.215(b):

The City's one-year goal is to provide affordable housing opportunities to the following:

-Tenant-Based Rental Assistance: Garden Grove will provide tenant-based rental assistance to 20 low income households.

-Acquisition / Rehabilitation: Garden Grove will pursue an affordable housing project with approximately 10 units.

-Senior Home Improvement Grants: Garden Grove will provide assistance in the form of a grant to 18 seniors for home rehabilitation.

-New Construction: Garden Grove will pursue an affordable housing project with approximately 10 units.

AP-35 Projects – 91.220(d)

Introduction

The Fiscal Year (FY) 2016-17 Action Plan implements the second year of the 2015 – 2020 Consolidated Plan and addresses HUD consolidated planning requirements for the Community Development Block Grant (CDBG), HOME Investment Partnership Act (HOME), and Emergency Solutions Grant (ESG) programs for the City of Garden Grove. This plan outlines the action steps that Garden Grove will use to address housing and community development needs in the City. The plan also includes a listing of activities that the City will undertake during FY 2016-17 (July 1, 2016 through June 30, 2017) that utilize CDBG, HOME and ESG funds.

Development of the FY 2016-2017 Action Plan coincides with the annual Request for Proposal (RFP) process for ESG funds. The City makes its funding allocation decisions in part based on proposals received as part of the annual RFP process. Through this process, funds are awarded to eligible activities that support the goals and address the priority needs described in the Strategic Plan. While CDBG, HOME, and ESG funding allocations for FY 2016-2017 will not address all of the community's priority needs, allocations are focused toward specific projects addressing high community priorities and that produce tangible community benefits.

#	Project Name
1	Program Administration
2	CDBG Municipal Support Services
3	CDBG Fair Housing Foundation
4	CDBG Gang Suppression Special Unit
5	CDBG Senior Center
6	CDBG Community SeniorServ
7	CDBG Section 108 Loan Repayment
8	CDBG Harbor Boulevard Improvements
9	CDBG Fire Station Acquisition
10	HOME Tenant Based Rental Assistance
11	HOME Multifamily Housing Acquisition and/or Rehabilitation
12	HOME New Construction of Affordable Housing
13	CDBG Senior Home Improvement Grant Program
14	ESG 2-1-1 Orange County
15	ESG Grandma's House Of Hope
16	ESG Mercy House
17	ESG Thomas House Temporary Shelter
18	ESG Interval House Crises Center

Table 8 – Project Information

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

Priority goals established in the 2015-2020 Consolidated Plan, which form the basis for establishing objectives and outcomes in the FY 2016-17 Action Plan are as follows:

- Provide decent and affordable housing through new construction activities, acquisition and rehabilitation activities, rehabilitation assistance programs, substandard housing code abatement services, lead-based paint hazard reduction efforts, and home ownership assistance.
- Promote equal access to housing for all residents.
- Address the needs of homeless individuals and those at risk of homelessness.
- Provide for a variety of community and support services.
- Improve lower-income neighborhoods through public facilities and infrastructure improvements.
- Promote economic development and employment opportunities.
- Provide for planning and administration activities to address housing and community development needs in the City

The major obstacle to addressing the underserved needs is the lack of adequate funding, especially for affordable housing activities. With the dissolution of redevelopment in California and reduced State and Federal funding levels, the City's ability to address the extensive needs in the community is seriously compromised.

Projects

AP-38 Projects Summary

Project Summary Information

Table 9 – Project Summary

1	**Project Name**	Program Administration
	Target Area	
	Goals Supported	Provide for Planning and Administration Activities
	Needs Addressed	Provide for Necessary Planning and Administration
	Funding	CDBG: $326,610 HOME: $136,610 ESG: $13,083
	Description	Provide for necessary planning and administration activities to address housing and community development needs in the City.
	Target Date	6/30/2017
	Estimate the number and type of families that will benefit from the proposed activities	Not Applicable
	Location Description	11222 Acacia Parkway, Garden Grove, Ca 92840
	Planned Activities	Planning and public participation, contract design, management and monitoring, financial administration, and HUD communication to administer the City's CDBG, HOME, and ESG programs.
2	**Project Name**	CDBG Municipal Support Services

	Target Area	
	Goals Supported	Provide for Planning and Administration Activities
	Needs Addressed	Provide for Necessary Planning and Administration
	Funding	CDBG: $24,782
	Description	City's indirect costs expended in support of HUD-funded programs in all City departments.
	Target Date	6/30/2017
	Estimate the number and type of families that will benefit from the proposed activities	Not Applicable
	Location Description	11222 Acacia Parkway, Garden Grove, Ca 92840.
	Planned Activities	Indirect support of HUD-funded programs by other City departments.
3	**Project Name**	CDBG Fair Housing Foundation
	Target Area	
	Goals Supported	Provide for Planning and Administration Activities
	Needs Addressed	Promote Equal Access to Housing
	Funding	CDBG: $34,932
	Description	CDBG funds will be provided to the Fair Housing Foundation for the provision of fair housing services as a sub-recipient to the City.
	Target Date	6/30/2017
	Estimate the number and type of families that will benefit from the proposed activities	Assist 528 households with fair housing services.
	Location Description	Citywide

	Planned Activities	Fair housing services and outreach.
4	**Project Name**	CDBG Gang Suppression Special Unit
	Target Area	
	Goals Supported	Provide Community Services
	Needs Addressed	Preserve and Improve Existing Supportive Services
	Funding	CDBG: $109,984
	Description	The Police Department's Gang Suppression Union is responsible for gang violence prevention, gang probation checks, counseling referrals, and youth truancy intervention. Funding this organization will enhance safety in lower-income areas.
	Target Date	6/30/2017
	Estimate the number and type of families that will benefit from the proposed activities	Enhance the safety of 1,500 residents in lower-income neighborhoods.
	Location Description	Lower-income neighborhoods
	Planned Activities	Gang violence prevention, gang probation checks, counseling referrals, and youth truancy intervention.
5	**Project Name**	CDBG Senior Center
	Target Area	
	Goals Supported	Provide Community Services
	Needs Addressed	Preserve and Improve Existing Supportive Services
	Funding	CDBG: $159,759
	Description	Provide one or more programs for seniors at the H. Louis Lake Senior Center. Programs include recreation and socialization, daily lunch, nutrition health education, and support for seniors.

	Target Date	6/30/2017
	Estimate the number and type of families that will benefit from the proposed activities	300 seniors.
	Location Description	11300 Stanford Avenue, Garden Grove, CA 92840.
	Planned Activities	Recreation and socialization programs, daily lunch, nutrition health education classes, and support services for seniors.
6	**Project Name**	CDBG Community SeniorServ
	Target Area	
	Goals Supported	Provide Community Services
	Needs Addressed	Preserve and Improve Existing Supportive Services
	Funding	CDBG: $20,000
	Description	Provide raw food for congregate meals to Garden Grove residents citywide.
	Target Date	6/30/2017
	Estimate the number and type of families that will benefit from the proposed activities	Congregate meals to 500 residents and home delivered meals to 90 residents.
	Location Description	Citywide
	Planned Activities	Provide raw food for congregate meals.
7	**Project Name**	CDBG Section 108 Loan Repayment
	Target Area	
	Goals Supported	Promote Economic Development and Employment
	Needs Addressed	Promote Economic Development and Employment

	Funding	CDBG: $1,226,880
	Description	CDBG funds will be used for repayment of principal and interest on a previous Section 108 Loan for economic development activities along Harbor Boulevard.
	Target Date	6/30/2017
	Estimate the number and type of families that will benefit from the proposed activities	Not applicable. Accomplishments have already been reported in a prior year activity. This Section 108 Loan was used for economic development activities in the Harbor Boulevard corridor, which provided 1,200 jobs in the community.
	Location Description	Harbor Boulevard
	Planned Activities	Repayment of Section 108 Loan.
8	**Project Name**	CDBG Harbor Boulevard Improvements
	Target Area	
	Goals Supported	Promote Economic Development and Employment
	Needs Addressed	Promote Economic Development and Employment
	Funding	CDBG: $1,000
	Description	CDBG funds will be used for acquisition of properties along Harbor Boulevard to facilitate economic development projects.
	Target Date	6/30/2016
	Estimate the number and type of families that will benefit from the proposed activities	Not applicable.
	Location Description	Harbor Boulevard
	Planned Activities	Property acquisition and facilitation of economic development activities.
9	**Project Name**	CDBG Fire Station Acquisition

	Target Area	
	Goals Supported	Improve Lower-Income Neighborhoods
	Needs Addressed	Address Public Facilities/Infrastructure Needs
	Funding	CDBG: $1,000
	Description	CDBG funds will be used for acquisition of properties along Harbor Boulevard for a potential future fire station to improve the safety of the area.
	Target Date	6/30/2017
	Estimate the number and type of families that will benefit from the proposed activities	Not applicable.
	Location Description	Harbor Boulevard
	Planned Activities	Land acquisition for a potential future fire station.
10	**Project Name**	HOME Tenant Based Rental Assistance
	Target Area	
	Goals Supported	Provide Decent and Affordable Housing
	Needs Addressed	Provide Rental Assistance to Alleviate Cost Burden
	Funding	HOME: $787,335
	Description	The program provides very low- and extremely low-income families with HOME-funded Tenant Based Rental Assistance vouchers.
	Target Date	6/30/2017
	Estimate the number and type of families that will benefit from the proposed activities	20 very low- and extremely low-income households.

	Location Description	Citywide
	Planned Activities	Direct rental assistance through the City's voucher program.
11	**Project Name**	HOME Multifamily Housing Acquisition and/or Rehabilitation
	Target Area	
	Goals Supported	Provide Decent and Affordable Housing
	Needs Addressed	Increase, Improve, and Preserve Affordable Housing
	Funding	HOME: $437,001
	Description	Dedication of affordable rental housing units in exchange for financial assistance for developers to acquire and/or rehabilitate properties.
	Target Date	6/30/2017
	Estimate the number and type of families that will benefit from the proposed activities	10 rehabilitated affordable housing units
	Location Description	Citywide
	Planned Activities	The City will use HOME funds to assist a developer acquire, rehabilitate, and manage rental units at affordable rents.
12	**Project Name**	HOME New Construction of Affordable Housing
	Target Area	
	Goals Supported	Provide Decent and Affordable Housing
	Needs Addressed	Promote New Construction of Affordable Housing
	Funding	HOME: $460,569
	Description	Facilitate predevelopment of new housing projects.

