

Ventura County

Urban County Entitlement Area

2018-19 Annual Action Plan

June 1, 2018

**County of Ventura
Community Development Division
County Executive Office
800 S. Victoria Avenue, L#1940
Ventura, CA 93009**

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Executive Summary

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

1. Introduction

The Ventura Urban County adopted a Regional Consolidated Plan in 2015 according to HUD requirements, which sets forth the County's overall five-year strategy for the expenditure of funds received through the Community Development Block Grant (CDBG) program, the HOME Investment Partnerships Program (HOME), and the Emergency Solutions Grant (ESG) program. The 2015-19 Regional Consolidated Plan covers the Ventura Urban County Entitlement Area (unincorporated County and the Cities of Fillmore, Moorpark, Ojai, Port Hueneme and Santa Paula) and four entitlement jurisdictions (the cities of Camarillo, Simi Valley, Thousand Oaks and San Buenaventura).

Each year, the County prepares an Action Plan for the Ventura Urban County Entitlement Area which provides an explanation of the County's planned uses of funds and serves as the County's annual funding application to HUD. This Action Plan is the fourth annual action plan in the current Consolidated Plan period.

This Action Plan was prepared using the eCon Planning Suite system developed by HUD. The system prescribes the structure and contents of this document, following Federal regulations. Companion documents to this Action Plan are the 2015-19 Regional Consolidated Plan, as amended, and the Analysis of Impediments (AI) to Fair Housing Choice. The AI also contains detailed data and analyses regarding the demographic and housing market conditions in the County.

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 Annual Action Plan incorporates outcome measures for activities in accordance with the Federal Register Notice dated March 7, 2006, which require the following Performance Measure Objectives/Outcomes to be associated with each activity funded:

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

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

Outcome Categories - Activities will meet one of the following:

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

The Ventura County EA has a range of housing and community development needs. CDBG, HOME, and ESG funds alone are not adequate to address the myriad of needs identified during the public outreach process. Recognizing the national objectives of these funding programs and specific program regulations, the Ventura County EA intends to use these funds to coordinate programs, services, and projects to create a decent and suitable living environment to benefit low- and moderate-income households and those with special needs, with a focus on housing and services for vulnerable populations. The table below summarizes the priorities to be addressed during the upcoming year.

| Sort Order | Goal | Funding | Goal Outcome |
|------------|--|---|--|
| 1 | Increase the Availability of Housing | CDBG: \$301,390; HOME: \$908,621 | 113 rental and 4 homebuyer units constructed and 10 homeowners assisted |
| 2 | Provide Services to the Homeless | CDBG: \$155,357, ESG: \$134,932 | 3,520 persons and 29 households assisted. 39 homeless persons provided overnight shelter |
| 3 | Improve Quality of Housing | CDBG: \$200,000 | 735 households assisted |
| 4 | Economic Development | CDBG: \$40,000 | 18 Businesses Assisted |
| 5 | Improve Infrastructure | N/A | N/A |
| 6 | Provide Non-Homeless Supportive Services | CDBG: \$105,500 | 3,415 persons and 98 households assisted |
| 7 | Improve Public Facilities | CDBG: \$588,993 | 9,370 persons assisted and 17 homeless persons provided overnight shelter |
| 8 | Planning and Administration | CDBG: \$326,538, HOME \$66,727, ESG: \$10,940 | N/A |
| 9 | Fair Housing Opportunity | CDBG: \$21,271 | N/A |

Table 1 - Table 1 - Summary of Objectives and Outcomes

3. Evaluation of past performance

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

The 2015-19 Regional Consolidated Plan, as amended, includes the Ventura Urban County Entitlement Area (unincorporated County and the cities of Fillmore, Moorpark, Ojai, Port Hueneme and Santa Paula)

and four entitlement jurisdictions (the cities of Camarillo, Simi Valley, Thousand Oaks and San Buenaventura).

Each year, the Ventura County EA and each entitlement jurisdiction separately prepares and submits a Consolidated Annual Performance and Evaluation Report (CAPER) to HUD, which reports upon the progress each jurisdiction made towards the goals set forth in the 2015-19 Regional Consolidated Plan. A more complete understanding of the 2015-19 Regional Consolidated Plan accomplishments achieved to-date may be obtained by combining the results reported by the County EA and each of the four entitlement jurisdictions.

As reported in the FY2016-17 CAPER, the County EA made progress towards meeting the nine Priority Needs identified in the Regional Consolidated Plan, all of which are designated as high priority:

- Increase Availability of Housing: The goal of 64 new rental units was not achieved due to the lengthy nature of affordable housing development. Program year accomplishments included the completion, per 24 CFR 92.2, of three projects (26 units total, of which 16 units were County HOME-assisted). All 26 units were dedicated to households at or below 50% of the Area Median Income (very low-income).
- Provide Services to the Homeless: Services to the Homeless were provided using both CDBG and ESG funds. The overall accomplishment rate was 94%, with the majority of the programs serving more than their goal numbers.
- Improve Quality of Housing: Quality of Housing activities during the year included both housing rehabilitation and code enforcement. 100% of the rehabilitation goal was met, and 112% of the code enforcement goal was met.
- Economic Development: Economic Development was provided by Women's Economic Ventures' Self Employment Training program. 11 of a goal of 15 businesses were served this program year, achieving 73% of the goal. These businesses consisted of 29 individuals, which, despite being short on the overall number of businesses served, exceeded expectations.
- Improve Infrastructure: No Infrastructure improvements were scheduled for the program year.
- Provide Non-Homeless Supportive Services: Non-Homeless Supportive Services consisted of senior services, including the long term care ombudsman program. These activities achieved 117% of their goals for the year.
- Improve Public Facilities: Public Facility projects included both those that received 2016-17 funding as well as continuing activities. 99% of the annual goal was achieved, mainly due to projects continued from prior years. These include final reporting of Fillmore's Fire Squad Truck, completion of Ojai's Sarzotti Park Renovation, and the County's Horizon View Mental Health Rehabilitation Center.
- Fair Housing Opportunity: Fair Housing was funded with CDBG funding. No goals or beneficiaries were set or reported.
- Administration: Administration was funded with the County's CDBG, HOME, and ESG administrative allowances. No goals or beneficiaries were set or reported.

4. Summary of Citizen Participation Process and consultation process

Summary from citizen participation section of plan.

As part of the Action Plan development, the County conducted a preliminary public hearing on November 8, 2017, at 9:00 a.m. to solicit input on the County's proposed uses of CDBG, HOME, and ESG funds and announce the opening of the funding cycle. On March 26, 2018 at 9:00 a.m., a second public hearing was held to receive feedback on specific projects recommended for HUD CDBG, HOME, and ESG funding. The final public hearing for adoption of the Annual Action Plan was scheduled to go before the Board of Supervisors on May 8, 2018 at 10:30 a.m. The item was continued until May 15, 2018 at 11:00 a.m., where it was adopted. The public hearings were held at the County Government Center.

The Draft Action Plan was made available for public review and comment from April 6 through May 6, 2018 on the County website and at various public locations throughout the County, including the County Executive Office. Notification of each hearing and the availability of the Draft Action Plan was published in the Ventura County Star and posted on the County's website.

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.

During the first public hearing (November 8, 2017), nine speakers from Big Brothers Big Sisters of Santa Paula, Big Brothers Big Sisters of Fillmore, Community Action of Ventura County, Habitat for Humanity, the Long Term Care Ombudsman, One Step a La Vez, Spirit of Santa Paula, Turning Point Foundation, and Women's Economic Ventures provided testimony of the need for: CDBG funding to provide critical matching funds for economic development activities; permanent housing of all types to support all populations; support for vulnerable elderly citizens; home repair services; support for vulnerable youth; and support and housing for homeless individuals and families. In response to the County's stated intent to prioritize vulnerable populations, comments provided support for the focus as well as a suggestion for the County to focus instead on the elimination of poverty.

Additionally, a survey was distributed to attendees prior to and at the public hearing which provided an additional opportunity for participants to indicate their top five priorities as well as provide written comments on the Action Plan Goals and Priorities. The top five priorities identified based upon survey results were, in order of priority: Affordable Housing Development (1st priority), Housing Rehabilitation and Emergency Shelters – Crisis Housing (tied in 2nd priority), Homeless Services & Street Outreach (3rd priority), and Youth Services (4th priority).

During the second public hearing (March 26, 2018), four speakers expressed their appreciation for the proposed recommendations and reiterated the necessity of their programs.

During the final public hearing (May 8, 2018, continued to May 15, 2018), no public comments were made.

Comments received at these meetings are detailed in the Participation (AP-12) section of this plan.

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

All public comments received were accepted.

7. Summary

The Ventura County EA has undertaken diligent and good faith efforts to outreach to all segments of the community that may benefit from or desire to have input on the use of CDBG, HOME, and ESG programs.

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

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

The following are the agencies/entities responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

| Agency Role | Name | Department/Agency |
|-----------------------|----------------|-----------------------|
| Lead Agency | VENTURA COUNTY | |
| CDBG Administrator | VENTURA COUNTY | Community Development |
| HOPWA Administrator | | |
| HOME Administrator | VENTURA COUNTY | Community Development |
| ESG Administrator | VENTURA COUNTY | Community Development |
| HOPWA-C Administrator | | |

Table 2 – Responsible Agencies

Narrative

The County of Ventura serves as the Lead Agency responsible for preparation of the Consolidated Plan as well as the Entitlement Area's Annual Action Plans and CAPERs. The Community Development Division of the County Executive Office is responsible for the administration of the HUD Entitlement Area grant programs, as well as serving as the Collaborative Applicant for the Continuum of Care (CoC) grants program. Those responsible for each grant and funding source within the Division are as follows:

Division Head: Christy Madden, Senior Deputy Executive Officer; Christy.Madden@ventura.org, 805--654-2679

CDBG Administrator: Mary Ann Guariento, Management Analyst II; MaryAnn.Guariento@ventura.org, 805-654-2852

HOME Administrator: Tracy McAulay, Management Analyst II; Tracy.McAulay@ventura.org, 805-662-6792

CoC Administrator: Tara Carruth, Program Management Analyst; Tara.Carruth@ventura.org, 805-654-838

ESG Administrator: Jennifer Harkey, Program Administrator II, Jennifer.Harkey@ventura.org, 805-658-4342

Consolidated Plan Public Contact Information

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Ventura, CA 93009
805-654-2679

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

1. Introduction

Integral to the development of the 2018-19 Annual Action Plan was consultation and coordination with local agencies and organizations serving the target population; namely, those providing facilities and services to persons of low- and very-low income throughout our Entitlement Area. While formal public notices and notification about our annual funding cycle were published and distributed and formal public hearings were held, coordination and consultation occurs throughout the year.

With Ventura County Entitlement Area funding administered by the County Executive Office, the agency that provides oversight to all County operations, the program benefits from a broad base of information and coordinated communication within the County and with outside community partners serving the target populations.

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)).

In addition to the Continuum of Care (specifically addressing coordination with housing, health, mental health and service agencies) which is discussed in more detail below, the County Executive Officer briefs his staff regarding discussions about homeless issues that arise at monthly meetings with City Managers representing all ten cities in the County. Staff also monitor and participate in presentations to the Ventura Council of Governments with elected officials from all ten cities and the Board of Supervisors. Staff also attend meetings within all jurisdictions on topics of homelessness and housing needs including providing presentations to these jurisdictions on regional needs. These venues are ideal for discussing policy issues and coordinating efforts of countywide and regional importance. Staff also monitor policy and budget issues for the Board of Supervisors, with particular attention to those impacting our social service, law enforcement, and health care agencies who all provide essential services to our target population.

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 Ventura County Continuum of Care consists of a Board of Directors established consistent with 24 CFR 578.5(b), with broad representation from government, service providers, emergency response,

health care, housing providers, business community, faith community and homeless/formerly homeless persons. The Continuum of Care Alliance, a collaborative group dedicated to promoting a safe, desirable and thriving community, works to garner community-wide commitment to ending and preventing homelessness in all parts of the region. The Alliance holds quarterly meetings and is open to all interested stakeholders. The forum is used as a platform for promoting their mission and the Alliance has seen growing interest and participation over the past year as agencies, organizations, and interested parties see the benefits of improved coordination and communication. Entitlement communities use the venue to promote participation in their annual funding cycles.

The CoC Alliance is the oversight committee for the CoC subcommittees: Data & System Performance, Housing & Services, HMIS, and Public Information & Outreach. The entire system is following the CoC's lead in pursuing projects that serve persons at highest risk (chronically homeless individuals and families, families with children, veterans, and unaccompanied youth). All funded programs are focused on exiting persons to permanent housing as quickly as possible.

The CoC coordinates with all systems of care that may discharge persons into homelessness including local hospitals, mental health facilities, foster care programs and correctional facilities. Stakeholders from these groups are participating in the CoC meetings and discussion and partnering with providers to reduce the number of discharges into homelessness. Successful partnerships have resulted in a new Recuperative Care program being established in Ventura County for homeless persons needing a safe place to recuperate after hospitalization.

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 Ventura County Entitlement Area participates in the local Continuum of Care and consults with the CoC on funding recommendations for homeless services and housing. Requests for Proposals are developed reflecting CoC priorities and staff evaluate and score applications. Staff recommendations are presented to the CoC Data and Performance & Evaluation committee before moving to the CoC Board and then for final approval by the County Board of Supervisors. The CoC also receives recommendations from other entitlement areas including California State ESG funds.

