City of Garden Grove

Action Plan

for the Use of HUD Funds

July 1, 2016 – June 30, 2017

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

Submitted to HUD on April 28, 2016

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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 2015-2020):

- 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.

Please see Appendix A for summary of comments received.

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

N/A

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 the 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 was available for public review beginning March 7, 2016 and ending April 12, 2016. The Draft Plan is 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 was reviewed as part of a regular NICC meeting.

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

A public notice regarding the meeting March 7, 2016 and the April 12, 2016 meetings were 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 Hearing	Non-targeted/broad community	See Appendix A	See Appendix A	N/A	N/A
2	Public Hearing	Non-targeted/broad community	See Appendix A	See Appendix A	N/A	N/A
3	Newspaper Ad	Non-targeted/broad community	See Appendix A	N/A	N/A	N/A
4	Newspaper Ad	Non-English Speaking - Specify other language: Vietnamese	See Appendix A	N/A	N/A	N/A

Sort Order	Mode of Outreach	Target of Outreach	Summary of Response/ Attendance	Summary of Comments received	Summary of comments not accepted and reasons	URL (If applicable)
5	Newspaper Ad	Non-English Speaking - Specify other language: Spanish	See Appendix A	N/A	N/A	N/A
6	Internet Outreach	Non-targeted/broad community	N/A	N/A	N/A	http://www.ci.garden-grove.ca.us/pdf/citymanager/commdev/Action-Plan-Draft-HUD-2016-2017.pdf

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 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 (HOME) 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.
	Project Name	CDBG Municipal Support Services

2	**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.
	Project Name	CDBG Fire Station Acquisition

9	**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 D 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)

MINUTE EXCERPT

GARDEN GROVE
NEIGHBORHOOD IMPROVEMENT AND CONSERVATION COMMISSION
MARCH 7, 2016

PUBLIC HEARING FOR FISCAL YEAR 2016-17 ACTION PLAN: The staff report dated March 7, 2016 was introduced.

Chair Brietigam asked if changes were made. Staff replied that the report was similar to last year's.

Commissioner Blackmun asked staff to explain the 1.4 million carry-over of HOME funds. Staff explained that the funds were used for the home investment partnership funds specific to the preservation and creation of affordable housing; that as an example, the Jamboree project was paid for by the prior year's funds; that if preliminary discussions with affordable housing developers move forward, the Action Plan would be modified; that funds were committed to a project for a certain amount of time and were to be expended in a certain amount of time; and that the funds could be lost if not committed by July 2017.

Vice Chair McIntosh asked staff to explain the excess match funds from previous years. Staff responded that the funds were not cash on hand; that HUD (Housing and Urban Development) requires that the City match every HOME dollar with another non-federal funding source.

Vice Chair McIntosh asked for more information on the FSS (Family Self Sufficiency) program. Staff responded that the FSS was a part of the Housing Authority, administered by staff and funded by HUD, outside of the Action Plan; that the funds were limited to Housing Authority clients with vouchers; and that a presentation could be given at the next meeting.

Vice Chair McIntosh commented that he understood the economic development for the Harbor Boulevard hotel district and fire station, however, he prefers that funds go to programs such as for the homeless, and at risk teens; that the private enterprise hotels should carry their own weight and not use City funds; and that the fire department funding should be from elsewhere.

Commissioner Blackmun asked if money allocated for the fire station would drain community funds. Staff explained that CDBG (Community Development Block Grant) funds had been expended to buy a potential fire station site, however, there was trouble trying to assemble the site; that the Action Plan line item, with a place holder of $1,000, was in place until the project was completed or cancelled, as required by HUD rules.

Commissioner Muneton understood the need for 'gang suppression' funding, however, he believed those funds could come from other sources and CDBG funding be directed toward community programs. He also agreed that in lieu of hotel

services, the funds should be focused on the community, not necessarily special interest groups.

Chair Brietigam asked for the amount of funds allocated for marketing the programs, as there was no account of how the programs were being offered to people who could benefit. Staff responded that for City-funded programs such as the Senior Center, they use the allocation given to them; that program promotion comes out of the $326,000 program administration fund; that the ESG programs sub-recipient market their own programs to their own client-base; that the Fair Housing program uses their allocation and markets themselves; that there was no marketing formula, however, to receive the funds there must be the capacity to administer the programs otherwise they wouldn't be high-performing enough to be recommended for funding.

Chair Brietigam recommended future Action Plans to have a line item showing the amount of money directed toward program marketing and the outreach process as residents should be aware of the programs. He also recommended that the City create a one-sheet list of the programs that includes where the money is directed, along with a brief summary of the program, and how much money is allocated for the program.

Commissioner Pham asked if the Action Plan was available to the public. Staff replied that the Plan was on the City's website, copies were at the Family Resource Centers, the Library, and the third floor Community Development Department of City Hall.

Vice Chair McIntosh suggested that a future Action Plan include a Veteran's program to support the Veteran's. Staff responded that the City released an RFP (Request for Proposal) for ESG funding, which went to members of the Continuum of Care, and that if Veteran's groups were a part of the Continuum of Care, they received it.

Commissioner Blackmun agreed that a one-sheet listing was a great idea, especially to inform residents who might wonder what the City does with the funds.

Vice Chair McIntosh mentioned that he would like to see more ROP (Regional Occupational Program) trade classes for the average person to take away a skill.

Commissioner Constantino also liked the one-page idea and would like to see a PDF version to post online to community groups. Staff responded that each year, with the new agreements, especially with the ESG providers, links become available on the City's Neighborhood Improvement web page that include contact information and a brief summary of services.

Chair Brietigam mentioned that the information would be buried, but the addition of a convenient one-page sheet, such as 'What is the City of Garden Grove doing to eradicate homelessness?' should be available to hand out to residents. Staff added that the current format of the Action Plan is a HUD requirement.

Commissioner Muneton asked if any CDBG programs, such as HOME or ESG, allocated funds to the Family Resource Centers, such as Buena Clinton or Magnolia Park. Staff responded that any services come under the public service cap, which is limited to 15 percent of the allocation; that the City has asked for the maximum allocation, which does include gang suppression, the Senior Center, and Community Senior Serv or Meals on Wheels. Commissioner Muneton then suggested that the gang suppression funds be directed toward the Family Centers or for use in expanding existing services.

Commissioner Pham asked staff for the current location for program resources such as a webpage. Staff replied that the ESG information was on the City's website, and that a Homeless resource brochure, with service providers listed, was handed out by Fire Fighters, Police, and resource centers, who had copies for people in need.

Chair Brietigam opened the public hearing.

Ms. Sharon Wie, of Interval House, a domestic violence and housing program, described the partnership with the City of Garden Grove, which includes housing victims of domestic violence, or any homeless individual or household from the City of Garden Grove, including seniors and veterans; that HUD has a priority to eradicate veteran homelessness and used County funding; that they are linked to OC211/211 for community resources; that they work with the school district and the Police Department; and that they do a lot of outreach.

Chair Brietigam closed the public hearing.

Vice Chair McIntosh mentioned that he and Commissioner Blackmun have social media pages to which they could add and share Ms. Wie's and Mr. Gibb's information.

Commissioner Muneton extended gratitude to Grandma's House of Hope and Interval House.

It was moved by Chair Brietigam and seconded by Vice Chair McIntosh, to accept staff's recommendation to transmit the Fiscal Year 2016-17 Action Plan and citizen comments to City Council. The motion carried by a 6-0-1 vote as follows:

Ayes:	(6)	Blackmun, Brietigam, Constantino, McIntosh, Muneton, Pham
Noes:	(0)	None
Absent:	(1)	Ramirez

EXCERPT FROM THE MINUTES

GARDEN GROVE CITY COUNCIL REGULAR MEETING OF APRIL 12, 2016

Community Meeting Center
11300 Stanford Avenue, Garden Grove, CA 92840

CONVENE MEETING

At 6:38 p.m., Mayor Nguyen convened the meeting in the Council Chamber.

ROLL CALL PRESENT: (4) Mayor Nguyen, Council Members Beard, Bui, Phan

ABSENT: (1) Council Member Jones

FISCAL YEAR 2016-17 ACTION PLAN FOR THE USE OF UNITED STATES DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT (HUD) FUNDS (F: 117.10D)

Speakers: Josh McIntosh, Michael Sheppard.

It was moved by Council Member Beard, seconded by Council Member Phan that:

The 2016-17 Action Plan for the use of U.S. Department of Housing and Urban Development Funds be approved; and

The City Manager be authorized to negotiate and execute related documents and agreements. (Some project-specific agreements may be brought before City Council for individual approval.)

The motion carried by a 4-0-1 vote as follows:

Ayes:	(4)	Beard, Bui, Nguyen, Phan
Noes:	(0)	None
Absent:	(1)	Jones

STATE OF CALIFORNIA)
COUNTY OF ORANGE) SS:
CITY OF GARDEN GROVE)

I, KATHLEEN BAILOR, City Clerk of the City of Garden Grove, California, do hereby certify that the foregoing is a true, full, and correct copy of the Minute Entry on record in this office, said minutes being subject to City Council approval.

IN WITNESS WHEREOF, I hereunto set my hand seal this 13th day of April 2016.

Kathleen Bailor

Kathleen Bailor, CMC
City Clerk

NOTICE OF PUBLIC HEARING

GARDEN GROVE NEIGHBORHOOD IMPROVEMENT AND CONSERVATION COMMISSION
AND
GARDEN GROVE CITY COUNCIL

NOTICE OF PUBLIC HEARING
REGARDING PROPOSED FY 2016-17 ACTION PLAN
FOR THE USE OF HUD FUNDS

The City of Garden Grove is an Entitlement City in the U.S. Department of Housing and Urban Development's (HUD) Community Development Block Grant (CDBG), HOME Investment Partnership Act (HOME), and Emergency Solutions Grant (ESG)/Homelessness Prevention programs.

On March 7, 2016, at 6:30 p.m., the Garden Grove Neighborhood Improvement and Conservation Commission will hold a Public Hearing in the Courtyard Center, 12732 Main Street, Garden Grove, to consider the FY-2016-17 Action Plan, covering the period of July 1, 2016, through June 30, 2017. This Action Plan will allocate approximately $2.5 million in new HUD funds, and reallocate approximately $1.4 million in unexpended and unprogrammed funds from prior years.

On April 12, 2016, at 6:30 p.m., the City Council will also hold a Public Hearing in the Council Chambers of the Community Meeting Center, 11300 Stanford Avenue, Garden Grove, to consider the FY 2016-17 Action Plan.

Opportunity for Public Review and Comment

From March 7, 2016 through April 12, 2016, the proposed FY 2016-17 Action Plan will be available for public review during regular business hours at the Community Development Department, located in City Hall, at 11222 Acacia Parkway, Garden Grove, CA 92840. Following adoption, the final Action Plan will be submitted to HUD and will remain available for public review throughout the program year.

Written and verbal comments will be accepted by the Community Development Department until 4:00 p.m. on April 12, 2016. If you wish to comment verbally, you are particularly encouraged to attend the Neighborhood Improvement and Conservation Commission's meeting at 6:30 p.m. on Monday, March 7, 2016. City Council will then hold a public hearing and consider adoption of the final Action Plan at its regular meeting at 6:30 p.m. on April 12, 2016. Please direct any questions or comments to Allison Mills via 714-741-5139, allisonj@garden-grove.org, or 800-735-2929 (TDD to voice).

THÔNG BÁO BUỔI ĐIỀU TRẦN CHO CÔNG CHÚNG

ỦY BAN BẢO TRÌ VÀ CẢI THIỆN KHU XÓM GARDEN GROVE
VÀ
HỘI ĐỒNG THÀNH PHỐ GARDEN GROVE

THÔNG BÁO BUỔI ĐIỀU TRẦN CHO CÔNG CHÚNG VỀ KẾ HOẠCH HÀNH ĐỘNG ĐỀ NGHỊ CHO TÀI KHÓA 2016-17 VỀ VIỆC DÙNG QUỸ HUD

Thành phố Garden Grove là một Thành Phố Đặc Quyền thuộc Ban Phát Triển Gia Cư và Đô Thị (HUD) Hoa Kỳ, Trợ Cấp Khu Phố Phát Triển Cộng Đồng (CDBG), Đạo Luật Cộng Tác Đầu Tư HOME (HOME), và các chương trình Trợ Cấp Giải Pháp Khẩn Cấp (ESG)/Ngăn Ngừa Nạn Vô Gia Cư.

Vào ngày 7 tháng Ba, 2016, lúc 6:30 chiều, Ủy Ban Bảo Trì và Cải Thiện Khu Xóm Garden Grove sẽ tổ chức một buổi Điều Trần Công Khai tại Courtyard Center, địa chỉ là 12732 Main Street, Garden Grove, để xem xét Kế Hoạch Hành Động cho Tài Khóa 2016-17, áp dụng cho thời kỳ từ 1 tháng Bảy, 2016, cho tới 30 tháng Sáu, 2017. Kế Hoạch Hành Động này sẽ cấp khoảng $2.5 triệu cho quỹ HUD mới, và cấp lại khoảng $1.4 triệu trong ngân quỹ chưa dùng tới và chưa hoạch định chương trình từ các năm trước.

Vào ngày 12 tháng Tư, 2016, lúc 6:30 chiều, Hội Đồng Thành Phố cũng sẽ tổ chức một buổi Điều Trần Công Khai tại Phòng Họp Hội Đồng, địa chỉ là 11300 Stanford Avenue, để xem xét Kế Hoạch Hành Động cho Tài Khóa 2016-17.

Cơ Hội cho Công Chúng Xét Duyệt và Góp Ý

Từ ngày 7 tháng Ba, 2016 cho tới 12 tháng Tư, 2016, Kế Hoạch Hành Động đề nghị cho tài khóa 2016-17 sẽ có sẵn cho công chúng duyệt xét vào các giờ giấc làm việc thông thường tại Ban Phát Triển Cộng Đồng (Community Development Department), tọa lạc tại Tòa Thị Sảnh Thành Phố (City Hall), 11222 Acacia Parkway, Garden Grove, CA 92840. Tiếp theo sau việc áp dụng, Kế Hoạch Hành Động sau cùng sẽ được nộp lên cho HUD và sẽ vẫn để cho công chúng duyệt xét trong suốt chương trình.

Các góp ý trên văn bản và bằng lời nói sẽ được chấp nhận bởi Ban Phát Triển Cộng Đồng cho đến 4:00 giờ chiều vào ngày tới ngày 12 tháng Tư, 2016. Nếu quý vị muốn góp ý bằng lời nói, quý vị đặc biệt nên tham dự buổi họp của Ủy Ban Cải Thiện và Bảo Trì Khu Xóm vào lúc 6:30 tối thứ Hai, ngày 7 tháng Ba, 2016. Hội Đồng Thành Phố sau đó sẽ tổ chức một buổi điều trần công khai và xét đến việc áp dụng Kế Hoạch Hành Động sau cùng vào buổi họp thường lệ của mình vào lúc 6:30 tối vào ngày 12 tháng Tư, 2016. Xin đưa ra bất cứ thắc mắc hay góp ý nào cho cô Allison Mills qua số 714-741-5139, allisonj@garden-grove.org, hoặc 800-735-2929 (TDD thành tiếng nói).

ÔNG TRỌNG ĐÃ CÓ CỜ ĐỂ PHẤT?

Phạm Trần

Âm mưu chà đạp lên Hiến pháp để cướp quyền được biểu tình của dân và tranh quyền Lập pháp với Quốc hội đang diễn ra trong nội bộ đảng Cộng sản Việt Nam.

Chuyện này đã được bạch hóa tại phiên họp ngày 17/02/2016 của Ủy ban Thường vụ Quốc hội khi Bộ trưởng Bộ Tư pháp Hà Hùng Cường, thay mặt Chính phủ đề nghị Quốc hội hoãn thảo luận dự án Luật Biểu tình tại kỳ họp cuối cùng (thứ 11) của Quốc hội khóa XIII, dự trù diễn ra từ ngày 21/3 đến 6/4/2016.

Theo lời ông Hà Hùng Cường thì trong Chính phủ "vẫn còn những ý kiến khác nhau về nhiều nội dung của dự án luật" do Bộ Công an chủ động soạn thảo có hợp tác của hai Bộ Tư Pháp và Quốc Phòng.

Ông Cường không cho biết "còn khác nhau" ở chỗ nào, nhưng tại một phiên họp với Quốc hội cuối năm 2015, Thượng tướng Bùi Văn Nam, Thứ trưởng Bộ Công an, cho biết: " Bộ Công an được Chính phủ giao soạn thảo Luật Biểu tình để trình Quốc hội. Đến nay, dự thảo Luật Biểu tình đã xây dựng xong và đã gửi văn bản xin ý kiến các bộ, ngành liên quan. Tuy nhiên, vẽ một số vấn đề nhạy cảm, hiện các bộ liên quan chưa cho ý kiến, như Bộ Quốc phòng, Bộ Tư pháp.

Do vậy, nếu đưa Luật Biểu tình vào để Quốc hội cho ý kiến tại kỳ họp thứ 11 thì sẽ gặp rất nhiều khó khăn, đặc biệt là việc tập hợp ý kiến các bộ liên quan." (Báo Người Lao Động/ ngày 11/12/2015)

Tuy nhiên, Tướng Nam không nói ra hay báo chí Việt Nam không được phép viết ra những vấn đề được gọi là "nhạy cảm". Hai bộ Công An và Quốc Phòng vẫn thường nêu ra nỗi lo người biểu tình sẽ lợi dụng Luật để chống đảng, chống nhà nước và chống luôn cả Trung Quốc nên đã tìm mọi cách trì hoãn trình ra Quốc hội, dù Bộ Công An được giao trách nhiệm soạn Luật biểu tình.

Dự Luật này đã bị Chính phủ xin lùi thêm từ kỳ họp thứ 9 tháng 6/2015 sang kỳ họp 11 năm 2016 nên tại phiên họp ngày 17/2 (2016),Chủ nhiệm Ủy ban Pháp luật Phan Trung Lý đã nói thẳng : "Dự án Luật Biểu tình đã lùi quá nhiều lần. Chỉ một ngày trước phiên họp này, Chính phủ lại gửi tờ trình xin tiếp tục lùi nữa. Đề nghị UBTVQH có ý kiến chính thức với Chính phủ về việc này".

Chủ tịch Quốc hội Nguyễn Sinh Hùng cũng đặt vấn đề: "Chính phủ ý kiến thế nào về vấn đề này? Tại sao cứ lùi mãi thế, không làm được hay không chịu làm, cứ bàn ra bàn vào mãi rồi. Quốc hội, Bộ chính trị đã quyết định đưa vào chương trình rồi sao Chính phủ cứ lùi mãi?".

Ông Hùng, người sẽ nghỉ hưu khi Quốc hội Khóa XIII chấm dứt nhiệm kỳ sau cuộc bầu cử Quốc hội khóa XIV ngày 22/05/2016 nói thêm: "Tôi thấy chương trình kỳ họp thứ 11 đã khá nặng rồi, không nên bổ sung thêm nữa. Nhưng Luật Biểu tình thì đã có trong chương trình và cũng đã điều chỉnh thời hạn nhiều lần rồi, nay không trình được phải báo cáo rõ trách nhiệm trước Quốc hội, chứ UBTVQH không thể quyết nghị cho lùi được. Phải có lý do rất chính đáng cho việc này" (Báo Giáo dục Việt Nam, 17/02/2016)

Đáng chú ý, theo lời Chủ tịch Nguyễn Sinh Hùng thì không những Quốc hội mà cả Bộ Chính trị cũng đã đồng ý đem Dự Luật Biểu tình ra thảo luận và cho ý kiến tại kỳ họp chót của Quốc hội XIII, nhưng Chính phủ vẫn không tuân thì coi như Cơ quan Hành pháp đã "bốp chết" nó mà chưa có hy vọng nó sẽ được hồi sinh tại nhiệm kỳ khóa Quốc hội XIV (2016-2021).

Vậy trách nhiệm trì hoãn Luật Biểu tình có quy về Thủ tướng sắp mãn nhiệm Nguyễn Tấn Dũng hay nằm gọn trong sân của 3 Bộ Công An, Quốc Phòng và Tư Pháp ?

Không thấy phía Chính phủ giải thích nó đang bị nghẽn ở đâu, nhưng ai cũng biết hai Bộ Quốc Phòng và Công An có tiếng nói lớn nhất trong công tác soạn thảo.

Người đứng đầu Bộ Công An Trần Đại Quang đã được Ban Chấp hành Trung ương khóa đảng XII đồng ý đề cử vào chức Chủ tịch nước, chỉ còn chờ được Quốc hội chấp thuận. Nhưng Đại tướng Bộ trưởng Quốc phòng Phùng Quang Thanh sẽ nghỉ hưu, sau ngày Quốc hội chấp thuận người thay thế.

Tuy vậy, trách nhiệm trì hoãn Luật biểu tình của hai ông Quang và Thanh không nhỏ vì là những người đứng đầu. Cũng chẳng ai tin Tổng Bí thư Nguyễn Phú Trọng, người đứng đầu cả hệ thống lãnh đạo đảng và nhà nước, không can dự gì vào quyết định xin Quốc hội đừng vội thảo luận Luật biểu tình.

Và có ai dám đánh cá rằng Ban Tuyên giáo và Quân Ủy Trung ương của Quân đội không quan tâm đến Luật biểu tình, bởi vì Dự luật biểu tình cũng quan hệ đến công tác chống "diễn biến hòa bình" và chống "các thế lực thù địch" của đảng và quân đội.

Đảng cũng đang lo Luật biểu tình sẽ mở đường cho tình trạng "tự diễn biến" và "tự chuyển hóa" trong cán bộ, đảng viên tăng nhanh và giúp cho các Tổ chức xã hội dân sự lớn mạnh để đe dọa đảng cầm quyền.

QUỐC PHÒNG NGỒI LÊN HIẾN PHÁP

Cũng nên biết, Tổng Bí thư đảng Nguyễn Phú Trọng còn kiêm nhiệm chức Bí thư Quân ủy Trung ương nên chuyện hai phe bảo vệ tư tưởng đảng và trong quân đội chưa đồng tình với Dự luật biểu tình cũng không ai ngạc nhiên.