	Target Date	6/30/2017
	Estimate the number and type of families that will benefit from the proposed activities	10 new affordable housing units
	Location Description	Citywide
	Planned Activities	Use HOME funds to support new projects that include affordable housing through target policies and procedures to facilitate such developments.
13	**Project Name**	CDBG Senior Home Improvement Grant Program
	Target Area	
	Goals Supported	Provide Decent and Affordable Housing
	Needs Addressed	Increase, Improve, and Preserve Affordable Housing
	Funding	CDBG: $90,995
	Description	The program provides on a citywide basis a grant of up to $5,000 for exterior minor home repairs, energy conversation activities, accessibility improvements, security and safety improvements, exterior refurbishing, and painting to eligible lower-income senior homeowners.
	Target Date	6/30/2017
	Estimate the number and type of families that will benefit from the proposed activities	18 lower-income senior homeowners.
	Location Description	Citywide
	Planned Activities	Home improvement grants for exterior minor home repairs, energy conversation activities, accessibility improvements, security and safety improvements, exterior refurbishing, and painting.
14	**Project Name**	ESG 2-1-1 Orange County
	Target Area	

	Goals Supported	Address the Needs of Homeless and Those At-Risk
	Needs Addressed	Promote Programs to Meet Homeless Needs
	Funding	ESG: $8,000
	Description	Provide Homeless Management Information System (HMIS), also known as Client Management Information System (CMIS), training and technical support.
	Target Date	6/30/2017
	Estimate the number and type of families that will benefit from the proposed activities	Not applicable.
	Location Description	Not applicable
	Planned Activities	Provide to training and technical support services.
15	**Project Name**	ESG Grandma's House Of Hope
	Target Area	
	Goals Supported	Address the Needs of Homeless and Those At-Risk
	Needs Addressed	Promote Programs to Meet Homeless Needs
	Funding	ESG: $20,000
	Description	Provide emergency and transitional housing to homeless women with or without very young children.
	Target Date	6/30/2017
	Estimate the number and type of families that will benefit from the proposed activities	Provide emergency, transitional and long-term supportive housing, as well as basic needs, case management, counseling, work force development, and individualized care to 25 homeless women with or without very young children.
	Location Description	Citywide

	Planned Activities	Provide shelter, basic needs, case management, counseling, work force development, and individualized care for homeless women with or without very young children.
16	**Project Name**	ESG Mercy House
	Target Area	
	Goals Supported	Address the Needs of Homeless and Those At-Risk
	Needs Addressed	Promote Programs to Meet Homeless Needs
	Funding	ESG: $17,500
	Description	Armory emergency shelter program to assist homeless persons and provide temporary rental assistance and case management.
	Target Date	6/30/2017
	Estimate the number and type of families that will benefit from the proposed activities	Provide shelter to 70 homeless persons from Garden Grove and homeless prevention assistance to 30 Garden Grove residents.
	Location Description	Citywide
	Planned Activities	Provide shelter, food, hygiene, and provide temporary rental assistance and case management.
17	**Project Name**	ESG Thomas House Temporary Shelter
	Target Area	
	Goals Supported	Address the Needs of Homeless and Those At-Risk
	Needs Addressed	Promote Programs to Meet Homeless Needs
	Funding	ESG: $30,000
	Description	Provide transitional shelter and supportive services for homeless families.
	Target Date	6/30/2017

	Estimate the number and type of families that will benefit from the proposed activities	80 Families
	Location Description	Citywide
	Planned Activities	Supply food, shelter, and a full spectrum of life skills resources to approximately 80 families to transition them to permanent housing and independent living.
18	**Project Name**	ESG Interval House Crises Center
	Target Area	
	Goals Supported	Address the Needs of Homeless and Those At-Risk
	Needs Addressed	Promote Programs to Meet Homeless Needs
	Funding	ESG: $85,865
	Description	Domestic violence shelter and supportive services for victims of domestic violence such as case management, counseling, crisis hotline, economic self-sufficiency and other life skills support.
	Target Date	6/30/2017
	Estimate the number and type of families that will benefit from the proposed activities	Provide shelter for 75 victims of domestic violence and rapid rehousing services for 18 victims of domestic violence in Garden Grove.
	Location Description	Citywide
	Planned Activities	Provide shelter and rapid rehousing services

AP-50 Geographic Distribution – 91.220(f)

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

The City has not established specific target areas to focus the investment of CDBG funds. Appendix B contains a map of block groups illustrating the lower-income areas in the City (defined as a block group where at least 51 percent of the population with incomes not exceeding 80 percent of the Area Median Income). Investments in housing and community development services serving special needs populations and primarily lower-income persons will be made throughout the City. Housing assistance will be available to income-qualified households citywide.

Geographic Distribution

Target Area	Percentage of Funds

Table 10 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

The majority of the City of Garden Grove qualifies as a low- and moderate-income area. Therefore, given the extensive needs in the community, the City has not targeted any specific neighborhood for investment of CDBG and HOME funds. Instead, projects are evaluated on a case-by-case basis, considering emergency needs, cost effectiveness, feasibility, and availability of other funding to address the needs or leverage federal funds.

Discussion

See responses above.

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

The City plans to utilize HOME and CDBG funds to support its authorized housing activities, including tenant-based rental assistance, the senior homeowner rehabilitation program, acquisition and rehabilitation of affordable housing units, and new construction of affordable units.

One Year Goals for the Number of Households to be Supported	
Homeless	0
Non-Homeless	58
Special-Needs	0
Total	58

Table 11 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through	
Rental Assistance	20
The Production of New Units	10
Rehab of Existing Units	18
Acquisition of Existing Units	10
Total	58

Table 12 - One Year Goals for Affordable Housing by Support Type

Discussion

See above

AP-60 Public Housing – 91.220(h)

Introduction

No public housing is located in Garden Grove.

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

Not applicable as there is no public housing in Garden Grove.

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

Not applicable.

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

Not applicable.

Discussion

See responses above.

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 2015-2020 Consolidated Plan. The City plans to address the needs of homeless individuals and those at risk of homelessness through allocation of ESG funds to support local efforts to prevent and address homelessness. The City will also continue to participate in the Orange County Continuum of Care System for the Homeless.

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

Garden Grove participates in the Orange County Continuum of Care (CoC) system. For the past several years, leadership and coordination of Orange County's Continuum of Care planning process has been the shared responsibility of OC Partnership, 211 Orange County, and the OC Community Services. This public /nonprofit partnership helps ensure comprehensive, regional coordination of efforts and resources to reduce the number of homeless and persons at risk of homelessness throughout Orange County. This group serves as the regional convener of the year-round CoC planning process and as a catalyst for the involvement of the public and private agencies that make up the regional homeless system of care, of which Garden Grove is a part. The Orange County Continuum of Care system consists of six basic components:

1. Advocacy on behalf of those who are homeless or at-risk of becoming homeless
2. A system of outreach, assessment, and prevention for determining the needs and conditions of an individual or family who is homeless
3. Emergency shelters with appropriate supportive services to help ensure that homeless individuals and families receive adequate emergency shelter and referrals
4. Transitional housing to help homeless individuals and families who are not prepared to make the transition to permanent housing and independent living
5. Permanent housing or permanent supportive housing to help meet the long term needs of homeless individuals and families
6. Reducing chronic homeless in Orange County and addressing the needs of homeless families and individuals using motels to meet their housing needsThe City of Garden Grove uses ESG funds to support a variety of services and programs for the homeless, sheltered and unsheltered, consistent with the goals of the Orange County CoC. Most of these services and programs supported by the City include an outreach component.

Addressing the emergency shelter and transitional housing needs of homeless persons

The City actively participates in the Orange County CoC by attending meetings to discuss how to establish performance measures that benefit the broader goals of the region. Consistent with the objectives of the countywide CoC, the City's Neighborhood Improvement Committee has developed several strategies to address homelessness. Some of the tasks recently undertaken by the City include: 1) assisting with the Point in Time Survey conducted by the County of Orange;2) development of a brochure for homeless persons that includes an inventory of local community resources; and 3) meetings with local Homeless Committee Activists, including ALMMA (Association of Local Missions & Ministries in Action) to explore potential locations in the community for homeless to shower, store items, and use as a permanent address to obtain assistance. The City will work with Coast to Coast to create a partnership among all agencies coast to coast.

In addition, the City addresses the emergency and transitional housing needs of homeless persons through allocation of its ESG funds. Garden Grove supports several homeless services providers that provide homeless prevention, supportive services, and emergency and transitional shelters. These include:

- Grandma's House Of Hope (addresses the needs of homeless women with or without very young children)
- Mercy House (addresses the needs of homeless and those at risk)
- Interval House (domestic violence shelter for support services to victims of domestic violence)
- 2-1-1 Orange County (provides technical support and training to homelessness service providers)
- Thomas House Temporary Shelter (food supply, shelter, and life skill resources to homeless families)
- Mercy House(seasonal homeless shelter and support services)

The City mobilizes its Section 8 Housing Choice Voucher program, to the extent possible, to address the needs of homeless individuals and families. The Housing Authority gives homeless families referred by social service and emergency/transitional shelter programs preference for Section 8 vouchers to assist in transition to stable and permanent housing.

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

According to the 2012 Orange County Ten-Year Plan to End Homelessness, the chronically homeless are the primary targets of most outreach activities presently conducted in Orange County. The two organizations most frequently involved in these efforts are the County of Orange Health Care Agency and the Mental Health Association of Orange County. These two agencies dispatch outreach teams to cities and unincorporated areas throughout the Orange County region. The Mental Health Association of Orange County has teams of workers who also conduct outreach to the chronically homeless throughout the County. These teams are dispatched on a referral basis, as well as through the agency's outreach schedule. Frequently, the Health Care Agency and the Mental Health Association collaborate and coordinate activities and services for individual clients.

Since 2005 (when planning began for Proposition 63, the Mental Health Services Act), the Orange County Health Care Agency has partnered with several private agencies to allocate resources for the homeless mentally ill, including outreach activities. This work involves comprehensive services to assist various homeless populations with mental illness including children, transitional age youth, adults, older adults, those dually diagnosed with co-occurring disorders, and those discharged from the Orange County jail system.

Also, the Orange County Health Care Agency manages several State and locally funded programs that conduct outreach to homeless individuals through workers offering mental health services, substance abuse prevention, and AIDS/HIV prevention services. Furthermore, in 2008, the Agency formed the Comprehensive Health Assessment Team-Homeless (CHAT–H) as a way to meet the growing health needs of homeless individuals in families with children. This team was instrumental in dispatching Mobile Unit Teams that provide direct client services through mobile medical vans to sites (including the Santa Ana and Fullerton Cold Weather Shelters) and select motels where homeless families reside. The Mobile Unit Team has demonstrated success in serving homeless individuals and families with children.

Some local law enforcement agencies have dedicated patrol officers to outreach to the homeless, sometimes independently and in other cases in partnership with County mental health workers. This includes one officer each with the Santa Ana and Laguna Beach police departments. Additionally, the Health Care Agency pairs two Crisis Assessment Team/Psychiatric Emergency Response Team units with the Westminster and Garden Grove Police Departments.

In addition, independent and informal outreach efforts are conducted through private organizations, including homeless service providers, faith-based organizations, service clubs, and private individuals. These services frequently include meals and/or food at local congregations, parks, and established gathering sites for people who are homeless.

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.

One of the key strategies for homeless prevention is employment development. The goal is to enhance a person's ability to obtain and keep a job, and to make an adequate income to be self-sufficient. To that end, the Garden Grove Housing Authority operates a Family Self Sufficiency Program (FSS) within its jurisdiction. FSS is a HUD program that provides the following support services: educational and/or job assessment, enrollment in an educational or job training program, childcare provisions, transportation, case management, budget counseling, and First Time Home Buyer counseling. Additional resources for employment development are described in detail under workforce training initiatives in Section MA-45 Non-Housing Community Development Assets of this Consolidated Plan.

The City works diligently to expand and conserve the affordable housing inventory, especially affordable rental housing that benefits the extremely low- and very low-income households who are most at risk of becoming homeless. The City allocates a portion of its HOME funds for tenant-based rental assistance. Additionally, lower-income households referred to the Housing Authority by local transitional housing and emergency shelters are given priority for the Section 8 program.

The Orange County Network of Care works with hospitals in the region to address their discharge policies to avoid discharging patients into homelessness. Also, the Orange County Recuperative Care Program provides basic medical and custodial care necessary to stabilize homeless patients after hospital discharge, and then connect them to social service and transitional or permanent housing programs.

Discussion

See responses above.

One year goals for the number of households to be provided housing through the use of HOPWA for:
Short-term rent, mortgage, and utility assistance to prevent homelessness of the individual or family
Tenant-based rental assistance
Units provided in housing facilities (transitional or permanent) that are being developed, leased, or operated
Units provided in transitional short-term housing facilities developed, leased, or operated with HOPWA funds
Total

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

Introduction

Lack of Affordable Housing Funds: With the dissolution of redevelopment in California, the City of Garden Grove has lost its most powerful tool and funding mechanism to provide affordable housing in the community. Funding at the State and federal levels has also continued to experience significant cuts. With reduced funding and increased housing costs, the City faces significant challenges in providing affordable and decent housing opportunities for lower-income residents.