The Ventura CoC has worked collaboratively with entitlement areas to develop and adopt local system performance measures and targets which are used in evaluating effectiveness of programs and making funding recommendations. All funded programs are required to use HMIS for data entry, follow locally adopted policies and procedures, participate in coordinated entry (Pathways to Home) and report program performance to the CoC. HMIS data quality standards are communicated to all providers and quarterly data reports are distributed to each provider for review. This data quality includes timeliness, completeness and accuracy of the information collected by provider staff.

2. Agencies, groups, organizations and others who participated in the process and consultations

Table 3 – Agencies, groups, organizations who participated

| | | |
|---|--|---|
| 1 | Agency/Group/Organization | Ventura County Continuum of Care |
| | Agency/Group/Organization Type | Housing Services - Housing Regional organization Planning organization |
| | What section of the Plan was addressed by Consultation? | Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy |
| | Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination? | The Ventura County Continuum of Care provided input on AP-10, AP-15, AP-65, AP-85 and AP-90. Representatives of the Continuum of Care also attended the first and second Public Hearings. |
| 2 | Agency/Group/Organization | Area Housing Authority of the County of Ventura |
| | Agency/Group/Organization Type | Housing PHA Services - Housing Services-Children Services-Elderly Persons |
| | What section of the Plan was addressed by Consultation? | Housing Need Assessment Public Housing Needs |
| | Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination? | The Area Housing Authority of the County of Ventura provided input on AP-60 and AP-85. |

| | | |
|---|--|---|
| 3 | Agency/Group/Organization | Santa Paula Housing Authority |
| | Agency/Group/Organization Type | Housing PHA Services - Housing Services-Children Services-Elderly Persons |
| | What section of the Plan was addressed by Consultation? | Housing Need Assessment Public Housing Needs |
| | Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination? | The Santa Paula Housing Authority provided input on AP-60 and AP-85. |
| 4 | Agency/Group/Organization | Port Hueneme Housing Authority |
| | Agency/Group/Organization Type | Housing PHA Services - Housing Services-Children Services-Elderly Persons |
| | What section of the Plan was addressed by Consultation? | Housing Need Assessment Public Housing Needs |
| | Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination? | The Port Hueneme Housing Authority provided input on AP-60 and AP-85. |
| 5 | Agency/Group/Organization | CITY OF FILLMORE |
| | Agency/Group/Organization Type | Housing Other government - Local |

| | | |
|---|--|---|
| | What section of the Plan was addressed by Consultation? | Housing Need Assessment |
| | Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination? | The City of Fillmore provided input on AP-75. Representatives from the City also attended the first and second Public Hearings. |
| 6 | Agency/Group/Organization | CITY OF MOORPARK |
| | Agency/Group/Organization Type | Housing Other government - Local |
| | What section of the Plan was addressed by Consultation? | Housing Need Assessment |
| | Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination? | The City of Moorpark provided input on AP-75. Representatives from the City also attended the first and second Public Hearings. |
| 7 | Agency/Group/Organization | CITY OF OJAI |
| | Agency/Group/Organization Type | Housing Other government - Local |
| | What section of the Plan was addressed by Consultation? | Housing Need Assessment |
| | Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination? | The City of Ojai provided input on AP-75. Representatives from the City also attended the first and second Public Hearings. |
| 8 | Agency/Group/Organization | CITY OF PORT HUENEME |
| | Agency/Group/Organization Type | Housing Other government - Local |

| | | |
|---|--|---|
| | What section of the Plan was addressed by Consultation? | Housing Need Assessment |
| | Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination? | The City of Port Hueneme provided input on AP-75. Representatives from the City also attended the first and second Public Hearings. |
| 9 | Agency/Group/Organization | CITY OF SANTA PAULA |
| | Agency/Group/Organization Type | Housing Other government - Local |
| | What section of the Plan was addressed by Consultation? | Housing Need Assessment |
| | Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination? | The City of Santa Paula provided input on AP-75. Representatives from the City also attended the first and second Public Hearings. |

| | | |
|----|--|--|
| 10 | Agency/Group/Organization | County of Ventura |
| | Agency/Group/Organization Type | Housing Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-homeless Services-Health Services-Education Services-Employment Service-Fair Housing Services - Victims Health Agency Child Welfare Agency Publicly Funded Institution/System of Care Other government - County Planning organization |
| | What section of the Plan was addressed by Consultation? | Housing Need Assessment Non-Homeless Special Needs Economic Development Anti-poverty Strategy Lead-based Paint Strategy |
| | Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination? | Many agencies within the County of Ventura provided input on the Annual Action Plan, including the County Executive Office, Behavioral Health Department, Planning Department, and the Childhood Lead Poisoning Prevention Program. Representatives from the County also attended the first, second, and third Public Hearings. |

| | | |
|----|--|--|
| 11 | Agency/Group/Organization | Workforce Development Board |
| | Agency/Group/Organization Type | Services-Education Services-Employment |
| | What section of the Plan was addressed by Consultation? | 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? | The Workforce Development Board provided input on AP-85. |
| 12 | Agency/Group/Organization | EDC-VC |
| | Agency/Group/Organization Type | Services-Education Services-Employment |
| | What section of the Plan was addressed by Consultation? | 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? | The Economic Development Collaborative of Ventura County (EDC-VC) provided input on AP-85. |
| 13 | Agency/Group/Organization | Ventura County Housing Trust Fund |
| | Agency/Group/Organization Type | Housing Community Development Financial Institution |
| | What section of the Plan was addressed by Consultation? | Housing Need Assessment |
| | Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination? | The Ventura County Housing Trust Fund provided input on Section AP-75, AP-85 and AP-90. |

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

Not applicable.

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 | Continuum of Care Alliance | Potential funding allocations of CDBG, HOME and ESG that address homeless needs will complement the CoC Strategy. |
| Housing Elements | City Councils and Board of Supervisors | Promoting the development and/or preservation of affordable housing is integrally correlated with these documents. Involvement of staff from these organizations is not only important, but promoting advocacy from stakeholders has taken on increased importance as vacancy rates continue to decline and rents increase. |

Table 4 – Other local / regional / federal planning efforts

Narrative

See discussions above.

AP-12 Participation - 91.105, 91.200(c)

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

The County of Ventura Citizen Participation Plan is designed to encourage participation in the development of the Consolidated Plan and/or Annual Action Plan by low- and moderate-income persons, particularly residents of slum and blighted areas or predominately low- and moderate-income neighborhoods, where HUD program funding is proposed to be used.

The County and the participating Cities from the Entitlement Area hold joint public hearings where public comment is solicited and considered for activity implementation toward identified priorities and goals. Subsequent public hearings and draft funding recommendations are made available to the public for additional feedback and comments from interested citizens. The draft recommendations are circulated to each jurisdiction and posted for public review prior to finalization.

Citizen Participation Outreach

| | | |
|---|--|---|
| 1 | Mode of Outreach | Public Hearing |
| | Target of Outreach | Non-targeted/broad community |
| | Summary of response/ attendance | As part of the Annual Action Plan development, the County conducted a preliminary public hearing at 9:00 a.m. on November 8, 2017 to solicit input on the County's proposed uses of CDBG, HOME, and ESG funds for FY 2018-19 and to announce the FY2018-19 funding cycle. The public hearing was held at the County of Ventura Government Center. Approximately 37 persons were in attendance. |
| | Summary of comments received | <p>Nine speaker sheets were received and speakers from Big Brothers Big Sisters of Santa Paula, Big Brothers Big Sisters of Fillmore, Community Action of Ventura County, Habitat for Humanity, the Long Term Care Ombudsman, One Step a La Vez, Spirit of Santa Paula, Turning Point Foundation, and Women's Economic Ventures provided testimony of the need for: CDBG funding to provide critical matching funds for economic development activities; permanent housing of all types to support all populations; support for vulnerable elderly citizens; home repair services; support for vulnerable youth; and support and housing for homeless individuals and families.</p> <p>In response to the County's stated intent to prioritize vulnerable populations, comments provided support for the focus as well as a suggestion for the County to focus instead on the elimination of poverty.</p> <p>A survey was distributed to attendees prior to and at the public hearing which provided an additional opportunity for participants to indicate their top five priorities as well as provide written comments on the Action Plan Goals and Priorities. The top five priorities identified based upon survey results were, in order of priority: Affordable Housing Development (1st priority), Housing Rehabilitation and Emergency Shelters/Crisis Housing (tied in 2nd priority), Homeless Services & Street Outreach (3rd priority), and Youth Services (4th priority). Written comments provided on the survey fell into the following broad categories: recommendation(s) to focus on elimination of poverty instead of vulnerable populations; need for affordable housing and related support (e.g. utility bills, weatherization, etc.) for all populations; support for County's increased focus on vulnerable populations; support for increased encouragement and support of centralized document and data</p> |

| | | |
|----------|---|---|
| | | management systems; recommendation(s) to focus on education; recommendation(s) to focus on homeless prevention activities. |
| | Summary of comments not accepted and reasons | All comments were accepted and kept on file. |
| | URL (if applicable) | |
| 2 | Mode of Outreach | Public Hearing |
| | Target of Outreach | |
| | Summary of response/ attendance | At 9:00 a.m. on March 26, 2018, a second public hearing was held to receive feedback on the projects recommended for funding in FY 2018-19 with HUD CDBG, HOME and ESG funds. The hearing was held at the County of Ventura Government Center. Approximately 17 persons were in attendance. |
| | Summary of comments received | Four providers spoke, expressing appreciation for funding recommendations and re-iterating the community need for their programs. |
| | Summary of comments not accepted and reasons | All comments were accepted and kept on file. |
| | URL (if applicable) | |
| 3 | Mode of Outreach | Internet Outreach |
| | Target of Outreach | Non-targeted/broad community |
| | Summary of response/ attendance | A draft of the 2018-19 Annual Action Plan was made available for public review on the County website. Additionally, copies were available for review at the County Executive Office. |

| | | |
|---|---|--|
| | Summary of comments received | No comments were received. |
| | Summary of comments not accepted and reasons | Not applicable. |
| | URL (if applicable) | https://www.ventura.org/county-executive-office/community-development/hud-plans-reports/ |
| 4 | Mode of Outreach | Public Hearing |
| | Target of Outreach | Non-targeted/broad community |
| | Summary of response/ attendance | At 10:30 a.m. on May 8, 2018, the County Board of Supervisors continued the scheduled public hearing until 11:00 a.m. on May 15, 2018. The third and final public hearing was conducted on May 15, 2018 at 11:00 a.m. before the Board of Supervisors to adopt the 2018-19 Annual Action Plan. |
| | Summary of comments received | No comments were received. |
| | Summary of comments not accepted and reasons | Not applicable. |
| | URL (if applicable) | |

Table 5 – Citizen Participation Outreach

Expected Resources

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

Introduction

The Annual Action Plan focuses on activities to be funded with the three entitlement grants (CDBG, ESG and HOME) from HUD. HUD allocates CDBG, ESG, and HOME funding to eligible jurisdictions on a formula basis, using factors such as population, income distribution, and poverty rate.

Anticipated Resources

| 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 | 1,739,049 | 0 | 0 | 1,739,049 | 1,739,049 | While CDBG funding is not strictly required to ensure matching funds, all of the public service funding is matched approximately 100%. Similarly, non-public service funding is allocated to projects that would not otherwise be able to successfully be completed with only local and/or state funding. In most cases, local jurisdiction general fund dollars make up a large part of the project budgets. |

| 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: \$ | | |
| HOME | public - federal | Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA | 667,279 | 66,878 | 241,191 | 975,348 | 667,279 | HOME funds have a mandatory match requirement of 25%. Local commitments of HOME funds are typically leveraged by millions of dollars from other resources, often from Low Income Housing Tax Credits and tax-exempt bonds. See the discussion of match below. |

| 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 | 145,872 | 0 | 0 | 145,872 | 145,872 | ESG funds have a mandatory match of 100%, but experience demonstrates that these projects are leveraged by significantly more money than what is required. Our ESG allocation, when received, is relatively small and therefore CDBG public service funds, general fund support, other state and federal grant funds, and faith-based funding augments ESG funding to make these projects feasible. |

Table 6 - 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

Leverage

In addition to the entitlement grants described above, other financial resources are expected to be available for the Urban County Entitlement Area to carry out and implement projects and activities identified for the upcoming year.

The Ventura County Continuum of Care receives just over 2 million dollars in funding for programs addressing homelessness including funding for Permanent Supportive Housing, Rapid Re-Housing, HMIS and Coordinated Entry. In addition, the City of Oxnard receives an ESG allocation and State ESG funds are administered by the County of Ventura as the Administrative Entity. These funds provide critical services including emergency shelter, street outreach, homelessness prevention and rapid re-housing.

Many entitlement areas in Ventura County utilize a portion of CDBG public service dollars to provide services to vulnerable populations including some homeless services. Emergency Food and Shelter Program (EFSP) is another source utilized by local service providers.

Affordable housing developments utilizing HOME funds often use the HOME allocation to leverage millions of dollars in other local, state and federal financing.

Match

Two projects are recommended for FY2018-19 HOME funding: the Housing Authority of the City of San Buenaventura's Villages at Westview and Habitat for Humanity Ventura County's San Pedro Street Affordable Homeownership Development. The Villages at Westview is being recommended for funding in the amount of \$660,011, which incurs a 25% match requirement of \$165,003. In the application for funding, the developer indicated that match in the approximate amount of \$1,520,000 is anticipated. Habitat for Humanity's San Pedro Street Affordable Homeownership Development is being recommended for funding in the amount of \$248,610, which incurs a 25% match requirement of \$62,153. In the application for funding, Habitat for Humanity indicated that match in the approximate amount of \$100,000 is anticipated from private donations. Matching funds for both projects are expected to be realized in FY2018-19.

ESG match requirements are met through services and operations on behalf of subrecipient providers, including cash and in-kind contributions.