Vì vậy việc nại cớ còn "một số vấn đề nhạy cảm" mà hai Bộ Quốc Phòng và Tư Pháp còn rụt rè, hay "vẫn còn những ý kiến khác nhau" trong Chính phủ về Luật Biểu tình nên chính phủ xin hoãn trình ra Quốc hội đã chứng minh có một thế lực trong đảng không muốn cho dân được biểu tình theo quy định của Hiến pháp.

Nhưng chẳng nhẽ Tổng Bí thư Nguyễn Phú Trọng không biết Điều 25 của Hiến pháp đã viết:"Công dân có quyền tự do ngôn luận, tự do báo chí, tiếp cận thông tin, hội họp, lập hội, biểu tình. Việc thực hiện các quyền này do pháp luật quy định"?

Do đó chừng nào chưa có Luật cho dân thực hành quyền biểu tình thì đảng và nhà nước đã công khai chà đạp lên Hiến pháp.

Bằng chứng này đã được Chủ nhiệm Ủy ban Quốc phòng - An ninh (QPAN) của Quốc hội, Nguyễn Kim Khoa, phê phán có "nhiều nội dung không hợp lý" trong văn thư giải trình chống Luật biểu tình của Bộ Quốc phòng.

Đó là:

"Thứ nhất, Bộ Quốc phòng cho rằng dây là đổi mới về chính trị. Chúng tôi cho rằng nhận thức như vậy là không đúng. Đây là đảm bảo về quyền con người, quyền công dân, chứ không phải là đổi mới chính trị.

Thứ hai, Bộ Quốc phòng cho rằng chờ bao giờ bảo đảm an ninh quốc gia, trật tự an toàn xã hội mới làm. Chúng ta đang làm cái này để đảm bảo an ninh quốc gia và trật tự an toàn xã hội, chứ không phải là chờ ổn định rồi làm.

Thứ ba, Bộ Quốc phòng đề nghị xây dựng Nghị định trước, tổng kết Nghị định rồi mới xây dựng luật. Chúng tôi thấy rằng, Nghị định 38 bây giờ đã trái với Hiến pháp. Chúng ta mà làm Nghị định thì càng trái với Hiến pháp, không phù hợp với Hiến pháp, trong đó rất nhiều nội dung hạn chế quyền con người, quyền công dân.

Ông Khoa nói thẳng: "Văn bản Bộ Quốc phòng gửi, nhiều nội dung các đồng chí kiến nghị không hợp lý. Tôi cũng đề nghị các đồng chí bên Chính phủ nghiên cứu trình tự xây dựng pháp luật ưu tiên thực hiện Hiến pháp. Chúng ta hiện nay không có trình tự rõ ràng, kể cả các luật liên quan tới quốc phòng."

Báo chí Việt Nam trích lời ông Nguyễn Kim Khoa cho rằng: "Biểu tình là quyền tự do công dân được Hiến pháp quy định và là nội dung được luật hóa cuối cùng nên sự cần thiết là hết sức quan trọng, nhằm đảm bảo an ninh quốc gia và trật tự an toàn xã hội.

"Nghị định 38 là hạn chế quyền công dân và con người. Nếu cứ dùng để quản lý an ninh quốc gia và trật tự xã hội, hạn chế quyền công dân là trái với Hiến pháp. Tôi đi khảo sát các đơn vị của Bộ công an đều yêu cầu phải làm ngay."

Ông Khoa nói:"Qua nghiên cứu thẩm tra dự thảo Luật Biểu tình của Bộ Công an gửi sang, chúng tôi thấy rất công phu và có thể trình ra được, không có gì phức tạp... Chúng ta không thể chỉ sửa nóc nhà. Cái chúng ta không làm, cái không cần thì các đồng chí lại làm".

NGUYỄN TẤN DŨNG-LUẬT BIỂU TÌNH

Thủ ra Bộ Quốc phòng là thủ phạm chính của âm mưu bóp chết Dự án Luật biểu tình trong tướng nước. Bộ này đã cố ý diễn giải với chủ tâm chống "đổi mới về chính trị" để không cho dân thực thi quyền làm chủ đất nước.

Và khi Bộ Quốc phòng đặt điều kiện phải "chờ bao giờ bảo đảm an ninh quốc gia, trật tự an toàn xã hội mới làm" luật Biểu tình là hành động cực kỳ phản động và phản dân chủ. Nhưng lấy tiêu chuẩn nào để đo lường, hay cơ chế nào của nhà nước có khả năng và thẩm quyền đánh giá mức độ chính xác Việt Nam đã được "bảo đảm an ninh quốc gia" và "trật tự an toàn xã hội"?

Còn chuyện Bộ Quốc phòng đề nghị ra thêm Nghị định hay tu sửa Nghị định 38/2005/NĐ-CP, ban hành ngày 18 tháng 3 năm 2005 (thời Thủ tướng Phan Văn Khải) "Quy định một số biện pháp bảo đảm trật tự công" thì Tướng Phùng Quang Thanh và Tướng Công an Trần Đại Quang hãy bình tai ra mà nghe câu trả lời của Thủ tướng Nguyễn Tấn Dũng tại phiên chất vấn của Quốc hội ngày 25/11/2011.

Ông Dũng nói:"Chính phủ đã ban hành nghị định số 38 để quản lý, điều chỉnh hiện tượng này nhưng Nghị định của chính phủ hiệu lực thấp chưa đáp ứng yêu cầu, tầm vóc như Hiến pháp quy định và cũng chưa đáp ứng được yêu cầu của thực tế cuộc sống đang đặt ra.

Chính phủ mới thấy phải kiến nghị đưa vào chương trình xây dựng luật để chúng ta có bộ luật, một luật biểu tình. Luật đó phù hợp Hiến pháp, phù hợp đặc điểm lịch sử, văn hóa, điều kiện cụ thể của Việt Nam cũng như thông lệ quốc tế và đảm bảo quyền tự do dân chủ của người dân theo đúng quy định của hiến pháp và pháp luật, đồng thời luật đó có yêu cầu ngăn chặn những việc làm, hành vi gây xâm hại an ninh trật tự, lợi ích của xã hội, nhân dân." (VietNamNet, 25/11/2011)

Nếu ý của ông Dũng chưa chọc thủng được những cái đầu tảm tối của hai Bộ Công an và Quốc phòng thì họ hãy giương mắt to ra để hình dung khi ông Thủ tướng giải thích Chính phủ đã cần cứ vào đâu để đề nghị Luật Biểu tình.

Bắt đầu bằng câu hỏi của Đại biểu Đỗ Văn Vẻ (Thái

Xem tiếp ÔNG TRỌNG trang A7

THÍCH THIỀN ÂN BUDDHIST & CHARITABLE CENTER

CHÙA A DI ĐÀ

TRUNG TÂM PHẬT GIÁO THÍCH THIỀN ÂN

14042 Swan Street, Westminster, CA 92683 Tel: (714) 890-0628

THƯ MỜI

THAM DỰ HÀNH HƯƠNG TẾT BÍNH THÂN 2016

NAM MÔ ĐƯƠNG LAI HẠ SANH DI LẶC TÔN PHẬT

Kính thưa Quý Phật Tử và Đồng Hương,

Mùa Xuân Di Lặc lại về với tất cả chúng ta. Chùa A Di Đà và Trung Tâm Phật Giáo Thích Thiên Ân xin kính nguyện Chư Phật gia hộ cho chúng ta một Mùa Xuân hoan hỉ và hạnh phúc.

Để chúng ta có thể thăm viếng và cầu nguyện Đầu Năm Mới, Chùa A Di Đà tổ chức Hành hương vùng Riverside, như các Chùa Văn Thù, Chùa Thiên Ân (người Hoa Kỳ), Thiền Viện Chân Nguyên và vài ngôi chùa khác quanh vùng.

Thời gian:

7:30AM đến 7:30PM, ngày Chủ Nhật 28 tháng 2 năm 2016

(nhằm ngày 21 tháng Giêng ÂL)

Địa điểm tổ chức: **Chùa A Di Đà**

14042 Swan St., Westminster, CA 92683.

ĐT: (714) 478-5678

Xe Bus mới, đủ tiện nghi

Muốn biết thêm chi tiết xin liên lạc: (714) 478-5678

Quý Phật tử đi Hành Hương xin có mặt lúc 7:00 giờ sáng tại Chùa A Di Đà. Xin thành thật cám ơn quý vị.

TM. Ban Tổ Chức

Xin Trân Trọng Kính Mời

Ni Sư Thích Nữ Như Ngọc

THÔNG BÁO BUỔI ĐIỀU TRẦN CHO CÔNG CHÚNG

ỦY BAN BẢO TRÌ VÀ CẢI THIỆN KHU XÓM GARDEN GROVE

VÀ

HỘI ĐỒNG THÀNH PHỐ GARDEN GROVE

THÔNG BÁO BUỔI ĐIỀU TRẦN CHO CÔNG CHÚNG VỀ KẾ HOẠCH HÀNH ĐỘNG ĐỀ NGHỊ CHO TÀI KHÓA 2016-17 VỀ VIỆC DÙNG QUỸ HUD

Thành phố Garden Grove là một Thành Phố Đặc Quyền thuộc Ban Phát Triển Gia Cư và Đô Thị (HUD) Hoa Kỳ, Trợ Cấp Khu Phố Phát Triển Cộng Đồng (CDBG), Đạo Luật Cộng Tác Đầu Tư HOME (HOME), và các chương trình Trợ Cấp Giải Pháp Khẩn Cấp (ESG)/Ngăn Ngừa Nạn Vô Gia Cư.

Vào ngày 7 tháng Ba, 2016, lúc 6:30 chiều, Ủy Ban Bảo Trì và Cải Thiện Khu Xóm Garden Grove sẽ tổ chức một buổi Điều Trần Công Khai tại Courtyard Center, địa chỉ là 12732 Main Street, Garden Grove, để xem xét Kế Hoạch Hành Động cho Tài Khóa 2016-17, áp dụng cho thời kỳ từ 1 tháng Bảy, 2016, cho tới 30 tháng Sáu, 2017. Kế Hoạch Hành Động này sẽ cấp khoảng $2.5 triệu cho quỹ HUD mới, và cấp lại khoảng $1.4 triệu trong ngân quỹ chưa dùng tới và chưa hoạch định chương trình từ các năm trước.

Vào ngày 12 tháng Tư, 2016, lúc 6:30 chiều, Hội Đồng Thành Phố cũng sẽ tổ chức một buổi Điều Trần Công Khai tại Phòng Họp Hội Đồng, địa chỉ là 11300 Stanford Avenue, để xem xét Kế Hoạch Hành Động cho Tài Khóa 2016-17.

Cơ Hội cho Công Chúng Xét Duyệt và Góp Ý

Từ ngày 7 tháng Ba, 2016 cho tới 12 tháng Tư, 2016, Kế Hoạch Hành Động đề nghị cho tài khóa 2016-17 sẽ có sẵn cho công chúng duyệt xét vào các giờ giấc làm việc thông thường tại Ban Phát Triển Cộng Đồng (Community Development Department), tọa lạc tại Tòa Thị Sảnh Thành Phố (City Hall), 11222 Acacia Parkway, Garden Grove, CA 92840. Tiếp theo sau việc áp dụng, Kế Hoạch Hành Động sau cùng sẽ được nộp lên cho HUD và sẽ vẫn để cho công chúng duyệt xét trong suốt chương trình.

Các góp ý trên văn bản và bằng lời nói sẽ được chấp nhận bởi Ban Phát Triển Cộng Đồng cho đến 4:00 giờ chiều vào ngày tới ngày 12 tháng Tư, 2016. Nếu quý vị muốn góp ý bằng lời nói, quý vị đặc biệt nên tham dự buổi họp của Ủy Ban Cải Thiện và Bảo Trì Khu Xóm vào lúc 6:30 tối thứ Hai, ngày 7 tháng Ba, 2016. Hội Đồng Thành Phố sau đó sẽ tổ chức một buổi điều trần công khai và xét đến việc áp dụng Kế Hoạch Hành Động sau cùng vào buổi họp thường lệ của mình vào lúc 6:30 tối vào ngày 12 tháng Tư, 2016. Xin đưa ra bất cứ thắc mắc hay góp ý nào cho cô Allison Mills qua số 714-741-5139, allisonj@garden-grove.org, hoặc 800-735-2929 (TDD thành tiếng nói).

/s/ KATHLEEN BAILOR, CMC
Thư Ký Thành Phố

Ngày: 2/23/2016
Công bố: 2/26/2016

AVISO DE AUDIENCIA PÚBLICA

COMISIÓN DE MEJORIA Y CONSERVACIÓN DE VECINDARIOS DE GARDEN GROVE
Y
CONSEJO MUNICIPAL DE GARDEN GROVE

AVISO DE AUDIENCIA PÚBLICA
REFERENTE AL PLAN DE ACCIÓN PROPUESTO PARA EL AÑO FISCAL 2016-17
PARA EL USO DE FONDOS DE HUD

La Ciudad de Garden Grove es una Ciudad con Derecho a los programas de Concesión Conjunta de Desarrollo Comunitario (CDBG), Ley de Sociedad de Inversiones de HOME (HOME), y Concesión de Soluciones de Emergencia (ESG)/Prevención de Desamparados del Departamento de Vivienda y Desarrollo Urbano (HUD) de EE.UU.

El 7 de marzo de 2016, a las 6:30 p.m., la Comisión de Mejoras y Conservación de Vecindarios de Garden Grove llevará a cabo una Audiencia Pública en el Courtyard Center, 12732 Main Street, Garden Grove, para considerar el Plan de Acción del año fiscal 2016-17, que abarca el período del 1 de julio de 2016, hasta el 30 de junio de 2017. Este Plan de Acción asignará aproximadamente $2.5 millones en nuevos fondos de HUD, y reasignará aproximadamente $1.4 millones en fondos no usados y no programados de años anteriores.

El 12 de abril de 2016, a las 6:30 p.m., el Consejo Municipal también llevará a cabo una Audiencia Pública en los Salones del Consejo del Centro de Reuniones Comunitarias, 11300 Stanford Avenue, Garden Grove para considerar el Plan de Acción del año fiscal 2016-17.

Oportunidad de Repaso y Comentarios del Público

Desde el 7 de marzo de 2016 hasta el 12 de abril de 2016, el Plan de Acción propuesto para el año fiscal 2016-17 estará a disposición para repaso del público durante horas de oficina regulares en el Departamento de Desarrollo Comunitario, ubicado en el Ayuntamiento, en 11222 Acacia Parkway, Garden Grove, CA 92840. Posterior a su adopción, el Plan de Acción definitivo será sometido a HUD y permanecerá a disposición para revisión del público durante todo el año del programa.

El Departamento de Desarrollo Comunitario aceptará comentarios por escrito y verbales hasta las 4:00 p.m. el 12 de abril de 2016. Si usted desea comentar verbalmente, se le anima especialmente a asistir a la reunión de la Comisión de Mejoras y Conservación a las 6:30 p.m. el lunes, 7 de marzo de 2016. El Consejo de la Ciudad luego llevará a cabo una audiencia pública y considerará la adopción del Plan de Acción definitivo en su reunión regular a las 6:30 p.m. el 12 de abril de 2016. Por favor dirija cualquier pregunta o comentario a Allison Mills vía el 714-741-5139, allisonj@garden-grove.org, o al 800-735-2929 (TDD a voz).

Appendix B:
Protocols for Administering
The Emergency Solutions Grant

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 1

Summary of Eligible Components, Activities and Expenses

Exhibit 1:
EMERGENCY SOLUTIONS GRANTS PROGRAM (ESG)
ELIGIBLE COMPONENTS, ACTIVITIES AND EXPENSES

Emergency Solutions Grants Program (ESG) funds may only reimburse cost directly related to the following ESG eligible expenditure program components:

- **Street Outreach** – Unsheltered individuals and families, meaning those who qualify under 24 CFR § 91.5 paragraph (1)(i) of the definition of "homelessness". Essential Services to eligible participants provided on the street or in parks, abandoned buildings, bus stations, campgrounds, and in other such settings where unsheltered persons are staying. Staff salaries related to carrying out street outreach activities are eligible.

  ✓ Essential Services – Services necessary to reach out to unsheltered homeless people; connect them with emergency shelters, housing, or critical services; and provide urgent, non-facility-based care to unsheltered homeless people who are unwilling or unable to access emergency shelter, housing, or an appropriate health facility.

  ✓ Engagement – activities to locate, identify, and build relationships with unsheltered homeless people for providing immediate support, intervention, and connections with homeless assistance programs and/or mainstream social services and housing programs.

  - ☐ Initial assessment of needs and eligibility
  - ☐ Providing crisis counseling
  - ☐ Addressing urgent physical needs
  - ☐ Actively connecting and providing information and referral
  - ☐ Cell phone costs of outreach workers

  ✓ Case Management – assessing housing and service needs and arranging/coordinating/ monitoring the delivery of individualized services.

  - ☐ Using the centralized or coordinated assessment system
  - ☐ Initial evaluation/verifying and document eligibility
  - ☐ Counseling
  - ☐ Developing/Securing/Coordinating Services
  - ☐ Helping obtain Federal, state, and local benefits

- ☐ Monitoring/evaluating participant progress
- ☐ Providing information and referral to other providers
- ☐ Developing an individualized housing/service plan

✓ Emergency Health Services – Outpatient treatment of urgent medical conditions by licensed medical professionals in community-based settings (e.g. streets, parks, and campgrounds) to those eligible participants unwilling or unable to access emergency shelter or an appropriate healthcare facility.

- ☐ Assessing participants' health problems and developing treatment plans
- ☐ Assisting participants to understand their health needs
- ☐ Providing or helping participants obtain appropriate emergency medical treatment
- ☐ Providing medication and follow-up services

✓ Emergency Mental Health Services – Outpatient treatment of urgent mental health conditions by licensed professionals in community-based settings (e.g. streets, parks, and campgrounds) to those eligible participants unwilling or unable to access emergency shelter or an appropriate healthcare facility.

- ☐ Crisis Intervention
- ☐ Prescription of psychotropic medications
- ☐ Explain the use and management of medications
- ☐ Combinations of therapeutic approaches to address multiple problems

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

- ☐ Transporting unsheltered people to emergency shelters or other service facilities
- ☐ Cost of a participant's travel on public transit
- ☐ Mileage allowance for outreach workers to visit participants
- ☐ Purchasing or leasing a vehicle for use in conducting outreach activities, including the cost of gas, insurance, taxes, and maintenance for the vehicle
- ☐ Costs of staff to accompany or assist participant to use public transportation

✓ Services to Special Populations – Otherwise eligible Essential Services that have been tailored to address the special needs of homeless youth, victims of domestic violence, and related crimes/threats, and/or people living with HIV/AIDS who are literally homeless. For all eligible expenses, refer above under Street Outreach.

- **Emergency Shelter** (Includes Emergency Shelters, Transitional Housing & Day Centers) –eligible participants are individuals and families who are homeless. Essential Services to persons in emergency shelters, renovating buildings to be used as emergency shelters, and operating emergency shelters are eligible costs. Staff costs related to carrying out emergency shelter activities are also eligible.

✓ Essential Services – Services provided to individuals and families who are in an emergency shelter:

□ Case Management – Assessing, arranging, coordinating, and monitoring individualized services.

➢ Using the centralized or coordinated assessment system
➢ Initial evaluation including verifying and documenting eligibility
➢ Counseling
➢ Developing, securing and coordinating services including Federal, State, and local benefits
➢ Monitoring and evaluating program participant progress
➢ Providing information and referrals to other providers
➢ Providing ongoing risk assessment and safety planning with victims of domestic violence, dating violence, sexual assault and stalking
➢ Developing an Individualized Housing and Service Plan

□ Childcare – "Licensed" childcare for program participants with children under the age of 13 or disabled children under the age of 18.

➢ Child care costs
➢ Meals and snacks
➢ Comprehensive and coordinated sets of appropriate developmental activities

- Education Services – Instruction or training to enhance participants' ability to obtain and maintain housing: literacy, English literacy, GED, consumer education, health education, and substance abuse prevention.

  - Educational services/skill-building
  - Screening, assessment, and testing
  - Individual or group instruction
  - Tutoring
  - Provision of books, supplies and instructional material
  - Counseling
  - Referral to community resources

- Employment Assistance and Job Training – Services assisting participants secure employment and job training programs.

  - Classroom, online, and/or computer instruction
  - On the-job instruction
  - Job finding, skill-building
  - Reasonable stipends in employment assistance and job training programs
  - Books and instructional material
  - Employment screening, assessment, or testing
  - Structured job-seeking support
  - Special training and tutoring, including literacy training and pre-vocational training
  - Counseling or job coaching
  - Referral to community resources

- Outpatient Health Services – Direct outpatient treatment of medical conditions provided by licensed medical professionals.

  - Assessing health problems and developing a treatment plan Emergency Solutions Grants Eligible Expense Guide
  - Assisting program participants to understand their health needs

- ➢ Providing or helping participants obtain appropriate medical treatment, preventive medical care, and health maintenance services, including emergency medical services
- ➢ Providing medication and follow-up services
- ➢ Providing preventive and non-cosmetic dental care

□ Legal Services – Necessary legal services regarding matters that interfere with the program participant's ability to obtain and retain housing.

- ➢ Hourly fees for legal advice and representation by licensed attorneys and certain other fees-for-service
- ➢ Client intake, preparation of cases for trial, provision of legal advice, representation at hearings, and counseling
- ➢ Filing fees and other necessary court costs

□ Legal Representation – Legal representation and advice to resolve legal problems that prevent participants from obtaining or retaining permanent housing.

- ➢ Child support
- ➢ Guardianship
- ➢ Paternity
- ➢ Emancipation
- ➢ Legal separation
- ➢ Resolution of outstanding criminal warrants
- ➢ Appeal of veterans and public benefit claim denials
- ➢ Orders of protection and other civil remedies for victims of domestic violence, dating violence, sexual assault, and stalking

□ Life Skills Training – Critical life management skills necessary to assist the program participant to function independently in the community.

- ➢ Budgeting resources
- ➢ Managing money
- ➢ Managing household

- ➢ Resolving conflict
- ➢ Shopping for food and needed items
- ➢ Improving nutrition
- ➢ Using public transportation
- ➢ Parenting

□ Mental Health Services – Direct outpatient treatment of mental health conditions by licensed professionals.