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

Planning and Development Fees: Development fees and taxes charged by local governments contribute to the cost of housing. Building, zoning, and site improvement fees can significantly add to the cost of construction and sometimes have a negative effect on the production of affordable housing. A comparative analysis of building fees by the Building Industry Association of Orange County shows that Garden Grove has fees comparable to and in some cases lower than neighboring jurisdictions (Fountain Valley, Santa Ana, Stanton, and Westminster).

Permit and Processing Procedures: The processing time required to obtain approval of development permits is often cited as a contributing factor to the high cost of housing. For some proposed development projects, additional time is needed to complete the environmental review process before an approval can be granted. Unnecessary delays add to the cost of construction by increasing land holding costs and interest payments. In Garden Grove, the review process takes approximately two to four weeks for a typical single-family project, six to eight weeks for a typical multi-family project, approximately 10 to 12 weeks for a planned unit development, and 10 to 12 weeks for a state-licensed residential care facility serving seven or more persons. These timeframes are fairly consistent with surrounding jurisdictions. The City has worked to improve the permit process through its one-stop counter and streamlined processing. The reduction in processing time results in a shorter holding time for the developer, which translates to cost savings that should be reflected in the prices or rents for the end products.

State Prevailing Wage Requirements: The State Department of Industrial Relations expanded the kinds of projects that require the payment of prevailing wages. Prevailing wage adds to the overall cost of development.

Davis-Bacon Prevailing Wages: A prevailing wage must be paid to laborers when federal funds are used to pay labor costs for any project over $2,000 or on any multi-family project over eight units. The prevailing wage is usually higher than competitive wages, raising the cost of housing production and

rehabilitation activities. Davis-Bacon also adds to housing costs by requiring documentation of the prevailing wage compliance.

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

Market and governmental factors pose barriers to the provision of adequate and affordable housing. These factors tend to disproportionately impact lower- and moderate-income households due to their limited resources for absorbing the costs. Garden Grove works to remove barriers to affordable housing by implementing a Housing Element that is consistent with California law and taking actions to reduce costs or provide off-setting financial incentives to assist in the production of safe, high-quality, affordable housing. The City is committed to removing governmental constraints that hinder the production of housing, and offers a "one-stop" streamlined permitting process to facilitate efficient entitlement and building permit processing.

The City of Garden Grove has instituted additional actions aimed at reducing the impact of the public sector role in housing costs. City efforts to remove barriers to affordable housing include:

- Periodical analysis and revision of the zoning code aimed at developing flexible zoning provisions in support of providing an adequate supply of desirable housing, such as mixed use zoning standards and updates to the Housing Element
- Provision of affordable housing projects through acquisition and rehabilitation activities, and new construction of affordable housing units
- Establishing a streamlined service counter to reduce process time
- Density bonuses for affordable projects
- Continued assessment of existing policies, procedures, and fees to minimize unnecessary delays and expenses to housing projects

In addition, the City is in the process of updating its Analysis of Impediments to Fair Housing Choice (AI) report in coordination with other local jurisdictions. This report will identify any potential impediments to fair housing and establish a Fair Housing Action Plan to outline steps to overcome any identified impediments.

Discussion

See responses above.

AP-85 Other Actions – 91.220(k)

Introduction

This section discusses the City's efforts in addressing underserved needs, expanding and preserving affordable housing, reducing lead-based paint hazards, and developing institutional structure for delivering housing and community development activities.

Actions planned to address obstacles to meeting underserved needs

The major obstacle to addressing the underserved needs is the lack of adequate funding, especially for affordable housing activities. With the dissolution of redevelopment in California and reduced State and federal funding levels, the City's ability to address the extensive needs in the community is seriously compromised. The City will strive to leverage available funds, to the greatest extent possible, to overcome obstacles in meeting underserved needs.

The City recently adopted its 2014-2021 Housing Element, which includes a commitment to annually pursue State, federal, and other funding opportunities to increase the supply of safe, decent, affordable housing in Garden Grove for lower-income households (including extremely low-income households), such as seniors, disabled, the homeless, and those at risk of. In addition, the leveraging of available funds, to the greatest extent possible, will continue.

Actions planned to foster and maintain affordable housing

Garden Grove has several programs in place to increase and preserve the supply of affordable housing for lower-income households. One of these programs involves the acquisition and rehabilitation of properties to produce affordable units. Often the City has partnered with nonprofit organizations and developers in this endeavor. Other programs include the provision of grants for home repairs and improvements, which helps preserve existing, affordable housing. Other actions planned to maintain affordable housing in Garden Grove includes the provision of rental assistance to lower-income households and the allocation of available funds to support the development of new affordable housing units.

Actions planned to reduce lead-based paint hazards

With the possibility that 27,675 housing units in Garden Grove may contain lead-based paint, the City has an aggressive policy to identify and address lead-based paint hazards in HUD-funded housing rehabilitation projects. Where disturbed paint is observed or if paint will be disturbed as part of the rehabilitation activities, the City will ensure interim controls where lead-based paint is found. To further efforts to reduce lead-based paint hazards, the City will continue to seek partnerships with organizations like the Orange County Public Health Care Agency Public Services.

In addition, when HUD funds are used to assist in the rehabilitation of housing units, testing for lead-based paint is required; when lead-based paint is found, the abatement efforts are included in the scope of the rehabilitation assistance.

Actions planned to reduce the number of poverty-level families

Garden Grove continues to look for ways to expand economic activities to include all people and provide programs to those people who are less fortunate. In the past, the City has focused on the creation of jobs for low- and moderate-income persons through economic development in the Harbor Boulevard area. Through the Consolidated Plan and associated Action Plans, the City seeks to create and retain permanent jobs that are available to and/or filled by low- and moderate-income people. In addition, other essential elements of the City's anti-poverty strategy include:

- Section 8 Housing Choice Voucher Program
- Housing Choice Voucher Family Self Sufficiency Program
- Economic Development programs
- Workforce Investment Board outreach and training programs
- Anti-crime programs
- Housing Rehabilitation programs
- Creation of Affordable Housing
- Transitional housing and homeless service programs

Through these programs, the City is working to reduce the number of families living below the poverty line. The goals and strategies contained in this Consolidated Plan for funding housing, community development, and community services activities often directly address poverty issues through provision of funding or services, or indirectly through the creation of jobs.

In addition, the City will allocate up to 15% of its CDBG funds annually to public service agencies that offer supportive services in an effort to reduce poverty.

Actions planned to develop institutional structure

Successful program implementation requires coordination, both internally and with outside agencies. The City makes changes, as needed, to its staff assignments to address the administrative, planning, and reporting needs of CDBG, HOME, and ESG funds. Project management improvements have included strengthened project eligibility review and staff training of regulatory compliance and procedures. The City of Garden Grove Neighborhood Improvement Division of the Community Development Department serves as the lead agency in the administration and compliance of CDBG, HOME, and ESG programs and grant management. The Neighborhood Improvement Division coordinates activities related to CDBG, HOME, and ESG funds, including coordination of internal departments, outside agencies, and grant recipients.

The City's ongoing efforts in its institutional structure include strengthening project designs through negotiating stronger and more specific performance goals for project contracts. This includes ongoing education and technical assistance for program stakeholders including fellow City Departments implementing HUD-funded programs, outside contractors, the Neighborhood Improvement and Conservation Commission, the City Council, and the public in general regarding the overall objectives and eligible and ineligible uses of each of our HUD funds.

The City also amended the Citizen Participation Plan to make it more readable and to officially designate the City Council as the public hearing body. It worked closely with the Neighborhood Improvement and Conservation Commission to deepen their understanding of the CDBG, HOME, and ESG programs.

Capacity-building is another development component in within the City's institutional structure. In addition to in-house training and development of improved management systems, the City will continue to participate in all HUD training offered locally. To gather more information, build staff knowledge, and seek regional solutions to regional problems, the City participates in regional efforts such as the Orange County Continuum of Care for the Homeless.

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

Housing, supportive services, and community development activities are delivered by a number of public agencies, nonprofit entities, and private organizations. The City of Garden Grove will continue to function in a coordinating role between local non-profit service providers and other county, State, and federal organizations, as well as regional agencies and plans such as the Orange County Continuum of Care (CoC).

To enhance coordination, the City participates in regional planning groups and forums to foster collaboration with other agencies and organizations. Through collaboration, the City identifies common goals and strategies to avoid overlaps in services and programs and identify potential for leveraging resources. The City also continues to work with a wide range of public and community social service agencies to meet and address the various needs of the community. The City also utilizes the services of 211 Orange County, whose mission is to help people in the community find the help they need by eliminating the barriers to finding and accessing social services.

Discussion

See responses above.

Program Specific Requirements

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

Introduction

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.

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:

   Not applicable as the City is unable to provide homebuyer assistance due to limited funding resources.

   In 2016-17, the City will use HOME funds for new construction of affordable housing units, for acquisition with or without rehabilitation of existing multi-family rental housing, and for a Tenant Based Rental Assistance (TBRA) program to provide rental assistance to extremely low- and very low-income renters. Guidelines for HOME-funded homebuyer assistance, single-family rehabilitation, housing reconstruction, manufactured housing, refinancing, and conversion of existing structures to or from housing are therefore not described here.

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:

   While the City does not anticipate providing home buying assistance during this 2015-2020 Consolidated Plan period, in previous years the City used CalHOME and Neighborhood Stabilization Program funds to assist first-time homebuyers to purchase a home in Garden Grove. The assistance provided by the City for the First-Time Homebuyer program included recapture guidelines pursuant to 24 CFR 92.254.

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:

   The City of Garden Grove does not intend to use HOME funds to refinance existing debt secured by multifamily housing that is being rehabilitated with HOME funds.

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

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

   Please see City of Garden Grove Protocols for Administering The Emergency Solutions Grant, included in Appendix B.

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 City of Garden Grove participates in the Orange County Continuum of Care system (CoC). The Orange County CoC has established the Orange County Homeless Management Information System (HMIS), an online database used by homeless and at-risk service providers that records demographic and service usage data and produces an unduplicated count of the people using those services.

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, along with the cities of Anaheim, Santa Ana and the County of Orange, have developed the Orange County ESG collaborative. This collaborative conducts an open and competitive Request for Proposal process for making sub-awards.

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 consults with the Continuum of Care, which has former homeless individuals as members. Subcontractors who run the shelters and the rapid re-housing programs in the community have former 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 performance standards for evaluating ESG are described in the Protocols for Administration of The Emergency Solutions Grant, included in Appendix B.

Discussion

See responses above.