Administration expenses, wrap around services and case management expenses are the most common in-kind services.

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

The County of Ventura owns property throughout the County, most of which is either currently used to house County operations and services, or may be deed-restricted making it infeasible for other uses. As property may be designated as surplus, it will be considered for feasibility in meeting the needs identified in this plan.

Discussion

See the table and discussion above.

Annual Goals and Objectives

AP-20 Annual Goals and Objectives - 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 | Increase Availability of Housing | 2015 | 2019 | Affordable Housing | | Increase Availability of Housing | CDBG: \$301,390 HOME: \$908,621 ESG: \$0 | Rental units constructed: 113 Household Housing Unit Homeowner Housing Added: 4 Household Housing Unit Direct Financial Assistance to Homebuyers: 10 Households Assisted |
| 2 | Provide Services to the Homeless | 2015 | 2019 | Homeless | | Provide Services to the Homeless | CDBG: \$155,357 HOME: \$0 ESG: \$134,932 | Public service activities other than Low/Moderate Income Housing Benefit: 3520 Persons Assisted Tenant-based rental assistance / Rapid Rehousing: 29 Households Assisted Homeless Person Overnight Shelter: 39 Persons Assisted |
| 3 | Improve Quality of Housing | 2015 | 2019 | Affordable Housing | | Improve Quality of Housing | CDBG: \$200,000 HOME: \$0 ESG: \$0 | Homeowner Housing Rehabilitated: 10 Household Housing Unit Housing Code Enforcement/Foreclosed Property Care: 725 Household Housing Unit |

| Sort Order | Goal Name | Start Year | End Year | Category | Geographic Area | Needs Addressed | Funding | Goal Outcome Indicator |
|------------|--|------------|----------|-----------------------------------|-----------------|--|--|--|
| 4 | Economic Development | 2015 | 2019 | Non-Housing Community Development | | Economic Development | CDBG: \$40,000 HOME: \$0 ESG: \$0 | Businesses assisted: 18 Businesses Assisted |
| 5 | Improve Infrastructure | 2015 | 2019 | Non-Housing Community Development | | Improve Infrastructure | | |
| 6 | Provide Non-Homeless Supportive Services | 2015 | 2019 | Non-Homeless Special Needs | | Provide Non-Homeless Supportive Services | CDBG: \$105,500 HOME: \$0 ESG: \$0 | Public service activities other than Low/Moderate Income Housing Benefit: 3415 Persons Assisted Public service activities for Low/Moderate Income Housing Benefit: 98 Households Assisted |
| 7 | Improve Public Facilities | 2015 | 2019 | Non-Housing Community Development | | Improve Public Facilities | CDBG: \$588,993 HOME: \$0 ESG: \$0 | Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 9370 Persons Assisted Homeless Person Overnight Shelter: 17 Persons Assisted |
| 8 | Planning and Administration | 2015 | 2019 | Administration | | Planning and Administration | CDBG: \$326,538 HOME: \$66,727 ESG: \$10,940 | |

| Sort Order | Goal Name | Start Year | End Year | Category | Geographic Area | Needs Addressed | Funding | Goal Outcome Indicator |
|------------|--------------------------|------------|----------|----------------------------|-----------------|--------------------------|---|------------------------|
| 9 | Fair Housing Opportunity | 2015 | 2019 | Non-Homeless Special Needs | | Fair Housing Opportunity | CDBG: \$21,271 HOME: \$0 ESG: \$0 | |

Table 7 – Goals Summary

Goal Descriptions

| | | |
|---|------------------|--|
| 1 | Goal Name | Increase Availability of Housing |
| | Goal Description | Increase the availability of affordable ownership and rental housing through affordable housing construction and homebuyer assistance. |
| 2 | Goal Name | Provide Services to the Homeless |
| | Goal Description | Provide housing opportunities and supportive services for the homeless and persons at risk of homelessness. |
| 3 | Goal Name | Improve Quality of Housing |
| | Goal Description | Improve the quality and accessibility of ownership and rental housing through housing rehabilitation activities. |
| 4 | Goal Name | Economic Development |
| | Goal Description | Enhance economic development opportunities for lower and moderate income residents. |

| | | |
|---|-------------------------|---|
| 5 | Goal Name | Improve Infrastructure |
| | Goal Description | Improve or construct infrastructure that will benefit lower and moderate income residents and persons with special needs. |
| 6 | Goal Name | Provide Non-Homeless Supportive Services |
| | Goal Description | Provide supportive services for lower and moderate income residents, persons with disabilities, seniors, youth, and other special needs populations. |
| 7 | Goal Name | Improve Public Facilities |
| | Goal Description | Improve or construct public facilities that support lower and moderate income residents and persons with special needs. |
| 8 | Goal Name | Planning and Administration |
| | Goal Description | The Ventura County Entitlement Area will implement the goals and objectives of the Consolidated Plan by delivering a variety of housing and community development programs and activities. It will continue to comply with the planning and reporting requirements of the Consolidated Plan regulations and CDBG regulations. Annually, the Entitlement Area will monitor its use of CDBG funds to ensure effective and appropriate use of funds. |
| 9 | Goal Name | Fair Housing Opportunity |
| | Goal Description | Promote equal housing opportunity for all residents. |

AP-35 Projects - 91.220(d)

Introduction

In this challenging economic environment of decreasing resources, for the FY2018-19 funding cycle and beyond, the County has clarified its intent of focusing funding, to the extent possible, on providing funding to serve our most vulnerable citizens, including persons who are homeless, very low-income, elderly and/or victims of domestic violence. Existing city-sponsored projects will continue to be funded at levels not to exceed the previous year's allocation if the city continues to apply for HUD EA funding through the end of the current Cooperating Agreement.

In an effort to increase the effectiveness of grant management and utilize taxpayer resource as efficiently as possible, in recent years, the County has consolidated grant awards to provide a minimum of \$20,000 per grant.

| # | Project Name |
|----|--|
| 1 | Affordable Housing Development |
| 2 | Emergency Solutions Grant Projects |
| 3 | Homeless Services and Street Outreach |
| 4 | Housing Rehabilitation Programs |
| 5 | Code Enforcement |
| 6 | Small Business and Micro Enterprise Technical Assistance and Loan Programs |
| 7 | Infrastructure |
| 8 | Other Non-Homeless Services |
| 9 | Senior Services |
| 10 | Public Facilities |
| 11 | Planning and Administration |
| 12 | Fair Housing Opportunity |

Table 8 – Project Information

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

Funding was allocated according to the new focus on vulnerable populations and to continue funding for City-sponsored projects which support public facilities and housing quality for low-income beneficiaries.

The community faces obstacles to addressing underserved needs, including lack of sufficient funding to satisfy the unmet need, as well as an expensive housing market with very low vacancy rates. The housing market was exacerbated Thomas Fire late in 2017 which resulted in the loss of over 1,000 structures, the majority of which provided housing for our residents

There remains a balance of \$456,702 of CDBG funds which have not been allocated. These funds will be allocated at a later time, in accordance with the Citizen Participation Plan.

AP-38 Project Summary

Project Summary Information

| | | |
|---|--|--|
| 1 | Project Name | Affordable Housing Development |
| | Target Area | |
| | Goals Supported | Increase Availability of Housing |
| | Needs Addressed | Increase Availability of Housing |
| | Funding | CDBG: \$301,390 HOME: \$908,621 |
| | Description | This program includes real property acquisition, pre-construction, site preparation, construction, relocation and other costs related to the development of new, or conversion of existing property, into affordable housing. The purpose of the program is to increase the region's stock of affordable ownership, rental, and special needs housing. |
| | Target Date | 7/1/2019 |
| | Estimate the number and type of families that will benefit from the proposed activities | 127 moderate-, low- and extremely low-income families. |
| | Location Description | Ventura, Port Hueneme and County-wide |

| | | |
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| | <p>Planned Activities</p> | <p>Housing Authority of the City of San Buenaventura (HACSB) – Villages at Westview: This new construction project will provide 113 units of affordable housing for low- and very low-income households, of which five (5) units are proposed to be funded with County HOME funds and restricted to households transitioning from homelessness. One additional unrestricted unit will be provided for a resident manager. The development is located in the City of Ventura and is expected to serve 38 entitlement area households. The project is part of the larger redevelopment of an existing 180-unit public housing community which will preserve the affordability of the existing housing units and increase the amount of affordable housing by 140 units. On-site amenities will include public park areas, a community center, and management offices.</p> <p>The HACSB will be the project sponsor, developer and property manager. The project will be owned by a Limited Partnership, in which the HACSB, or an affiliate, will be the Managing General Partner.</p> <p>HOME: \$660,011; GOI: Rental units constructed, 113</p> <p>Habitat for Humanity Ventura County - San Pedro Street Affordable Homeownership Development: This new construction project will provide 4 units of affordable homeownership housing for low-income households ($\leq 80\%$ AMI) located within the Entitlement Area city of Port Hueneme. Eligible households will provide sweat-equity and attend homeowner education courses. HOME/CDBG funding will be used to subsidize the development of these units to make the mortgage payments affordable to low-income households. All units will be deed restricted with resale provisions.</p> <p>Habitat for Humanity will be the project sponsor, developer, and general contractor.</p> <p>HOME: \$248,610; CDBG: \$51,390; GOI: Homeowner Housing Added, 4</p> |
|--|----------------------------------|--|

| | | |
|---|--|--|
| | | <p>Ventura County Community Development Corporation (VCCDC) – New Way Home: The VCCDC A New Way Home program, in collaboration with community partners, provides Down Payment Assistance (DPA) to expand homeownership opportunities in Ventura County. The program helps bridge the homeownership affordability gap for local working households by providing DPA to assist first-time low to upper moderate – income (LMI) homebuyers, including Section 8 participants, in purchasing a home in Ventura County.</p> <p>VCCDC proposes to use CDBG funds to assist 10 Ventura County LMI families with \$25,000 each in DPA. These funds will leverage monies from other grants and provide up to an additional \$30,000 in assistance, for a total of \$55,000 per household.</p> <p>CDBG: \$250,000; GOI: Direct Financial Assistance to Homebuyers, 10</p> |
| 2 | Project Name | Emergency Solutions Grant Projects |
| | Target Area | |
| | Goals Supported | Provide Services to the Homeless |
| | Needs Addressed | Provide Services to the Homeless |
| | Funding | ESG: \$134,932 |
| | Description | HUD requires all ESG-funded activities to be consolidated under one project. ESG funds may be used for activities that: 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; prevent families and individuals from becoming homeless. Up to 7.5% of ESG funds can be used to support general administration of the program. |
| | Target Date | 6/30/2019 |
| | Estimate the number and type of families that will benefit from the proposed activities | 29 households and 39 persons will be assisted. |

| | | |
|----------|-----------------------------|--|
| | Location Description | Throughout the Entitlement Area. |
| | Planned Activities | <p>County of Ventura – Human Services Agency – Rapid Re-Housing: The programs assists homeless and at-risk individuals and families by providing homeless prevention, rapid re-housing, and stabilization services. The program proposes to assist 29 households (52 persons) obtain or remain in decent and affordable rental housing. Proposed outcomes include moving 100% into permanent housing, 50% will obtain cash/non-cash benefits, 50% will obtain or increase earned income, and 80% who move into permanent housing will remain housed for 6 months.</p> <p>ESG: \$58,349</p> <p>GOI: Tenant-based rental assistance/Rapid Rehousing, 29 Households Assisted</p> <p>Turning Point Foundation – Safe Haven Shelter: Our Place Safe Haven Shelter serves mentally ill homeless persons requiring case management, supervision and mental health services. The program has ten beds and a drop in center. The staff provide counseling, education services, assistance with obtaining employment, referrals to services, transportation to appointment, and upon discharge, housing services. The program proposes to serve 39 persons with these funds. Proposed outcomes include moving 60% into permanent housing, 75% will obtain cash/non-cash benefits, and 70% who move into permanent or transitional housing will remain housed for 3 months.</p> <p>ESG: \$76,583</p> <p>GOI: Homeless Person Overnight Shelter, 39 Persons Assisted</p> |
| 3 | Project Name | Homeless Services and Street Outreach |
| | Target Area | |
| | Goals Supported | Provide Services to the Homeless |
| | Needs Addressed | Provide Services to the Homeless |
| | Funding | CDBG: \$155,357 |

| | | |
|--|--|--|
| | Description | In addition to immediate food and shelter assistance, homeless families and individuals can benefit from a variety of supportive services. Homeless service programs provide mobile outreach and intensive case management, including information and referrals along with brief interventions to homeless Ventura County residents. These programs are often coordinated with other emergency and transitional housing programs, and may include supportive services to persons and/or families in permanent housing. |
| | Target Date | 6/30/2019 |
| | Estimate the number and type of families that will benefit from the proposed activities | 3,520 homeless persons will be served. |
| | Location Description | Throughout the Entitlement Area. |
| | Planned Activities | <p>Catholic Charities – Moorpark Community Service Center: The Moorpark Community Service Center/Moorpark Pantry Plus provides essential safety net services and outreach programs to stabilize low-income households in Moorpark and surrounding areas with supplemental food, clothing, eviction prevention assistance, utility assistance, information and referrals.</p> <p>CDBG: \$20,000; GOI: Public service activities other than Low/Moderate Income (LMI) Housing Benefit, 2,962 Persons Assisted</p> <p>County of Ventura Human Services Agency – Homeless Services Program (HSP): The HSP is the main implementer of countywide assessment, information, referral, case management and housing placement services, using Rapid Re-Housing whenever possible. The HSP's 12 centers are positioned to cross refer homeless persons and to problem solve their situations. Social Workers also travel directly to the person at risk, which is critical in communities without service hubs.</p> <p>CDBG: \$40,500; GOI: Public service activities other than LMI Housing Benefit, 400 Persons Assisted</p> |