- ➢ Crisis intervention
- ➢ Individual, family, or group therapy sessions
- ➢ Prescription of psychotropic medications or explanations about the use and management of medications
- ➢ Combinations of therapeutic approaches to address multiple problems

□ Substance Abuse Treatment Services – Substance abuse treatment provided by licensed or certified professionals, designed to prevent, reduce, eliminate or deter relapse of substance abuse or addictive behaviors.

- ➢ Client intake and assessment
- ➢ Outpatient treatment for up to thirty days
- ➢ Group and individual counseling
- ➢ Drug testing

□ Transportation – Costs of travel by program participants to and from medical care, employment, childcare, or other facilities that provide eligible essential services; and cost of staff travel to support provision of essential services.

- ➢ Cost of program participant's travel on public transportation
- ➢ Mileage allowance for service workers to visit participants
- ➢ Purchasing or leasing a vehicle used for transport of participants and/or staff serving participants, including the cost of gas, insurance, taxes, and maintenance for the vehicle
- ➢ Travel costs of staff to accompany or assist program participants to use public transportation

- Services for Special Populations – Otherwise eligible essential services tailored to address the special needs of homeless youth, victims of domestic violence, and related crimes/threats and people living with HIV/AIDS in emergency shelters.

  - See all eligible expenses above under Essential Services

- Rehabilitation and Renovation – Renovating buildings used as emergency shelter for homeless families and individuals.

  - Labor
  - Materials
  - Tools
  - Other costs for renovation, including soft costs
  - Major rehabilitation of an emergency shelter
  - Conversion of a building into an emergency shelter

- Shelter Operations – Costs to operate and maintain emergency shelter activities and also provide other emergency lodging when appropriate.

  - Maintenance (including minor or routine repairs)
  - Rent
  - Security
  - Fuel
  - Insurance
  - Utilities
  - Food
  - Furnishings
  - Equipment
  - Supplies necessary for the operation of emergency shelter activities
  - Hotel and motel voucher for family or individuals Note:* Hotel or motel vouchers are only eligible when no appropriate emergency shelter is available.

- Assistance Required under URA – Assistance required under the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (URA) as described in subpart E of the interim regulations.

  - Costs of providing URA assistance under 24 CFR § 576.408, including relocation payments and other assistance to persons displaced by a project assisted with ESG funds. (Note: Persons that receive URA assistance are not considered "program participants" for the purposes of this part of ESG and relocation payments and other URA assistance are not considered "rental assistance" or "housing relocation and stabilization services" for the purposes of this part under ESG.

- **Homelessness Prevention** – individuals and families who are at imminent risk or at risk of homelessness, meaning those who qualify under 24 CFR 576.2 paragraph (1) of the homeless definition or those who qualify as at risk of homelessness. Individuals and families must have an income below 30% of AMI. Short and medium-term rental assistance and housing relocation and stabilization services are eligible activities. Staff salaries related to carrying out homelessness prevention activities are also eligible.

  - Housing Relocation and Stabilization Services

    - Financial Assistance

      - Moving Costs – moving costs, such as truck rental or hiring a moving company, including certain temporary storage fees.
      - Rent Application Fees – application fee that is charged by the owner to all applicants.
      - Security Deposit – equal to no more than 2 months' rent.
      - Last Month's Rent – paid to the owner of housing at the time security deposit and first month's rent are paid.
      - Utility Deposit – standard utility deposit required by the utility company for all customers (i.e. gas, electric, water/sewage).
      - Utility Payments – up to 24 months of utility payments per participant per service (i.e. gas, electric, water/sewage), including a 1 time payment up to 6 months of arrearages, per service.

□ Services

➢ Housing Search and Placement

- o Assessment of housing barriers, needs and preferences
- o Development of an action plan for locating housing
- o Housing search and outreach to and negotiation with owner
- o Assistance with submitting rental applications and understanding leases
- o Assessment of housing for compliance with ESG requirements for habitability, lead based paint and rent reasonableness
- o Assistance with obtaining utilities and making moving arrangements
- o Tenant counseling

➢ Housing Stability Case Management – Assessing, arranging, coordinating, and monitoring the delivery of individualized services to facilitate housing stability

- o Using the centralized or coordinated assessment system conduct the initial evaluation and reevaluation
- o Counseling
- o Developing, securing, and coordinating services including Federal, state, and local benefits
- o Monitoring and evaluating program participant progress
- o Providing information and referrals to other providers
- o Developing an Individualized Housing and Service Plan.

➢ Mediation – Mediation between the program participant and the owner or person(s) with whom the program participant is living, to prevent the program participant from losing permanent housing in which they currently reside.

- o Time and/or services associated with mediation activities

➢ Legal Services – legal services that are necessary to resolve a legal problem that prohibits the program participant from obtaining or maintaining permanent housing.

- o Hourly fees for legal advice and representation
- o Fees based on the actual service performed (i.e. fee for service), but only if the cost would be less than the cost of hourly fees
- o Client intake, preparation of cases for trial, provision of legal advice, representation at hearings, and counseling
- o Filing fees and other necessary court costs
- o Subrecipient's employees' salaries and other costs necessary to perform the series, if the subrecipient is a legal services provider and performs the services itself

➢ Legal Representation may be provided for:

- o Landlord/tenant matters
- o Child support
- o Guardianship
- o Paternity
- o Emancipation
- o Legal Separation
- o Resolution of outstanding criminal warrants
- o Orders of protection and other civil remedies for victims of domestic violence, dating violence, sexual assault, and stalking
- o Appeal of veterans and public benefit claim denials

➢ Credit Repair – services necessary to assist program participants with critical skills related to household budgeting, managing money, accessing a free personal credit report, and resolving personal credit problems (Note: Assistance cannot include the payment or modification of a debt).

- o Credit counseling
- o Other related Services

- Short and Medium-Term Rental Assistance

  - Short-Term Rental Assistance -up to 3 months
  - Medium-Term Rental Assistance – 4 to 24 months
  - Payment of Rental Arrears – Onetime payment up to 6 months, including any late fees on those arrears
  - Any Combination of the Three Types of Rental Assistance Above – Total not to exceed 24 months during any 3-year period, including any payment for last month's rent.

- **Rapid Re-Housing** – individuals and families who are literally homeless, meaning those who qualify under 401(1) McKinney-Vento Act of the definition of homeless. Short and medium-term rental assistance and housing relocation and stabilization services are eligible activities. Staff salaries related to carrying out Rapid Re-Housing activities are also eligible.

  ✓ Relocation and Stabilization Services above.

  ✓ Short and Medium-Term Rental Assistance – See Short and Medium-Term Rental Assistance above.

- **HMIS** – the HEARTH Act makes HMIS participation a statutory requirement for ESG subrecipients. Victim service providers cannot and Legal Services Organizations may choose not to, participate in HMIS. Providers that do not participate in HMIS must use a comparable database that produces unduplicated, aggregate reports instead. Activities funded under this component must comply with HUD's standards on participation, data collection and reporting under a local HMIS.

  ✓ Hardware, Equipment and Software Costs

  - Purchasing or leasing computer software
  - Purchasing software or software licenses
  - Purchasing or leasing equipment, including telephones, faxes, and furniture

  ✓ Staffing: Paying salaries for operating HMIS, including:

- ☐ Data collection
- ☐ Completing data entry
- ☐ Monitoring and reviewing data quality
- ☐ Completing data analysis
- ☐ Reporting to the HMIS Lead
- ☐ Training staff on using the HMIS or comparable database
- ☐ Implementing and complying with HIMIS requirements

✓ Training and Overhead

- ☐ Obtaining technical support
- ☐ Leasing office space
- ☐ Paying charges for electricity, gas, water, phone service and high-speed data transmission necessary to operate or contribute data to HMIS
- ☐ Paying costs of staff to travel to and attend HUD-sponsored and HUD-approved training on HMIS and programs authorized by Title IV of the McKinney-Vento Homeless Assistance Act
- ☐ Paying staff travel costs to conduct intake
- ☐ Paying participation fees charged by the HMIS Lead

- **Administration**

✓ General Management / Oversight / Coordination – Costs of overall program management, coordination, monitoring, and evaluation

- ☐ Administrative services performed under third party contracts or agreements, including general legal services, accounting services, and audit services

- ☐ Other costs for goods and services required for administration of the program, including rental or purchase of equipment, insurance, utilities, office supplies, and rental and maintenance (but not purchase) of office space

- ☐ Staff salaries, wages, and related costs of staff engaged in eligible program administration activities

✓ Training on ESG Requirements

- Costs of providing training on ESG requirements and attending HUD-sponsored ESG trainings

✓ Consolidated Plan

- Costs of preparing and amending the ESG and homelessness related sections of the consolidated plan in accordance with ESG requirements and 24 CFR part 91

✓ Environmental Review

- Costs of carrying out the environmental review responsibilities under 24 CFR § 576.407 of the HUD regulations

- **Ineligible Costs.**

✓ Emergency Shelter

- Legal Services Ineligible Costs:

  - Legal Services for immigration and citizenship matters
  - Issues related to mortgages
  - Retainer fee arrangements and contingency fee arrangements
  - Substance abuse treatment services for inpatient detoxification and other inpatient drug or alcohol treatment are ineligible costs

✓ Homelessness Prevention and Rapid Re-housing

- Housing Relocation and Stabilization Services Ineligible Costs:

  - Payment of temporary storage fees in arrears

- ➢ No financial assistance to a household for a purpose and time period supported by another public source
- ➢ Credit Repair assistance does not include the payment or modification of a debt

□ Rental Assistance Ineligible Cost:

- ➢ Late payment penalties.

✓ Administration

□ General management / Oversight / Coordination Ineligible Cost:

Purchase of office space.

Exhibit 2
ESG Subgrantee Report

Attachment B: 2015-16 City of Garden Grove Emergency Solutions Grant - Scope of Services and Performance Reporting

Subgrantee is to complete all shaded areas and submit this quarterly with invoices by the 15th of October, January, April, and July.

SUBRECIPIENT INFORMATION & PROJECT ELIGIBILITY

Subrecipient: _____
Project Title: _____
Contact: _____
Site Address: _____
City, State, Zip: _____
Phone: _____
E-Mail: _____
City Contact: Allison Mills, Neighborhood Improvement Manager
Phone: (714)741-5139
Email AllisonJ@ci.garden-grove.ca.us

Con Plan Priority: #6D Homeless Priority Objective
National Objective: L/M Ltd Clientele
Reg Citation: 576.3/576.21(a)(3)
Matrix Code/Descrp: 03T Operating Costs
Eligibility: 570.201(e)
Environmental: Exempt
Activity: Emergency Services
Accomplishment Type: People

Census Tract: confidential
Census Block Grp confidential
Percent L/M by CT: N/A: L/M Ltd Clientele
L/M by Survey: N/A: L/M Ltd Clientele
Activity Area: Citywide
Contract Amount: _____
Funding Source: ESG
Insurance: _____
Does this contract provide assistance to homeless persons? YES
Does this contract prevent homelessness? YES

PURPOSE (Identify the purpose and nature of the different services under this agreement)

Scope of Services: Emergency Solutions Grant (ESG) funds for essential services will be used to help at least 400 victims of domestic violence and their children from Garden Grove by providing access to domestic violence shelter support services. Essential services include legal assistance, health and wellness services, social service advocacy, youth violence prevention programs, multi-cultural programs and other support services needed by victims. Provide rapid rehousing services for 10 homeless and at risk homeless Garden Grove households.

Types of facilities and activities supported by this contract:

Emergency Shelter: _____
Transitional Housing _____
Vouchers for Shelters _____
Outreach _____
Drop-In Center _____

Soup Kitchen / Meal Distr _____
Food Pantry _____
Health Care _____
Mental Health _____
HIV/AIDS Services: _____

Alcohol/Drug program _____
Employment Services: _____
Child Care: _____
Homeless Prevention _____
Other (specify) _____

ACCOMPLISHMENTS SUMMARY		1st Qtr	2nd Qtr	3rd Qtr	4th Qtr	Total Year to Date
Provide	0	0				0
Totals (cumulative)	0	0	0	0	0	0
ESG Budget: Shelter Operations	Funded					Balance
Total/Disbursed to date						
Match ($1:$1 minimum)*						$0

*Sources of match are:

Other federal sources: $
Other Sources (specify): $
Local Government: $
Fees: $
Private Sources: $

Subgrantee is to complete all shaded areas and submit this quarterly with invoices by the 15th of October, January, April, and July.

BENEFICIARY CHARACTERISTICS

Race (Residential and Non-Residential Services)**						
	Reporting Period	1st Quarter	2nd Quarter	3rd Quarter	4th Quarter	Total
Single Race	White					
	Black / African American					
	Asian					0
	Native American (North or Latin America, Alaska)					0
	Native Hawaiian / Other Pacific Islander					0
Multi-Racial	Native American & White					0
	Asian & White					0
	Black / African American & White					0
	Native American & Black / African American					0
	Other Multi-racial					0
	Total	0	0	0	0	0

** Important Note: For each Hispanic or Latino client, you must FIRST indicate a racial category (above) and then indicate their Latino/Hispanic ethnicity (below). This is consistent with the 2000 census and HUD funding requirements. If they decline to identify one of the racial categories above, show them in the "Other Multi-Racial" category.

Hispanic / Latino Ethnicity (Residential and Non-Residential Services) **					
Hispanic/Latino Ethnicity by Race	1st Quarter	2nd Quarter	3rd Quarter	4th Quarter	Total
White & Hispanic / Latino					0
Black / African American & Hispanic / Latino					0
Asian & Hispanic / Latino					0
Native American & Hispanic / Latino					0
Native Hawaiian & Hispanic / Latino					0
Native American & White & Hispanic / Latino					0
Asian & White & Hispanic / Latino					0
African American & White & Hispanic / Latino					0
Native American & African American & Hispanic / L					0
Other multi-racial & Hispanic/Latino					0
Total Latino/Hispanic, of any race	0	0	0	0	0

Subgrantee is to complete all shaded areas and submit this quarterly with invoices by the 15th of October, January, April, and July.

Homeless Prevention (Financial Assistance & Services)

Total Number of Persons		1st Quarter	2nd Quarter	3rd Quarter	4th Quarter	Total
Unaccompanied 18 and Over	Male:					
	Female:					
Unaccompanied Under 18	Male:					
	Female:					

Annual Number of Family Households with Children Headed by Single Parents		1st Quarter	2nd Quarter	3rd Quarter	4th Quarter	Total
Single Parent 18 and Over	Male:					
	Female:					
Single Parent Under 18	Male:					
	Female:					

Annual Number of Family Households	1st Quarter	2nd Quarter	3rd Quarter	4th Quarter	Total
Two Parents 18 and Over with Children					
Two Parents Under 18 with Children					
Family Households with No Children					

Total Number Served	1st Quarter	2nd Quarter	3rd Quarter	4th Quarter	Total
Total Number of Persons					
Total Number of Households					

Subgrantee is to complete all shaded areas and submit this quarterly with invoices by the 15th of October, January, April, and July.

NUMBER OF INDIVIDUALS HOUSED IN EACH OF THE FOLLOWING TYPES OF SHELTER?

NUMBER OF INDIVIDUALS HOUSED IN EACH OF FOLLOWING TYPES OF SHELTER?	1st Quarter	2nd Quarter	3rd Quarter	4th Quarter	Total
Barracks (# persons):					
Group/large house (# persons):					
Scattered-site apartments (# persons):					
Single-family detached home (# persons):					
Single room occupancy (# persons):					
Mobile home/trailer (# persons):					
Hotel/motel (# persons):					
Other (# persons) / Specify:					

SUBPOPULATIONS SERVED:	1st Quarter	2nd Quarter	3rd Quarter	4th Quarter	Total
Chronically Homeless (Emergency Shelter only)(# persons):					
Severely Mentally Ill (# persons):					
Chronic Substance Abuse (# persons):					
Other Disability (# persons):					
Veterans (# persons):					
Persons with HIV/AIDS (# persons):					
Victims of Domestic Violence (# persons):					
Elderly (# persons):					

Subgrantee is to complete all shaded areas and submit this quarterly with invoices by the 15th of October, January, April, and July.

NARRATIVE PERFORMANCE REPORT

Accomplishment Narrative [Describe project accomplishments associated with this reporting period, including type of service or product and the unit of measure used to describe accomplishments, such as number of calls, persons, bed nights, linear feet of improvements, etc.]

Implementation Status [Identify the status of any portion of the contract that is not complete, indicate any challenges, and describe the schedule you anticipate for fully completing that contract area.]

REPORT SUBMITTAL/REVIEW CERTIFICATION

I certify that the above information is true and accurate, and, that the source of documentation is available for review by both the City of Garden Grove and the U. S. Department of Housing and Urban Development.

Prepared by: _____ Submittal Date: _____

Signature: _____ Phone No. : _____

As the assigned representative for the City of Garden Grove, Community Development Department I have reviewed this Grantee Performance Report relative to the executed funding contract. I find the project-related information and the reported accomplishments acceptable and am authorizing reimbursement.

Reviewed by: Allison Mills, Neighborhood Improvement Manager Phone No. : 714-741-5139

Signature: _____ Review Date: _____

Exhibit 3
Eligibility Evaluation

City of Garden Grove Neighborhood Improvement Division

FY 2014-15 Eligibility Evaluation: ESG Program

Subrecipient:

PROJECT INFORMATION		
APPLICANT CONTACT INFORMATION	**Agency/Program:**	
	Contact Person/Title:	
	Street Address:	
	City, State, Zip:	
	Telephone & Email:	
PROJECT DESCRIPTION	This program funds ----	
OUTCOME STATEMENT	During FY 2014-15, the subrecipient will implement the ---- Program to assist ---- persons.	
OBJECTIVE CATEGORY	☐ Suitable Living Environment ☒ Decent Housing ☐ Economic Opportunity ☐ NA	
OUTCOME CATEGORY	☒ Availability/Accessibility ☐ Affordability ☐ Sustainability ☐ NA	
PERFORMANCE INDICATOR	☒ New (continuing) Access ☐ NA ☐ Improved Access ☐ Receiving a service or benefit no longer substandard	
PROJECT LOCATION (See Attached Map):		

ACTIVITY ELIGIBILITY (check at least one applicable category)		Allowable Activity		Allowable Costs
Street Outreach				
☐ **Essential Services** (24 CFR 576.101). Includes the provision of Essential Services to unsheltered homeless individuals (those who qualify under 24 CFR 91.5 paragraph (1)(i) of the definition of "homelessness"); connect the homeless with emergency shelter, housing, or critical services; and provide urgent non-facility-based care to unsheltered homeless individuals unwilling or unable to access emergency shelter, housing or an appropriate health facility.	☐	**Engagement.** The cost of activities to locate, identify, and build relationships with unsheltered homeless people for the purpose of providing immediate support, intervention, and connections with homeless assistance programs and/or mainstream social services and housing programs.	☐	Initial assessment of needs and eligibility ☐ Providing crisis counseling ☐ Addressing urgent physical needs ☐ Actively connecting and providing information and referral ☐ Cell phone costs of outreach workers
	☐	**Case Management.** Assessing housing and service needs and arranging/coordinating/ monitoring the delivery of individualized services.	☐	Initial evaluation/verifying and document eligibility ☐ Counseling ☐ Developing/Securing/Coordinating Services ☐ Helping obtain Federal, state, and local benefits ☐ Monitoring/evaluating participant progress ☐ Providing information and referral to other providers ☐ Developing an individualized housing/service plan
	☐	**Emergency Health Services.** Outpatient treatment of urgent medical conditions by licensed medical professionals in community based settings (e.g. streets, parks, and campgrounds) to eligible participants unwilling or unable to access emergency shelter or an appropriate healthcare facility.	☐	Assessing participants' health problems and developing treatment plans ☐ Assisting participants to understand their health needs ☐ Providing or helping participants obtain appropriate emergency medical treatment ☐ Providing medication and follow-up services
	☐	**Emergency Health Services and Emergency Mental Health Services.** Outpatient treatment of urgent mental health conditions by licensed professionals in community-based settings (e.g. streets, parks, and campgrounds) to eligible participants unwilling or unable to access emergency shelter or an appropriate healthcare facility	☐	Crisis Intervention ☐ Prescription of psychotropic medications ☐ Explain the use and management of medications ☐ Combinations of therapeutic approaches to address multiple problems

ACTIVITY ELIGIBILITY (check at least one applicable category)		Allowable Activity		Allowable Costs
Street Outreach (continued)				
☐		☐ **Transportation.** Travel by outreach workers, social workers, medical professionals or other service providers while providing eligible street outreach services	☐ LMA Transporting unsheltered people to emergency shelters or other service facilities ☐ Cost of a participant's travel on public transit ☐ Mileage allowance for outreach workers to visit participants ☐ Purchasing or leasing a vehicle for use in conducting outreach activities, including the cost of gas, insurance, taxes, and maintenance for the vehicle ☐ Costs of staff to accompany or assist participant to use public transportation
		☐ **Services to Special Populations.** Otherwise eligible Essential Services that have been tailored to address the special needs of homeless youth, victims of domestic violence, and related crimes/threats, and/or people living with HIV/AIDS who are literally homeless.	☐ Identify specific costs; all eligible expenses above under Street Outreach	

ACTIVITY ELIGIBILITY (check at least one applicable category)		Allowable Activity		Allowable Costs
Emergency Shelter (Includes Emergency Shelters, Transitional Housing & Day Centers)				
☐ **Essential Services.** Provided to persons in emergency shelters, renovating buildings to be used as emergency shelters, and operating emergency shelters	☐	**Case Management.** Assessing, arranging, coordinating, and monitoring individualized services.	☐	Using the centralized or coordinated assessment system
			☐	Initial evaluation including verifying and documenting eligibility
			☐	Counseling
			☐	Developing, securing and coordinating services including Federal, State, and local benefits
			☐	Monitoring and evaluating program participant progress
			☐	Providing information and referrals to other providers
			☐	Providing ongoing risk assessment and safety planning with victims of domestic violence, dating violence, sexual assault and stalking
			☐	Developing an Individualized Housing and Service Plan
	☐	**Child Care.** "Licensed" child care for program participants with children under the age of 13 or disabled children under the age of 18.	☐	Child care costs
			☐	Meals and Snacks
			☐	Comprehensive coordinated sets of appropriate developmental activities
	☐	**Education Services.** Instruction or training to enhance participants' ability to obtain and maintain housing: literacy, English literacy, GED, consumer education, health education and substance abuse prevention.	☐	Educational services/skill-building
			☐	Screening, assessment, and testing
			☐	Individual or group instruction
			☐	Tutoring
			☐	Provision of books, supplies and instructional material
			☐	Counseling
			☐	Referral to community resources
	☐	**Employment Assistance and Job Training.** Services assisting participants secure employment and job training programs.	☐	Classroom, online, and/or computer instruction
			☐	On the-job instruction
			☐	Job finding, skill-building
			☐	Reasonable stipends in employment assistance job training programs
			☐	Books and instructional material
			☐	Employment screening, assessment, or testing
			☐	Structured job-seeking support
			☐	Special training, tutoring including literacy training, re-vocational training
			☐	Counseling or job coaching
			☐	Referral to community resources