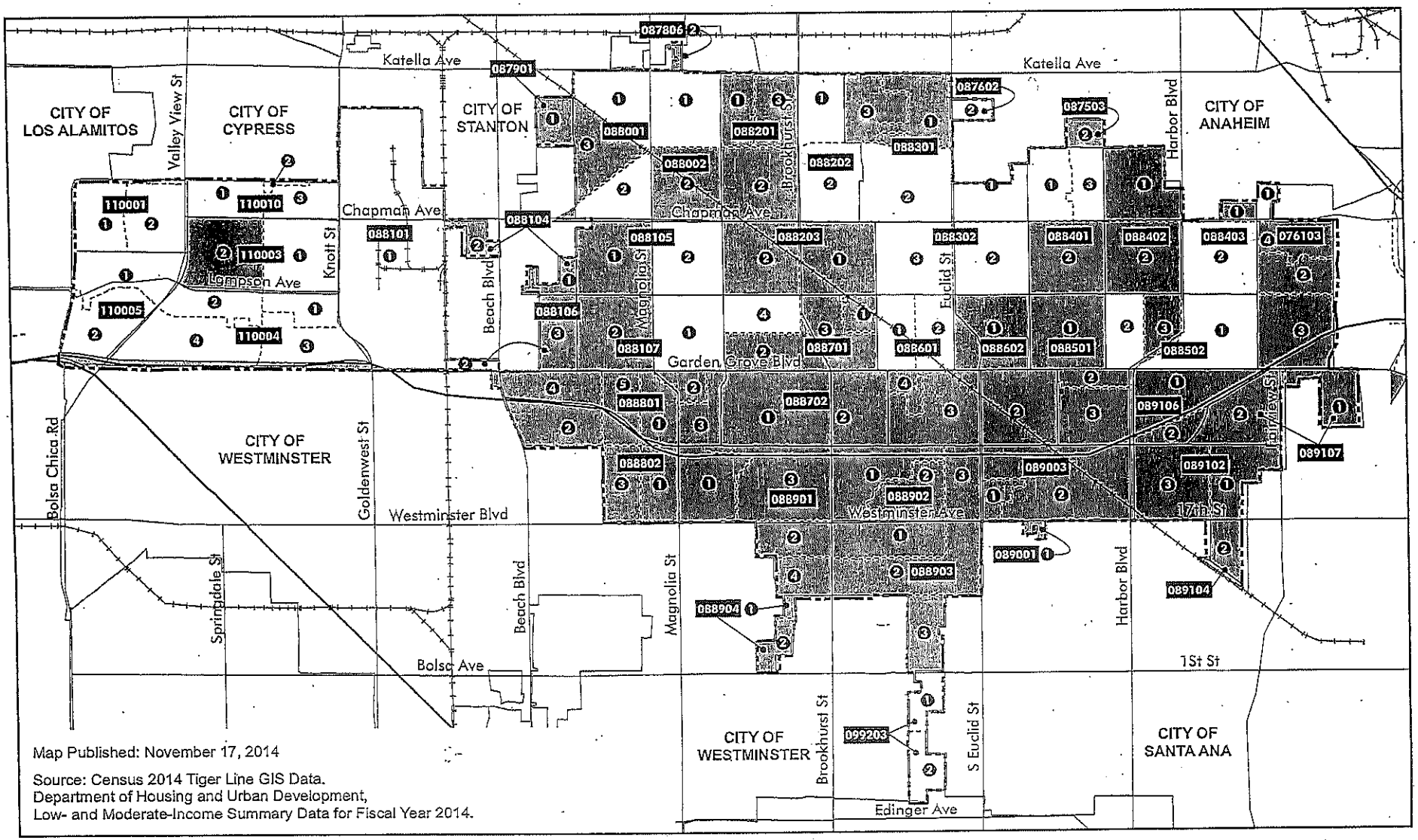
Appendix A:

Summary of Public Outreach

(to be updated at the conclusion of the Public Comment period)

Appendix B:

Maps and References



LEGEND

Lower Income Areas

Lower Income concentration is defined by Census Block Groups with 51% of households that have incomes at or below 80% of the area median income (AMI)

- Garden Grove City Boundary
- Surrounding City Boundary
- Freeway/Highway
- Major Road
- Railroad
- Census Tract
- 000000 Tract Number
- Census Block Group
- 0 Block Group Number

City of Garden Grove Lower Income Areas

2015-2020 Consolidated Plan

GARDEN GROVE

City of Garden Grove

Protocols for Administering The Emergency Solutions Grant

City of Garden Grove
COMMUNITY DEVELOPMENT DEPARTMENT
NEIGHBORHOOD IMPROVEMENT DIVISION
11222 ACACIA PARKWAY
GARDEN GROVE, CA 92840

Consultant to the City:

Lorraine Mendez & Associates

OVERVIEW

This document establishes protocols for administering the Emergency Solutions Program (ESG) and replaces previous protocols for the defunct Emergency Shelter Grants Program. The protocols herein incorporate changes in the ESG program pursuant to the Interim Rule (effective January 4, 2012), which established the regulations for the Emergency Solutions Grants Program (ESG). Unlike the former Emergency Shelter Grants Program that emphasized serving the needs of the homeless in emergency or transitional shelters, the focus of the ESG aims at "assisting people to quickly regain stability in permanent housing after experiencing a housing crisis and/or homelessness" (Interim Rule, Federal Register / Vol. 76, No. 233. p. 75954).

Regulatory Authority. The Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act of 2009, was promulgated on May 20, 2009, reauthorized and amended the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11371 et seq) consolidating three homeless assistance programs into one grant program and revising the Emergency Shelter Grants program and renaming it as the Emergency Solutions Grants (ESG) program. The HEARTH Act also codifies into law the Continuum of Care planning process.

Effective January 4, 2012, the Homeless Emergency Assistance and Rapid Transition to Housing: Emergency Solutions Grants Program and Consolidated Plan Conforming Amendments interim rule revised the regulations for the Emergency Shelter Grants program by establishing the regulations for the Emergency Solutions Grants program, which replaced the Emergency Shelter Grants program.

Objectives. The ESG Program provides funding to achieve these objectives:

- Engage homeless individuals and families living on the street;
- Improve the number and quality of emergency shelters for homeless individuals and families;
- Help operate these shelters;
- Provide essential services to shelter residents,
- Rapidly re-house homeless individuals and families, and
- Prevent families/individuals from becoming homeless.

Beneficiary Eligibility

City staff will ensure compliance by subrecipients with the minimum eligibility criteria for ESG beneficiaries:

- For essential services related to street outreach, beneficiaries must meet the criteria under paragraph (1)(i) of the "homeless" definition under 24 CFR 576.2, namely:

  An individual or family with a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, including a car, park, abandoned building, bus or train station, airport, or camping ground;

- For emergency shelter, beneficiaries must meet the "homeless" definition in 24 CFR 576.2.

(1) An individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:
(i) An individual or family with a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings ,including a car, park, abandoned building, bus or train station, airport, or camping ground;
(ii) An individual or family living in a supervised publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state, or local government programs for low income individuals); or
(iii) An individual who is exiting an institution where he or she resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution;
(2) An individual or family who will imminently lose their primary nighttime residence, provided that
:(i) The primary nighttime residence will be lost within 14 days of the date of application for homeless assistance;
(ii) No subsequent residence has been identified; and
(iii) The individual or family lacks the resources or support networks, e.g., family, friends, faith-based or other social networks, needed to obtain other permanent housing;
(3) Unaccompanied youth under 25 years of age, or families with children and youth, who do not otherwise qualify as homeless under this definition, but who:
(i) Are defined as homeless under section 387 of the Runaway and Homeless Youth Act (42 U.S.C. 5732a), section 637 of the Head Start Act (42 U.S.C. 9832), section 41403 of the Violence Against Women Act of 1994 (42 U.S.C. 14043e–2), section 330(h) of the Public Health Service Act (42 U.S.C. 254b(h)), section 3 of the Food and Nutrition Act of 2008 (7 U.S.C. 2012), section 17(b) of the Child Nutrition Act of 1966 (42 U.S.C. 1786(b)) or section 725 of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a);
(ii) Have not had a lease, ownership interest, or occupancy agreement in permanent housing at any time during the 60 days immediately preceding the date of application for homeless assistance;
(iii) Have experienced persistent instability as measured by two moves or more during the 60-day period immediately preceding the date of applying for homeless assistance; and
(iv) Can be expected to continue in such status for an extended period of time because of chronic disabilities, chronic physical health or mental health conditions, substance addiction, histories of domestic violence or childhood abuse (including neglect), the presence of a child or youth with a disability, or two or more barriers to employment, which include the lack of a high school degree or General Education Development (GED), illiteracy, low English proficiency, a history of incarceration or detention for criminal activity, and a history of unstable employment; or

(4) Any individual or family who:
(i) Is fleeing, or is attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions that relate to violence against the individual or a family member, including a child, that has either taken place within the individual's or family's primary nighttime residence or has made the individual or family afraid to return to their primary nighttime residence;
(ii) Has no other residence; and
(iii) Lacks the resources or support networks, e.g., family, friends, faith based or other social networks, to obtain other permanent housing.

- For essential services related to emergency shelter, beneficiaries must be "homeless" and staying in an emergency shelter (which could include a day shelter).
- For homelessness prevention assistance, beneficiaries must meet the requirements described in 24 CFR 576.103par. That is, those who meet the criteria under "At Risk of Homelessness", and who have an annual income below 30% of the median family income for the area. At Risk of Homelessness" means an individual or family who has an annual income below 30 percent of median family income for the area, as determined by HUD, and does not have sufficient resources or support networks.
- For rapid re-housing assistance, beneficiaries must meet requirements described in 24 CFR 576.104, that is:

Program participants who meet the criteria under paragraph (1) of the "homeless" definition in § 576.2 or who meet the criteria under paragraph (4) of the "homeless" definition and live in an emergency shelter or other place described in paragraph (1) of the "homeless" definition.

Further eligibility criteria may be established at the local level in accordance with 24 CFR 576.400(e).

Minimum Documentation. The following standards for documenting homelessness are to be monitored by City staff.

Persons living on the street	Certify that the persons served reside on the street.	Provision of services (e.g., outreach, food, health care, clothing) to persons who reside on the streets and not in shelters or other places meant for human habitation), require the outreach or service worker to sign and date a general certification that: ▪ verifies that the services are going to homeless persons, and ▪ indicates where the persons served reside.

Persons coming from living on the street (and into a place meant for human habitation)	Obtain information to indicate that the participant is coming from the street.	You must verify that an individual is coming from the street through: ▪ organizations or outreach workers who have assisted him/her in the past; ▪ determining where the resident receives assistance checks, if applicable; and/or ▪ other information regarding the participant's recent past activities. Document your verification efforts! Your staff should prepare a statement that is then signed and dated. As a last resort, if you are unable to verify in this manner that the person is coming from living on the street, the participant or a staff member may prepare a short written statement about the participant's previous living place and have the participant sign the statement and date it.
Persons coming from an emergency shelter Persons coming from a transitional housing	Verify from the emergency shelter staff that the participant has been residing at the emergency shelter. Verify with the transitional housing staff that: ▪ the participant has been residing at the transitional housing; and ▪ the participant was living on the streets or in an emergency shelter prior to living in the transitional housing facility or was discharged from an institution or evicted prior to living in the transitional housing and would have been homeless if not for the transitional housing.	You need to obtain from the referring agency a written, signed, and dated verification that the individual has been a resident of the emergency shelter. You must obtain from the referring agency two written, signed, and dated verifications: ▪ a signed statement from the transitional housing staff indicating that the individual had been a resident there; and ▪ the referring agency's written, signed, and dated verification as to the individual's homeless status when he/she entered their program. If the referring agency did not verify the individual's homeless status upon entry into their program, you will need to verify that status yourself. That is, in addition to the written, signed, and dated verification from the referring agency that the individual has been residing in the transitional housing, you need to verify their status upon entry into transitional housing and document that status according to the instructions here. (For example, if the person was living on the streets before moving into the transitional housing, you will need to obtain the documentation required under "Persons coming from living on the street" above).
Persons being evicted from a private dwelling	Have evidence of the eviction proceedings.	You need to obtain two types of information: ▪ Documentation of: ✓ the income of the participant; ✓ what efforts were made to obtain housing; and ✓ why, without the homeless assistance, the participant would be living on the street or in an emergency shelter.