| | | |
|---|------------------------|---|
| | | <p>Peoples' Self Help Housing - El Patio Hotel: The El Patio Hotel provides supportive services and permanent affordable housing where formerly homeless individuals can stabilize in housing and continue to increase their independence/self-sufficiency. The facility offers 41 furnished studios for persons who are disabled, chronically homeless, and/or very low-income.</p> <p>CDBG: \$30,000; GOI: Public service activities other than LMI Housing Benefit, 40 Persons Assisted</p> <p>One Step A La Vez – One Step Home: One Step a La Vez operates a drop-in teen center in Fillmore. CDBG funding will target homeless services by offering a food pantry, hot meals, job skills training, life skills classes, case management, bus passes, shower and laundry, and transportation to services.</p> <p>The applicant plans to hire a case manager for homeless services. Current operations include case management, job skills training, mentoring, and various services offered by outside agencies.</p> <p>CDBG: \$20,000; GOI: Public service activities other than LMI Housing Benefit, 23 Persons Assisted</p> <p>SPIRIT of Santa Paula – Homeless Services: This program will expand the services provided to homeless persons in Santa Paula by hiring a Coordinator for the Drop-In Center, funding their Food Rescue program, giving persons who are homeless access to overnight restroom facilities and creating a fund for those who are working to overcome homelessness.</p> <p>CDBG: \$44,857; GOI: Public service activities other than LMI Housing Benefit, 95 Persons Assisted</p> |
| 4 | Project Name | Housing Rehabilitation Programs |
| | Target Area | |
| | Goals Supported | Improve Quality of Housing |
| | Needs Addressed | Improve Quality of Housing |
| | Funding | CDBG: \$50,000 |

| | | |
|----------|--|---|
| | Description | These programs are designed to retain and improve the existing housing stock, eliminate substandard housing or conditions that threaten residents' health and safety, and improve/enhance community neighborhoods. Programs typically use deferred loans or grants to finance repair and renovation work for owner-occupied single family detached homes, or owners of multi-family rental properties. Qualified repairs include, but are not limited to: plumbing/sewer, electrical, roofing, painting, windows and doors, pest damage repair, structural repairs, and kitchen and bathroom remodeling. |
| | Target Date | 6/30/2019 |
| | Estimate the number and type of families that will benefit from the proposed activities | Ten (10) low- and very low-income families. |
| | Location Description | Throughout the Entitlement Area. |
| | Planned Activities | Habitat for Humanity Preserve a Home: This program serves owner occupied low and very low income families and individuals that have home rehabilitation needs and otherwise are not able to perform the work on their own or pay full cost for a general contractor. Homeowners must participate in program, providing sweat equity or other public service hours. Repairs may include life/safety issues, window/door/light fixture replacement, flooring, plumbing and electrical work, walk in shower and/or grab bar installation, wheelchair ramps, and weatherization. CDBG: \$50,000 GOI: Homeowner Housing Rehab, 10 units |
| 5 | Project Name | Code Enforcement |
| | Target Area | |
| | Goals Supported | Improve Quality of Housing |
| | Needs Addressed | Improve Quality of Housing |
| | Funding | CDBG: \$150,000 |

| | | |
|--|--|---|
| | Description | These programs operate through a combination of regular neighborhood canvassing and surveying, systematic inspections and response to citizen complaints. Particular emphasis is placed on property maintenance, landlord training, resident safety, eradication of substandard building conditions, and abatement of inoperative and abandoned vehicles. Brochures may also be provided, informing property owners of available financial assistance such as housing rehabilitation programs. |
| | Target Date | 6/30/2019 |
| | Estimate the number and type of families that will benefit from the proposed activities | 725 low-, extremely low-, and moderate-income families. |
| | Location Description | The cities of Port Hueneme and Santa Paula. |
| | Planned Activities | <p>City of Port Hueneme Code Enforcement: Provide funding for Code Enforcement staff for the City's Neighborhood Strategy Area (NSA). Within the NSA approximately 3,246 housing units were built between 1940 and 1969, and 34 units were built prior to 1940. As housing is subject to gradual deterioration over time, it is necessary to enforce the city's property maintenance ordinance, zoning regulations, and building codes to eradicate blighting influences and arrest deterioration.</p> <p>CDBG: \$50,000</p> <p>GOI: Housing Code Enforcement, 600</p> <p>City of Santa Paula Housing Code Enforcement Program: The Code Enforcement Program helps relieve overcrowded living conditions, corrects unsafe living conditions and property maintenance issues and provides guidance for housing construction projects by ensuring proper permits are issued, inspections conducted and city building and municipal codes are followed. The city has aging housing stock and high overcrowded conditions resulting in residents, especially low income families, living in unsafe housing that must be addressed.</p> <p>CDBG: \$100,000</p> <p>GOI: Housing Code Enforcement, 125</p> |

| | | |
|---|--|--|
| 6 | Project Name | Small Business and Micro Enterprise Technical Assistance and Loan Programs |
| | Target Area | |
| | Goals Supported | Economic Development |
| | Needs Addressed | Economic Development |
| | Funding | CDBG: \$40,000 |
| | Description | The County may utilize CDBG funds for activities that assist small businesses, leading to the creation and retention of jobs in the Urban County. |
| | Target Date | 6/30/2019 |
| | Estimate the number and type of families that will benefit from the proposed activities | 18 low, extremely low-, and moderate-income businesses. |
| | Location Description | Throughout the Entitlement Area. |
| 7 | Planned Activities | <p>Women's Economic Ventures – Micro Business Development Program: WEV assists individuals in developing skills to start or expand a business of their own. Funds are requested for their 14-week Self Employment Training (SET) courses in both English and Spanish-languages. The program's goal is to improve economic security for low-income individuals (mostly women), create jobs for the unemployed, alleviate poverty, and promote a vibrant local economy.</p> <p>CDBG: \$40,000</p> <p>GOI: Businesses assisted, 18</p> |
| | Project Name | Infrastructure |
| | Target Area | |
| | Goals Supported | Improve Infrastructure |
| | Needs Addressed | Improve Infrastructure |
| | Funding | |
| | Description | Public infrastructure, which includes local street systems as well as water and sewer systems, is critical to the welfare and safety of all residents. Funds may be used for upgrades and rehabilitation of Urban County infrastructure. |

| | | |
|---|--|--|
| | Target Date | 6/30/2019 |
| | Estimate the number and type of families that will benefit from the proposed activities | None. |
| | Location Description | Not applicable. |
| | Planned Activities | No infrastructure projects are planned for 2018-19. |
| 8 | Project Name | Other Non-Homeless Services |
| | Target Area | |
| | Goals Supported | Provide Non-Homeless Supportive Services |
| | Needs Addressed | Provide Non-Homeless Supportive Services |
| | Funding | CDBG: \$20,000 |
| | Description | The County places a priority on services for other low-income residents, such as farmworkers. |
| | Target Date | 6/30/2019 |
| | Estimate the number and type of families that will benefit from the proposed activities | This program anticipates serving 98 farmworkers and their families. |
| | Location Description | Rancho Sespe 2950 E Telegraph Road Fillmore, CA 93015 |
| | Planned Activities | Peoples' Self-Help Housing – Rancho Sespe: This is a supportive housing project for residents of the Rancho Sespe rental property, which is restricted to farmworkers and their families. Residents receive services that include benefits counseling, assistance with job search, linkage to medical and mental health services, budgeting, transportation assistance, and crisis intervention to promote self-sufficiency. CDBG: \$20,000 GOI: Public service activities other than Low/Moderate Income Housing Benefit, 98 Households Assisted |
| | Project Name | Senior Services |

| | | |
|---|--|--|
| 9 | Target Area | |
| | Goals Supported | Provide Non-Homeless Supportive Services |
| | Needs Addressed | Provide Non-Homeless Supportive Services |
| | Funding | CDBG: \$85,500 |
| | Description | Seniors are among the County's most frail and vulnerable residents. The County may use CDBG funds to support programs that provide assistance for the elderly living in long term care facilities or with terminal illnesses, nutrition and meal programs, educational and social opportunities, and information and referral services. |
| | Target Date | 6/30/2019 |
| | Estimate the number and type of families that will benefit from the proposed activities | These programs anticipate serving 3,415 seniors. |
| | Location Description | Throughout the Entitlement Area. |
| | Planned Activities | <p>City of Port Hueneme - Senior Activities: Primary services include a home-delivered meals program, limited health services, Grey Law legal assistance, visual aid counseling, professional tax advice, senior exercise programs and referrals for other senior-related issues.</p> <p>CDBG: \$30,000</p> <p>GOI: Public service activities other than Low/Moderate Income Housing Benefit, 200 Persons Assisted</p> <p>City of Santa Paula – Senior Center Coordinator: The coordinator position is the main staff person for the Santa Paula Senior Center, which provides information and assistance Monday through Friday at no cost to low income, disabled or other senior citizens who walk in or call and need referrals to social services programs. Services include access to nutritious food, legal services, medical care, and social services and other benefits.</p> <p>CDBG: \$25,500</p> <p>GOI: Public service activities other than Low/Moderate Income Housing Benefit, 1,600 Persons Assisted</p> |

| | | |
|----|--|--|
| | | <p>Long Term Care Services of Ventura County – Ombudsman Program: The Ombudsman is the federally mandated advocate for elderly persons living in long term care facilities. They make unscheduled, unannounced visits to the facilities and work with the elderly residents investigating complaints and resolving issues on their behalf. The 8,500 elderly persons living in 233 long term care facilities in Ventura County and attending Adult Day Health Care facilities are their target population.</p> <p>CDBG: \$30,000</p> <p>GOI: Public service activities other than Low/Moderate Income Housing Benefit, 1,615 Persons Assisted</p> |
| 10 | Project Name | Public Facilities |
| | Target Area | |
| | Goals Supported | Improve Public Facilities |
| | Needs Addressed | Improve Public Facilities |
| | Funding | CDBG: \$588,993 |
| | Description | Public facilities often house services essential to the health and well-being of residents. It is, therefore, important for these facilities to be safe, accessible, and able to meet the needs of any resident or employee who will use them. Funds will be used to upgrade and rehabilitate these facilities. |
| | Target Date | 6/30/2019 |
| | Estimate the number and type of families that will benefit from the proposed activities | These programs will assist an estimated 9,370 persons, plus 17 homeless persons with overnight shelter. |
| | Location Description | Throughout the Entitlement Area. |

| | | |
|--|---------------------------|---|
| | Planned Activities | <p>City of Fillmore - Fire Engine: This funding will provide payment for the fourth year of a six-year lease for the purchase of a new fire engine which will enable the department to provide improved critical fire and emergency medical services to the Fillmore community, of which over 51% are low/mod income residents.</p> <p>CDBG: \$57,291</p> <p>GOI: Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit, 9,370 Low-To-Moderate Persons Assisted.</p> <p>Turning Point Foundation – River Haven Dome</p> <p>Replacement: River Haven is an innovative bridge community for homeless adults in Ventura County. It provides an interim housing solution and supportive community for homeless individuals struggling with substance use disorders and mental illness focused on helping them stabilize their health as well as connecting them to supportive services such as health care services, rehabilitation services, alcohol and drug treatment services, securing income/benefits and obtaining permanent housing. The ultimate goal is to assist each individual in developing the skills needed to successfully lead healthy lives, and reach their highest potential as contributing members of the community. Funding is requested for the replacement of the existing domes, which are deteriorating and present safety concerns.</p> <p>CDBG: \$75,000</p> <p>GOI: Homeless Person Overnight Shelter, 17 Persons Assisted.</p> <p>RESERVED: Placeholder for an as-yet undetermined activity.</p> <p>CDBG: \$456,702</p> <p>GOI: N/A</p> |
| | 11 | |
| | Project Name | Planning and Administration |
| | Target Area | |
| | Goals Supported | Planning and Administration |
| | Needs Addressed | Planning and Administration |

| | | |
|----|--|--|
| | Funding | CDBG: \$326,538 HOME: \$66,727 ESG: \$10,940 |
| | Description | Up to 20% of CDBG, 10% of HOME, and 7.5% of ESG funds can be used by the County to support the general administration of these programs. During the five-year Consolidated Plan period, the County (as grantee) will provide all administration for these programs in compliance with program regulations and requirements. Subrecipients will administer their respective projects and programs in compliance with program regulations and requirements, with oversight provided by the County. |
| | Target Date | 6/30/2019 |
| | Estimate the number and type of families that will benefit from the proposed activities | Not applicable. |
| | Location Description | Ventura County Government Center 800 South Victoria Avenue Ventura, CA 93009 |
| | Planned Activities | County of Ventura: County staff will provide all administration for these programs in compliance with program regulations and requirements. |
| 12 | Project Name | Fair Housing Opportunity |
| | Target Area | |
| | Goals Supported | Fair Housing Opportunity |
| | Needs Addressed | Fair Housing Opportunity |
| | Funding | CDBG: \$21,271 |
| | Description | Provide fair housing services to residents. |
| | Target Date | 6/30/2019 |
| | Estimate the number and type of families that will benefit from the proposed activities | Approximately 200 residents. |
| | Location Description | Throughout the Entitlement Area. |

| | | |
|--|----------------------------------|--|
| | <p>Planned Activities</p> | <p>County of Ventura: The Urban County sets aside a portion of its CDBG Planning and Administration budget for fair housing. Ventura County currently contracts with the Housing Rights Center (HRC) to provide fair housing services to its residents. HRC provides telephone and in-person counseling to both tenants and landlords regarding their respective rights and responsibilities under California law and local city ordinances. In addition to answering basic housing questions, counselors commonly cite specific civil codes that pertain to the client’s matter and/or provide sample letters that discuss a particular issue. HRC investigates housing discrimination complaints brought under both State and Federal fair housing laws. The Agency also develops and distributes written materials that describe the applicable laws that protect against housing discrimination and ways to prevent housing injustices. HRC also offers Fair Housing Certification Training for housing industry professionals.</p> |
|--|----------------------------------|--|

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 Ventura County Entitlement Area does not prioritize funding by geographic area, nor does it include any target areas. The Westside Neighborhood Revitalization Strategy Area referenced below is designated by the City of San Buenaventura (Ventura), which is a partner in the 2015-19 Regional Consolidated Plan. This section does not apply to the County.