ACTIVITY ELIGIBILITY (check at least one applicable category)		Allowable Activity		Allowable Costs
Emergency Shelter (Includes Emergency Shelters, Transitional Housing & Day Centers) (continued)				
	☐	**Outpatient Health Services.** Direct outpatient treatment of medical conditions provided by licensed medical professionals.	☐	Assessing health problems and developing a treatment plan
			☐	Providing or helping participants obtain appropriate medical treatment, preventive medical care, and health maintenance services, including emergency medical services
			☐	Providing medication and follow-up services
			☐	Providing preventive and non-cosmetic dental care
	☐	**Legal Services.** Necessary legal services regarding matters that interfere with the program participant's ability to obtain and retain housing	☐	Hourly fees for legal advice and representation by licensed attorneys and certain other fees-for-service
			☐	Client intake, preparation of cases for trial, provision of legal advice, representation at hearings, and counseling
			☐	Filing fees and other necessary court costs
	☐	**Legal Representation.** Legal representation and advice to resolve legal problems that prevent participants from obtaining or retaining permanent housing.	☐	Child support
			☐	Guardianship
			☐	Paternity
			☐	Emancipation
			☐	Legal separation
			☐	Resolution of outstanding criminal warrants
			☐	Appeal of veterans and public benefit claim denials
			☐	Orders of protection and other civil remedies for victims of domestic violence, dating violence, sexual assault, and stalking
	☐	**Life Skills Training.** Critical life management skills necessary to assist the program participant to function independently in the community.	☐	Budgeting resources
			☐	Managing money
			☐	Managing household
			☐	Resolving conflict
			☐	Shopping for food and needed items
			☐	Improving nutrition
			☐	Using public transportation
			☐	Parenting

ACTIVITY ELIGIBILITY (check at least one applicable category)		Allowable Activity		Allowable Costs
Emergency Shelter (Includes Emergency Shelters, Transitional Housing & Day Centers) (continued)				
	☐	**Mental Health Services.** Direct outpatient treatment of mental health conditions by licensed professionals	☐	Crisis intervention
			☐	Individual, family, or group therapy sessions
			☐	Prescription of psychotropic medications or explanations about the use and management of medications
			☐	Combinations of therapeutic approaches to address multiple problems
	☐	**Substance Abuse Treatment Services.** Substance abuse treatment provided by licensed or certified professionals, designed to prevent, reduce, eliminate or deter relapse of substance abuse or addictive behaviors	☐	Client intake and assessment
			☐	Outpatient treatment for up to thirty days Group and individual counseling
			☐	Drug testing
	☐	**Transportation.** Costs of travel by program participants to and from medical care, employment, child care, or other facilities that provide eligible essential ser ices; and cost of staff travel to support provision of essential services.	☐	Cost of program participant's travel on public transportation
			☐	Mileage allowance for service workers to visit participants
			☐	Purchasing or leasing a vehicle used for transport of participants and/or staff serving participants, including the cost of gas, insurance, taxes, and maintenance for the vehicle
			☐	Travel costs of staff to accompany or assist program participants to use public transportation
	☐	**Services for Special Populations.** Otherwise eligible essential services tailored to address the special needs of homeless youth, victims of domestic violence, and related crimes/threats and people living with HIV/AIDS in emergency shelters.	☐	See all eligible expenses above under Essential Services
	☐	**Rehabilitation and Renovation.** Renovating buildings to be used as emergency shelter for homeless families and individuals.	☐	Labor
			☐	Materials
			☐	Tools
			☐	Other costs for renovation, including soft costs
			☐	Major rehabilitation of an emergency shelter
			☐	Conversion of a building into an emergency shelter

ACTIVITY ELIGIBILITY (check at least one applicable category)		Allowable Activity		Allowable Costs
Emergency Shelter (Includes Emergency Shelters, Transitional Housing & Day Centers) (continued)				
☐	**Shelter Operations**	☐	**Shelter Operations.** Costs to operate and maintain emergency shelter activities and also provide other emergency lodging when appropriate. * **Hotel or motel vouchers are only eligible when no appropriate emergency shelter is available*	☐ Maintenance (including minor or routine repairs) ☐ Rent ☐ Security ☐ Fuel ☐ Insurance ☐ Utilities ☐ Food ☐ Furnishings ☐ Equipment ☐ Supplies necessary for the operation of emergency shelter activities
☐	**Assistance Required under URA.**	☐	**Assistance Required under URA.** Assistance required under the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (URA) as described in subpart E of the interim regulations	☐ Costs of providing URA assistance under 24 CFR § 576.408, including relocation payments and other assistance to persons displaced by a project assisted with ESG funds. * **Persons that receive URA assistance are not considered "program participants" for the purposes of this part of ESG and relocation payments and other URA assistance are not considered "rental assistance" or "housing relocation and stabilization services" for the purposes of this part under ESG.*

ACTIVITY ELIGIBILITY (check at least one applicable category)		Allowable Activity		Allowable Costs
Homelessness Prevention (24 CFR 576.103) and Rapid Re-Housing (24 CFR 576.104)				
☐	**Housing Relocation and Stabilization Services**	☐	**Financial Assistance**	☐ Moving Costs. Moving costs, such as truck rental or hiring a moving company, including certain temporary storage fees. ☐ Rent Application Fees. Application fee that is charged by the owner to all applicants. ☐ Security Deposit. Equal to no more than 2 months' rent. ☐ Last Month's Rent. Paid to the owner of housing at the time security deposit and first month's rent are paid. ☐ Utility Deposit. Standard utility deposit required by the utility company for all customers (i.e. gas, electric, water/sewage). ☐ Utility Payments. Up to 24 months of utility payments per participant per service (i.e. gas, electric, water/sewage), including a 1 time payment up to 6 months of arrearages, per service.
		☐	**Services: Housing Search and Placement:**	☐ Assessment of housing barriers, needs and preferences ☐ Development of an action plan for locating housing ☐ Housing search and outreach to and negotiation with owner ☐ Assistance with submitting rental applications and understanding leases ☐ Assessment of housing for compliance with ESG requirements for habitability, lead based paint, and rent reasonableness ☐ Assistance with obtaining utilities and making moving arrangements ☐ Tenant counseling ☐ Assessment of housing barriers, needs and preferences
		☐	**Housing Stability Case Management.** Assessing, arranging, coordinating, and monitoring the delivery of individualized services to facilitate housing stability	☐ Using the centralized or coordinated assessment system conduct the initial evaluation and reevaluation

ACTIVITY ELIGIBILITY (check at least one applicable category)		Allowable Activity		Allowable Costs
Homelessness Prevention (24 CFR 576.103) and Rapid Re-Housing (24 CFR 576.104) (continued)				
				☐ Counseling ☐ Developing, securing, and coordinating services including Federal, state, and local benefits ☐ Monitoring and evaluating program participant progress ☐ Providing information and referrals to other providers ☐ Developing an Individualized Housing and Service Plan
			Services: Mediation.	☐ Time and/or services associated with mediation activities between the program participant and the owner or person(s) with whom the program participant is living, to prevent the program participant from losing permanent housing in which they currently reside.
		☐	**Legal Services.** Legal services that are necessary to resolve a legal problem that prohibits the program participant from obtaining or maintaining permanent housing	☐ Hourly fees for legal advice and representation ☐ Fees based on the actual service performed (i.e. fee for service), but only if the cost would be less than the cost of hourly fees ☐ Client intake, preparation of cases for trial, provision of legal advice, representation at hearings and counseling
		☐	**Services: Legal Representation**	☐ Landlord/tenant matters ☐ Child support ☐ Guardianship ☐ Paternity ☐ Emancipation ☐ Legal Separation ☐ Resolution of outstanding criminal warrants ☐ Orders of protection and other civil remedies for victims of domestic violence, dating violence, sexual assault and stalking

ACTIVITY ELIGIBILITY (check at least one applicable category)		Allowable Activity		Allowable Costs
Homelessness Prevention (24 CFR 576.103) and Rapid Re-Housing (24 CFR 576.104) (continued)				
		☐ **Services: Credit Repair.** Services necessary to assist program participants with critical skills related to household budgeting, managing money, accessing a free personal credit report, and resolving personal credit problems* * *Assistance cannot include the payment or modification of a debt.*	☐ Credit counseling ☐ Other related Services	
☐	Short and Medium-Term Rental Assistance	☐ **Short-Term Rental Assistance.** Extended up to 3 months	☐ Rental Assistance: rental assistance and rental arrears ☐ rental application fees, security and utility deposits, utility payments, last month's rent, moving costs	
		☐ **Medium-Term Rental Assistance.** Extended 4 to 24 months		
		☐ **Payment of Rental Arrears.** Onetime payment up to 6 months, including any late fees on those arrears		
		☐ **Any Combination of the Three Types of Rental Assistance Above.** Total not to exceed 24 months during any 3 year period, including any payment for last month's rent.		
HMIS (24 CFR 576.107)				
☐	**HMIS.** The HEARTH Act makes HMIS participation a statutory requirement for ESG subrecipients. Activities funded under this component must comply with HUD's standards on participation, data collection and reporting under a local HMIS.	☐ **Hardware, Equipment and Software Costs**	☐ Purchasing or leasing computer software ☐ Purchasing software or software licenses ☐ Purchasing or leasing equipment, including telephones, faxes, and furniture	
		☐ **Staffing: Paying salaries for operating HMIS**	☐ Data collection ☐ Completing data entry ☐ Monitoring and reviewing data quality ☐ Completing data analysis ☐ Reporting to the HMIS ☐ Training staff on using the HMIS or comparable database ☐ Implementing and complying with HMIS requirements	

City of Garden Grove Neighborhood Improvement Division

FY 2014-15 Eligibility Evaluation: ESG Program

Subrecipient:

ACTIVITY ELIGIBILITY (check at least one applicable category)		Allowable Activity		Allowable Costs
HMIS (24 CFR 576.107) (continued)				
		☐ Training and Overhead	☐	Obtaining technical support
			☐	Leasing office space
			☐	Paying charges for electricity, gas, water, phone service and high speed data transmission necessary to operate or contribute data to HMIS
			☐	Paying costs of staff to travel to and attend HUD-sponsored and HUD approved training on HMIS and programs authorized by Title IV of the McKinney-Vento Homeless Assistance Act
			☐	Paying staff travel costs to conduct intake
			☐	Paying participation fees charged by the HMIS

Is the project an ineligible activity? (Double-check that it is none of the following.) (570.207)	
☐	**Emergency Shelter Legal Services:**
☐	Legal Services for immigration and citizenship matters
☐	Issues related to mortgages
☐	Retainer fee arrangements and contingency fee arrangements
☐	Substance abuse treatment services for inpatient detoxification and other inpatient drug or alcohol treatment are ineligible costs
☐	**Homelessness Prevention and Rapid Re-housing/ Housing Relocation and Stabilization Services:**
☐	Payment of temporary storage fees in arrears
☐	No financial assistance to a household for a purpose and time period supported by another public source
☐	Credit Repair assistance does not include the payment or modification of a debt
☐	**Rental Assistance**
☐	Late payment penalties.
☐	**Administration** **General management / Oversight / Coordination**
☐	Purchase of office space.
☐	Bad debts (e.g., late fees shown on invoices), , grant writing, public relations events, staff training, attending conferences, advertising, and entertainment

PROJECT FUNDING/ MATCHING REQUIREMENT (24 CFR 576.201)		
Subrecipient's estimated cost:		
Recommended ESG funding:		
Match sources (amount & source):* *Matching contributions in an amount that equals the amount of ESG funds applied for, and awarded. Matching contributions may be obtained from any source, including any federal source		

other than the ESG Program, as well as State, local, and private sources.		
ESG share of City's estimated total cost		

CONSOLIDATED OR ACTION PLAN

☐ Yes ☐ No	Is the project consistent with a priority need or objective identified in the Consolidated Plan? If not, a Plan amendment will be needed, following the Citizen Participation Plan. Identify the priority:
☐ Yes ☐ No	Is the project identified in the current Action Plan or as a previous Action Plan activity for which there are still sufficient funds? If not, if this is a "substantial amendment" per the Citizen Participation Plan, a Plan amendment will be needed to implement the project.

CONTINUUM OF CARE CONSULTATION (24 CFR 576.400(a))

☐ Yes ☐ No	Project is consistent with local CoC: (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 **(24 CFR 576.400(a)).**
☐ Yes ☐ No	Subrecipient has coordinated and integrated, to the maximum extent practicable, ESG-funded activities with other programs targeted to homeless people in the area covered by the CoC to provide a strategic, community-wide system to prevent and end homelessness for the area (24 CFR 576.400(c)).
☐ Yes ☐ No	Subrecipient has coordinated and integrated, to the maximum extent practicable, 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 (24 CFR 576.400(d)).
☐ Yes ☐ No ☐ NA	If the CoC has developed Written Standards in accordance with the requirements outlined in 24 CFR 576.400(e)(2)(3), is the subrecipient using those written standards.
☐ Yes ☐ No ☐ NA	If the CoC has not yet established its Written Standards, has subrecipient established and applied written standards for providing ESG Assistance per 24 CFR 576.400 (e)(2)(3).

Participation in HMIS

☐ Yes ☐ No	The subrecipient has ensured that data on all persons served and all activities assisted under ESG are entered into the HMIS. If 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 (24 CFR 576.400(f)).

RECOMMENDATION AND COMMENTS

Comments:

PREPARER'S SIGNATURE			
Signature:		Date:	
Name:		Title:	
CITY REVIEWER SIGNATURE			
Signature:		Date:	
Name:		Title:	
CITY REVIEWER SIGNATURE			
Signature:		Date:	
Name:		Title:	
ATTACHMENTS			

Exhibit 4
Subrecipient Agreement

EMERGENCY SOLUTIONS GRANT PROGRAM
SUBRECIPIENT AGREEMENT
BETWEEN THE CITY OF GARDEN GROVE
AND (Insert Organization)
FOR (Insert activities that are being funded)

This agreement is made and entered into this (Insert date), by and between the CITY OF GARDEN GROVE, a municipal corporation of the State of California, hereinafter referred to as "CITY," and (Insert name of subrecipient), a nonprofit corporation under the laws of the State of California, hereinafter referred to as "SUBRECIPIENT."

RECITALS

The following recitals are a substantive part of this agreement:

1. The CITY has applied for and received funds from the U.S. Department of Housing and Urban Development (HUD) under subtitle B of Title IV of the McKinney-Vento Homeless Assistance Act of 1974, (42 U.S.C. 11371-11378); and

2. The CITY's Annual Action Plan submitted to HUD includes the PROJECT described herein and indicates that a portion of the funds received from HUD shall be allocated to SUBRECIPIENT; and

3. HUD has accepted and certified the aforementioned Annual Action Plan; and

4. The CITY wishes to engage the SUBRECIPIENT to provide (Insert activities that are being funded) , as set forth in CITY's Annual Action Plan, in accordance with the Scope of Services (Attachment A) of this agreement (the "PROJECT"); and

5. The provision of this service is an eligible expenditure of available Emergency Solutions Grant (ESG) Program funds of the CITY required to carry out the purpose of the ESG Program under 24 CFR 576.1.

AGREEMENT

The parties mutually agree as follows:

1. **Term of Agreement**. This agreement shall cover services rendered from (Insert start date of agreement) until (Insert date that the contract will expire). The term of this agreement and the provisions herein shall be extended to cover any additional time period during which the SUBRECIPIENT remains in control of ESG funds or other assets, including program income. Subrecipient shall remain obligated to perform such duties as would normally extend beyond the end date of reimbursable activities, including, but not limited to, indemnification, audits, reporting, and accounting.

2. **Services to be Provided**. As a condition of receiving ESG funding pursuant to this agreement, the SUBRECIPIENT shall perform all the services necessary to administer the PROJECT as described in the CITY's Annual Action Plan and as set forth in the Scope of Services described in Attachment A to this agreement, a copy of which is attached hereto and incorporated herein by this reference. The Scope of Services includes the following

components:

2.1 Activities. The SUBRECIPIENT will be responsible for administering the services with Fiscal (Insert year) ESG Program funds to qualified Garden Grove residents in a manner satisfactory to the CITY and consistent with any and all standards required as a condition of providing these funds, the terms of this agreement, and all applicable Federal, State and local laws, guidelines, policies and regulations.

a. Program Delivery. The Scope of Services includes a description of each activity eligible under the ESG Program, the products or services to be performed, where they are to be provided, for whom they are to be provided, and how many they are to be provided.

b. General Administration. A description of the SUBRECIPIENT's general administrative services to be performed in support of the activities is noted in the Scope of Services. A schedule for the completion of these services and goals is included in the Scope of Services. The services will include activities eligible under the ESG Program.

2.2 The Eligible Expense Guide The Eligible Expense Guide, attached hereto as Attachment B and incorporated herein by reference, details what activities are eligible for reimbursement with ESG funds, and includes the following components:

a. Eligible Activities. A complete description of each activity eligible under the ESG Program, the products or services to be performed, where the services are to be provided and for how long services are to be provided.

b. Participant Qualifications. A description of client qualification to receive ESG services, including the definitions of "at risk" and "homeless", and maximum gross household income.

2.3 Emergency Solutions Program Objectives. All activities funded with ESG funds are limited to ones that increase the number and quality of emergency shelters and transitional housing facilities for homeless individuals and families and to operate these facilities, and provide essential social services, homelessness prevention and rapid rehousing services.

2.4 Level of Accomplishment-Goals and Performance Measures. The Scope of Services includes measurements for each activity per quarter and year-to-date.

2.5 Performance Monitoring. The CITY will monitor the performance of the SUBRECIPIENT against goals and performance standards required herein. Substandard performance as determined by the CITY will constitute non-compliance with this agreement. If action to correct such substandard performance is not taken by the SUBRECIPIENT within a reasonable period of time after being notified by the CITY, Agreement suspension or termination procedures will be initiated.

3. Disbursement of Funds. SUBRECIPIENT shall receive ESG Funds as follows:

3.1 Amount. It is expressly agreed and understood that the total amount to be paid by the CITY under this agreement shall not exceed (Insert amount funded to subrecipient). Payment may be contingent upon certification of the SUBRECIPIENT's financial management system in accordance with the standard specified in 2 CFR Part 200.

3.2 Not to Exceed. ESG Funds under this agreement shall not exceed (Insert amount funded). If the costs of services provided exceed (Insert amount funded), the SUBRECIPIENT shall pay all additional costs. If the cost of services provided is less than (Insert amount funded), the CITY shall retain all unused funds.

3.3 Budget. Drawdowns for the payment of eligible expenses shall be made in accordance with the line item budgets specified in the Project Budget set forth in Attachment A hereto, and in accordance with the payment procedures set forth in Section 5.10 of this agreement.

3.4 Prohibition of Subrecipient Income from ESG Funds. Subrecipient agrees that it shall not use ESG Funds in any manner which shall provide income to Subrecipient, other than Program Income. Any earned interest income on funds generated through the use of investment of funds received from ESG shall be cause, at the discretion of the City, for recapture of such income and/or the full amount of funds originally granted to Subrecipient.

4. General Conditions. During the performance of this agreement, the SUBRECIPIENT agrees as follows:

4.1 General Compliance. The SUBRECIPIENT agrees to comply with applicable Uniform Administrative Requirements of Title 2 of the Code of Federal Regulations as well as the requirements of Title 24 of the Code of Federal Regulations, Part 576 (the U.S. Housing and Urban Development regulations concerning the Emergency Solutions Grant Program (ESG) including 24 CFR 576.407 of these regulations, except that (1) the SUBRECIPIENT does not assume the recipient's environmental responsibilities described in 24 CFR 576.407 (d) and (2) the SUBRECIPIENT does not assume the recipient's responsibility for initiating the environmental review process under the provisions of 24 CFR Part 52. The SUBRECIPIENT also agrees to comply with all other applicable federal, state and local laws, regulations, and policies governing the funds provided under this agreement. The SUBRECIPIENT further agrees to utilize funds available under this agreement to supplement rather than supplant funds otherwise available.

Subrecipient shall keep itself fully informed of and in compliance with all local, state, and federal laws, rules, and regulations in any manner affecting the performance of the Agreement or the ESG Program, including all Cal/OSHA requirements, and shall give all notices required by law. Subrecipient shall be liable for all violations of such laws and regulations in connection with performing work related to the Agreement or ESG Program. If Subrecipient performs any work or services in violation of such laws, rules, and regulations, Subrecipient shall be solely responsible for all penalties and costs arising therefrom. Subrecipient shall defend, indemnify, and hold City, its officials, officers, employees, agents and

volunteers, free and harmless from any claim or liability arising out of any failure or alleged failure to comply with such laws, rules, or regulations.

4.2. Notices. All notices or other communications required or permitted hereunder shall be in writing, and shall be personally delivered or mailed to the below listed addresses, or to such other addresses as may be designated by written notice. These addresses shall be used for delivery of service of process.