		▪ Documentation of one of the following: ✓ For formal eviction proceedings, evidence that the participant was being evicted within the week before receiving homeless assistance; ✓ Where a participant's family is evicting, a signed and dated statement from a family member describing the reason for the eviction; ✓ Where there is no formal eviction process (in these cases, persons are considered evicted when they are forced out of the dwelling unit by circumstances beyond their control), two things are needed: ▪ a signed and dated statement from the participant describing the situation; and ▪ documentation and verification (through written, signed, and dated statements) of efforts to confirm that these circumstances are true.
Persons from a short term stay (up to 30 consecutive days) in an institution who previously resided on the street or in an emergency shelter	Verify from the institution staff that the participant has been residing at the institution and was homeless before entering the institution	You must obtain: ▪ written verification from the situation's staff that the participant has been residing in the institution for less that 31 days; and ▪ information on the previous living situation. Preferably, this will be the institution's written, signed, and dated verification on the individual's homeless status when he/she entered the institution. If the institution's staff did not verify the individual's homeless status upon entry into the institution, you will need to verify that status yourself, according to the instructions above (i.e., if the person was living on the streets before moving into the institution, you will need to obtain the documentation required under "Persons coming from living on the street").
Persons being discharged from a longer stay in an institution	Verify from the institution staff that the participant has been residing at the institution and will be homeless if not provided with assistance.	You need to obtain signed and dated: ▪ evidence from the institution's staff that the participant was being discharged within the week before receiving homeless assistance; and ▪ documentation of the following: ✓ the income of the participant; ✓ what efforts were made to obtain housing; and ✓ why, without the homeless assistance, the participant would be living on the street or in an emergency shelter.

Persons fleeing domestic violence	Verify that the participant is fleeing a domestic violence situation.	You must obtain written, signed, and dated verification from the participant that he/she is fleeing a domestic violence situation. If the participant is unable to prepare the verification, you may prepare a written statement about the participant's previous living situation, have the participant sign, and date it.

SALIENT ESG COMPONENTS

The following summarizes the five allowable ESG components and corresponding activities. Refer to **Exhibit 1** for a detailed summation of ESG components, activities and allowable costs.

- **Street Outreach.** Essential Services necessary to reach out to unsheltered homeless individuals and families, connect them with emergency shelter, housing, or critical services, and provide them with urgent, non-facility-based care. Component services per 24 CFR 576.101 comprise the following:

  - ✓ Engagement,
  - ✓ Case management,
  - ✓ Emergency health and mental health services,
  - ✓ Transportation.

- **Emergency Shelter.** Per 24 CFR 576.102, ESG funds may be used to renovate a building to serve as an emergency shelter. Site must serve homeless persons for at least 3 or 10 years, depending on the cost and type of renovation (major rehabilitation, conversion, or other renovation). Note: Property acquisition and new construction are ineligible.

  - ✓ Essential Services for individuals and families in emergency shelter. Component services generally consist of case management, childcare, education services, employment assistance and job training, outpatient health services, legal services, life skills training, mental health services, substance abuse treatment services, and transportation.

  - ✓ Shelter Operations, including maintenance, rent, security, fuel, equipment, insurance, utilities, and furnishings.

  - ✓ Relocation assistance for persons displaced by a project assisted with ESG funds.

  - ✓ **Homelessness Prevention.** Housing relocation and stabilization services and/or short and/or medium-term rental assistance necessary to prevent the individual or family from moving into an emergency shelter or another place described in paragraph (1) of the "homeless" definition in § 576.2.

Component services and assistance generally consist of short-term and medium-term rental assistance, rental arrears, rental application fees, security deposits, advance payment of last month's rent, utility deposits and payments, moving costs, housing search and placement, housing stability case management, mediation, legal services, and credit repair. For specific requirements and eligible costs, see 24 CFR 576.103, 576.105, and 576.106.

- **Rapid Re-Housing.** Housing relocation and stabilization services and short and/or medium-term rental assistance as necessary to help individuals or families living in an emergency shelter or other place described in paragraph (1) of the "homeless" definition move as quickly as possible into permanent housing and achieve stability in that housing.

  Component services and assistance generally consist of short-term and medium-term rental assistance, rental arrears, rental application fees, security deposits, advance payment of last month's rent, utility deposits and payments, moving costs, housing search and placement, housing stability case management, mediation, legal services, and credit repair. For specific requirements and eligible costs, see 24 CFR 576.104, 576.105, and 576.106.

The following chart summarizes the ESG components and related activities:

Components	ESG Eligible Activities						
	Renovation/ Rehab	Essential Services	Operations	Housing Relocation & Stabilization/ Financial Assistance	Housing Relocation & Stabilization/ Financial Services	Rental Assistance	
Street Outreach		✓					
Shelter	✓	✓	✓				
Homeless Prevention				✓	✓	✓	
Rapid Re-Housing				✓	✓	✓	

ESG funds are also used for the following:

- **HMIS.** Grant funds may be used for certain Homeless Management Information System (HMIS) and comparable database costs, as specified at 24 CFR 576.107.

- **Administration.** Pursuant to 24 CFR 576.108.,up to 7.5% of a recipient's fiscal year grant can be used for administrative activities, such as general management, oversight, coordination, and reporting on the program. State recipients must share administrative funds with their subrecipients who are local governments and may share with their subrecipients who are nonprofit organizations.

SALIENT MONITORING COMPONENTS

City staff will monitor subrecipients to ensure compliance with ESG requirements outlined below.

The Eligibility Evaluation form and the Subrecipient Agreement will include the following performance objective and performance outcome by ESG activity category.

ESG Activity Category in IDIS	Performance Objective: Create Suitable Living Environments	Performance Objective: Provide Decent Affordable Housing	Performance Outcome: Availability/ Accessibility	Performance Outcome: Affordability
Shelter	✓		✓	
Street Outreach	✓		✓	
Homeless Prevention		✓		✓
Rapid Re-Housing		✓		✓

Obligation & Expenditure Deadlines

In accordance with 24 CFR 576.203, the City is to adhere to the following deadlines:

ESG Timeliness Requirement	Timeframe
Obligate funds (from the date HUD signs the grant agreement)	60 Days
Select subrecipient organizations	120 Days
Reimburse subrecipient organizations	30 Days
Expend all ESG funds	2 Years

In addition, an Emergency Shelter facility must be maintained and used for the homeless based upon minimum time periods (See 24 CFR 576.102(c)(1)) according to the types of activities assisted with ESG funds. Emergency Shelter Facilities (24 CFR 576.2) comprise facilities primarily intended to provide a temporary shelter for the homeless in general or for specific populations of the homeless and which do not require occupants to sign leases or occupancy agreements.

Emergency Shelter Activities	Timeframe
Major Rehabilitation	10 years after the date the building is first occupied by a homeless individual or family after the completed Rehabilitation, if Rehabilitation costs exceed 75 percent (75%) of the value of the building before Rehabilitation. A recorded deed or use restriction is required.
Conversion	10 years after the date the building is first occupied by a homeless individual or family after the completed Conversion, if Conversion costs exceed 75 percent of the value of the building after Conversion. A recorded deed or use restriction is required.
Renovation	3 years after the date the building is first occupied by a homeless individual or family after the completed Renovation.
Shelter Operations or	Term of the Standard Agreement, without regard to a particular site or structure, so long as the

Essential Services	Applicant serves the same type of persons (e.g., families with children, unaccompanied youth, veterans, disabled individuals, or victims of domestic violence) or persons in the same geographic area.

GENERAL REQUIREMENTS

Along with monitoring activity eligibility, cost eligibility and proper documentation to support beneficiary eligibility, City staff will also ensure compliance with the following general requirements.

- **Uniform Administrative Requirement.** ESG regulations at 24 CFR 576.407(c) require the governmental agencies apply 24 CFR Part 85, except for 24 CFR 85.24 and 85.42 , and program income is to be used as match under 24 CFR 85.25 (g). The requirements of 24 CFR Part 84 apply to Private Nonprofit subrecipients, except for 24 CFR 84.23 and 84.53, and program income is to be used as the non-Federal share under 24 CFR 84.24 (b).

- **Homeless Participation**. Under 24 CFR 576.405 the City is ensure subrecipients provide for the participation of not less than one homeless individual or formerly homeless individual on the Board of Directors or other equivalent policy-making entity, to the extent that the entity considers and makes policies and decisions regarding any facilities, services or other assistance that receives funding under ESG.

- **Program Termination**. The City will review the termination/denial policy in each subrecipient's Written Standards to verify that the following minimal components are included: a progressive discipline warning system, written notices, a formal appeal process, and consideration of the appeal by someone not involved in the original termination. Staff will also monitor each subrecipient's compliance with ESG regulations at 24 CFR 576.402 to ascertain whether persons or families receiving assistance who violate program requirements are terminated only in the most severe cases. The subrecipient is required to terminate assistance in accordance with a formal process that has been established and that recognizes the rights of individuals or families affected.

City staff will monitor compliance with the following area-wide systems coordination requirements pursuant to 24 CFR 576.400.

- **Consultation with CoCs.** Staff will assist subrcipients are to consult with the CoC to (1) determine how ESG funds will be allocated in that region; (2) identify the performance standards for evaluating the outcomes of projects and activities; and (3) identify the funding, policies and procedures for the administration and operation of the HMIS, if appropriate

- **Coordination with Other Targeted Homeless Services**. City staff will monitor subrecipients to verify that other programs are targeted to homeless people in the area covered by the CoC to provide a strategic, community-wide system to prevent and end homelessness for that area.

- **System and Program Coordination with Mainstream Resources**. The subrecipient is to coordinate and integrate ESG-funded activities with mainstream housing, health, social services, employment, education, and youth programs for which families and individuals at risk of homelessness and homeless individuals and families may be eligible.

- **Centralized or Coordinated Assessment**. Each ESG-funded subrecipient is to work with the CoC to ensure the screening, assessment and referral of participants are consistent with the Written Standards. A Victim Service Provider may choose not to use the CoC Centralized or Coordinated Assessment System.

- **Written Standards** .Once the CoC has developed Written Standards in accordance with the requirements outlined in 24 CFR 576.400(e)(2)(3), Each subrecipient is to use the CoC's Written Standards.

- **Participation in HMIS.** The subrecipient is to ensure that data on all persons served and all activities assisted under ESG are entered into the applicable community-wide HMIS in the area in which those persons and activities are located, or a comparable database in accordance with HUD's standards on participation, data collection and reporting under a local HMIS. If the subrecipient is a Victim Service Provider or a Legal Services Provider, it may use a comparable database that collects client level data over time (i.e., longitudinal data) and generates unduplicated aggregate reports based on the data. Information entered into a comparable database must not be entered directly into or provided to an HMIS.

City staff will monitor each subrecipient's compliance with other federal and state requirements set forth at 24 CFR 576.406-576.408.

- Per 24 CFR 576.407(a), the subrecipient is to adhere to the requirements in 24 CFR Part 5, Subpart A, including the nondiscrimination and equal opportunity requirements at 24 CFR 5.105(a). Section 3 of the Housing and Urban Development Act of 1968, 12 U.S.C. 41701u, and implementing regulations at 24 CFR Part 135 apply, except that homeless individuals have priority over other Section 3 residents in accordance with 24 CFR 576.405(c).

- **Faith-Based Activities**. Religious organizations may receive ESG funds if agreeable to providing all eligible ESG activities in a manner that is in accordance with 24 CFR 576.406. ESG funds may not be used for the rehabilitation of structures if those structures are used for inherently religious activities. Where a structure is used for both eligible and inherently religious activities, funds may not exceed the cost of those portions of the rehabilitation that are attributable to eligible activities in accordance with the federal cost accounting requirements. Sanctuaries, chapels, or other rooms the religious congregation uses as its principal place of worship are ineligible for ESG-funded

improvements. Disposition of real property after the term of the grant, or any change in use of the property during the term of the grant, is subject to government-wide regulations governing real property disposition (See 24 CFR Parts 84 and 85).