Geographic Distribution

| Target Area | Percentage of Funds |
|--|----------------------------|
| Westside Neighborhood Revitalization Strategy Area | |

Table 9 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

N/A

Discussion

See above.

Affordable Housing

AP-55 Affordable Housing - 91.220(g)

Introduction

The Entitlement Area strives to promote affordable housing by expanding the stock of housing through new construction of rental and homeownership housing, as well as maintaining the existing stock of housing through rehabilitation.

The Entitlement Area's one year goals are described in the following tables. These estimates do not include emergency or transitional shelters, social services, or code enforcement activities.

| One Year Goals for the Number of Households to be Supported | |
|---|-----|
| Homeless | 34 |
| Non-Homeless | 132 |
| Special-Needs | 0 |
| Total | 166 |

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

| One Year Goals for the Number of Households Supported Through | |
|---|-----|
| Rental Assistance | 29 |
| The Production of New Units | 117 |
| Rehab of Existing Units | 10 |
| Acquisition of Existing Units | 10 |
| Total | 166 |

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

Discussion

The Villages at Westview will add 113 units of affordable rental housing plus 1 unrestricted manager's unit in the City of Ventura. Of the 113 units, five (5) will be HOME-assisted and will be restricted to persons transitioning from homelessness. The San Pedro Street Affordable Homeownership Development will add four (4) units of homeownership housing for low-income households.

The County also supports Habitat for Humanity's "Preserve a Home" program. It is anticipated that ten (10) homes in the Entitlement Area will be rehabilitated during the upcoming year.

Down payment assistance is expected to be provided to 10 low- to moderate-income households

ESG funds are anticipated to support 29 homeless households with rapid re-housing assistance.

AP-60 Public Housing - 91.220(h)

Introduction

Public Housing needs in the Entitlement Area are met by three Housing Authorities: The Area Housing Authority of the County of Ventura (AHA), the Housing Authority of the City of Port Hueneme (PHHA), and the Santa Paula Housing Authority (SPHA).

The AHA owns and operates 355 units of public housing in seven complexes which serve the residents of Camarillo, Fillmore, Moorpark, Ojai, Simi Valley, Thousand Oaks and the unincorporated areas of Ventura County. Three of the complexes (165 units) are located with the Urban County - the Roth Apartments (a family development in Meiners Oaks), Whispering Oaks (a seniors/disabled project in the City of Ojai), and Tafoya Terrace (senior project in Moorpark). The AHA has been named one of the nation's best run housing authorities. Exemplary program management and efficient program implementation earned AHA the designation of a "High Performer" from the Department of Housing and Urban Development (HUD) for the Section 8 Housing Choice Voucher Program and Conventional Low-Income Public Housing Program.

The PHHA administers 90 public housing units, consisting of 30 family units that range from 1, 2 and 3 bedrooms. The remaining 60 units consist of 40 studio apartments and 20 one-bedroom units occupied by persons who are 62 years or older or disabled.

Although the SPHA does not own or operate any public housing units, it does own and operate six affordable housing complexes with a total of 73 units for seniors and families. The SPHA also act as Administrative Managing Partner of the Harvard Place Apartments, a 40-unit affordable rental development for persons with special needs.

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

Area Housing Authority of the County of Ventura (AHA)

The AHA plans to continue encouraging the formation of site-based Resident Councils composed of residents in each public housing complex with the purpose of enhancing the quality of life of the residents. Members of the Resident Council may also participate in the Resident Advisory Board (RAB), which reviews and makes recommendations to the agency's annual plan and recommends the appointment of one Resident Commissioner to the AHA's Board of Commissioners.

In conjunction with Ventura County social services agencies, the Resident Services Department plans to continue the provision of information on employment opportunities, tutoring, parenting workshops, wellness programs, health screening, adult and child protective services, food banks, safety and other

life enriching programs. The AHA will continue to work with the Ventura Unified School District, Conejo Unified School District and the Superintendent of Schools Office to continue the Summer Lunch Program and employment training. The program is designed to provide children and youth with a nutritious meal while they are on summer break and allow residents to train in the areas of food safety, reporting, and interviewing skills.

The AHA also plans to continue programs that assist the elderly and persons with disabilities maintain their independence. These programs include transportation services to doctor's appointments, group grocery shopping, pharmacies, and other essential locations; and Case Management, in collaboration with Help of Ojai and Conejo Valley Senior Concerns, which links residents with resources in the community including Meals on Wheels, Senior Share Program, HICAP information, safety and nutrition education, and assistance with medical and Medicare questions.

The AHA expects to renew their collaboration with California Lutheran University to provide tutoring services to children in various subjects including, but not limited to, math and English. Continued collaboration with the Conejo Recreation and Park District is also expected to serve youth in the Thousand Oaks area. Lastly, the AHA will continue to offer full or partial recreational scholarships to children and youth who wish to participate in local sports or activities.

Housing Authority of the City of Port Hueneme (PHHA)

To address the needs of the residents, the PHHA has partnered with the Port Hueneme Police Department and non-profit organizations to bring informational classes to residents living in public housing. Nutrition, Smoking Cessation, Elder Abuse, Fraud Alert and Security educational classes will continue to be offered. The PHHA will continue to support programs that have already been established such as Meals on Wheels and the senior nutrition program.

Santa Paula Housing Authority (SPHA)

In accordance with the City of Santa Paula's General Plan to increase affordable housing rental units, alleviate household overcrowding and overpayment and the County's objective to end homelessness: the SPHA intends to achieve and maintain a tenant based program utilization rate of 99%; lease-up 11 affordable rental units (including units for homeless persons); continue acquiring land for affordable housing development; and explore opportunities offered by the State of California's low cost loan programs directed towards persons who are special needs, homeless and/or veterans.

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

Area Housing Authority of the County of Ventura (AHA)

The AHA provides four opportunities for Public Housing residents to participate in management: 1) Site based Resident Councils, 2) Advertising activities of the resident councils, 3) Participating in the Resident Advisory Board; and 4) becoming a Resident Commissioner on the AHA's Board of Commissioners. To assist Public Housing residents to gain knowledge and move toward homeownership, the AHA offers a free monthly First-Time Home Buyers Workshop which includes a free credit score.

The AHA encourages clients who have been assisted under the Section 8 Program for at least one year in becoming homebuyers through HUD's Section 8 Homeownership Program. Participants must be first-time homebuyers, with no one in the household having owned a home within the past three years. The program requires that a participant have a minimum down payment of 3% of the home's purchase price and good credit.

Housing Authority of the City of Port Hueneme (PHHA)

The PHHA will encourage Public Housing residents to become Resident Commissioners and to encourage their participation with other organizations. The PHHA will continue to inform Public Housing Residents of options available for First Time Homebuyers.

Santa Paula Housing Authority (SPHA)

The SPHA encourages resident interaction with social services and staff through quarterly events, and makes available portability opportunities for program participants in other jurisdictions. As Successor Housing Agency to the City of Santa Paula Redevelopment Agency, the SPHA continues to administer the First Time Home Buyer and Housing Preservation Programs, and accommodates inquiries for possible home ownership by directing residents to agencies offering counseling and other available opportunities. In addition, the SPHA utilizes County facilities to educate and improve self-management skills of developmentally and psychically disabled residents.

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

Not Applicable.

Discussion

Area Housing Authority of the County of Ventura (AHA)

In addition to owning and operating seven public housing sites, the AHA serves low-income residents through other programs and housing. It administers a rental subsidy program called the Housing Choice Voucher Program (Section 8). In the entitlement area, the AHA also operates Colina Vista, a low-income tax credit project in Piru with 35 rental units (two are handicapped accessible) and a 15-unit apartment complex known as Summerwind Apartments located in the unincorporated area outside Fillmore. These are not public housing and receive no operational HUD subsidy.

The AHA actively coordinates with other local organizations to develop new housing, preserve existing housing, and expand the supply of assisted housing for families in low-income ranges. The overriding goal for the AHA is to promote affordable housing that the communities will not only accept but also respect. AHA continues its efforts to enhance affordable housing through collaborative efforts with other local agencies.

Housing Authority of the City of Port Hueneme (PHHA)

The mission of the PHHA is to provide quality housing to eligible households in a professional, fiscally prudent manner and be a positive force in the community by working with others to assist these families with appropriate supportive services. The agency shares the mission of HUD to promote adequate and affordable housing, economic opportunity, and a suitable living environment free from discrimination. In order to continue this practice the PHHA will continue to work with its neighboring Housing Authorities to better assist the community.

Santa Paula Housing Authority (SPHA)

The SPHA administers subsidized rental housing programs for Section 8 Tenant Based Vouchers/Certificates, Project Based Section 8 Vouchers, and affordable housing owned by the Authority. Under the Section 8 Voucher Program, the Authority provides affordable housing for 620 families, with an additional 1,270 applicants on the waiting list. To date, the Authority has constructed three multifamily projects for low income seniors totaling 34-units, with another 11-units in the process of receiving a Certificate of Occupancy.

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

Introduction

The Countywide Continuum of Care (CoC) has celebrated the first year of operations of Pathways to Home, the local coordinated entry system. This system utilizes all current service providers, regardless of funding sources, as points of entry into the system, uses a common assessment tool to determine eligibility and prioritization and matches individuals and families with services through the HMIS eligibility module. This system was launched with full HMIS integration in October of 2016.

The CoC participated in HUD-sponsored technical assistance and received feedback on compliance with HUD requirements. The CoC continues to focus on expanding this system to include all veteran service providers, youth providers and privately funded entities to increase participation in Pathways to Home and HMIS. The system is also focused on evaluating system performance and conducting gaps analysis to advocate for new resources to help move more people out of homelessness in Ventura County. Efforts are focused on developing more supportive housing units and year-round emergency shelter(s). The CoC is also focused on prevention and diversion efforts to prevent persons from becoming homeless and to divert persons from entering the service system whenever possible.

System Performance is the primary focus and all partners are focused on implementing ways to increase exits to permanent housing and support persons so that they can maintain their housing. The CoC is also focused on increasing person's access to mainstream benefits and increasing income.

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

Individuals and families experiencing homelessness can seek services through multiple homeless services providers as well as community and government social service programs. Outreach workers from government agencies and non-profit organizations along with volunteers from the faith-based communities are engaging individuals on the streets and connecting them to services. The County of Ventura Health Care Agency has launched the Whole Person Care program which includes outreach through mobile care pods with showers and healthcare services in places frequented by homeless persons. This program is utilizing HMIS and partnering with CoC service providers to coordinate care and services for persons who are high-utilizers of healthcare services and homeless.

Addressing the emergency shelter and transitional housing needs of homeless persons

There is very limited access to emergency shelter within Ventura County. The Ventura County Rescue Mission in Oxnard provides the largest number of year-round shelter beds in the community. Seasonal shelters operate from December 1-March 31 in various regions of the county. Transitional Housing programs are working to reduce length of stay in transitional programs to move individuals and families to permanent housing. The CoC is using the Coordinated Entry System to prioritize emergency shelter and transitional housing beds and working to move individuals more quickly to permanent housing.

The CoC is working with domestic violence service providers to improve the link to the CoC and Pathways to Home. The CoC is also working with local jurisdictions to establish year round shelter that will participate in Pathways to Home. Increasing the number of year round emergency shelter beds in the region is one of the top priorities of the CoC.

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

Through Pathways to Home, the highest need persons who have been homeless the longest are prioritized for available permanent supportive housing units. The system is utilizing the VI-SPDAT tool for singles, families and transition-age-youth (TAY). A weekly case conferencing meeting is held to discuss the most vulnerable persons and develop a plan to address their needs and move them as

quickly as possible into a housing unit. CoC funded permanent supportive housing projects are implementing the Housing First approach that involves moving persons directly from the streets/shelters into permanent housing accompanied by home-based supportive services.

The CoC continues to work with veteran service providers to reach the goal of ending veteran homelessness in Ventura County. The Supportive Services for Veteran Families is now utilizing HMIS and participating in Pathways to Home and the Housing Authorities that have VASH allocations are meeting with the CoC to discuss using HMIS. Through partnerships with the provider network, the VC CoC has housed the majority of veterans that are currently eligible for VASH but are working to connect other veterans to the VA health system. Veterans who are not eligible for VASH are being served by SSVF and by other homeless service providers.

The CoC has an active youth collaborative focused on addressing and ending youth homelessness. Partners from around the region are participating by helping evaluate the current system, develop policies and train homeless service providers around youth-specific needs and advocate for youth-specific housing and shelter resources.

Families are connected with Rapid Re-Housing (RRH) assistance and some transitional housing programs. Rapid Re-housing has been established as the best practice model for families and the CoC has multiple providers that administer RRH assistance including the CalWORKs Housing Support Program (CHSP). As a result, the number of homeless families has decreased in recent years and the CoC is tracking data and prioritizing resources for unsheltered families.

Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); or, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs.