Address of CITY is as follows:

City of Garden Grove
Attn: Neighborhood Improvement Division, 3rd Floor
Community Development Department
11222 Acacia Parkway
Garden Grove, CA 92840-5208

With One (1) Copy to:

City of Garden Grove
Attn: City Attorney

City Attorney's Office
11222 Acacia Parkway
Garden Grove, CA 92840-5208

Address of SUBRECIPIENT:
(Name of subrecipient)
Attn: (Contact name)
(Contact title)
(Address)

4.3. Independent Contractor. Nothing contained in this agreement is intended to, or shall be construed in any manner, as creating or establishing the relationship of employer/employee between the parties. The SUBRECIPIENT shall at all times remain an independent contractor with respect to the services to be performed under this agreement. All persons employed for the performance of services and functions hereunder shall be officers, agents, or employees (including volunteers) of SUBRECIPIENT and shall not be deemed to be those of CITY; no CITY officer, agent, or employee shall be under control or supervision of SUBRECIPIENT, and no SUBRECIPIENT officers, agents or employees (including volunteers), shall have any entitlement to wages, pension, civil service, or any status or rights with CITY. The CITY shall be exempt from payment of all Unemployment Compensation, FICA, retirement, life and/or medical insurance and Workers' Compensation Insurance, as the SUBRECIPIENT is an independent contractor.

4.4 Licensing. Prior to performing any services or work hereunder Subrecipient shall obtain all licenses, permits, qualifications, and approvals of whatever nature that are legally required to perform the work and services required by this Agreement and ESG Funds. Subrecipient represents and warrants to City that Subrecipient shall, at its sole cost and expense, keep in effect at all times during the term of this Agreement and any extension, any license, permit, qualification, or approval that is legally required for Subrecipient to perform the work and services required or authorized by this Agreement or ESG Funds. Subrecipient shall have the sole obligation to pay for any fees, assessments, and taxes, plus applicable penalties and interest, which may be imposed by law and arise from or are necessary for the Subrecipient's performance of the work and services required or authorized by this Agreement or ESG Funds, and shall defend, indemnify, and hold the City, its

officials, officers, employees, agents and volunteers, free and harmless from and against any claim or liability arising out of any failure or alleged failure to obtain such license, permits, and approvals of whatever nature that are legally required to perform the work or services set forth in the ESG Program.

4.5 Ineligibility of Subrecipient or Contractors. Subrecipient shall not use ESG Funds directly or indirectly in its operations or to employ, award contracts to, or otherwise engage the services of, or fund any contractor during any period of debarment, suspension, or placement in ineligibility status of the Subrecipient or such contractor under the provisions of the applicable federal regulations governing ESG funds, projects, or programs.

4.6 Prohibition of Expending ESG Funds to Obtain Other Funding. Subrecipient shall in no event expend ESG Funds granted hereunder to fund another service provider, to pay a contractor for services outside the scope of this Agreement, to apply for other public agencies' program funds, or to supplant another funding source, unless expressly approved by the City.

4.7 Unauthorized Aliens. Subrecipient represents and warrants that it will comply with all of the provisions of the Federal Immigration and Nationality Act, 8 U.S.C.A. §§1101, et seq., as amended, and in connection therewith, shall not employ unauthorized aliens as defined therein. Should Subrecipient so employ such unauthorized aliens for the performance of any work and/or services under this Agreement, and should any liability or sanctions be imposed against City for such use of unauthorized aliens, Subrecipient hereby agrees to reimburse City for any and all liabilities, actions, suits, claims, demands, losses, costs, judgments, arbitration awards, settlements, damages, demands, orders, or penalties which arise out of or are related to such employment, together with any and all costs, including attorneys' fees, incurred by City.

4.8 Hold Harmless. SUBRECIPIENT agrees to protect, defend, and hold harmless CITY and its elective or appointive boards, officers, agents, and employees from any and all claims, liabilities, expenses, or damages of any nature, including attorneys' fees, for injury or death of any person, or damage to property, or interference with use of property, arising out of, or in any way connected with performance of the Agreement by SUBRECIPIENT, SUBRECIPIENT's agents, officers, employees, subcontractors, or independent contractors hired by SUBRECIPIENT. The only exception to SUBRECIPIENT's responsibility to protect, defend, and hold harmless CITY, is due to the sole negligence of CITY, or any of its elective or appointive boards, officers, agents, or employees. This hold harmless agreement shall apply to all liability regardless of whether any insurance policies are applicable. The policy limits do not act as a limitation upon the amount of indemnification to be provided by SUBRECIPIENT.

4.5 Workers' Compensation. For the duration of the agreement, SUBRECIPIENT shall maintain Workers' Compensation Insurance in the amount and type required by law.

4.6 Insurance: The SUBRECIPIENT shall maintain the following insurance for the duration of this agreement. Work should not commence until all insurance is approved.

a. For the duration of this agreement, SUBRECIPIENT and all subcontractors, consultants, and agents shall maintain workers compensation insurance in the amount and type required by California Law, if applicable.

b. Commercial General Liability in an amount not less than $1,000,000 per occurrence; (claims made and modified occurrence policies are not acceptable); Insurance companies must be acceptable to CITY and have a Best's Guide Rating of A-Class VII or better, as approved by CITY.

c. Automobile Liability in an amount not less than $1,000,000 combined single limit; Insurance companies must be acceptable to CITY and have a Best's Guide Rating of A-Class VII or better, as approved by CITY.

d. Professional Liability in an amount not less than $1,000,000 per occurrence; Insurance companies must be acceptable to CITY and have a Best's Guide Rating of A-Class VII or better, as approved by the CITY.

Additional Insured Endorsements and Loss Payee Endorsement:

All certificates and endorsements must be in a form and content as approved by CITY. An additional insured Endorsement for commercial general liability policies (Subsection "b" above) shall designate the City of Garden Grove, Garden Grove Agency for Community Development, their officers, officials, employees, agents, and volunteers as additional insureds for liability arising out of work or operations performed by or on behalf of SUBRECIPIENT. SUBRECIPIENT shall provide to CITY proof of insurance and endorsement forms that conform to CITY's requirements, as approved by the CITY.

An Additional Insured Endorsement for automobile liability policies (Subsection "c" above) shall designate the City of Garden Grove, the Garden Grove Agency for Community Development, their officers, officials, employees, agents, and volunteers as additional insureds for automobiles owned, leased, hired, or borrowed by SUBRECIPIENT. SUBRECIPIENT shall provide CITY proof of insurance and endorsement forms that conform to CITY's requirements, as approved by CITY.
SUBRECIPIENT shall provide to CITY endorsements from each insurance carrier wherein the insurance carrier shall give CITY thirty (30) days advanced written notice of any material change, cancellation, or termination of coverage.

For any claims related to this Agreement, SUBRECIPIENT's insurance coverage shall be primary insurance as respects the City of Garden Grove, Garden Grove Agency for Community Development, their officers, officials, employees, agents, and volunteers. Any insurance or self-insurance maintained by the CITY, its officers, officials, employees, agents, or volunteers shall be excess of the SUBRECIPIENT'S insurance and shall not contribute with it. Claims made and modified occurrence policies are not acceptable.

4.7. City Recognition. The SUBRECIPIENT shall insure recognition of the role of the CITY in providing services through this agreement. All activities, facilities and items utilized pursuant to this agreement shall be prominently labeled as to funding source. In addition, the SUBRECIPIENT will include a reference to the support

provided herein in all publications made possible with funds made available under this agreement

4.8. Amendments. The CITY or SUBRECIPIENT may amend this agreement at any time provided that such amendments make specific reference to this agreement, and are executed in writing, signed by a duly authorized representative of each organization, and approved by the CITY's governing body. Such amendments shall not invalidate this agreement, nor relieve or release the CITY or SUBRECIPIENT from its obligations under this agreement.

The CITY may, in its discretion, amend this agreement to conform with federal, state or local governmental guidelines, policies and available funding amounts, or for other reasons. If such amendments result in a change in the funding, the scope of services, or schedule of the activities to be undertaken as part of this agreement, such modifications will be incorporated only by written amendment signed by both CITY and SUBRECIPIENT.

4.9. Suspension or Termination. In accordance with 2 CFR 200.338, the CITY may suspend or terminate this agreement if the SUBRECIPIENT materially fails to comply with any terms of this agreement, which include (but are not limited to) the following:

a. Failure to comply with any of the rules, regulations or provisions referred to herein, or such statutes, regulations, executive orders, and HUD guidelines, policies or directives as may become applicable at any time;

b. Failure, for any reason, of the SUBRECIPIENT to fulfill in a timely and proper manner its obligations under this agreement;

c. Ineffective or improper use of funds provided under this agreement; or

d. Submission by the SUBRECIPIENT to the CITY reports that are incorrect or incomplete in any material respect.

In accordance with 2 CFR 200.339, this agreement may also be terminated for convenience by either the CITY or the SUBRECIPIENT, in whole or in part, by setting forth the reasons for such termination, the effective date, and, in the case of partial termination, the portion to be terminated. However, if in the case of a partial termination, the CITY determines that the remaining portion of the award will not accomplish the purpose for which the award was made, the CITY may terminate the award in its entirety.

5. Administrative Requirements

Financial Management

5.1. Accounting Standards. The SUBRECIPIENT agrees to comply with 2 CFR 200.302 and all other applicable provisions of 2 CFR Part 200 and agrees to adhere to the accounting principles and procedures required therein, utilize adequate internal controls, and maintain necessary source documentation for all costs incurred.

5.2. Cost Principles. The SUBRECIPIENT shall administer its program in conformance with 2 CFR Part 200 as it pertains to all costs incurred whether charged on a direct or indirect basis.

Documentation and Record Keeping

5.3. Records to be Maintained. The SUBRECIPIENT shall maintain all records required by the federal regulations specified in 24 CFR 576.500 that are pertinent to the activities to be funded under this agreement. Such records shall include but not be limited to:

a. Records providing a full description of each activity undertaken;

b. Records demonstrating that each activity undertaken meets the Purpose of the ESG Program;

c. Records required to determine the eligibility of activities;

d. Records required to document the acquisition, improvement, use or disposition of real property acquired or improved with ESG assistance;

e. For homeless prevention activities, records documenting evidence of an eviction, foreclosure, or utility termination notice(s) and evidence that the inability to pay was sudden, necessary to prevent homelessness, and resumption of payment is reasonably expected within the near future;

f. Financial records as required by and 2 CFR Part 200;

g. Records to document homelessness status to determine the eligibility of persons served by the ESG Program; and

h. Other records necessary to document compliance with 24 CFR Part 576.57.

5.4. Retention. The SUBRECIPIENT shall retain all financial records, supporting documents, statistical records, and all other records pertinent to the agreement for a period of four (4) years. The retention period begins on the date of the submission of the CITY's annual performance and evaluation report to HUD in which the activities assisted under the agreement are reported on for the final time. Notwithstanding the above, if there is litigation, claims, audits, negotiations or other actions that involve any of the records cited and that have started before the expiration of the four-year period, then such records must be retained until completion of the actions and resolution of all issues, or the expiration of the four-year period, whichever occurs later.

5.5. Client Data. The SUBRECIPIENT shall maintain client data demonstrating client eligibility for services provided. Such data shall include, but not be limited to, client name, address, income level or other basis for determining eligibility, and description of service provided. Such information shall be made available to CITY monitors or their designees for review upon request.

5.6. Disclosure. The SUBRECIPIENT understands that client information collected under this agreement is private and the use or disclosure of such information, when not directly connected with the administration of the CITY's or SUBRECIPIENT's responsibilities with respect to services provided under this agreement, is prohibited by the all applicable state and federal law unless written consent is obtained from such person receiving service and, in the case of a minor, that of a responsible parent/guardian.

5.7. Closeouts. The SUBRECIPIENT's obligation to the CITY shall not end until all closeout requirements are completed. Activities during this closeout period shall include, but are not limited to: Making final payments, disposing of program assets (including the return of all unused materials, equipment, unspent cash advances, program income balances, and accounts receivable to the CITY), and determining the custodianship of records. Notwithstanding the foregoing, the terms of this agreement shall remain in effect during any period that the SUBRECIPIENT has control over ESG funds.

5.8. Audits and Inspections. All SUBRECIPIENT records with respect to any matters covered by this agreement shall be made available to the CITY, grantor agency, and the Comptroller General of the United States or any of their authorized representatives, at any time during normal business hours, as often as deemed necessary, to audit, examine, and make excerpts or transcripts of all relevant data. Any deficiencies noted in audit reports must be fully cleared by the SUBRECIPIENT within 30 days after receipt by the SUBRECIPIENT. Failure of the SUBRECIPIENT to comply with the above audit requirements will constitute a violation of this agreement and may result in the withholding of future payments. The SUBRECIPIENT hereby agrees to have an annual agency audit conducted in accordance with current CITY policy concerning SUBRECIPIENT audits and 2 CFR Part 200 subparts A-F.

Reporting and Payment Procedures

5.9 Quarterly Reports. The Subrecipient shall submit "Quarterly Reports" during the program year beginning (Insert date), and ending (Insert date), within fifteen (15) calendar days of the end of each quarter. The final quarterly report is due no later than July 15, (Insert year). The report must include sufficient information to assist the City in monitoring the Subrecipient's performance. The Subrecipient must demonstrate satisfactory performance prior to reimbursement for expenditures. The Quarterly Reports shall indicate the number of persons assisted, income and ethnicity of persons assisted, how/what assistance was provided, and a description of how and when determination of eligibility status was made for persons assisted.

5.10 Reimbursement Schedule. Subrecipient may request to draw down on these ESG Funds in the manner delineated in Scope of Services, unless receipts and appropriate documentation can be provided to, and approved by, the City indicating the need to draw down on funds earlier. The City shall not provide any payments/reimbursements in advance of actual expenditures by the Subrecipient.

5.11 Reimbursement Requests. Concurrently with the submittal of each Quarterly Report, as described in subsection 5.9, Subrecipient shall submit a "Reimbursement Request" to the City to request payment for eligible ESG Program costs. Each Reimbursement Request shall include documentation to verify that the expenditure of funds is consistent with the ESG Program description/definition as approved by the City Council. Documentation shall include, but not be limited to, both (i) an original invoice and (ii) true copies of other receipts, agreements, payroll records or other documentation supporting and evidencing how the ESG Funds have been or will be expended during the applicable quarter. Prior to reimbursing Subrecipient, the City will verify that Subrecipient has met all applicable regulations for the ESG Program.

5.12 Remaining Balance. The ESG Program shall be completed and all funds provided through this Agreement shall be expended on eligible ESG Program activities from (Insert date) through (Insert date). Invoices for approved ESG Program costs funded under this Agreement shall be submitted within 30 days after the Agreement expiration date. After the 30 day period for submitting invoices has expired, any remaining balance on this Agreement may be allocated by City to other eligible ESG projects within the City's approved ESG Program.

5.13 Separation of Accounts. All ESG Funds received by Subrecipient from City pursuant to this Agreement shall be maintained in an account in a federally insured banking or savings and loan institution with record keeping of such accounts maintained pursuant to Title 2 of the Code of Federal Regulations ("2 CFR") Part 200. The Subrecipient is not required to maintain separate depository accounts for ESG Funds; provided however, the Subrecipient must be able to account for receipt, obligation and expenditure of ESG Funds pursuant to applicable 2 CFR 200.302 et seq., requirements and any other applicable law.

5.14 Repayment of Funds by Subrecipient. In the event this Agreement is terminated, as provided in section 4.9, Subrecipient agrees to and shall immediately return to City any and all unexpended and unencumbered ESG Funds. Further, Subrecipient shall comply with the provisions of the section of this Agreement relating to Reversion of Assets.

5.15 Additional Payment after Notice of Termination at Discretion of City. In the event of early termination of the Agreement by either party without cause, at the sole discretion and election of the City, the Subrecipient will be compensated for all services rendered and necessarily incurred costs performed in good faith in accordance with the terms of this Agreement that have been previously eligible for reimbursement and paid, to the date of the notice of termination to the extent that ESG Funds are available from HUD.

In the event of early termination of the Agreement by the City for cause (but not due to the non-performance or breach by Subrecipient), at the sole discretion and election of the City, the Subrecipient will be compensated for all services rendered and necessarily incurred costs performed in good faith in accordance with the terms of this Agreement that have been previously eligible for reimbursement and paid, to the date of the notice of termination to the extent that ESG Funds are available from HUD.

5.16 Indirect Costs. If indirect costs are charged, the SUBRECIPIENT will develop an indirect cost allocation plan for determining the appropriate SUBRECIPIENT's share of administrative costs and shall submit such plan to the CITY for approval, in a form specified by the CITY.

5.10 Payment Procedures. The CITY will pay to the SUBRECIPIENT funds available under this agreement based upon information submitted by the SUBRECIPIENT and consistent with any approved budget and CITY policy concerning payments. With the exception of certain advances, payments will be made for eligible expenses actually incurred by the SUBRECIPIENT, and not to exceed actual cash requirements. Payments are to be adjusted by the CITY in accordance with advanced fund and program income balances available in SUBRECIPIENT accounts. In addition, the CITY reserves the right to liquidate funds available under this agreement for costs incurred by the CITY on behalf of the SUBRECIPIENT.

5.11 Progress Reports. The SUBRECIPIENT shall submit regular Progress Reports to the CITY in the form, content, and frequency as required by the CITY.

5.12 Procurement

a. Compliance
The SUBRECIPIENT shall comply with current CITY policy concerning the purchase of equipment and shall maintain inventory records of all non-expendable personal property as defined by such policy as may be procured with funds provided herein. All program assets (unexpended program income, property, equipment, etc.) shall revert to the CITY upon termination of this Agreement.

b. OMB Standards
Unless specified otherwise within this agreement, the SUBRECIPIENT shall procure all materials, property, or services in accordance with the requirements of 2 CFR Part 200.

c. Travel
The SUBRECIPIENT shall obtain written approval from the CITY for any travel outside the metropolitan area with funds provided under this Agreement.

Use and Reversion of Assets

5.13. Compliance. The SUBRECIPIENT shall comply with current CITY policy concerning the purchase of equipment and shall maintain inventory records of all non-expendable personal property as defined by such policy as may be procured with funds provided herein. All program assets shall revert to the CITY upon termination of this agreement as provided for in Use and Reversion of Assets.

5.14. OMB Standards. Unless specified otherwise within this agreement, the SUBRECIPIENT shall procure all materials, property, or services in accordance with the requirements of 2 CFR Part 200.

5.15. Travel. The SUBRECIPIENT shall obtain written approval from the CITY for any travel outside the metropolitan area with funds provided under this agreement.

5.16. Use as an Emergency Shelter. The use and disposition of real property and equipment under this agreement shall be in compliance with the requirements of 2 CFR Part 200, which include but are not limited to the following:

a. The SUBRECIPIENT shall transfer to the CITY any ESG funds on hand and any accounts receivable attributable to the use of funds under this agreement at the time of expiration, cancellation, or termination.

b. Real property under the SUBRECIPIENT's control that was improved, in whole or in part, with funds under this agreement shall comply with ESG assistance involving major rehabilitation or conversion, requires any building for which ESG assistance is used to continue in use as a shelter for homeless individuals and families for not less than a ten-year period. ESG assistance involving rehabilitation (other than major rehabilitation or conversion) requires any building for which ESG assistance is used to continue in use as a shelter for homeless individuals and families for not less than a three-year period. Thus, for either the 3- or 10-year period of use, the use requirement starts on the date of initial occupancy for a building that had not previously been operated as a shelter. The date the ESG funds are obligated to a shelter starts the applicable use requirement where the building was previously operated as a shelter.

c. In all cases in which equipment acquired, in whole or in part, with funds under this agreement is sold, the proceeds shall be program income (prorated to reflect the extent to that funds received under this agreement were used to acquire the equipment). When equipment is no longer needed in the same project, it cannot be used to assist homeless or low-income persons, and the value of the property in question is $5,000 or more, disposition instructions should be requested from HUD. If HUD has neither use for the equipment nor provides instruction within 120 days, the recipient may dispose of the equipment provided the ESG account is reimbursed by applying to the sales price or fair market value of the equipment an amount equal to the percentage of HUD's participation in the original acquisition price of the equipment.

6. **Relocation, Real Property Acquisition.** The SUBRECIPIENT agrees to comply with the following:

a. The Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended (URA), and implementing regulations at 49 CFR Part 24; and,

b. The SUBRECIPIENT also agrees to comply with all applicable CITY ordinances, resolutions and policies concerning the displacement of persons from their residences.

c. The requirements in 24 CFR 570.606(d) governing optional relocation policies.

The CITY hereby reserves the right to preempt the optional policies.

The SUBRECIPIENT shall provide relocation assistance to displaced persons as defined by 24 CFR 570.606(b) (2) that are displaced as a direct result of acquisition, rehabilitation, demolition or conversion for an ESG-assisted project. The SUBRECIPIENT also agrees to comply with applicable CITY ordinances, resolutions and policies concerning the displacement of persons from their residences.

7. Personnel & Participant Conditions.

7.1. Civil Rights

a. Compliance
The SUBRECIPIENT agrees to comply with all local and State civil rights laws and with Title VI of the Civil Rights Act of 1964 as amended, Title VIII of the Civil Rights Act of 1968 as amended, Section 104(b) and Section 109 of Title I of the Housing and Community Development Act of 1974 as amended, Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 706), the Americans with Disabilities Act of 1990, the Age Discrimination Act of 1975, Executive Order 11063, and Executive Order 11246 as amended by Executive Orders 11375, 11478, 12107 and 12086.

b. Nondiscrimination
The SUBRECIPIENT agrees to comply with the non-discrimination in employment and contracting opportunities laws, regulations, and executive orders, as revised by Executive Order 13279 and all local ordinances. The applicable non-discrimination provisions in Section 109 of the HCDA are still applicable.

c. Land Covenants
This agreement is subject to the requirements of Title VI of the Civil Rights Act of 1964 (P. L. 88-352). In regard to the sale, lease, or other transfer of land acquired, cleared or improved with assistance provided under this agreement, the SUBRECIPIENT shall cause or require a covenant running with the land to be inserted in the deed or lease for such transfer, prohibiting discrimination as herein defined, in the sale, lease or rental, or in the use or occupancy of such land, or in any improvements erected or to be erected thereon, providing that the CITY and the United States are beneficiaries of and entitled to enforce such covenants. The SUBRECIPIENT, in undertaking its obligation to carry out the program assisted hereunder, agrees to take such measures as are necessary to enforce such covenant, and will not itself so discriminate.

d. Section 504
The SUBRECIPIENT agrees to comply with all Federal regulations issued pursuant to compliance with Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794), which prohibits discrimination against the individuals with disabilities or handicaps in any Federally assisted program. The CITY shall provide the SUBRECIPIENT with any guidelines necessary for compliance with that portion of the regulations in force during the term of this agreement.