- Organizations that are religious or faith-based are eligible to receive ESG funds but may not engage in inherently religious activities, such as worship, religious instruction, or proselytization as part of the programs or services funded under ESG. Refer to 24 CFR 576.406 for additional details.

- **Affirmative Outreach.** As required under 24 CFR 576.407(b), the subrecipient is to establish procedures that ensure the use of the facilities, assistance, and services are available to all on a nondiscriminatory basis.

- **Displacement, Relocation, and Acquisition**. In accordance with 24 CFR 576.408, the displacement of persons as a result of a Components/Activities assisted with ESG funds must be provided Relocation Assistance pursuant to the URA and 49 CFR Part 24. Temporary relocation is not permitted. No tenant occupant of housing (a dwelling unit) that is converted into an Emergency Shelter may be required to relocate temporarily for a Component/Activity assisted with ESG funds or be required to move to another unit in the same building/complex. The acquisition of real property, whether funded privately or publicly, for a Component/Activity assisted with ESG funds is subject to the URA and the federal government-wide regulations at 49 CFR Part 24, Subpart B. Refer to 24 CFR 576.408 for additional details.

- **Match**. City staff will monitor matching contributions from each subrecipient to verify that the amount of match equals the amount of ESG funds received per 24 CFR 576.201, and that the match sources include any federal source other than the ESG Program, as well as State, local, and private sources (see 24 CFR 576.201).

- **Shelter and Housing Standards.** City staff will require per 24 CFR 576.403 that any ESG-assisted shelter to meet minimum Habitability Standards. Shelters renovated with ESG funds, are to meet State or local government Safety and Sanitation Standards, as applicable, include energy-efficient appliances and materials, as well as incorporate lead-based paint remediation and disclosure requirements.

- **Recordkeeping and Reporting Requirements.** City staff will monitor subrecipients have written policies and procedures to ensure that ESG funds are used in accordance with requirements at 24 CFR 576.500. In addition, sufficient records must be established and maintained to enable HCD and HUD to determine whether ESG requirements are being met. Refer to for additional details. (24 CFR 576.500):

- ✓ **Homeless status.** Follow written intake procedures to ensure compliance with the homeless definition in § 576.2. The procedures must require documentation at intake of the evidence relied upon to establish and verify homeless status.
- ✓ **At risk of homelessness status.** For each individual or family who receives ESG homelessness prevention assistance, the records must include the evidence relied upon to establish and verify the individual or family's "at risk of homelessness" status. This evidence must include an intake and certification form that meets HUD specifications.
- ✓ **Determinations of ineligibility.** For each individual and family determined ineligible to receive ESG assistance, the record must include documentation of the reason for that determination.
- ✓ **Annual income.** For each program participant who receives homelessness prevention assistance, or who receives rapid re-housing assistance longer than one year
  - ➢ Income evaluation form completed by the subrecipient; and
  - ➢ Source documents for the assets held by the program participant and income received over the most recent period (*e.g.*, wage statement, unemployment compensation statement, public benefits statement, bank statement);
  - ➢ If source documents are unobtainable, a written statement by the relevant third party (*e.g.*, employer, government benefits administrator) or the written certification by the subrecipient's intake staff of the oral verification by the relevant third party of the income the program participant received over the most recent period for which representative data is available; or
  - ➢ If source documents and third party verification are unobtainable, the written certification by the program participant of the amount of income the program participant received for the most recent period representative of the income that the program participant is expected to receive over the 3-month period following the evaluation.
- ✓ ***Program participant records.*** In addition to evidence of homeless status or "at risk of homelessness" status, as applicable, records must be kept for each program participant that document:
  - ➢ The services and assistance provided to program participant, including the security deposit, rental assistance, and utility payments made on behalf of the program participant;
  - ➢ Compliance with the applicable requirements for providing services and assistance to t program participant under the program components and eligible activities provisions at § 576.101 through §576.106, the provision on determining eligibility and amount and type of assistance at § 576.401(a) and (b), and the provision on using appropriate assistance and services at § 576.401(d) and (e); and
  - ➢ Where applicable, compliance with the termination of assistance requirement in § 576.402.

- ✓ ***Centralized or coordinated assessment systems and procedures.*** Documentation evidencing written intake procedures for, the centralized or coordinated assessment system(s) developed by the CoC.
- ✓ ***Rental assistance agreements and payments.*** The records must include copies of all leases and rental assistance agreements for the provision of rental assistance, documentation of payments made to owners for the provision of rental assistance, and supporting documentation for these payments, including dates of occupancy by program participants.
- ✓ ***Utility allowance.*** The records must document the monthly allowance for utilities (excluding telephone) used to determine compliance with the rent restriction.
- ✓ ***Shelter and housing standards.*** Documentation of compliance with the shelter and housing standards in § 576.403, including inspection reports.
- ✓ ***Emergency shelter facilities.*** The amount and type of assistance provided to each emergency shelter.
- ✓ ***Services and assistance provided.*** Types of essential services, rental assistance, and housing stabilization and relocation services and the amounts spent on these services and assistance. Subrecipients that are units of general-purpose local government must keep records to demonstrate compliance with the maintenance of effort requirement, including records of the unit of the general-purpose local government's annual budgets and sources of funding for street outreach and emergency shelter services.
- ✓ ***Coordination with CoC and other programs.*** Document their compliance with the requirements of § 576.400 for consulting with the CoC and coordinating and integrating ESG assistance with programs targeted toward homeless people and mainstream service and assistance programs.
- ✓ ***HMIS.*** Records of the participation in HMIS or a comparable database by all projects.
- ✓ ***Matching.*** The recipient must keep records of the source and use of contributions made to satisfy the matching requirement in § 576.201. The records must indicate the particular fiscal year grant for which each matching contribution is counted. The records must show how the value placed on third party, noncash contributions was derived. To the extent feasible, volunteer services must be supported by the same methods that the organization uses to support the allocation of regular personnel costs.
- ✓ ***Conflicts of interest.*** Records to show compliance with the organizational conflicts-of-interest requirements in § 576.404(a), a copy of the personal conflicts of interest policy or codes of conduct developed and implemented to comply with the requirements in §576.404(b), and records supporting exceptions to the personal conflicts of interest prohibitions.
- ✓ ***Homeless participation.*** Document compliance with the homeless participation requirements under § 576.405.
- ✓ ***Faith-based activities.*** Document compliance with the faith-based activities requirements under § 576.406.
- ✓ ***Other Federal requirements.*** Document compliance with the Federal requirements in § 576.407, as applicable, including:

- Records demonstrating compliance with the nondiscrimination and equal opportunity requirements under § 576.407(a), including data concerning race, ethnicity, disability status, sex, and family characteristics of persons and households who are applicants for, or program participants in, any program or activity funded in whole or in part with ESG funds and the affirmative outreach requirements in § 576.407(b).
- Records demonstrating compliance with the uniform administrative requirements in 24 CFR part 85(for governments) and 24 CFR part 84 (for nonprofit organizations).
- Records demonstrating compliance with the environmental review requirements, including flood insurance requirements.
- Certifications and disclosure forms required under the lobbying and disclosure requirements in 24 CFR part 87.

✓ ***Relocation.*** Document compliance with the displacement, relocation, and acquisition requirements in § 576.408.

✓ ***Financial records.***

- Supportive documentation for all costs charged to the ESG grant.
- Documentation showing that ESG grant funds were spent on allowable costs in accordance with the requirements for eligible activities under § 576.101-§576.109 and the cost principles in OMB Circulars A-87 (2 CFR part 225) and A-122 (2 CFR part 230).
- Records of the receipt and use of program income.
- Documentation of compliance with the expenditure limits in § 576.100 and the expenditure deadline in § 576.203.

✓ ***Subrecipients and contractors.***

- The recipient must retain copies of all solicitations of and agreements with subrecipients, records of all payment requests by and dates of payments made to subrecipients, and documentation of all monitoring and sanctions of subrecipients, as applicable. If the recipient is a State, the recipient must keep records of each recapture and distribution of recaptured funds under § 576.501.
- The recipient and its subrecipients must retain copies of all procurement contracts and documentation of compliance with the procurement requirements in 24 CFR 85.36 and 24 CFR 84.40-84.48.
- The recipient must ensure that its subrecipients comply with the recordkeeping requirements specified by the recipient and HUD notice or regulations.

✓ ***Confidentiality.***

- Written procedures to ensure:
  - ☐ All records containing personally identifying information 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; and

- ☐ The address or location of any housing of a program participant will not be made public, except as provided under a preexisting privacy policy of the recipient or subrecipient and consistent with state and local laws regarding privacy and obligations of confidentiality.
- ☐ Written confidentiality procedures.

✓ ***Period of record retention.*** All records pertaining to each fiscal year of ESG funds must be retained for the greater of 5 years or the period specified below.

- ☐ Documentation of each program participant's qualification as a family or individual at risk of homelessness or as a homeless family or individual and other program participant records must be retained for 5 years after the expenditure of all funds from the grant under which the program participant was served;
- ☐ Where ESG funds are used for the renovation of an emergency shelter involves costs charged to the ESG grant that exceed 75 percent of the value of the building before renovation, records must be retained until 10 years after the date that ESG funds are first obligated for the renovation; and
- ☐ Where ESG funds are used to convert a building into an emergency shelter and the costs charged to the ESG grant for the conversion exceed 75 percent of the value of the building after conversion, records must be retained until 10 years after the date that ESG funds are first obligated for the conversion.

✓ ***Access to records.***

- ➢ ***Federal government rights.*** Notwithstanding the confidentiality procedures established under paragraph (w) of this section, HUD, the HUD Office of the Inspector General, and the Comptroller General of the United States, or any of their authorized representatives, must have the right of access to all books, documents, papers, or other records pertinent to the ESG grant, in order to make audits, examinations, excerpts, and transcripts. These rights of access are not limited to the required retention period but last as long as the records are retained.
- ➢ ***Public rights.*** Provide citizens, public agencies, and other interested parties with reasonable access (consistent with state and local laws regarding privacy and obligations of confidentiality and the confidentiality requirements in this part) to records regarding any uses of ESG funds the recipient received during the preceding 5 years.
- ➢ ***Reports.*** The recipient must collect and report data on its use of ESG funds in the Integrated Disbursement and Information System (IDIS) and other reporting systems, as specified by HUD. The recipient must also comply with the reporting requirements in 24 CFR parts 85 and 91 and the reporting requirements under the Federal Funding Accountability and Transparency Act of 2006, (31 U.S.C. 6101 note), which are set forth in appendix A to 2 CFR part 170.

THE MONITORING PROCESS

Monitoring of ESG-assisted activities takes place on a quarterly and annual basis.

Quarter Reports

Each quarter, subrecipients submit an ESG Subgrantee Report **(Exhibit 2)**, which City staff use to monitor performance measured against the requirements initially outlined in the Eligibility Evaluation **(Exhibit 3)** and Subrecipient Agreement **(Exhibit 4).**

Desk Audit

Desk reviews are done at the City and entail a review of reports and other documentation that are submitted to the City that help the City understand how well a project is managed, and whether it is achieving its goals and compliance obligations.

At the close of each program year, City staff issue a monitoring letter **(Exhibit 5: Monitoring Notification Letter: On-Site Visit** or **Exhibit 6: Annual Monitoring Notification Letter: Desk Audit)** will be sent to the subrecipient transmitting the following documents to be completed and returned to the City prior to the scheduled monitoring visit:

- **Monitoring Notification Letter: Desk Audit**
  A Monitoring Notification Letter: Desk Audit will be sent to the owner/property manager detailing the salient terms of the Subrecipient Agreement that will be the source of monitoring.