The local Homeless Prevention and Rapid Re-housing Programs are operated by the same service provider that administered the HPRP Homeless Prevention Program. Eligible services include those that were eligible under HPRP and include 1) short-term rental assistance; 2) medium-term rental assistance; 3) security and utility deposits; 4) utility payments; 5) moving cost assistance; and 6) motel and hotel vouchers available only to program participants prior to move-in under the Rapid Re-housing Program.

CalWORKS Housing Support Program provides help to move homeless families into rental housing and

connect families with resources to remain stably housed.

The Continuum of Care has implemented a community outreach and education campaign that informs households at risk of becoming homeless about resources available to them through homeless prevention programs. Several discharge and re-entry planning groups work in partnership with a wide range of public and private agencies to house homeless persons leaving publicly funded institutions or systems of care, when no housing has been identified.

Discussion

See discussions above.

AP-75 Action Plan Barriers to Affordable Housing - 91.220(j)

Introduction

The following section addresses housing policies and other relevant issues within the participating jurisdictions, including the region's ongoing efforts to eliminate or mitigate barriers to affordable housing. Programs that may have an impact on affordable housing are also discussed.

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

Inclusionary Housing/Development Agreements: The City of Ojai is considering an amendment to its Zoning Ordinance to increase its inclusionary housing requirement to 15% for all new residential construction, consistent with state law.

Expedited Review: Most communities expedite reviews to encourage affordable housing and all communities are working to implement the streamlining approval process required under SB35.

In 2017, the County released standardized plans for construction of Accessory or Farmworker Dwelling Units. The plans are available in three different sizes and are designed to expedite the plan check review process and reduce design costs.

Fair Housing Services: All EA jurisdictions promote fair housing by coordinating with the County for the administration of fair housing services by the Southern CA Housing Rights Center.

Preservation of Existing Affordable Housing: All jurisdictions monitor the affordability covenants on existing affordable housing with the intent of preserving long-term affordability of existing units. The EA provides CDBG funds to Habitat for Humanity's Preserve a Home program, which helps to preserve existing homeowner properties.

Development Standards and Regulations: All EA jurisdictions have approved 2014-2021 Housing Elements (HE). As a part of Moorpark's HE certification, 200+ acres was rezoned to 20 units/acre by right to encourage development. The City of Ojai is updating their adopted 2014-2021 HE, which identifies 8 parcels for a Special Housing Overlay (SPL) zone, which would allow a density of up to 20 units/acre by-right. One of the SPL sites is a City owned 0.20 acre parcel that is identified as a site for 4 units of affordable housing.

Reduction/Deferral of Fees: Most jurisdictions consider reduction or deferral of development fees as a

means of reducing cost of affordable housing construction.

Accessory Dwelling Units (ADU): Effective January 1, 2018, new state laws went into effect to clarify and promote the development of ADUs to increase the supply and affordability of housing in California. The County, Moorpark, Ojai and Santa Paula are currently in compliance with the new laws. Fillmore plans to eliminate potential constraints toward the development of second units.

The County's ordinance removed the requirement for a ministerial planning permit where an ADU is created from an interior conversion of existing space in residential zones; thus only a building permit will be required. The ordinance also decreased the minimum lot size required for an ADU and, in some geographical areas, increased the allowable size of an ADU. Ojai's new ADU standards remove the minimum lot size in all subject zones and create greater leniency with respect to parking requirements. Additionally, Ojai's existing program to legalize dwellings that were constructed without record of permits has been extended for two years, and is set to expire in March of 2019. To-date, 41 units have been issued building permits and finalized under this program.

Discussion

In addition to the planned actions discussed above, the EA has a variety of other programs that aid in creating and maintaining affordable housing.

The City of Ojai allows "Home-Splitting", or the division of a single-family home of at least 2,000 square feet into two separate units. Home-Splitting is exempt from the City's Growth Management Ordinance. A Design Review Permit is not required as long as the project does not involve new two-story construction or the alteration of the second story of an existing two-story residence. Physical expansion to accommodate kitchen and bathroom facilities is allowed.

The County and Santa Paula have Mobile Home Park Rent Control programs to help ensure rents remain affordable.

Fillmore increased its available buildable land by constructing levees, which reduced land costs.

Port Hueneme approved the conversion of a 90-room motel into 65 apartment units which are deed-restricted to low-income families. A density bonus, off street parking reductions, and waiver of development permit and processing fees all aided in reducing development cost. The City has also processed amendments to allow a mixed use development including 112 apartments, for which a reduction in parking requirements and fees were used as incentives.

The Entitlement Area jurisdictions are committed to ongoing review of regulations, ordinances, and fees

to ensure they do not unduly constrain the production, maintenance, and improvement of housing.

Ventura County Housing Trust Fund

All but one jurisdiction in the County of Ventura have committed to financially support the Ventura County Housing Trust Fund (VCHTF), a 501(c)(3) whose mission is to support more housing choices by generating and leveraging financial resources. The VCHTF uses a revolving loan fund to provide below-market interest rate loans to developers producing new affordable housing in Ventura County.

Ventura County Behavioral Health Department (VCBH)

VCBH provides comprehensive mental health services to severely and persistently mentally ill adults through regionally based teams in Ventura County. VCBH has increased the availability of housing and residential options by utilizing funds provided through the Mental Health Services Act (MHSA) in partnership with non-profit agencies that developed affordability of housing units. Supportive services, appropriate to the need of the resident, are subsequently provided by VCBH.

Through its HUD Continuum of Care projects for the chronically homeless and partnering with property owners throughout the county, Ventura County Behavioral Health is committed to the Housing First approach by establishing a low barrier model toward homelessness. Potential residents will not be screened out due to: little or no income; active or history of substance abuse; criminal record (except state-mandated restrictions); and/or a history of or currently a victim of domestic violence. The focus is on assisting potential resident's access and ability to sustain permanent housing as quickly as possible.

AP-85 Other Actions - 91.220(k)

Introduction

The following section addresses the Entitlement Area's planned actions to carry out the following strategies outlined in the Consolidated Plan:

- Foster and maintain affordable housing
- Evaluate and reduce lead-based paint hazards
- Reduce the number of poverty-level families
- Develop institutional structure
- Enhance coordination

Actions planned to address obstacles to meeting underserved needs

A lack of affordable housing is the critical need currently faced by the Entitlement Area jurisdictions. The County's traditionally low vacancy rate for rental properties, with higher than average rent and home purchase prices, has been exacerbated by the devastating Thomas Fire that ravaged through our community late in 2017, destroying over a thousand structures, the majority of which provided housing for our residents. The loss of limited housing stock exacerbates an already constrained housing market and creates a burden for low- and moderate-income households, and especially for homeless individuals and families, or those on the verge of becoming homeless. As the community continues its recovery from the fire, new and innovative options and alternatives to meet the immediate housing needs of our displaced residents, and those priced out of the market, are being explored. Some options under consideration include, but are not limited to, master leasing, bridge housing using pre-fabricated structures, and increasing capacity at River Haven, a transitional housing program for previously homeless persons with mental illness.

Joint efforts between non-profits, the public housing authorities, the cities, and the County to promote affordable housing projects and special needs housing projects, including those to address the shortage of farm worker housing, are ongoing. The establishment of the Countywide Continuum of Care, with representation across public, private, non-profit agencies, and others interested in ending homelessness in our community, creates opportunity for collaboration in the creation and preservation of affordable housing.

To address fair housing issues, the County, the five participating cities, and the cities of Camarillo, Simi Valley, and Thousand Oaks (through a Joint Powers Agreement) contract with a fair housing consultant to provide fair housing education and counseling throughout the Entitlement Area.

In February of 2016 the Ventura County Board of Supervisors allocated \$1 million in general funds across

three separate projects to support the development of 83 new units of rental housing for farmworkers. Two of these projects are located in the City of Ventura (Villages at Westview and Rancho Verde Apartments) and one is in the City of Oxnard (Etting Road Farmworker Apartments). The Rancho Verde Apartments started construction in the April of 2018 with completion estimated in late 2019. The developers of the Villages at Westview, which is recommended for an allocation of HOME funding in this Annual Action Plan, and Etting Road are pursuing other financing for their projects, including Low Income Housing Tax Credits and USDA Section 514 Farmworker Housing grants.

Actions planned to foster and maintain affordable housing

Regional and distinct area efforts are described in the previous section, Action Plan Barriers to Affordable Housing.

First-time home buyers are able to participate in the State funded Mortgage Credit Certificate (MCC) program, which provides tax credit incentives to low- and moderate-income families who are looking to become home owners. This program is available through the Golden State Finance Authority and the California Housing Finance Agency. Additional support is available through the Ventura County Community Development Corporation's Home Ownership Center which provides educational services, lending and realty support, down payment assistance and consulting for first-time buyers.

Rural homeowners may be eligible to participate in loan and grant programs through the United States Department of Agriculture for the purchase of a new home or to make necessary home improvements, accessibility improvements and energy upgrades. Assistance is available only for households meeting low and very-low income requirements or for persons with disabilities to make their homes accessible.

Additionally, rental and mortgage assistance is available to help stabilize residents at risk of losing their housing and assist homeless residents to obtain housing. Rental assistance is available through the County of Ventura's Homeless Prevention and Rapid Rehousing Program (HPRP). Assistance may include rental deposits; short-term rental payments; credit counseling; utility deposits and payments; and/or moving and storage costs. The Keep Your Home California program offered through the United States Treasury Department and the California Housing Finance Agency provides assistance to residents struggling to pay their mortgages.

Actions planned to reduce lead-based paint hazards

The Childhood Lead Poisoning Prevention Program continues to monitor the status of housing in Ventura County that are at risk for LBP hazard through providing testing for all children deemed to be at risk due to their living situation. If a child is found with Lead Poisoning, the program provides medical case management and an environmental evaluation to determine the cause of the lead poisoning. Efforts are then initiated to contain and/or dispose of the source of the lead. Intensive outreach is

provided throughout the community regarding the dangers of lead and how to recognize and prevent potential exposure. Education regarding anyone who has a potential of exposure, through remodeling, or other lead source is offered at a variety of venues, including the media, health fairs, and other community events. Specific activities include:

- Ensure that all medical providers in the County follow the mandated Statewide Targeted Blood Lead Screening Policy.
- Engage Ventura County's Medi-Cal Managed Care Program in the effort to encourage enrolled providers to test for lead, through outreach, education and routine collaborative activities.
- Ensure those children not in publicly funded programs be assessed for risk of lead poisoning by their providers at the appropriate ages.
- Provide case management services to children who meet case definition per CDC guidelines and to reduce environmental hazards.
- Provide case tracking services to those children with levels that are elevated but not high enough to meet state case criteria.
- Inform families and child caregivers who are responsible for children at risk about how to prevent lead exposure.
- Increase awareness of lead hazards among those local governmental agencies that can assist in decreasing lead exposures to children.
- Identify and inform CLPPP Branch of any newly suspected or newly identified sources of childhood lead exposure.
- Maintain contact with liaisons in other health programs and community groups to facilitate information-sharing and potential development of joint outreach and education programs.
- Continue to increase community awareness through outreach.
- Promote and maintain interagency collaboration between the local Ventura County Childhood Lead Poisoning Prevention Program (CLPPP) and the Environmental Health Division, and each of the perspective cities and/or County Code Enforcement and/or Building and Safety departments in order to address lead hazards and lead hazard controls.
- Facilitate assisting HUD in identifying HUD housing where a child under 6 years old with an actionable elevated blood lead level resides so that HUD can conduct environmental inspection to identify lead paint exposure and remediate the hazard.

Actions planned to reduce the number of poverty-level families

The Workforce Development Board (WDB) of Ventura County, offers a valuable, no cost resource for employers and job seekers. Through the effective use of federal funds and strong partnerships with private and public sector providers, the WDB programs offer support that would be costly for individuals or businesses to receive from other sources. The WDB programs provide guidance for individuals needing help with job readiness, job placement or job transitions, and for employers seeking support for

business services, recruitment, retention, or layoffs. In addition to providing services through the American Job Center of California, located in Oxnard and Simi Valley the WDB contracts with external providers for youth programs that provide after-school activities, job training and support services to low-income in-school youth and out-of-school youth ages 16-24. There are also federally sponsored on-the-job training subsidies and supportive services to assist those previously incarcerated to reenter the job force.

The Economic Development Collaborative-Ventura County (EDC-VC) focuses on attraction, retention and expansion of businesses in Ventura County through economic development programs that showcase the county's investment in cutting-edge business sectors and the high quality of life for residents. EDC-VC is funded through contributions from the County of Ventura, all 10 cities in the county and top-level private sector executives. EDC-VC promotes jobs and economic growth to maintain the county's economic vitality through key programs and services such as business consulting and workshops, loans, Manufacturing Assistance Program, and G.E.T. Trade, the how-to on international trade.

The County of Ventura actively enforces its Section 3 Policy on all construction related projects assisted with federal funding, where contracts are awarded in excess of \$100,000. Section 3 is a means to foster local economic development, neighborhood economic improvement, and individual self-sufficiency and to ensure that employment and other economic opportunities generated be directed to low- and very low-income persons, particularly those who are recipients of government assistance for housing, and to business concerns which provide economic opportunities to low- and very low-income persons. The purpose of Section 3 preferences is to be results oriented by: 1) encouraging business concerns that are not major sources of employment for low-income persons to increase their employment of these persons when economic opportunities arise from HUD financed construction related projects; and 2) promoting the growth of "profit-making" enterprises owned by low-income persons that substantially employ low-income persons with Section 3 contract awards.