7.2. Affirmative Action

a. Approved Plan
The SUBRECIPIENT agrees that it shall be committed to carry out pursuant to the CITY's specifications an Affirmative Action Program in keeping with the principles as provided in President's Executive Order 11246 of September 24, 1966. The CITY shall provide Affirmative Action guidelines to the SUBRECIPIENT to assist in the formulation of such program. The SUBRECIPIENT shall submit a plan for an Affirmative Action Program for approval prior to the award of funds.

b. Women- and Minority-Owned Business Enterprise (W/MBE)
The SUBRECIPIENT will use its best efforts to afford small businesses, minority business enterprises, and women's business enterprises the maximum practicable opportunity to participate in the performance of this agreement. As used in this agreement, the terms "small business" means a business that meets the criteria set forth in section 3(a) of the Small Business Act, as amended (15 U.S.C. 632), and "minority and women's business enterprise" means a business at least fifty-one (51) percent owned and controlled by minority group members or women. For the purpose of this definition, "minority group members" are Afro-Americans, Spanish-speaking, Spanish surnamed or Spanish-heritage Americans, Asian Americans, and American Indians. The SUBRECIPIENT may rely on written representations by businesses regarding their status as minority and female business enterprises in lieu of an independent investigation.

c. Access to Records
The SUBRECIPIENT shall furnish and cause each of its own SUBRECIPIENT's or subcontractors to furnish all information and reports required hereunder and will permit access to its books, records and accounts by the CITY, HUD or its agent, or other authorized Federal officials for purposes of investigation to ascertain compliance with the rules, regulations and provisions stated herein.

d. Confidentiality of Records
The SUBRECIPIENT is to ensure the safety and security of ESG project participants fleeing domestic violence situations by developing and implementing procedures to guarantee the confidentiality of records concerning project participants as required under 24 CFR 576.500. In addition, the address and location of family violence shelter facilities receiving ESG funding may not be publicly disclosed except with the written authorization of the person(s) responsible for the shelter facility's operation. To comply with this requirement, recipient organizations should, for example, keep written records or files pertaining to families under lock and key with only particular personnel granted access to those files.

e. Notifications
The SUBRECIPIENT will send to each labor union or representative of workers with which it has a collective bargaining agreement or other contract or understanding, a notice, to be provided by the agency contracting officer, advising the labor union or worker's representative of the SUBRECIPIENT's

commitments hereunder, and shall post copies of the notice in conspicuous places available to employees and applicants for employment.

f. Equal Employment Opportunity and Affirmative Action (EEO/AA) Statement
The SUBRECIPIENT will, in all solicitations or advertisements for employees placed by or on behalf of the SUBRECIPIENT, state that it is an Equal Opportunity or Affirmative Action employer.

7.3 Subcontract Provisions
The SUBRECIPIENT will require and include compliance with any and all provisions of Civil Rights, Affirmative Action, and other applicable requirements applicable to SUBRECIPIENT in every subcontract or purchase order as applicable, specifically or by attached reference, so that such provisions will be binding upon each of its own subcontractors.

7.4 Other Employment Restrictions
The SUBRECIPIENT is prohibited from using funds provided herein or personnel employed in the administration of the program for: Political activities, inherently religious activities, lobbying, political patronage, and nepotism activities.

7.5 OSHA
Where employees are engaged in activities not covered under the Occupational Safety Act of 1970 (OSHA), they shall not be required or permitted to work, be trained, or receive services in buildings that are unsanitary, hazardous, or dangerous to the participants' health or safety.

7.6 Labor Standards
The SUBRECIPIENT agrees to comply with the requirements of the Secretary of Labor in accordance with the Davis-Bacon Act as amended, the provisions of Contract Work Hours and Safety Standards Act (40 U.S.C. 327 *et seq.*) and all other applicable Federal, state and local laws and regulations pertaining to labor standards insofar as those acts apply to the performance of this agreement. The SUBRECIPIENT agrees to comply with the Copeland Anti-Kick Back Act (18 U.S.C. 874 *et seq.*) and it's implementing regulations of the U.S. Department of Labor at 29 CFR Part 5. The SUBRECIPIENT shall maintain documentation that demonstrates compliance with hour and wage requirements of this part. Such documentation shall be made available to the CITY for review upon request.

The SUBRECIPIENT agrees that, except with respect to the rehabilitation or construction of residential property containing less than eight (8) units, all contractors engaged under contracts in excess of $2,000.00 for construction, renovation or repair work financed in whole or in part with assistance provided under this agreement, shall comply with Federal requirements adopted by the CITY pertaining to such contracts and with the applicable requirements of the regulations of the Department of Labor, under 29 CFR Parts 1, 3, 5 and 7 governing the payment of wages and ratio of apprentices and trainees to journey workers provided that, if wage rates higher than those required under the regulations are imposed by state or local law, nothing hereunder is intended to relieve the

SUBRECIPIENT of its obligation, if any, to require payment of the higher wage. The SUBRECIPIENT shall cause or require to be inserted in full, in all such contracts subject to such regulations, provisions meeting the requirements of this paragraph.

7.7 Section 3 Clause

a. Compliance

Compliance with the regulations set forth in 24 CFR 135, and all applicable rules and orders issued hereunder prior to the execution of this agreement, shall be a condition of the Federal financial assistance provided under this agreement and binding upon the CITY, the SUBRECIPIENT and any of the SUBRECIPIENT's subrecipients and subcontractors. Failure to fulfill these requirements shall subject the CITY, the SUBRECIPIENT and any of the SUBRECIPIENT's subrecipients and subcontractors, their successors and assigns, to those sanctions specified by the agreement through which federal assistance is provided. The SUBRECIPIENT certifies and agrees that no contractual or other disability exists that would prevent compliance with these requirements.

The SUBRECIPIENT further agrees to comply with these "Section 3" requirements and to include the following language in all subcontracts executed under this agreement:

> "The work to be performed under this agreement is a project assisted under a program providing direct Federal financial assistance from HUD and is subject to the requirements of Section 3 of the Housing and Urban Development Act of 1968, as amended (12 U.S.C. 1701). Section 3 requires that to the greatest extent feasible opportunities for training and employment be given to low- and very low-income residents of the project area, and that contracts for work in connection with the project be awarded to business concerns that provide economic opportunities for low and very low-income persons residing in the metropolitan area in which the project is located."

The SUBRECIPIENT further agrees to ensure that opportunities for training and employment arising in connection with rehabilitation (including reduction and abatement of lead-based paint hazards) are given to low and very low-income persons residing within the metropolitan area in which the ESG-funded project is located; where feasible, priority should be given to low and very low-income persons within the service area of the project or the neighborhood in which the project is located, and to low and very low-income participants in other HUD programs; and award contracts for work undertaken in connection with a housing rehabilitation (including reduction and abatement of lead-based paint hazards), housing construction, or other public construction project to business concerns that provide economic opportunities for low and very low-income persons residing within the metropolitan area in which the ESG-funded project is located; where feasible, priority should be given to business concerns that provide economic opportunities to low and very low-income residents within the service area or the neighborhood in which the project is located, and to low and very low-income participants in other HUD programs.

The SUBRECIPIENT certifies and agrees that no contractual and/or other legal incapacity exists that would prevent compliance with these requirements.

b. Notification

The SUBRECIPIENT agrees to send to each labor organization or representative of workers with which it has a collective bargaining agreement or other contract or understanding, if any, a notice advising said labor organization or worker's representative of its commitments under this Section 3 clause and shall post copies of the notice in conspicuous places available to employees and applicants for employment or training.

c. Subcontract

The SUBRECIPIENT will include this Section 3 clause in every subcontract and will take appropriate action pursuant to the subcontract upon a finding that the subcontractor is in violation of regulations issued by the grantor agency. The SUBRECIPIENT will not subcontract with any entity where it has notice or knowledge that the latter has been found in violation of regulations under 24 CFR Part 135 and will not let any subcontract unless the entity has first provided it with a preliminary statement of ability to comply with the requirements of these regulations.

d. Conduct

i. Assignability

The SUBRECIPIENT shall not assign or transfer any interest in this agreement without the prior written consent of the CITY thereto; provided, however, that claims for money due or to become due to the SUBRECIPIENT from the CITY under this agreement may be assigned to a bank, trust company, or other financial institution without such approval. Notice of any such assignment or transfer shall be furnished promptly to the CITY.

ii. Subcontracts

a. Approvals

The SUBRECIPIENT shall not enter into any subcontracts with any agency or individual in the performance of this agreement without the written consent of the CITY prior to the execution of such agreement.

b. Monitoring

The SUBRECIPIENT will monitor all subcontracted services on a regular basis to assure contract compliance. Results of monitoring efforts shall be summarized in written reports and supported with documented evidence of follow-up actions taken to correct areas of noncompliance.

c. Content
The SUBRECIPIENT shall cause all of the provisions of this agreement in its entirety to be included in and made a part of any subcontract executed in the performance of this agreement.

d. Selection Process
The SUBRECIPIENT shall undertake to insure that all subcontracts let in the performance of this agreement shall be awarded on a fair and open competition basis in accordance with applicable procurement requirements. Executed copies of all subcontracts shall be forwarded to the CITY along with documentation concerning the selection process.

7.8 Hatch Act
The SUBRECIPIENT agrees that no funds provided, nor personnel employed under this agreement, shall be in any way or to any extent engaged in the conduct of political activities in violation of Chapter 15 of Title V of the U.S.C.

7.9 Conflict of Interest
The SUBRECIPIENT agrees to abide by the provisions of 2 CFR Part 200, which include (but are not limited to) the following:

a. No employee, officer or agent of the SUBRECIPIENT shall participate in the selection, or in the award, or administration of, a contract supported by Federal funds if a conflict of interest, real or apparent, would be involved.

b. No covered persons who exercise or have exercised any functions or responsibilities with respect to ESG-assisted activities, or who are in a position to participate in a decision-making process or gain inside information with regard to such activities, may obtain a financial interest in any contract, or have a financial interest in any contract, subcontract, or agreement with respect to the ESG-assisted activity, or with respect to the proceeds from the ESG-assisted activity, either for themselves or those with whom they have business or immediate family ties, during their tenure or for a period of one (1) year thereafter. For purposes of this paragraph, a "covered person" includes any person who is an employee, agent, subcontractor, consultant, officer, or elected or appointed official of the CITY, the SUBRECIPIENT, or any designated public agency.

7.10 Lobbying The SUBRECIPIENT hereby certifies that:

a. No federally 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; and,

b. If any funds other than federally 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,

c. It will require that the language of paragraph (d) of this 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; and,

d. 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.C. 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.

7.11. Copyright

If this agreement results in any copyrightable material or inventions, the CITY and/or grantor agency reserves the right to royalty-free, exclusive and irrevocable license to reproduce, publish or otherwise use and to authorize others to use, the work or materials for governmental purposes.

7.12. Religious Activities

The SUBRECIPIENT agrees that funds provided under this agreement will not be utilized for inherently religious activities prohibited by 24 CFR 576.406 such as worship, religious instruction, or proselytization. An organization that is awarded direct HUD funds may still engage in inherently religious activities provided they are voluntary for participants in HUD-funded activities and occur separately in time or location from the HUD-funded activities. An organization receiving HUD funds may not restrict HUD-funded services or housing to people of a particular religion or religious denomination.

8. Environmental Conditions.

8.1 Air and Water

The SUBRECIPIENT agrees to comply with the following requirements insofar as they apply to the performance of this agreement:

a. Clean Air Act, 42 U.S.C., 7401, *et seq.*;

b. Federal Water Pollution Control Act, as amended, 33 U.S.C., 1251, *et seq.*, as amended, 1318 relating to inspection, monitoring, entry, reports, and information, as well as other requirements specified in said Section 114 and Section 308, and all regulations and guidelines issued hereunder;

c. Environmental Protection Agency (EPA) regulations pursuant to 40 CFR Part 50, as amended.

8.2 Flood Disaster Protection

In accordance with the requirements of the Flood Disaster Protection Act of 1973 (42 U.S.C. 4001), the SUBRECIPIENT shall assure that for activities located in an area identified by the Federal Emergency Management Agency (FEMA) as having special flood hazards, flood insurance under the National Flood Insurance Program is obtained and maintained as a condition of financial assistance for acquisition or construction purposes (including rehabilitation).

8.3 Lead-Based Paint

The SUBRECIPIENT agrees that any construction or rehabilitation of residential structures with assistance provided under this agreement shall be subject to HUD Lead-Based Paint Regulations at 24 CFR 570.608, and 24 CFR Part 35, Subpart B. Such regulations pertain to all ESG-assisted housing and require that all owners, prospective owners, and tenants of properties constructed prior to 1978 be properly notified that such properties may include lead-based paint. Such notification shall point out the hazards of lead-based paint and explain the symptoms, treatment and precautions that should be taken when dealing with lead-based paint poisoning and the advisability and availability of blood lead level screening for children under seven. The notice should also point out that if lead-based paint is found on the property, abatement measures might be undertaken. The regulations further require that, depending on the amount of Federal funds applied to a property, paint testing, risk assessment, treatment and/or abatement may be conducted.

8.4 Historic Preservation

The SUBRECIPIENT agrees to comply with the Historic Preservation requirements set forth in the National Historic Preservation Act of 1966, as amended (16 U.S.C. 470) and the procedures set forth in 36 CFR Part 800, Advisory Council on Historic Preservation Procedures for Protection of Historic Properties, and any and all local ordinances insofar as they apply to the performance of this agreement.

In general, this requires concurrence from the State Historic Preservation Officer for all rehabilitation and demolition of historic properties that are fifty years old or older or that are included on a federal, state, or local historic property list.

8.5 Building Standards

The SUBRECIPIENT agrees that any assistance to a building for which ESG amounts are used for conversion, major rehabilitation, rehabilitation, or renovation must meet local government safety and sanitation standards in accordance with 24 CFR 576.55.

9. Severability.

If any provision of this agreement is held invalid, the remainder of the agreement shall not be affected thereby and all other parts of this agreement shall nevertheless be in full force and effect.

10. Section Headings and Subheadings.

The section headings and subheadings contained in this agreement are included for convenience only and shall not limit or otherwise affect the terms of this agreement.

11. Waiver.

The CITY's failure to act with respect to a breach by the SUBRECIPIENT does not waive its right to act with respect to subsequent or similar breaches. The failure of the CITY to exercise or enforce any right or provision shall not constitute a waiver of such right or provision.

12. Entire Agreement.

This agreement constitutes the entire agreement between the CITY and the SUBRECIPIENT for the use of funds received under this agreement, and it supersedes all prior or contemporaneous communications and proposals, whether electronic, oral, or written between the CITY and the SUBRECIPIENT with respect to this agreement.

IN WITNESS WHEREOF, the City Manager of the City of Garden Grove has caused this agreement to be subscribed and attested by the City Clerk hereof, and the SUBRECIPIENT has subscribed the same through its authorized officer, the day, month and year first above written.

"SUBRECIPIENT"
(Name of subrecipient)

By: _____
(Name of director),
Executive Director

Dated: _____

CITY OF GARDEN GROVE ("CITY")
A Municipal Corporation

By: _____
Scott Stiles,
City Manager

Dated: _____

APPROVED AS TO FORM:

By: _____
Omar Sandoval,
City Attorney

Dated: _____

ATTEST:

By: _____
KATHLEEN BAILOR,
City Clerk

Dated: _____

Attachment A

SCOPE OF SERVICES AND BUDGET
FY (Year)

ATTACHMENT A

SCOPE OF SERVICES AND BUDGET

CITY OF GARDEN GROVE & *[SUBRECIPEINT NAME]*

A. SCOPE OF SERVICES

This project is designed to provide availability and accessibility to a suitable living environment by providing [DESCRIBE PROJECT]. *[SUBRECIPEINT NAME]* shall provide essential services [DESCRIBE CLIENTEL BEING SERVED]. Furthermore this project furthers Priority #7 in the City of Garden Grove's adopted Housing and Community Development Consolidated Plan (HUD 5-year plan), which is to address the needs of homeless individuals and those at risk of homelessness.

Between July 1, [20xx] and June 30, [20xx], *[SUBRECIPEINT NAME]* will provide the following eligible activities:

1. *[DESCRIBE SERVICE/ACTIVITY AND THE NUMBER OF INDIVIDUALS SERVED IN PROGRAM YEAR].*

B. PERFORMANCE MEASURES

[SUBRECIPEINT NAME] will submit to the City of Garden Grove Community Development Department quarterly reports on the form attached hereto by October 15, January 15, April 15, and July 15 over the duration of this agreement.

C. PROJECT BUDGET

Essential Services	$ XX,XXX
Street Outreach	$ XX,XXX
Emergency Shelter	$ XX,XXX
Homeless Prevention	$ XX,XXX
Rapid Rehousing	$ XX,XXX
HMIS/CMIS	$ XX,XXX

Total ***[SUBRECIPEINT NAME]*** budget $ **XX,XXX**

Attachment B

ELIGIBLE EXPENSE GUIDE

EMERGENCY SOLUTIONS GRANTS PROGRAM

(ESG)

ELIGIBLE EXPENSE GUIDE

GARDEN GROVE

FEBRUARY 2012

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Emergency Solutions Grants Program (ESG) funds may only reimburse cost directly related to the following ESG eligible expenditure program components:

1. **Street Outreach**
2. **Emergency Shelter**
3. **Homelessness Prevention**
4. **Rapid Re-housing**
5. **Homelessness Management Information System (HMIS)**
6. **Administration**

Subrecipients may consult the Federal and State ESG regulations at the HCD website: http://www.hcd.ca.gov/fa/esg/

Indirect costs and any activities determined by the Department of Housing and Community Development to be ineligible, inefficient, or ineffective use of Grant funds as stated in the applicable NOFA will be disallowed.

1. **Street Outreach** – Unsheltered individuals and families, meaning those who qualify under 24 CFR § 91.5 paragraph (1)(i) of the definition of "homelessness". Essential Services to eligible participants provided on the street or in parks, abandoned buildings, bus stations, campgrounds, and in other such settings where unsheltered persons are staying. Staff salaries related to carrying out street outreach activities are eligible.

    1.1 Engagement
    1.2 Case Management
    1.3 Emergency Health Services
    1.4 Emergency Mental Health Services
    1.5 Transportation
    1.6 Services to Special Populations

    1.1 Engagement – Activities to locate, identify, and build relationships with unsheltered homeless people for the purpose of providing immediate support, intervention, and connections with homeless assistance programs and/or mainstream social services and housing programs.

    - **Initial assessment of needs and eligibility**
    - **Providing crisis counseling**
    - **Addressing urgent physical needs**
    - **Actively connecting and providing information and referral**
    - **Cell phone costs of outreach workers**

1.2 Case Management – Assessing housing and service needs, and arranging/coordinating/monitoring the delivery of individualized services.

- **Using the centralized or coordinated assessment system**
- **Initial evaluation/verifying and document eligibility**
- **Counseling**
- **Developing/Securing/Coordinating Services**
- **Helping obtain Federal, State, and local benefits**
- **Monitoring/evaluating participant progress**
- **Providing information and referral to other providers**
- **Developing an individualized housing/service plan**

1.3 Emergency Health Services – Outpatient treatment of urgent medical conditions by licensed medical professionals in community-based settings (e.g., streets, parks, and campgrounds) to those eligible participants unwilling or unable to access emergency shelter or an appropriate healthcare facility.

- **Assessing participant's health problems and developing treatment plans**
- **Assisting participants to understand their health needs**
- **Providing or helping participants obtain appropriate emergency medical treatment**
- **Providing medication and follow-up services**

1.4 Emergency Mental Health Services – Outpatient treatment of urgent mental health conditions by licensed professionals in community-based settings (e.g., streets, parks, and campgrounds) to those eligible participants unwilling or unable to access emergency shelter or an appropriate healthcare facility.

- **Crisis Intervention**
- **Prescription of psychotropic medications**
- **Explain the use and management of medications**
- **Combinations of therapeutic approaches to address multiple problems**

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

- **Transporting unsheltered people to emergency shelters or other service facilities**
- **Cost of a participant's travel on public transit**
- **Mileage allowance for outreach workers to visit participants**

- **Purchasing or leasing a vehicle for use in conducting outreach activities, including cost of gas, insurance, taxes, and maintenance for the vehicle**
- **Costs of staff to accompany or assist participant to use public transportation**

1.6 Services to Special Populations – Otherwise eligible Essential Services that have been tailored to address the special needs of homeless youth, victims of domestic violence, and related crimes/threats, and/or people living with HIV/AIDS who are literally homeless.

- **See all eligible expenses above under Street Outreach (1)**

2. **Emergency Shelter (Includes Transitional Housing & Day Centers)** – Eligible participants are individuals and families who are homeless. Essential Services to persons in emergency shelters, renovating buildings to be used as emergency shelters, and operating emergency shelters are eligible costs. Staff costs related to carrying out emergency shelter activities are also eligible.

2.1 Essential Services
2.2 Rehabilitation and Renovation
2.3 Shelter Operations
2.4 Assistance Required under Uniform Relocation Assistance (URA)

2.1 Essential Services – Services provided to individuals and families who are in an emergency shelter:

- **Case Management** – Assessing, arranging, coordinating, and monitoring individualized services.

  - Using the centralized or coordinated assessment system
  - Initial evaluation including verifying and documenting eligibility
  - Counseling
  - Developing, securing, and coordinating services including Federal, State, and local benefits
  - Monitoring and evaluating program participant progress
  - Providing information and referrals to other providers
  - Providing on-going risk assessment and safety planning with victims of domestic violence, dating violence, sexual assault, and stalking
  - Developing an Individualized Housing and Service Plan

- **Child Care** – Licensed child care for program participants with children under the age of 13 or disabled children under the age of 18.

    - Child care costs
    - Meals and snacks
    - Comprehensive and coordinated sets of appropriate developmental activities

- **Education Services** – Instruction or training to enhance participant's ability to obtain and maintain housing: literacy, English literacy, GED, consumer education, health education, and substance abuse prevention.

    - Educational services/skill-building
    - Screening, assessment, and testing
    - Individual or group instruction
    - Tutoring
    - Provision of books, supplies, and instructional material
    - Counseling
    - Referral to community resources

- **Employment Assistance and Job Training** – Services assisting participants secure employment and job training programs.