- **Monitoring Checklist**
  This report collects information as a basis for conclusions to be included in the Monitoring Summary letter and follow-up **(Exhibit 7: Monitoring Checklist)**.

- **Monitoring Summary**
  A Monitoring Summary Letter will be provided to the subrecipient that serves as the formal notification of the results of the monitoring. All negative conclusions will be considered a finding or concern with a specific required corrective action. A copy is retained in the Project monitoring file.

  - ✓ A "finding" is a deficiency in project performance evidencing an unmet statutory or regulatory requirement.

  - ✓ A "concern" relates to project performance-requiring improvement before becoming a finding.

  The subrecipient is to provide a written response within 30 days of the date of the Monitoring Summary letter. Upon completion of all corrective actions, a letter is sent to the owner/property manager stating that the monitoring findings and concerns have been closed. A copy is retained in the Project monitoring file.

ON-SITE VISIT

On-site monitoring enables the City to conduct a more in-depth level of review than the desk review and entails a visit to the office of the owner or property manager to review documents and source information, as well as observe operations. On-site monitoring is necessary when the risk analysis or desk review suggests that there may be problems, or if a protracted period of time has elapsed since the last visit.

The following steps are to be taken when monitoring ***on-site***:

- **Monitoring Notification Letter: On-Site Visit**
  A Monitoring Notification Letter: On-Site Visit will be sent to the owner/property manager at least two weeks in advance of the monitoring visit. The letter will detail the salient terms of the Subrecipient Agreement that will be the source of monitoring. The letter will also notify the owner/property manager of the date and time of an interview that will be conducted to make sure that the owner and/or manager thoroughly understands the purpose, scope, and schedule for the monitoring.

In addition to the aforementioned reports, these items also are to be reviewed:

- **Monitoring Summary**
  After the monitoring visit, a Monitoring Summary letter is forwarded to the subrecipient that serves as the formal notification of the results of the monitoring. All negative conclusions are considered a finding or concern with a specific required corrective action. If relevant, the letter may stipulate steps initiated by the owner/property manager to correct areas of noncompliance or nonperformance. A copy is retained in the Project monitoring file.

  ✓ A "finding" is a deficiency in project performance evidencing an unmet statutory or regulatory requirement.

  ✓ A "concern" relates to project performance requiring improvement before becoming a finding.

  The owner/property manager is to provide a written response within 30 days of the date of the Monitoring Summary letter. Upon completion of all corrective actions, a letter is sent to the owner/property manager stating that the monitoring findings and concerns have been closed. A copy is retained in the Project monitoring file.

APPENDIX

Exhibit 1: Summary of Eligible Components, Activities and Expenses

Exhibit 2: ESG Subgrantee Report

Exhibit 3: Eligibility Evaluation

Exhibit 4: Subrecipient Agreement

Exhibit 5: Monitoring Notification Letter: On-Site Visit

Exhibit 6: Annual Monitoring Notification Letter: Desk Audit

Exhibit 7: Monitoring Checklist

Exhibit 8: Monitoring Schedule

Exhibit 1

Summary of Eligible Components, Activities and Expenses

Exhibit 2
ESG Subgrantee Report

Exhibit 3
Eligibility Evaluation

Exhibit 4
Subrecipient Agreement

Exhibit 5
Monitoring Notification Letter: On-Site Visit

Exhibit 6
Annual Monitoring Notification Letter: Desk Audit

Exhibit 7
Monitoring Checklist

Exhibit 8
Monitoring Schedule

Appendix C:

SF 424 Forms and Certifications

OMB Number: 4040-0004
Expiration Date: 8/31/2016

Application for Federal Assistance SF-424

* 1. Type of Submission:
- [ ] Preapplication
- [x] Application
- [ ] Changed/Corrected Application

* 2. Type of Application:
- [ ] New
- [x] Continuation
- [ ] Revision

* If Revision, select appropriate letter(s):

* Other (Specify):

* 3. Date Received: 03/07/2016

4. Applicant Identifier: B-13-MC-07-0505

5a. Federal Entity Identifier:

5b. Federal Award Identifier: N/A

State Use Only:

6. Date Received by State:

7. State Application Identifier:

8. APPLICANT INFORMATION:

* a. Legal Name: City of Garden Grove

* b. Employer/Taxpayer Identification Number (EIN/TIN): 95-6005848

* c. Organizational DUNS: 0095964950000

d. Address:

* Street1: 11222 Acacia Parkway
Street2:
* City: Garden Grove
County/Parish: Orange
* State: CA: California
Province:
* Country: USA: UNITED STATES
* Zip / Postal Code: 92840-5208

e. Organizational Unit:

Department Name: Community Development

Division Name: Neighborhood Improvement

f. Name and contact information of person to be contacted on matters involving this application:

Prefix:
* First Name: Allison
Middle Name:
* Last Name: Mills
Suffix:

Title: Neighborhood Improvement Manager

Organizational Affiliation:

* Telephone Number: (714) 741-5139
Fax Number: (714)741-5136

* Email: allisonj@garden-grove.org

Application for Federal Assistance SF-424

*** 9. Type of Applicant 1: Select Applicant Type:**

C: City or Township Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

*** 10. Name of Federal Agency:**

Housing and Urban Development (HUD)

11. Catalog of Federal Domestic Assistance Number:

14-218

CFDA Title:

Community Development Block Grant Program

*** 12. Funding Opportunity Number:**

N/A

* Title:

N/A

13. Competition Identification Number:

Title:

14. Areas Affected by Project (Cities, Counties, States, etc.):

Add Attachment | Delete Attachment | View Attachment

*** 15. Descriptive Title of Applicant's Project:**

Continue implementation of CDBG programs to stimulate affordable housing preservation and expansion, economic development, neighborhood improvement, and community services.

Attach supporting documents as specified in agency instructions.

Add Attachments | Delete Attachments | View Attachments

Application for Federal Assistance SF-424

16. Congressional Districts Of:

* a. Applicant: CA-047 | * b. Program/Project: CA-047

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

Add Attachment | Delete Attachment | View Attachment

17. Proposed Project:

* a. Start Date: 07/01/2016 | * b. End Date: 06/30/2017

18. Estimated Funding ($):

* a. Federal	1,931,623.00
* b. Applicant	
* c. State	
* d. Local	
* e. Other	
* f. Program Income	
* g. TOTAL	1,931,623.00

*** 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 on .

☐ b. Program is subject to E.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.)**

☐ Yes ☒ No

If "Yes", provide explanation and attach

Add Attachment | Delete Attachment | View Attachment

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 218, Section 1001)**

☒ ** 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:

Prefix: | * First Name: Scott

Middle Name:

* Last Name: Stiles

Suffix:

* Title: City Manager

* Telephone Number: (714)741-5100 | Fax Number: (714)741-5044

* Email: sstiles@garden-grove.org

* Signature of Authorized Representative: | * Date Signed:

OMB Number: 4040-0004
Expiration Date: 8/31/2016

Application for Federal Assistance SF-424

* 1. Type of Submission:
- [ ] Preapplication
- [x] Application
- [ ] Changed/Corrected Application

* 2. Type of Application:
- [ ] New
- [x] Continuation
- [ ] Revision

* If Revision, select appropriate letter(s):

* Other (Specify):

* 3. Date Received: 03/07/2016

4. Applicant Identifier: S-13-MC-07-0505

5a. Federal Entity Identifier:

5b. Federal Award Identifier: N/A

State Use Only:

6. Date Received by State:

7. State Application Identifier:

8. APPLICANT INFORMATION:

* a. Legal Name: City of Garden Grove

* b. Employer/Taxpayer Identification Number (EIN/TIN): 95-6005848

* c. Organizational DUNS: 0095964950000

d. Address:

* Street1: 11222 Acacia Parkway
Street2:
* City: Garden Grove
County/Parish:
* State: CA: California
Province:
* Country: USA: UNITED STATES
* Zip / Postal Code: 92840-5208

e. Organizational Unit:

Department Name: Community Development

Division Name: Neighborhood Improvement

f. Name and contact information of person to be contacted on matters involving this application:

Prefix:
* First Name: Allison
Middle Name:
* Last Name: Mills
Suffix:

Title: Neighborhood Improvement Manager

Organizational Affiliation:

* Telephone Number: 714-741-5139
Fax Number: 714-741-5136

* Email: allisonj@ci.garden-grove.ca.us

Application for Federal Assistance SF-424

*** 9. Type of Applicant 1: Select Applicant Type:**

C: City or Township Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

*** 10. Name of Federal Agency:**

Housing and Urban Development (HUD)

11. Catalog of Federal Domestic Assistance Number:

14-231

CFDA Title:

Emergency Solutions Grant (ESG)

*** 12. Funding Opportunity Number:**

N/A

* Title:

N/A

13. Competition Identification Number:

Title:

14. Areas Affected by Project (Cities, Counties, States, etc.):

Add Attachment | Delete Attachment | View Attachment

*** 15. Descriptive Title of Applicant's Project:**

Implementation of the ESG programs to provide homeless prevention and rapid rehousing.

Attach supporting documents as specified in agency instructions.

Add Attachments | Delete Attachments | View Attachments

Application for Federal Assistance SF-424

16. Congressional Districts Of:

* a. Applicant: CA-047 | * b. Program/Project: CA-047

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

Add Attachment | Delete Attachment | View Attachment

17. Proposed Project:

* a. Start Date: 07/01/2016 | * b. End Date: 06/30/2017

18. Estimated Funding ($):

* a. Federal	174,448.00
* b. Applicant	
* c. State	
* d. Local	
* e. Other	
* f. Program Income	
* g. TOTAL	174,448.00

*** 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 on .

☐ b. Program is subject to E.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.)**

☐ Yes ☒ No

If "Yes", provide explanation and attach

Add Attachment | Delete Attachment | View Attachment

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 218, Section 1001)**

☒ ** 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:

Prefix: | * First Name: Scott

Middle Name:

* Last Name: Stiles

Suffix:

* Title: City Manager

* Telephone Number: 714-741-5100 | Fax Number: 714-741-5044

* Email: sstiles@ci.garden-grove.ca.us

* Signature of Authorized Representative: | * Date Signed:

OMB Number: 4040-0004
Expiration Date: 8/31/2016

Application for Federal Assistance SF-424

* 1. Type of Submission:
- [ ] Preapplication
- [x] Application
- [ ] Changed/Corrected Application

* 2. Type of Application:
- [ ] New
- [x] Continuation
- [ ] Revision

* If Revision, select appropriate letter(s):

* Other (Specify):

* 3. Date Received: 03/07/2016

4. Applicant Identifier: M-13-MC-07-0511

5a. Federal Entity Identifier:

5b. Federal Award Identifier: N/A

State Use Only:

6. Date Received by State:

7. State Application Identifier:

8. APPLICANT INFORMATION:

* a. Legal Name: City of Garden Grove

* b. Employer/Taxpayer Identification Number (EIN/TIN): 95-6005848

* c. Organizational DUNS: 0095964950000

d. Address:

* Street1: 11222 Acacia Parkway
Street2:
* City: Garden Grove
County/Parish: Orange
* State: CA: California
Province:
* Country: USA: UNITED STATES
* Zip / Postal Code: 92840-5208

e. Organizational Unit:

Department Name: Community Development

Division Name: Neighborhood Improvement

f. Name and contact information of person to be contacted on matters involving this application:

Prefix:
* First Name: Allison
Middle Name:
* Last Name: Mills
Suffix:

Title: Neighborhood Improvement Manager

Organizational Affiliation:

* Telephone Number: (714) 741-5139
Fax Number: (714)741-5136

* Email: allisonj@garden-grove.org

Application for Federal Assistance SF-424

*** 9. Type of Applicant 1: Select Applicant Type:**

C: City or Township Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

*** 10. Name of Federal Agency:**

Housing and Urban Development (HUD)

11. Catalog of Federal Domestic Assistance Number:

14-239

CFDA Title:

Home Investment Partnership Act (HOME)

*** 12. Funding Opportunity Number:**

N/A

* Title:

N/A

13. Competition Identification Number:

Title:

14. Areas Affected by Project (Cities, Counties, States, etc.):

Add Attachment | Delete Attachment | View Attachment

*** 15. Descriptive Title of Applicant's Project:**

Continue implementation of affordable single and multi-family affordable housing expansion through acquisition/rehabilitation, often in partnership with and leveraging resources, and through rentals.