Some housing authorities, including the Area Housing Authority of the County of Ventura, help residents build for tomorrow through the Family Self-Sufficiency (FSS) Program. The FSS Program is a voluntary program designed and administered to help low-income, Section 8 families achieve economic self-sufficiency through education and job training. Services might include: childcare, education, transportation, development of resumes, job training and placement, counseling, parenting skills, money management or credit counseling.

Actions planned to develop institutional structure

Several gaps and weaknesses were identified on SP-40 in the Strategic Plan. The following is a discussion of how the County plans to address these gaps in the upcoming year.

The County of Ventura is the Collaborative Applicant under the Countywide Continuum of Care. In that

capacity, County Executive Office staff are expanding and building upon the partnerships and cooperation among agencies that deliver services to homeless and at-risk homeless members of our communities. The Continuum of Care Alliance brings together members of government (including federal partners from Veterans' Affairs, County social service agencies and City policymakers), representatives from education, non-profit partners, faith community, and community advocates to improve and enhance not only coordination of care, but identification and development of housing solutions, and strategic use of limited financial resources targeted to the neediest in our communities.

To address the diminishing resources for the development and retention of housing for low-income persons, the County of Ventura and nine of the ten cities in the County have made financial contributions to the Ventura County Housing Trust Fund. This organization, with broad representation from government representatives, housing developers and financing entities, provides short-term financing for the development of new rental properties for low-income persons with emphasis on farmworkers, veterans, youth and those who are homeless.

A long time recognized gap in our continuum of homeless services has been a lack of year-round homeless shelters for the general population. There are a limited number of beds for specialized populations, but these are all located outside of the Entitlement Area in the cities of Oxnard and Ventura. This need has been a topic of discussion by the Continuum of Care Alliance, which is exploring the most effective and efficient remedy, be it permanent shelters, bridge housing, or other options. The CoC Alliance and Board are working with stakeholders including representation from local housing authorities and other low-income housing development organizations, to address this need along with the general shortage of affordable housing in one of the highest cost, lowest vacancy rate communities in the nation. Program administration and coordination for the CDBG program is provided by the County in conjunction with efforts of the five Entitlement Area Cities. The Cities provide the County the authority to expend CDBG funds on their behalf. In turn, the County enters into a single contract with regional program or project providers. This approach enhances efficiency and effectiveness for all entities.

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

The Ventura County Entitlement Area facilitated the development of a regional Consolidated Plan with 9 of the 10 cities in the County participating. The City of Oxnard, who had recently prepared the update to their plan, has requested to be included in the upcoming 2020-2025 Consolidated Plan. Furthermore, the County of Ventura is the Collaborative Applicant under the Countywide Continuum of Care. These two initiatives create an environment that dramatically improves coordination, communication and participation of all parties who address the needs of low-moderate income persons including homeless. The Countywide Continuum of Care Alliance includes participants from local housing authorities, mental

health providers, public health and ambulatory care, local non-profit entities, faith community and others from around Ventura County. Oxnard and the County - the only ESG entitlement grantees in the County, are also active in the Continuum of Care.

The Ventura County Board of Supervisors has enhanced its outreach to cities and partners for the development of shelter and interim housing solutions, by indicating willingness to share in development and operational costs for the development of emergency shelter programs in their communities. Their action in March of 2018 signals renewed interest in collaboration and urgency in the development of solutions for the community.

The County, through the Economic Development Corporation - Ventura County (EDC-VC), provides county-wide small business support, job training and enhances economic development opportunities throughout region. Other agencies such as the Workforce Development Board (WDB), Women's Economic Ventures (WEV), SCORE, Ventura County Lodging Association (VCLA), participate alongside representatives from the school districts, State legislature and other community agencies that support creating economic vitality throughout the county. The county and cities participate in these efforts either through their community development or economic development departments, each with strong connections to their respective housing divisions. This provides a direct connection between government, private industry, businesses, developers and social service agencies.

The County of Ventura recently completed its first Economic Development Strategy, developed by engaging a diverse group of stakeholders with the aid of an economic development expert, to inform the process about what impact the County as an employer and as an entity can do to facilitate the economic health of our County. The document outlines a wide variety of programs to enhance and improve the economic health of our community. The document is posted on the following website: <http://vcevsp.org/>

Discussion

See discussions above.

Program Specific Requirements

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

Introduction

The information in this section pertains to requirements set forth in HUD regulations that are specific to the CDBG, HOME, and ESG programs.

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:

Other forms of local investments for housing that may be available include the Ventura County Housing Trust Fund, in-lieu fees, CDBG funding, and other potential grant funding opportunities.

Low Income Housing Tax Credits, administered by the State of California Tax Credit Allocation Committee, as well as tax-exempt bond financing available through the California Debt Limit Allocation Committee are also available to finance the development of affordable housing.

It is anticipated that funding for affordable housing development will be available in the coming years from the State of California, potentially including financing from: Affordable Housing and Sustainable Communities Program; Joe Serna Farmworker Housing Grant Program; Multi Family Housing Program Funds; No Place Like Home; and Veterans Housing and Homelessness Prevention Program.

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

The County's HOME Program utilizes the recapture option in its Homebuyer Assistance Program (HBAP) and the resale option for assistance provided to developers who use HOME funds to develop income-restricted for-sale housing. Due to reductions in HOME funding and staffing, the County is not currently offering the HBAP program.

The County's HOME Policy and Procedure governing homebuyer activities was reviewed and approved by HUD on May 1, 2018.

Recapture Loans:

The County is not currently funding programs with Recapture Provisions. Existing homebuyer assistance (before May 1, 2018) will continue to be governed by the policies in place at the time the assistance was provided. An overview of provisions for newly funded programs has been included in the event that a program subject to these provisions is funded at a future time.

HOME Recapture provisions permit the original homebuyer to sell the property during the Period of Affordability. Upon sale, refinancing or transfer of the property during the Period of Affordability, the County will recapture a portion of the Net Proceeds of the original HOME direct subsidy.

Recaptured funds will be re-invested in HOME eligible projects.

Loans will have a term of twenty (20) years. Assistance will be provided as a forgivable loan, with no interest due except in the event of default. Loan balances will be forgiven over time, provided no event of default occurs. If the property is sold or transferred, either voluntarily or involuntarily, or refinanced during the first eleven (11) years, the entire amount of the HOME assistance shall be repaid. If a property sale, transfer or refinance occurs after the end of the eleventh (11th) year, for each additional full year of owner-occupancy, 10% of the original loan amount will be forgiven.

Resale Loans:

Assistance provided through the HOME program to developers of income-restricted for-sale housing will utilize the resale option.

In the event a property with resale restrictions is sold during the affordability period, the property will be sold to a qualified low-income buyer who will occupy the unit as their primary residence. The original homebuyer will receive a fair return on investment. Finally, the property will be sold at a price that is affordable to a reasonable range of low-income homebuyers.

Resale of HOME-assisted housing will be targeted to households at or below 80% of the Area Median Income. The maximum percentage of income that an initial or subsequent homebuyer will spend on the fixed costs of owning a home (e.g. loan payments of principal, interest, taxes and insurance) will be no more than 40%.

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:

Please see above.

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 County does not have any plans to invest HOME funds in this type of activity.

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

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

The Ventura County Continuum of Care has established policies and procedures that include written standards, Coordinated Entry, HMIS standards and performance measures. The overarching goal of ESG projects is to reduce the time spent homeless. ESG Emergency Shelter funds are intended to respond to crisis and provide short-term emergency assistance to enable homeless households to move toward independent living by obtaining permanent housing as quickly as possible. The 2017 CoC Board approved document is attached as Appendix C.

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 Continuum of Care's coordinated entry system is called Pathways to Home. The CoC covers the entire geographic area of the County of Ventura which includes a total of 10 cities and 5 regional areas. The Ventura County CES "Pathways to Home" includes full HMIS integration and all funded providers. The system is a virtual "front door" to the Homeless Services System. All providers conduct an initial screening and assessment and input that information into HMIS. Once that information is collected and entered, the eligibility module is run in HMIS to determine which programs the client/household is eligible for. The client and assessor discuss options and an electronic referral is made through HMIS. Prioritization is done by using the VI-SPDAT tools as well as through discussion at a weekly case conferencing meeting.

This system was launched in October of 2016 and the CoC is evaluating the system and making modifications to improve the system. The CoC has added Ventura County 2-1-1 as another "front door" that allows for 24/7 coverage for a system that lacks year round shelter capacity.

Outreach has been expanded to reach all parts of the county and individuals who do not seek services through traditional systems. Collaboration with healthcare systems, mainstream resource programs, youth providers, and law enforcement will increase the points of access to the system and services. Evaluation of diversion and enhanced homeless prevention programs are ongoing initiatives.

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 Ventura County Continuum of Care (CoC) along with the County of Ventura actively recruit non-funded entities to encourage program proposals for funding as well as building capacity within the CoC. Requests for Proposals are released publicly, posted on the Ventura County CoC website, distributed via the United Way email listserv and via press release. Verbal communication at CoC and other community meetings is another way staff spread the word about potential funding opportunities.

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 local CoC has homeless and formerly homeless persons participating in the CoC committees and on the CoC Board. These persons are critical in providing input to the funding recommendations developed by staff and presented through the CoC.

5. Describe performance standards for evaluating ESG.

ESG funded programs are held to the same standards as CoC funded programs including system performance and program level performance. All homeless services programs follow the same written standards and policies and procedures. County staff review Quarterly Status Reports (QSRs) to ensure performance is adequate and timely compared to the goals stated in the Consolidated and Annual Action Plans. These reports are completed by all subrecipients and include information on milestones, status and accomplishments. Progress delays are addressed and resolved. If additional monitoring is required or if an on-site visit appears to be beneficial or necessary, the County's Monitoring Guidelines will be utilized. All data is collected in the HMIS system. In addition, the CoC Data Committee is monthly reviewing system-wide performance and using that information to make funding recommendations.

Discussion

CDBG program income is typically received from loan repayments from various historical loan programs. Any program income received is usually reprogrammed during the year it is received, generally to an existing activity, and in accordance with the County's Citizen Participation Plan. Anticipated program income for the upcoming cycle is both unpredictable and minimal, therefore has not been included in current year project funding.

HOME program income is typically received from loan repayments from various historical loan programs. In accordance with Grant Based Accounting, program income received during a program year will be included in the following year's Annual Action Plan's Expected Resources (AP-15).

Attachments

Grantee Unique Appendices

Appendix A: Grantee's Proof of Publication

APPENDIX A

Grantee's Proof of Publication



I hereby certify that the Ventura County Star Newspaper has been adjudged a newspaper of general circulation by the Superior Court of California, County of Ventura within the provisions of the Government Code of the State of California, printed in the City of Camarillo, for circulation in the County of Ventura, State of California; that I am a clerk of the printer of said paper; that the annexed clipping is a true printed copy and publishing in said newspaper on the following dates to wit:

certify
correct


Legal Clerk

**NOTICE OF DOCUMENT
AVAILABILITY AND
PUBLIC HEARING
COUNTY OF VENTURA
FY 2018-19 ANNUAL
ACTION PLAN AND
SUBSTANTIAL AMENDMENT
TO THE CITIZEN
PARTICIPATION PLAN
MAY 8, 2018, 10:30 A.M.**

per
Room
ment Center
Administration
S. Victoria Ave.
ntura, CA 93099

The County of Ventura will conduct a public hearing for the draft FY 2018-19 Annual Action Plan (3rd public hearing) and for a Substantial Amendment to the County of Ventura Entitlement Area Consolidated Plan Citizen Participation Plan. The purpose of this public hearing is to receive comments and seek Board of Supervisor's approval before transmitting the Plans to the Department of Housing and Urban Development.

2018-19 Action Plan specific projects to meet goals in the fourth year of the five-year period covered by the 2015-19 Regional Consolidated Plan, which addresses the unmet needs of low and moderate-income persons and persons with special needs who reside in the Ventura County Entitlement Area (comprised of the unincorporated areas and the cities of Fillmore, Moorpark, Ojai, Port Hueneme, and Santa Paula). Subject to federal appropriations, the Entitlement Area anticipates allocating approximately \$2,235,737 in FY18-19 funding and prior year's resources from three HUD grant programs - the Community Development Block Grant Program (CDBG), the Home Investment Partnership (HOME), and the Emergency Solutions Grant program. Funding is proposed to be used for housing (affordability, availability and quality of housing) (\$1,260,011), public service programs including programs for vulnerable populations (\$448,076), community and economic development projects (\$247,291), other (\$232,788), and administration/fair housing opportunity (\$382,498).

Participation Plan is proposed to clarify the process for processing plan amendments.

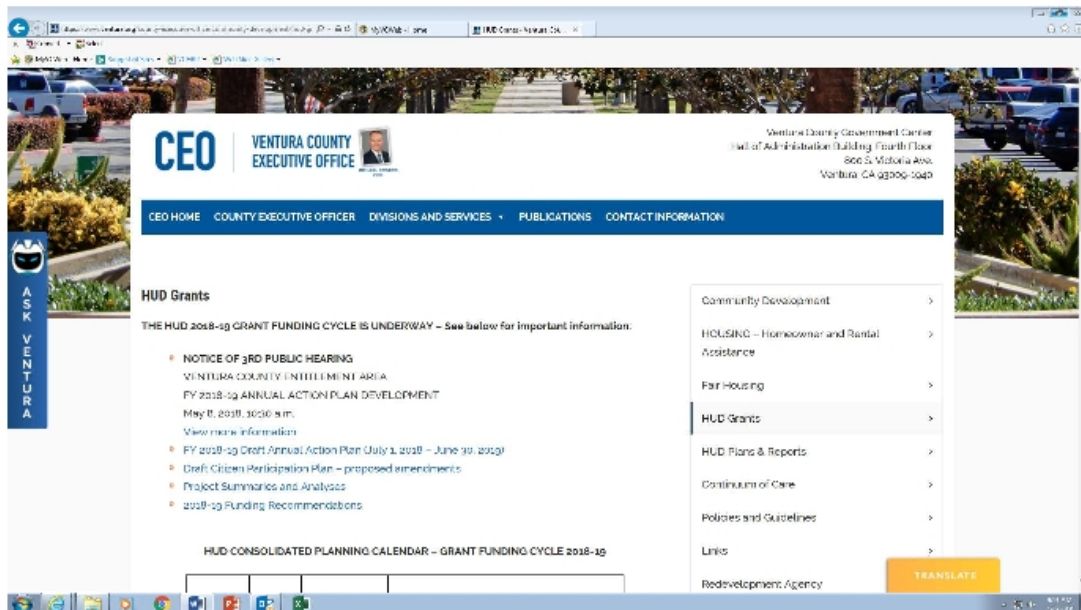
Ventura County Executive Office's website at <https://www.ventura.org/county-executive-office/community-development/hud-plans-reports/>.