    - Classroom, online, and/or computer instruction
    - On-the-job instruction
    - Job finding, skill-building
    - Reasonable stipends in employment assistance and job training programs
    - Books and instructional material
    - Employment screening, assessment, or testing
    - Structured job-seeking support
    - Special training and tutoring, including literacy training and pre-vocational training
    - Counseling or job coaching
    - Referral to community resources

- **Outpatient Health Services** – Direct outpatient treatment of medical conditions provided by licensed medical professionals.

    - Assessing health problems and developing a treatment plan

- Assisting program participants to understand their health needs
- Providing or helping participants obtain appropriate medical treatment, preventive medical care, and health maintenance services, including emergency medical services
- Providing medication and follow-up services
- Providing preventive and non-cosmetic dental care

- **Legal Services** – Necessary legal services regarding matters that interfere with the program participant's ability to obtain and retain housing.

  - Hourly fees for legal advice and representation by licensed attorneys and certain other fees-for-service
  - Client intake, preparation of cases for trial, provision of legal advice, representation at hearings, and counseling
  - Filing fees and other necessary court costs

- **Legal Representation** – Legal representation and advice to resolve legal problems that prevent participants from obtaining or retaining permanent housing.

  - Child support
  - Guardianship
  - Paternity
  - Emancipation
  - Legal separation
  - Resolution of outstanding criminal warrants
  - Appeal of veterans and public benefit claim denials
  - Orders of protection and other civil remedies for victims of domestic violence, dating violence, sexual assault, and stalking

- **Life Skills Training** – Critical life management skills necessary to assist the program participant to function independently in the community.

  - Budgeting resources
  - Managing money
  - Managing household
  - Resolving conflict
  - Shopping for food and needed items
  - Improving nutrition

- Using public transportation
- Parenting

- **Mental Health Services** – Direct outpatient treatment of mental health conditions by licensed professionals.

  - Crisis intervention
  - Individual, family, or group therapy sessions
  - Prescription of psychotropic medications or explanations about the use and management of medications
  - Combinations of therapeutic approaches to address multiple problems

- **Substance Abuse Treatment Services** – Substance abuse treatment provided by licensed or certified professionals, designed to prevent, reduce, eliminate or deter relapse of substance abuse or addictive behaviors.

  - Client intake and assessment
  - Outpatient treatment for up to thirty days
  - Group and individual counseling
  - Drug testing

- **Transportation** – Costs of travel by program participants to and from medical care, employment, child care, or other facilities that provide eligible essential services; and cost of staff travel to support provision of essential services.

  - Cost of program participant's travel on public transportation
  - Mileage allowance for service workers to visit participants
  - Purchasing or leasing a vehicle used for transport of participants and/or staff serving participants, including the cost of gas, insurance, taxes, and maintenance for the vehicle
  - Travel costs of staff to accompany or assist program participants to use public transportation

- **Services for Special Populations** – Otherwise eligible essential services tailored to address the special needs of homeless youth, victims of domestic violence, and related crimes/threats, and people living with HIV/AIDS in emergency shelters.

  - See all eligible expenses above under Essential Services (2.1)

2.2 Rehabilitation and Renovation* - Renovating buildings to be used as emergency shelter for homeless families and individuals.

- Labor
- Materials
- Tools
- Other costs for renovation, including soft costs
- Major rehabilitation of an emergency shelter
- Conversion of a building into an emergency shelter

* *HCD encourages the use of other funding sources for renovation and limits renovation to an amount not to exceed $10,000.*

2.3 Shelter Operations – Costs to operate and maintain emergency shelters and also provide other emergency lodging when appropriate.*

- Maintenance (including minor or routine repairs)
- Rent
- Security
- Fuel
- Insurance
- Utilities
- Food
- Furnishing
- Equipment
- Supplies necessary for the operation of the emergency shelter
- Hotel and motel voucher for family or individuals*

**Hotel and motel vouchers are only eligible when no appropriate emergency shelter is available.*

2.4 Assistance Required under URA – Assistance required under the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (URA) as described in subpart E of the interim regulations.

- Costs of providing URA assistance under 24 CFR § 576.408, including relocation payments and other assistance to persons displaced by a project assisted with ESG funds.*

* *Persons that receive URA assistance are not considered "program participants" for the purposes of this part of ESG and relocation payments and other URA assistance are not considered "rental assistance" or "housing relocation and stabilization services" for the purposes of this part under ESG.*

3. **Homelessness Prevention** – Individuals and families who are at imminent risk or at risk of homelessness, meaning those who qualify under 24 CFR § 576.2 paragraph (1) of the homeless definition or those who qualify as at risk of homelessness. Individuals and families must have an income below 30% of AMI. Short and medium-term rental assistance and housing relocation and stabilization services are eligible activities. Staff salaries related to carrying out homelessness prevention activities are also eligible.

3.1 Housing Relocation and Stabilization Services

3.2 Short and Medium-Term Rental Assistance

3.1 Housing Relocation and Stabilization Services

❖ Requirements and Restrictions:

1. Participants must meet with a case manager at least once a month for the duration of assistance, except where funding under Violence Against Women Act (VAWA) or Family Violence Prevention and Services Act (FVPS) prohibits the subrecipient from making shelter or housing conditional upon the receipt of services.

2. Participants must be assisted, as needed, in obtaining:

   - Appropriate supportive services, like mediation or mental health treatment or services essential for independent living
   - Mainstream benefits like Medicaid, SSI, or TANF

- **Financial Assistance**

  - **Moving Costs** – Moving costs, such as a truck rental or hiring a moving company, including certain temporary storage fees.
  - **Rent Application Fees** – Application fee that is charged by the owner to all applicants.
  - **Security Deposit** – Equal to no more than 2 month's rent
  - **Last Month's Rent** – Paid to the owner of housing at the time security deposit and first month's rent are paid.
  - **Utility Deposit** – Standard utility deposit required by the utility company for all customers (i.e., gas, electric, water/sewage).
  - **Utility Payments** – Up to 24 months of utility payments per participant per service (i.e., gas, electric, water/sewage), including a 1 time payment up to 6 month of arrearages, per service.

- **Services**
  - **Housing Search and Placement**
    - Assessment of housing barriers, needs and preferences
    - Development of an action plan for locating housing
    - Housing search and outreach to and negotiation with owner
    - Assistance with submitting rental applications and understanding leases
    - Assessment of housing for compliance with ESG requirements for habitability, lead based paint, and rent reasonableness
    - Assistance with obtaining utilities and making moving arrangements
    - Tenant counseling
  - **Housing Stability Case Management** – Assessing, arranging, coordinating, and monitoring the delivery of individualized services to facilitate housing stability
    - Using the centralized or coordinated assessment system, conduct the initial evaluation and re-evaluation
    - Counseling
    - Developing, securing, and coordinating services including Federal, State, and local benefits
    - Monitoring and evaluating program participant progress
    - Providing information and referrals to other providers
    - Developing an Individualized Housing and Service Plan
  - **Mediation** – Mediation between the program participant and the owner or person(s) with whom the program participant is living, to prevent the program participant from losing permanent housing in which they currently reside.
    - Time and/or services associated with mediation activities

- **Legal Services** – Legal services that are necessary to resolve a legal problem that prohibits the program participant from obtaining or maintaining permanent housing.

    - Hourly fees for legal advice and representation
    - Fees based on the actual service performed (i.e., fee for service), but only if the cost would be less than the cost of hourly fees
    - Client intake, preparation of cases for trial, provision of legal advice, representation at hearings, and counseling
    - Filing fees and other necessary court costs
    - Subrecipient's employee's salaries and other costs necessary to perform the series, if the subrecipient is a legal services provider and performs the services itself

- **Legal Representation may be provided for:**

    - Landlord/tenant matters
    - Child support
    - Guardianship
    - Paternity
    - Emancipation
    - Legal Separation
    - Resolution of outstanding criminal warrants
    - Order of protection and other civil remedies for victims of domestic violence, dating violence, sexual assault, and stalking
    - Appeal of veterans and public benefit claim denials

- **Credit Repair** – Services necessary to assist program participants with critical skills related to household budgeting, managing money, accessing a free personal credit report, and resolving personal credit problems*

    - Credit counseling

    - Other related services

    * *Assistance cannot include the payment or mediation of a debt.*

3.2 Short and Medium-Term Rental Assistance

❖ Requirements and Restrictions:

1. Compliance with Fair Market Rent (FMR) limits and Rent Reasonableness.

2. Compliance with Minimum Habitability Standards.

3. Rental Assistance Agreement and Lease Standards:

   - The rental assistance agreement must set forth the terms under which rental assistance will be provided.
   - Each participant receiving rental assistance must have a legally binding, written lease (between the owner and participant) for the rental unit, unless the assistance is solely for the rental arrears
   - Project-based rental assistance leases must have an initial term of one year.

4. Cannot use with other subsidies

   - No rental assistance can be provided to a household receiving rental assistance from another public source for same time period (except 6 months of arrears).
   - Rental assistance may not be provided to participants who are currently receiving replacement housing payments under the URA.

5. Late Payments

   - The rental assistance agreement must contain the same payment due date, grace period, and late payment penalty requirements as the program participant's lease.
   - The subrecipient must make timely payments to the owners in accordance with the rental assistance agreement.
   - The subrecipient is solely responsible for paying (with non-ESG funds) late payment penalties that it incurs.

   - **Short-Term Rental Assistance** – Up to 3 months
   - **Medium-Term Rental Assistance** – 4 to 24 months
   - **Payment of Rental Arrears** – One time payment up to 6 months, including any late fees on those arrears.
   - **Any Combination of the Three Types of Rental Assistance Above** – Total not to exceed 24 months during any 3 year period, including any payment for last month's rent.

4. **Rapid Re-Housing** – Individuals and families who are literally homeless, meaning those who qualify under 401 (1) McKinney-Vento Act of the definition of homeless. Short and medium-term rental assistance and housing relocation and stabilization services are eligible activities. Staff salaries related to carrying out homelessness prevention activities are also eligible.

   4.1 Housing Relocation and Stabilization Services – See 3.1 Housing Relocation and Stabilization Services above.

   4.2 Short and Medium-Term Rental Assistance – See 3.2 Short and Medium-Term Rental Assistance above.

5. **HMIS** – The HEARTH Act makes HMIS participation a statutory requirement for ESG subrecipients. Victim service providers cannot, and Legal Services Organizations may choose not to, participate in HMIS. Providers that do not participate in HMIS must use a comparable database that produces unduplicated, aggregate reports instead. Activities funded under this component must comply with HUD's standards on a participation, data collection and reporting under a local HMIS.

   5.1 Hardware, Equipment, and Software Costs

   5.2 Staffing: Paying salaries for operating HMIS

   5.3 Training and Overhead

   5.1 Hardware, Equipment, and Software Costs

   - Purchasing or leasing computer software
   - Purchasing software or software licenses
   - Purchasing or leasing equipment, including telephones, faxes, and furniture

   5.2 Staffing: Paying salaries for operating HMIS, including:

   - Data collection
   - Completing data entry
   - Monitoring and reviewing data quality
   - Completing data analysis
   - Reporting to the HMIS Lead
   - Training staff on using the HMIS or comparable database
   - Implementing and complying with HMIS requirements

   5.3 Training and Overhead

   - Obtaining technical support
   - Leasing office space

- Paying charges for electricity, gas, water, phone service and high-speed data transmission necessary to operate or contribute data to HMIS
- Paying costs of staff to travel to and attend HUD-sponsored and HUD-approved training on HMIS and programs authorized by Title IV of the McKinney-Vento Homeless Assistance Act
- Paying staff travel costs to conduct intake
- Paying participation fees charged by the HMIS Lead

6. Administration

6.1 General Management / Oversight / Coordination

6.2 Training on ESG Requirements

6.3 Consolidated Plan

6.4 Environmental Review

6.1 General Management / Oversight / Coordination – Costs of overall program management, coordination, monitoring, and evaluation

- Administrative services performed under third party contracts or agreements, including general legal services, accounting services, and audit services
- Other costs for goods and services required for administration of the program, including rental or purchase of equipment, insurance, utilities, office supplies, and rental and maintenance (but not purchase) of office space
- Staff salaries, wages, and related costs of staff engaged in eligible program administration activities

6.2 Training on ESG Requirements

- Costs of providing training on ESG requirements and attending HUD-sponsored ESG trainings

6.3 Consolidated Plan

- Costs of preparing and amending the ESG and homelessness related sections of the consolidated plan in accordance with ESG requirements and 24 CFR part 91

6.4 Environmental Review

- Costs of carrying out the environmental review responsibilities under 24 CFR § 576.407 of the HUD regulations

ESG Written Standards Checklist

The written standards required in ESG must be established for each area covered by a Continuum of Care or area over which the services are coordinated and followed by each subrecipient providing assistance in that area; or by each subrecipient and applied consistently within the subrecipient's program. Please attach and identify the written standards below to your application.

☐	**i.** Standard policies and procedures for evaluating individuals' and families' eligibility for assistance under Emergency Solutions Grant (ESG). The policies and procedures must be consistent with the recordkeeping requirements and definitions of "homeless" and "at-risk of homelessness" in the federal ESG regulations at: 24 CFR 576.2 and 24 CFR 576.500 (b-e).
☐	**ii.** Standards for targeting and providing essential services related to street outreach.
☐	**iii.** Policies and procedures for admission, diversion, referral, and discharge by emergency shelters assisted under ESG, including standards regarding length of stay, if any, and safeguards to meet the safety and shelter needs of special populations, *e.g.*, victims of domestic violence, dating violence, sexual assault, and stalking; and individuals and families who have the highest barriers to housing and are likely to be homeless the longest.
☐	**iv.** Policies and procedures for assessing, prioritizing, and reassessing individuals' and families' needs for essential services related to emergency shelter.
☐	**v.** Policies and procedures for coordination among emergency shelter providers, essential services providers, homelessness prevention, and rapid re-housing assistance providers; other homeless assistance providers; and mainstream service and housing providers. The required coordination may be done over an area covered by the Continuum of Care or a larger area.
☐	**vi.** Policies and procedures for determining and prioritizing which eligible families and individuals will receive homelessness prevention assistance and which eligible families and individuals will receive rapid re-housing assistance. For homeless prevention, include the risk factors used to determine who would be most in need of this assistance to avoid becoming homeless.
☐	**vii.** Standards for determining what percentage or amount, (if any), of rent and utilities costs each program participant must pay while receiving homelessness prevention or rapid re-housing assistance. If the assistance will be based on a percentage of the participant's income, specify this percentage, and how income will be calculated.

☐	**viii.** Standards for determining how long a particular program participant will be provided with rental assistance and whether and how the amount of that assistance will be adjusted over time. One-year lease required for project-based assistance. Annual participant evaluations required with rapid re-housing assistance; 3-month evaluations required with homeless prevention assistance. Individual assistance cannot exceed 24 months in a 3-year period.
☐	**ix.** Standards for determining the type, amount, and duration of housing stabilization and/or relocation services to provide to a program participant, including the limits, if any, on the homelessness prevention or rapid re-housing assistance that each program participant may receive, such as the maximum amount of assistance, maximum number of months the program participant receives assistance; or the maximum number of times the program participant may receive assistance. Note: ESG regulations limit this assistance to no more than 24 months in a 3-year period. Housing stability case management is limited as specified on pp. 75979-80 of the federal regulations.
☐	**x.** *Participation in HMIS.* The recipient must 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.

Exhibit 5
Monitoring Notification Letter: On-Site Visit

Date XX

Entity

Subject: Guidance to ESG Subrecipients

Dear Subrecipient:

This letter serves to notify you that the City of Garden Grove will be monitoring your agency's use of Emergency Shelter Grant Program (ESG) funds under the terms and conditions set forth in the Subrecipient Agreement implemented during Fiscal 20XX-XX. This letter further serves to memorialize reporting procedures for Fiscal 20XX-XX for ESG funds awarded to your agency.

Monitoring

City representatives the will hold an entrance interview on --------- at your agency with you and staff you wish to designate. The purpose of the interview is to review your agency's administrative and financial procedures pertinent to the management of your Fiscal 20XX-XX ESG-funded program, and to ascertain whether it comports with ESG requirements described in the Subrecipient Agreement. In anticipation of the forthcoming visit, we will request access to records that include the following:

- A full description of the program;
- Evidence that the program meets the ESG permitted activities;
- Characteristics and numbers of beneficiaries;
- Documentation of participant eligibility;
- Review of the program's financial records, e.g., chart of accounts, any recent audit report, documentation of expenses.
- Record retention and file management practices; and
- Procurement procedures.

Following this meeting, the City will then transmit the preliminary results of the monitoring visit, which provides you with an opportunity to correct any misunderstandings, provide additional information that may be needed, and set forth the actions being undertaken to correct areas of noncompliance. Within 30 days of the monitoring visit, the City will notify you in writing of the results of the monitoring and set forth any findings or concerns and the timeframe for a written response and corrective action.

Fiscal 20XX-XX Procedures

- **Submittal of Payment Requests** (Payment of Invoices)
  Remember that payment requests should be submitted on a quarterly basis (a copy of the City's payment request form, previously transmitted electronically to your agency, is attached) and accompanied by support documentation. Support documentation may include copies of time sheets, invoices, purchase orders, receipts, or other relevant records showing how you expended the City-awarded ESG funds.

- **Quarterly Subgrantee Performance Reports**
  Quarterly Grantee Performance Reports, or GPR's, are to be submitted electronically and concurrently with your agency's request for reimbursement for the ending quarter. Quarterly GPR's for the reporting periods listed below will be due as follows:

Reporting Period		Report Due Date
July 1, 20XX – September 30, 20XX		October 15, 20XX
October 1, 20XX – December 31, 20XX		January 15, 20XX
January 1, 20XX – March 31, 20XX		April 15, 20XX
April 1, 20XX – June 30, 20XX		July 15, 20XX

- **Obtaining, Documenting, and Reporting Program Beneficiary Data**
  Under the current ESG Subrecipient Agreement, your agency must certify that the activities being carried out will comply with requirements under the ESG Program. Your agency is also to report on the beneficiaries of your program and on the accomplishments in accordance with the outcomes set forth in the Subrecipient Agreement. This data is to be documented in the GPR each quarter and should be accompanied by copies of intake forms, income self-certification forms, or any form used to determine beneficiary eligibility for those persons assisted during the relevant quarter.

Please direct your questions or comments to Monica Covarrubias at (714) 741-5144 or by e-mail at monicac@ci.garden-grove.ca.us.

Sincerely,

City of Garden Grove

Allison Mills

Neighborhood Improvement Manager

Attachment

Exhibit 6
Annual Monitoring Notification Letter: Desk Audit

October 3, 2011

Subrecipient
ATTN: XXXXX

SUBJECT: ESG MONITORING – DESK AUDIT
FY 201-

Dear Subrecipient:

The City of Garden Grove will be monitoring records pertaining to your agency's use of Emergency Solutions Grant (ESG) funds under the terms and conditions set forth in the Subrecipient Agreement implemented during Fiscal 201—1- . Specifically, the City will be monitoring records for the periods of --- April 1, 2009 through June 30, 2009 (Quarter 4 of FY 2009-10) and April 1, 2010 through June 30, 2010 (Quarter 4 of FY 2010-11) via a desk audit based upon the following support documentation to be submitted **no later than Monday, October 31, 2011**:

- For Quarter 4 of FY 2009-10 and Quarter 4 of FY 2010-11, please submit an intake application for each beneficiary served during these periods.
- Support documentation such as receipts, invoices, purchase orders, time sheets, for all expenditures requested to be reimbursed by the City in Quarter 4 of FY 2009-10 and Quarter 4 of FY 2010-11.
- Record retention and file destruction policy
- Copy of your homeless termination procedures.

If you have already submitted part, or all, of this information to the City along with your quarterly Grantee Performance Report (GPR), then no action is necessary on your part.

Within 30 days of the desk audit, you will be notified in writing of the results of the monitoring and set forth any findings or concerns and the timeframe for a written response and corrective action. At this time you

will have the opportunity to correct any misunderstandings, provide additional information that may be needed, and/or describe any actions you will undertake to correct areas of noncompliance, if applicable.

Thank you for your time and attention to this matter. Please direct your questions to Monica Covarrubias, Senior Program Specialist, at (714) 741-5144 or via email at monicac@ci.garden-grove.ca.us

Sincerely,
CITY OF HUNTINGTON PARK

Allison Mills
Neighborhood Improvement & Code Enforcement Manager

Exhibit 7
Monitoring Checklist

Monitoring Emergency Solutions Grant (ESG) Subrecipients	
Subrecipient	
Project Name	
Subrecipient Representative(s)	
Community Development Representative(s)	
Date monitoring conducted	☐ Desk Audit ☐ On-site visit(s)
Monitoring letter sent on	
Date follow-up monitoring visit conducted/letter sent	

A. Eligible Program Components/Activities

tttSecondary Activity Category (ESG eligible activities)

ESG Activity Categories (Components)	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 ☐ HMIS	☐	☐ ☐	☐	☐ ☐	☐	☐ ☐

Standard policies and procedures for evaluating individuals' and families' eligibility for assistance under Emergency Solutions Grant (ESG)

Yes	No	NA		Comments

☐ ☐ ☐	Does the subrecipient have safeguards to meet the safety and shelter needs of special populations, *e.g.* victims of domestic violence, dating violence, sexual assault, and stalking; and individuals and families who have the highest barriers to housing and are likely to be homeless the longest?	
☐ ☐ ☐	Does the subrecipient have policies and procedures for assessing, prioritizing, and reassessing individuals' and families' needs for essential services related to emergency shelters?	
☐ ☐ ☐	Does the subrecipient have policies and procedures for coordination among emergency shelter providers, essential services providers, homelessness prevention, and rapid re-housing assistance providers; other homeless assistance providers; and mainstream service and housing providers activities must be coordinated and integrated to the maximum extent practicable?	
☐ ☐ ☐	Does the subrecipient have policies and procedures for determining and prioritizing which eligible families and individuals will receive homelessness prevention assistance and which eligible families and individuals will receive rapid re-housing assistance?	
☐ ☐ ☐	Does the subrecipient have standards for targeting and providing essential services related to street outreach?	
☐ ☐ ☐	If the subrecipient uses ESG funds to operate an emergency shelter, are there policies and procedures for admission, diversion, referral, and discharge, including standards regarding length of stay?	
☐ ☐ ☐	Does the subrecipient have standards for determining what percentage or amount of rent and utilities costs each program participant must pay while receiving homelessness prevention or rapid re-housing assistance?	
☐ ☐ ☐	Does the subrecipient have standards for determining how long a particular program participant will be provided with rental assistance and whether and how the amount of that assistance will be adjusted over time?	