Attach supporting documents as specified in agency instructions.

Add Attachments | Delete Attachments | View Attachments

Application for Federal Assistance SF-424

16. Congressional Districts Of:

* a. Applicant: CA-047 | * b. Program/Project: CA-047

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

Add Attachment | Delete Attachment | View Attachment

17. Proposed Project:

* a. Start Date: 07/01/2016 | * b. End Date: 06/30/2017

18. Estimated Funding ($):

* a. Federal	485,556.00
* b. Applicant	
* c. State	
* d. Local	
* e. Other	
* f. Program Income	
* g. TOTAL	485,556.00

*** 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 on .

☐ b. Program is subject to E.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.)**

☐ Yes ☒ No

If "Yes", provide explanation and attach

Add Attachment | Delete Attachment | View Attachment

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 218, Section 1001)**

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** 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:

Prefix: | * First Name: Scott

Middle Name:

* Last Name: Stiles

Suffix:

* Title: City Manager

* Telephone Number: (714)741-5100 | Fax Number: (714)741-5044

* Email: sstiles@garden-grove.org

* Signature of Authorized Representative: | * Date Signed:

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 antidisplacement and relocation assistance plan required under section 104(d) of the Housing and Community Development Act of 1974, as amended, in connection with any activity assisted with funding under the CDBG or HOME programs.

Drug Free Workplace -- It will or will continue to provide a drug-free workplace by:

1. Publishing a statement notifying employees that the unlawful manufacture, distribution, dispensing, possession, or use of a controlled substance is prohibited in the grantee's workplace and specifying the actions that will be taken against employees for violation of such prohibition;

2. Establishing an ongoing drug-free awareness program to inform employees about –

   (a) The dangers of drug abuse in the workplace;
   (b) The grantee's policy of maintaining a drug-free workplace;
   (c) Any available drug counseling, rehabilitation, and employee assistance programs; and
   (d) The penalties that may be imposed upon employees for drug abuse violations occurring in the workplace;

3. Making it a requirement that each employee to be engaged in the performance of the grant be given a copy of the statement required by paragraph 1;

4. Notifying the employee in the statement required by paragraph 1 that, as a condition of employment under the grant, the employee will –

(a) Abide by the terms of the statement; and
(b) Notify the employer in writing of his or her conviction for a violation of a criminal drug statute occurring in the workplace no later than five calendar days after such conviction;

5. Notifying the agency in writing, within ten calendar days after receiving notice under subparagraph 4(b) from an employee or otherwise receiving actual notice of such conviction. Employers of convicted employees must provide notice, including position title, to every grant officer or other designee on whose grant activity the convicted employee was working, unless the Federal agency has designated a central point for the receipt of such notices. Notice shall include the identification number(s) of each affected grant;

6. Taking one of the following actions, within 30 calendar days of receiving notice under subparagraph 4(b), with respect to any employee who is so convicted -

(a) Taking appropriate personnel action against such an employee, up to and including termination, consistent with the requirements of the Rehabilitation Act of 1973, as amended; or
(b) Requiring such employee to participate satisfactorily in a drug abuse assistance or rehabilitation program approved for such purposes by a Federal, State, or local health, law enforcement, or other appropriate agency;

7. Making a good faith effort to continue to maintain a drug-free workplace through implementation of paragraphs 1, 2, 3, 4, 5 and 6.

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 it, 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 extension, continuation, renewal, amendment, or modification 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-LLL, "Disclosure Form to Report 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 tiers (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

Date

City Manager
Title

CERTIFICATIONS

The Entitlement Community certifies that:

Citizen Participation -- It is in full compliance and following a detailed citizen participation plan that satisfies the requirements of 24 CFR 91.105.

Community Development Plan --Its consolidated housing and community development plan identifies community development and 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 CFR 24 570.2 and CFR 24 part 570)

Following a Plan -- It is following a current 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 which benefit low and moderate income families or aid in the prevention or elimination of slums or blight. The Action Plan may also include activities which the grantee certifies are designed to meet other community development needs having a particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community, and other financial resources are not available);

2. Overall Benefit. The aggregate use of CDBG funds including section 108 guaranteed loans during program year 2016-17, a period specified by the grantee consisting of one specific consecutive program year, shall principally benefit persons of low and moderate income in a manner that ensures that at least 70 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 including Section 108 loan guaranteed funds by assessing any amount against properties owned and occupied by persons of low and moderate income, including any fee charged or assessment made as 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 (assisted 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 assisted with CDBG funds, including Section 108, unless CDBG funds are used to pay the proportion of fee or assessment attributable to the capital costs of public improvements financed from other revenue sources. In this case, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds. Also, in the case of properties owned and occupied by moderate-income (not low-income) families, an assessment or charge may be made against the property for public improvements financed by a source other than CDBG funds if the jurisdiction certifies that it lacks CDBG funds to cover the assessment.

Excessive Force --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 grant will be conducted and administered in conformity with title VI of the Civil Rights Act of 1964 (42 USC 2000d), the Fair Housing Act (42 USC 3601-3619), and implementing regulations.

Lead-Based Paint -- Its activities concerning lead-based paint will comply with the requirements of 24 CFR Part 35, subparts A, B, J, K and R;

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

_____ _____

Signature/Authorized Official Date

City Manager

Title

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;

_____ _____

Signature/Authorized Official Date

City Manager

Title

CERTIFICATIONS

INSTRUCTIONS CONCERNING LOBBYING AND DRUG-FREE WORKPLACE REQUIREMENTS:

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.

B. Drug-Free Workplace Certification

1. By signing and/or submitting this application or grant agreement, the grantee is providing the certification.

2. The certification is a material representation of fact upon which reliance is placed when the agency awards the grant. If it is later determined that the grantee knowingly rendered a false certification, or otherwise violates the requirements of the Drug-Free Workplace Act, HUD, in addition to any other remedies available to the Federal Government, may take action authorized under the Drug-Free Workplace Act.

3. Workplaces under grants, for grantees other than individuals, need not be identified on the certification. If known, they may be identified in the grant application. If the grantee does not identify the workplaces at the time of application, or upon award, if there is no application, the grantee must keep the identity of the workplace(s) on file in its office and make the information available for Federal inspection. Failure to identify all known workplaces constitutes a violation of the grantee's drug-free workplace requirements.

4. Workplace identifications must include the actual address of buildings (or parts of buildings) or other sites where work under the grant takes place. Categorical descriptions may be used (e.g., all vehicles of a mass transit authority or State highway department while in operation, State employees in each local unemployment office, performers in concert halls or radio

stations).

5. If the workplace identified to the agency changes during the performance of the grant, the grantee shall inform the agency of the change(s), if it previously identified the workplaces in question (see paragraph three).

6. The grantee may insert in the space provided below the site(s) for the performance of work done in connection with the specific grant:

City of Garden Grove
11222 Acacia Parkway
Garden Grove, CA 92840

The certification with regard to the drug-free workplace is required by 24 CFR part 21.

7. Definitions of terms in the Nonprocurement Suspension and Debarment common rule and Drug-Free Workplace common rule apply to this certification. Grantees' attention is called, in particular, to the following definitions from these rules:

"Controlled substance" means a controlled substance in Schedules I through V of the Controlled Substances Act (21 U.S.C. 812) and as further defined by regulation (21 CFR 1308.11 through 1308.15);

"Conviction" means a finding of guilt (including a plea of nolo contendere) or imposition of sentence, or both, by any judicial body charged with the responsibility to determine violations of the Federal or State criminal drug statutes;

"Criminal drug statute" means a Federal or non-Federal criminal statute involving the manufacture, distribution, dispensing, use, or possession of any controlled substance;

"Employee" means the employee of a grantee directly engaged in the performance of work under a grant, including: (i) All "direct charge" employees; (ii) all "indirect charge" employees unless their impact or involvement is insignificant to the performance of the grant; and (iii) temporary personnel and consultants who are directly engaged in the performance of work under the grant and who are on the grantee's payroll. This definition does not include workers not on the payroll of the grantee (e.g., volunteers, even if used to meet a matching requirement; consultants or independent contractors not on the grantee's payroll; or employees of subrecipients or subcontractors in

covered workplaces).

CERTIFICATIONS

ESG Certifications

The Emergency Solutions Grants Program Recipient certifies that:

Major rehabilitation/conversion – If an emergency shelter's rehabilitation costs exceed 75 percent of the value of the building before rehabilitation, the jurisdiction will maintain the building as a shelter for homeless individuals and families for a minimum of 10 years after the date the building is first occupied by a homeless individual or family after the completed rehabilitation. If the cost to convert a building into an emergency shelter exceeds 75 percent of the value of the building after conversion, the jurisdiction will maintain the building as a shelter for homeless individuals and families for a minimum of 10 years after the date the building is first occupied by a homeless individual or family after the completed conversion. In all other cases where ESG funds are used for renovation, the jurisdiction will maintain the building as a shelter for homeless individuals and families for a minimum of 3 years after the date the building is first occupied by a homeless individual or family after the completed renovation.

Essential Services and Operating Costs – In the case of assistance involving shelter operations or essential services related to street outreach or emergency shelter, the jurisdiction will provide services or shelter to homeless individuals and families for the period during which the ESG assistance is provided, without regard to a particular site or structure, so long the jurisdiction serves the same type of persons (e.g., families with children, unaccompanied youth, disabled individuals, or victims of domestic violence) or persons in the same geographic area.

Renovation – Any renovation carried out with ESG assistance shall be sufficient to ensure that the building involved is safe and sanitary.

Supportive Services – The jurisdiction will assist homeless individuals in obtaining permanent housing, appropriate supportive services (including medical and mental health treatment, victim services, counseling, supervision, and other services essential for achieving independent living), and other Federal State, local, and private assistance available for such individuals.

Matching Funds – The jurisdiction will obtain matching amounts required under 24 CFR 576.201.

Confidentiality – The jurisdiction has established and is implementing procedures to

ensure the confidentiality of records pertaining to any individual provided family violence prevention or treatment services under any project assisted under the ESG program, including protection against the release of the address or location of any family violence shelter project, except with the written authorization of the person responsible for the operation of that shelter.

Homeless Persons Involvement – To the maximum extent practicable, the jurisdiction will involve, through employment, volunteer services, or otherwise, homeless individuals and families in constructing, renovating, maintaining, and operating facilities assisted under the ESG program, in providing services assisted under the ESG program, and in providing services for occupants of facilities assisted under the program.

Consolidated Plan – All activities the jurisdiction undertakes with assistance under ESG are consistent with the jurisdiction's consolidated plan.

Discharge Policy – The jurisdiction will establish and implement, to the maximum extent practicable and where appropriate policies and protocols for the discharge of persons from publicly funded institutions or systems of care (such as health care facilities, mental health facilities, foster care or other youth facilities, or correction programs and institutions) in order to prevent this discharge from immediately resulting in homelessness for these persons.

Signature/Authorized Official	Date

City Manager
Title