☐ ☐ ☐	Does the subrecipient standards have for determining the type, amount, and duration of housing stabilization and/or relocation services to provide to a program participant, including the limits, if any, on the homelessness prevention or rapid re-housing assistance that each program participant may receive, such as the maximum amount of assistance, maximum number of months the program participant receive assistance; or the maximum number of times the program participant may receive assistance?	
☐ ☐ ☐	For ESG service activities, are the services new, or quantifiable increases in the service levels, provided by the local government with local funds within the last year before the initial ESG grant? [24 CFR 576.21(b)(1)]	
☐ ☐ ☐	Do the projects reviewed with both completed and underway activities demonstrate that beneficiaries receive, or were referred to, appropriate supportive services, access to mainstream resources, and other services needed to achieve independent living? [24 CFR 576.56(a)(1)]	

Yes No NA	Type of Participants Assisted	Required Documentation
☐ ☐ ☐	Persons living on the street	For projects providing services (e.g., outreach, food, health care, clothing to persons who reside on the streets (but not in shelters or other places meant for human habitation), are there certifications signed and dated by staff 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	Was a statement signed and dated verifyng provided that person 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? If staff is unable to verify in this manner that the person is coming from living on the street, were written, signed and dated statement prepared about the participant's previous living place?
☐ ☐ ☐	Persons coming from an emergency shelter	Did subrecipient obtain from the referring agency a written, signed, and dated verification that the individual has been a resident of the emergency shelter?
☐ ☐ ☐	Persons coming from a transitional housing	Did subrecipient obtain from the referring agency two written, signed, and dated verifications: 1) a signed statement from the transitional housing staff indicating that the individual had been a resident there; and 2) 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, did subrecipient verify that status? 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, did subrecipient verify their status upon entry into transitional housing and document that status?.
☐ ☐ ☐	Persons being evicted from a private dwelling	Did the subrecipient: ▪ Document: 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), he subrecipient secure: ✓ 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	Did the subrecipient 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, did subrecipient verify that status (i.e., if the person was living on the streets before moving into the institution, subrecipient is to obtain the documentation required under "Persons coming from living on the street").
☐ ☐ ☐	Persons being discharged from a longer stay in an institution	Did subrecipient 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	Did subrecipient 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, did subrecipient prepare a written statement about the participant's previous living situation and have the participant sign and date it?

Yes	NO	NA	Did the subrecipient meet the following minimum eligibility criteria for ESG beneficiaries	Comments
☐	☐	☐	For essential services related to street outreach, beneficiaries must meet the criteria under paragraph (1)(i) of the "homeless" definition under § 576.2: " 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	
☐	☐	☐	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 576.103 provided to individuals and families 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.	
☐	☐	☐	For rapid re-housing assistance, beneficiaries must meet requirements described in 24 CFR 576.104; that is, meet the criteria under paragraph (1) of the "homeless" definition in 24 CFR 576.2: " 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;" or who meet the criteria under paragraph (4) of the "homeless" definition and live in an emergency shelter or other place – "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 described in paragraph (1) of the "homeless" definition"	
☐ ☐ ☐	Did the subrecipient re-evaluate program participants' eligibility and the types and amounts of assistance once every 3 months for homelessness prevention and not less than once annually for rapid re-housing assistance?	
☐ ☐ ☐	Did the subrecipient re-evaluate program participants' eligibility and the types and amounts of assistance once every 3 months for homelessness prevention and not less than once annually for rapid re-housing assistance?	
	For projects funding homeless prevention activities, are the beneficiaries low-income individuals or families at imminent risk of losing their housing due to a notice of eviction, foreclosure, or utility termination? [McKinney-Vento Act, 42 USC 11374(a)(4)]	
	If "yes," do the files show that the (a) beneficiaries' assistance is necessary, (b) due to a sudden loss of income, (c) the beneficiaries are able to resume payments in a reasonable time period, and (d) there are no similar funds available locally? [McKinney-Vento Act, 42 USC 11374(a)(4)]	
	Are the homeless prevention funds defined as short term assistance (described in question 3 above), security deposits or first month's rent, landlord-tenant mediation, indigent tenant legal services, or other innovative homeless prevention? [24 CFR 576.3, Definitions, Homeless Prevention]	
	Does assistance meet the definition of "innovative?" (Describe nature of assistance in response below.) [24 CFR 576.3, Definitions, Homeless Prevention]	

ESG Match Requirements

ESG Match (List each source of match separately)	Action Plan Amount Pledged	CAPER Amount Shown	Final Documented Match
CASH/GOV'T. GRANTS			
	$	$	$

	$	$	$
	$	$	$
	$	$	$
	$	$	$
NON-CASH CONTRIBUTIONS			
	$	$	$
	$	$	$
	$	$	$
	$	$	$
	$	$	$
TOTAL MATCH	$	$	$

Yes	No	NA	Requirement	Comments
☐	☐	☐	Does the subrecipient's final documented match shown above equal or exceed the ESG grant amount? (24 CFR 576.201)	
☐	☐	☐	Are the documented match sources eligible forms of match expended within the grant year? (24 CFR 576.201)	
☐	☐	☐	Is the documented match above consistent with the amount shown in the quarterly subrecipient reports?	

Yes	No	NA	Record-Keeping Systems	Comments
☐	☐	☐	Filing System. Are the subrecipient's files orderly, comprehensive, secured for confidentiality where necessary, and up-to-date? Note any areas of deficiency.	
☐	☐	☐	Documentation (confidentiality). Do the ESG project files and subrecipient records have the necessary documentation written records or files pertaining to families under lock and key with only particular personnel granted access to those files? ESG subrecipients are to develop and implement procedures to guarantee the confidentiality of records concerning project participants and ensure that the address and location of family violence shelter facilities receiving ESG funding are not publicly disclosed except with the written authorization of the person(s) responsible for the shelter facility's operation.	

☐	☐	☐	Record Retention. Participation of Homeless Persons in Policy-making and Operations. Are there records evidencing how the subrecipient encourages the participation of homeless persons in projects	
☐	☐	☐	Documentation (Evidence of homelessness and termination procedures). Does the subrecipient maintain adequate documentation to determine the eligibility of persons served by HUD's homeless assistance programs, and that the termination provision is correctly applied for any individual or family terminated or violating program requirements. records are maintained for a 4-year period.	
☐	☐	☐	Record Retention. Is there a process for determining which records need to be retained and for how long?	

Yes	No	NA	Financial Management Systems (84.21-28) Requirements	Comments
☐	☐	☐	Does the subrecipient have written procedures covering the recording of transactions, an accounting manual and a chart of accounts? Areas for possible sampling: ➢ Is there an organization chart describing actual lines of responsibility ➢ Are key employee duties defined ➢ Is the chart of accounts inclusive of account numbers to support the control needed to ensure resources used do not exceed resources authorized ➢ Do the internal control procedures support the subrecipients ability to prepare financial statements:	
☐	☐	☐	If the grantee has a written policy manual, does it provide guidelines for controlling expenditures, such as purchasing requirements and travel authorizations?	
☐	☐	☐	Are systems in compliance with accounting policies and procedures for cash, real and personal property, equipment and other assets	

			(85.20(b)(3) and 84.20(b)(3))?	
☐	☐	☐	Review the chart of accounts, journals, ledgers, reconciliation, data processing, and reporting system. Areas for possible sampling: ➢ Does subrecipient record an encumbrance/obligation when executing contracts, purchase orders or maintain readily accessible information on obligations ➢ Are expenditures supported for instance by invoices, contracts or purchase orders ➢ Are expenditures identified with ESG source	
☐	☐	☐	Has all cash been promptly drawn down and deposited? Are all drawdowns of Federal funds properly recorded?	
☐	☐	☐	Has an audit been prepared for the subrecipient? Determine if the subrecipient has expended $500,000 or more in Federal funds for the subject program year. (OMB Circular A-133)	
☐	☐	☐	If an IPA was prepared were there any findings related to ESG activity?	
Yes	**No**	**NA**	**Insurance Requirements**	**Comments**
☐	☐	☐	Has the subrecipient submitted a current copy of its Certificate of Insurance?	
☐	☐	☐	Is the City named as an additional insured?	
Yes	**No**	**NA**	**Procurement Requirements**	**Comments**
☐	☐	☐	Do the procedures the subrecipient uses for procurement of goods and services meet requirements at 24 CFR Part 84? Review a sample number of procurements.	
☐	☐	☐	How does the subrecipient assure there was no conflict of interest, real or apparent?	
Yes	**No**	**NA**	**Procurement Requirements**	**Comments**
☐	☐	☐	Has the subrecipient purchased equipment with ESG funds in excess of $1,000? Does the	

			subrecipient maintain the records required at 84.34?	
☐	☐	☐	Has a physical inventory taken place and the results reconciled with property records within the last two years?	
☐	☐	☐	If the subrecipient disposed of equipment/property that was purchased with Federal funds within the last five years: • Were proceeds from the sale reported as program income?	
Yes	**No**	**NA**	**General Requirements**	**Comments**
☐	☐	☐	Equal Employment Opportunity. Does the subrecipient make it known that facilities and services supported by this grant are available to any person (who otherwise meets the eligible criteria for the program) without discrimination on the basis of race, color, religion, sex, marital status, national origin, familial status, disability, age or creed? Note any deficiencies.	
☐	☐	☐	Section 3. Opportunities for Training and Employment for Local Residents – Refer to City Section 3 Protocols. Note any deficiencies.	
☐	☐	☐	Requirements for Disabled Persons: Refer to EEO section above and note any concerns.	
☐	☐	☐	Women and Minority Business Enterprises. Refer to OMB 84.44, affirmative steps documentation. Note any concerns.	

I. Conclusion and Follow-up

Prepared by City of Garden Grove, Community Development Department, Neighborhood Improvement Division:

Date	Signature	Title
Date	Signature	Title

	Is the number of beneficiaries currently being served consistent with the service number in the approved Action Plan for the program year? [24 CFR 91.220(d)]	☐ Yes	☐ No
2.	Per the ESG Desk Guide, Section 6.2, is the IDIS drawdown rate consistent with the projected point-in-time expenditures for all projects reviewed during the grant term? (For example, if the project is in Year 1 of the maximum two-year term, the grantee should have expended all of its rehabilitation and one-half of any operations, supportive services, any homeless prevention, and administrative costs.)	☐ Yes	☐ No ☐ N/A
3.	For the program year, has the grantee spent no more than 30% of its ESG grant for supportive services, unless a grantee had requested and received a waiver from HUD? [24 CFR 576.21(a)(2) and McKinney-Vento Act, 42 USC 11374]	☐ Yes	☐ No ☐ N/A
4.	For the program year, has the grantee spent no more than 30% of its ESG grant for homeless prevention and other short-term financial assistance to prevent homelessness? [24 CFR 576.21(c), 24 CFR 576.3 and McKinney-Vento Act, 42 USC 11374]	☐ Yes	☐ No
5.	For the program year, has the grantee spent no more than 10% of its ESG grant for operations for management staff costs? [24 CFR 576.21(a)(3)]	☐ Yes	☐ No
6.	For the program year, has the grantee spent no more than 5% of its ESG grant for grant administration costs? [24 CFR 576.21(a)(5); McKinney-Vento Act, 42 USC 11378]	☐ Yes	☐ No

7.

For completed program years reviewed, has the grantee spent all of its ESG funds within 24 months of grant award? [24 CFR 576.35]	☐ Yes ☐ No

Essential Services

For ESG service activities, are the services new, or quantifiable increases in the service levels, provided by the local government with local funds within the last year before the initial ESG grant? [24 CFR 576.21(b)(1)]	☐ Yes ☐ No ☐ N/A

2.

Do the projects reviewed with both completed and underway activities demonstrate that beneficiaries receive, or were referred to, appropriate supportive services, access to mainstream resources, and other services needed to achieve independent living? [24 CFR 576.56(a)(1)]	☐ Yes ☐ No

Homeless Prevention

For projects funding homeless prevention activities, are the beneficiaries low-income individuals or families at imminent risk of losing their housing due to a notice of eviction, foreclosure, or utility termination? [McKinney-Vento Act, 42 USC 11374(a)(4)]	☐ Yes ☐ No ☐ N/A

4.

If the answer to question 3 above is "yes," do the files show that the (a) beneficiaries' assistance is necessary, (b) due to a sudden loss of income, (c) the beneficiaries are able to resume payments in a reasonable time period, and (d) there are no similar funds available locally? [McKinney-Vento Act, 42 USC 11374(a)(4)]	☐ Yes ☐ No ☐ N/A

5.

Does the total amount of homeless prevention funds spent by the grantee for the program year fall at or below the 30 percent limitation for this expenditure category? [McKinney-Vento Act, 42 USC 11374(a)(4)]	☐ Yes ☐ No

6.

Are the homeless prevention funds defined as short term assistance (described in question 3 above); security deposits or first month's rent; landlord-tenant mediation; indigent tenant legal services; or other innovative homeless prevention? [24 CFR 576.3, Definitions: Homeless Prevention]	☐ Yes ☐ No

7.

If the grantee funded innovative homeless prevention activities, does assistance meet the definition of "innovative?" (Describe nature of assistance in response below.) [24 CFR 576.3, Definitions: Homeless Prevention]	☐ Yes ☐ No ☐ N/A

Beneficiary Services

Complete the table below using the information from the selected beneficiary sample. (Add more lines or attach another sheet, if needed.)				
NAME (if appropriate)	**CASE NUMBER**	**ADDRESS**	**FORMER (F) OR CURRENT (C) BENEFICIARY?**	**ENTRY DATE**

2.

For **homeless assistance** activities, does a review of the beneficiary files adequately document that the individuals or families were homeless prior to residency? [McKinney-Vento Act, 42 USC 11302(a)]	☐ Yes	☐ No

3.

For **homeless prevention activities**, are the individuals or families facing eviction or utility shutoffs, or in need of financial or legal services, eligible for assistance? (By HUD definition, prevention activities occur before persons become homeless.) [McKinney-Vento Act, 42 USC 11374(a)(4) and 24 CFR 576.21(a)(4)]	☐ Yes	☐ No	☐ N/A

4.

Is there at least one homeless person or formerly homeless person participating in the policy decision-making process regarding projects receiving ESG funds? [McKinney Act, 42 USC 11375(d) and 24 CFR 576.56(b)(1)]	☐ Yes	☐ No

5.

Are homeless persons, to the extent possible, involved in project development, operations and the provision of supportive services? [McKinney Act, 42 USC 11375(c) and 24 CFR 576.56(b)(2)]	☐ Yes	☐ No

6.

For projects serving domestic violence victims, is there evidence to support that the grantee has established written procedures regarding confidentiality of client records and the address/location of any project serving domestic violence victims? [McKinney-Vento Act, 42 USC 11375(c) and 24 CFR 576.56(a)(2)]	☐ Yes	☐ No	☐ N/A

7.

(a) Does the grantee have a written policy for the termination of beneficiaries? [McKinney-Vento Act, 42 USC 11375(e) and 24 CFR 576.56(a)(3)]	☐ Yes	☐ No

(b) If no written guidance is available, interview staff to determine how terminations are handled.

(c) If beneficiaries have been terminated during the program year under review, does a file review indicate that the minimum due process requirements for termination (and, if applicable, the established policy guidance) were followed? [McKinney-Vento Act, 42 USC 11375(e) and 24 CFR 576.56(a)(3)]	☐ Yes	☐ No	☐ N/A

Match Matrix

In completing the table below, the HUD reviewer should use the Consolidated Annual Performance and Evaluation Report (CAPER) as a basis to review documentation from the grantee or recipient to determine the amount of cash and in-kind resources brought to the grant.

Grant Number:	***ESG Allocation: $***		
ESG Match (List each source of match separately)	**Action Plan Amount Pledged**	**CAPER Amount Shown**	**Final Documented Match**
CASH/GOVN'T. GRANTS			
	$	$	$
	$	$	$
	$	$	$
	$	$	$
	$	$	$
IN-KIND/SALARIES			
	$	$	$
	$	$	$
	$	$	$
	$	$	$
	$	$	$
VOLUNTEERS (@$5/hour)			
	$	$	$
	$	$	$
	$	$	$
	$	$	$
	$	$	$
TOTAL MATCH	$	$	$

2.

Does the grantee's final documented match shown in question 1 above equal or exceed the ESG grant amount? [24 CFR 576.51 and 24 CFR 91.225(c)(6)]	☐ Yes	☐ No

3.

Is the documented match shown in question 1 above consistent with the amount shown in the CAPER? [24 CFR 576.51 and 24 CFR 91.225(c)(6)]	☐ Yes	☐ No

4.

If the state government grantee claims the $100,000 match exclusion, did it provide documentation of benefit for those subgrantee recipients least able to pay? [24 CFR 576.51 and 24 CFR 91.225(c)(6)]	☐ Yes	☐ No	☐ N/A

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.** What steps has your agency taken 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.** Describe how your agency has worked 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 Provide a copy of your agency's Written Standards established and applied for providing ESG assistance

- **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 System and Program Coordination with Mainstream Resources** What steps has your agency taken 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** Describe how your agency has worked 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 Provide a copy of your agency's Written Standards established and applied for providing ESG assistance

-

- **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.** Submit a copy of the written policies and procedures your agency has developed 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.

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:	4/25/16

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:

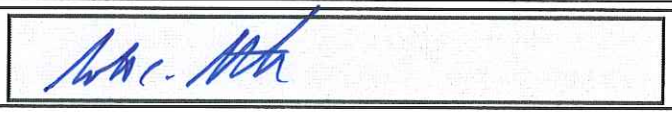
* Last Name: Stiles

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: 4/25/16

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)**

☒ ** 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:	4/25/16

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

4/25/16
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

4/25/16
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

4/25/16
Date

City Manager
Title

GARDEN GROVE

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.

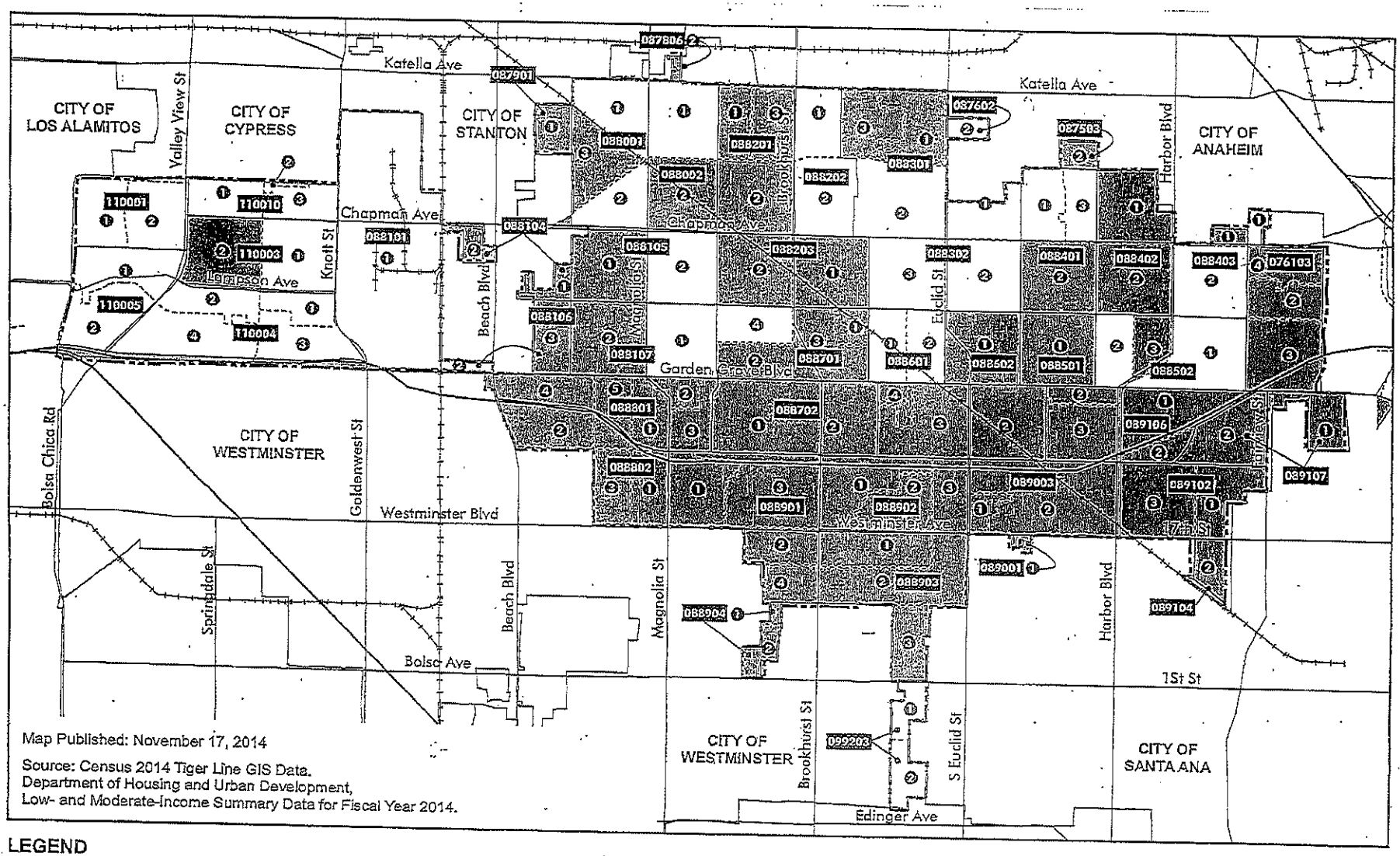
Signature/Authorized Official

4/25/16
Date

City Manager
Title

Appendix D:

Maps



Map Published: November 17, 2014

Source: Census 2014 Tiger Line GIS Data.
Department of Housing and Urban Development,
Low- and Moderate-Income Summary Data for Fiscal Year 2014.

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
- (1) Block Group Number

City of Garden Grove
Lower Income Areas

2015-2020 Consolidated Plan