Persons who require accommodation for any audio, visual or other disability in order to participate in a meeting of the Board of Supervisors per the American Disabilities Act (ADA), may obtain assistance by requesting such accommodation in writing addressed to the Clerk of the Board, 800 South Victoria Avenue, Loc. #192, Ventura, CA 93099 or telephonically by calling (805) 654-2251. Any such request for accommodation should be made at least 48 hours prior to the scheduled meeting for which assistance is needed.

directed to Community Development, c/o Tracy McAulay, County Executive Office, County of Ventura, 800 S. Victoria Avenue, L01940, Ventura, CA 93099 or to Community Development

the process contact Tracy McAulay (805) 662-679

blish April
No. 9771





**Certificate of
Publication**

In Matter of Publication of:

CALIFORNIA NEWSPAPER SRV/CNSB
Cindy a/p 229-5420 CALIFORNIA NEWSPAPER SRV/CNSB
PO BOX 63460

LOS ANGELES, CA 90060

State of California)
))
County of Ventura)

I hereby certify that the Ventura County Star Newspaper has been adjudged a newspaper of general circulation by the Superior Court of California, County of Ventura within the provisions of the Government Code of the State of California, printed in the City of Camarillo, for circulation in the County of Ventura, State of California; that I am a clerk of the printer of said paper; that the annexed clipping is a true printed copy and publishing in said newspaper on the following dates to wit:

March 16, 2018

I certify under penalty of perjury, that the foregoing is true and correct.

Dated this March 16, 2018; in Green Bay, Wisconsin, County of Brown.

Legal Clerk

NOTICE OF PUBLIC HEARING
VENTURA COUNTY ENTITLE-
MENT AREA
FY 2018-19 ANNUAL ACTION
PLAN DEVELOPMENT
MARCH 26, 2018, 9:00 A.M.
Lower Plaza Assembly Room
Government Center, Hall of
Administration
800 S. Victoria Avenue,
Ventura, CA 93009

The County of Ventura will conduct the second public hearing for development of the FY 2018-19 Annual Action Plan. This hearing will be held jointly with the cities of Fillmore, Moorpark, Ojai, Port Hueneme and Santa Paula that, along with the County unincorporated area, comprise the Entitlement Area. The purpose of this public hearing is to discuss specific recommended projects to be funded by HUD Community Development Block Grant (CDBG), Emergency Solutions Grant (ESG), and Home Investment Partnerships (HOME) funds. Attendance is mandatory for applicants with projects recommended for funding.

The County anticipates similar funding to FY 2017-18 for the Entitlement Area, across all entitlement grant programs. Anticipated amounts for FY 2018-19 are \$1,662,458 in CDBG funding, which may be utilized for activities for persons of low-income that fall into the categories of housing, public facilities, economic development, and public service; \$140,556 in ESG funding, which may be utilized to address the needs of homeless people in emergency or transitional shelters and to assist people to quickly regain stability in permanent housing after experiencing a housing crisis and/or homelessness; and \$779,707 in HOME funding to increase the supply of affordable housing for low-income persons.

If you require language translation, physical assistance or other assistance to attend or participate in the hearing, please contact Gia Allen at (805) 654-5027 by March 23, 2018.
3/16/18
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AD No. 1957758

NOTICE OF PUBLIC HEARING
VENTURA COUNTY ENTITLE-
MENT AREA
FY 2018-19 ANNUAL ACTION
PLAN DEVELOPMENT
MARCH 26, 2018, 9:00 A.M.
Lower Plaza Assembly Room
Government Center, Hall of
Administration
800 S. Victoria Avenue,
Ventura, CA 93009

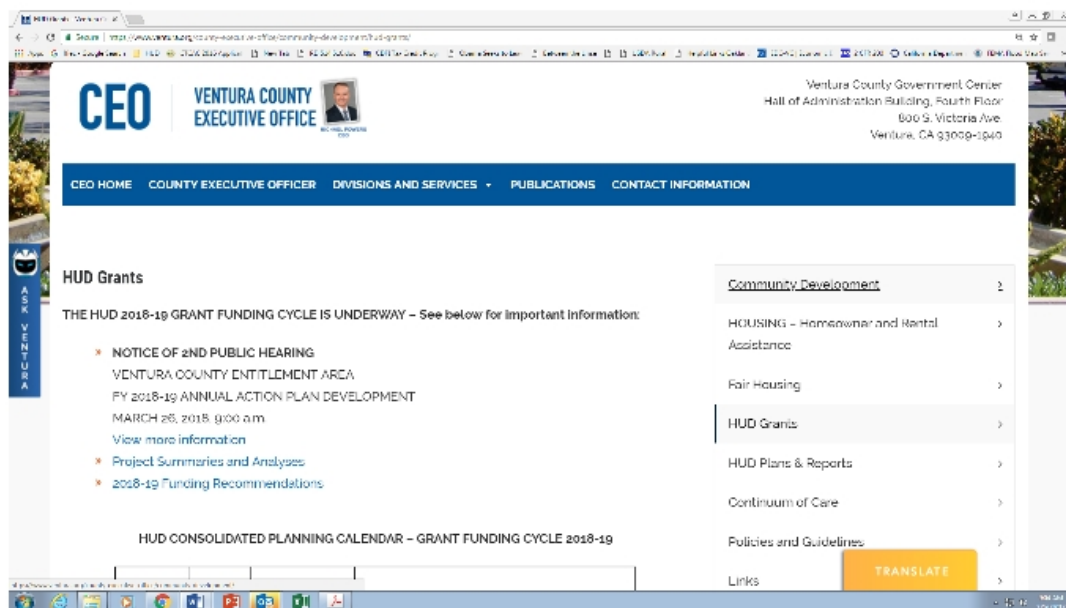
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If you require language translation, physical assistance or other assistance to attend or participate in the hearing, please contact Gia Allen at (805) 654-5027 by March 23, 2018.
3/16/18
CNS-311195#
VENTURA COUNTY STAR
AD No. 1957758

AD No. 1957758
P.O.
Printed Under U.S.





Certificate of Publication

Ad #1790430

In Matter of Publication of:

Public Notice

State of California)

)))

County of Ventura)

I, **Maria Rodriguez**, hereby certify that the **Ventura County Star Newspaper** has been adjudged a newspaper of general circulation by the Superior Court of California, County of Ventura within the provisions of the Government Code of the State of California, printed in the City of Irwindale, for circulation in the County of Ventura, State of California; that I am a clerk of the printer of said paper; that the annexed clipping is a true printed copy and publishing in said newspaper on the following dates to wit:

Oct. 20, 2017

I, **Maria Rodriguez** certify under penalty of perjury, that the foregoing is true and correct.

Dated this Oct. 20, 2017; in Camarillo, California, County of Ventura.



Maria Rodriguez
(Signature)

* 4 0 0 0 3 0 4 5 8 4 0 2 * *

COUNTY OF VENTURA FY 2018-19 CONSOLIDATED ANNUAL ACTION PLAN

**NOTICE OF MANDATORY
PUBLIC HEARING**
Wednesday, November 8, 2017,
9:00 a.m.
County Government Center,
Administration Building,
Lower Plaza Assembly Room,
800 South Victoria Avenue,
Ventura.

The County of Ventura Entitlement Area will conduct the first FY 2018-19 Consolidated Annual Action Plan Public Hearing on Wednesday, November 8th at 9:00 a.m. It is mandatory for potential applicants to attend the hearing in order to submit an application in this year's cycle. Sign-ins and speaker cards will not be accepted after 9:15 a.m.

The public hearing will be held jointly with the cities of Fillmore, Moorpark, Ojai, Port Hueneme and Santa Paula that, along with the County

unincorporated area, comprise the Entitlement Area. The purpose of the hearing is to receive input from non-profit organizations and other agencies regarding unmet needs for low-income persons and outlining potential activities to address those needs. The public hearing will begin promptly at 9:00 a.m. and end no later than 11:00 a.m. Public comment will be limited to three minutes per program.

Input received at the public hearing will be considered in preparing the County's Consolidated Annual Action Plan

for FY 2018-19, which outlines projects to be funded through three U.S. Department of Housing and Urban Development (HUD) grant programs: the Community Development Block Grant (CDBG) program, the HOME Investment Partnerships Program (HOME), and, if funding is received, the Emergency Solutions Grant Program (ESG).

At the direction of the Board of Supervisors, an emphasis will be placed on programs and activities serving the homeless and other vulnerable populations.

The County received \$1,620,399 in CDBG funds in the current cycle. CDBG funds may be utilized for affordable housing, public facilities, economic development, and public services (limited to 15% of the grant amount).

The County received \$467,435 in HOME funds in the current cycle. Funds may be used to increase the supply of affordable housing for low-income persons through acquisition, new construction, reconstruction or substantial rehabilitation of housing, and tenant-based rental assistance.

The County received \$140,550 in ESG funds in the current cycle. Funds may be used to provide services for persons who are homeless or at risk of homelessness.

The aforementioned grant funding amounts are estimates only and may change depending upon the Congressional allocation in the Federal budget.

Instructions, program summaries and the calendar of key dates for the FY 2018-19 funding process are available on-line at the County Executive Office's website at <http://www.ventura.org/divisions/community-development> (click on HUD Grants). Letters of Intent to apply (e-mails will be accepted) will be due no later than 5:00 p.m. December 1, 2017. Full applications will be made available no later than November 24th at 5:00 p.m. at www.citydataservices.net and will be due no later than 5:00 p.m. on January 5, 2018.

If you require language translation, physical assistance or other assistance to attend or participate in the hearing, please contact Gia Allen at (805) 654-5027 by November 3, 2017.
10/20/17
CVS-3061629#
VENTURA COUNTY STAR
Ad No.1790430

Appendix B: Ventura County Continuum of Care Written Standards for HUD CoC and ESG 2017

APPENDIX B

Ventura County Continuum of Care Written Standards for HUD CoC and ESG 2017



**Ventura County Continuum of Care
Written Standards for HUD CoC and ESG
2017**

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The County of Ventura is the Collaborative Applicant (CA) for the Ventura County Continuum of Care. Staff support is provided to the Ventura County Continuum of Care Alliance and Board by the County of Ventura County Executive Office. The standards contained within this document shall be applied to all projects funded within the Ventura County Continuum of Care. Standards that apply only to subrecipients of Ventura County will be differentiated by the term "Subrecipient"; all other standards will refer to "recipient."

I. Introduction

Purpose for Standards

The purpose of the *Standards* is to:

- ✓ Provide detail on participant eligibility;
- ✓ Outline the allowable activities; and
- ✓ Provide standards for documenting eligibility.

For Subrecipients of Ventura County, this document is incorporated into the Specific Terms and Conditions (Exhibit A) of the signed agreement (hereinafter Contract) between the County and its Subrecipient. Local policies and procedures are subject to change at any time.

Overview of the HEARTH Act

The U.S. Department of Housing and Urban Development (HUD) Homeless Emergency Assistance and Rapid Transition to Housing Act of 2009 (HEARTH Act) was signed into law on May 20, 2009. The HEARTH Act reauthorizes the McKinney-Vento Homeless Assistance Act of 1987, but with some important changes, including:

- The consolidation of HUD's competitive grant programs, the Supportive Housing Program (SHP), Shelter Plus Care Program (SPC) and the Section 8 Moderate Rehabilitation Program;
- The revision of the Emergency Shelter Grants Program and renaming it as the Emergency Solutions Grants (ESG) Program;
- The creation of a Rural Housing Stability Assistance Program;
- A change in HUD's definition of homelessness and chronic homelessness;
- A simplified match requirement;
- An increase in prevention resources; and,
- An increased emphasis on performance.

The HEARTH Act implementation is occurring in stages, including the publication of the following regulations:

- ❖ [Definition of Homeless \(Final Rule\) Docket No. FR-5333-F-02](#)
This final rule was published on December 5, 2011 and provided the definition of "homeless", "disability", and "developmental disability". Additionally, the rule established clear recordkeeping requirements for verifying eligibility to receive assistance.
- ❖ [Defining "Chronically Homeless" \(Final Rule\) Docket No. FR-5809-F-01](#)
This final rule was effective on January 4, 2016, and HUD expected compliance with this definition for all new admissions as of January 16, 2016. The final rule changed the definition that was in effect in the CoC Program interim rule: key changes included requiring an individual or head of household to have been living in a place not meant for human habitation, in an emergency shelter, or in a safe haven for the last 12 months continuously or on at least four occasions in the last three years *where those occasions cumulatively total at least 12 months*; replacing the term "disabling condition" with "homeless individual with a disability"; and defining an occasion by a break of at least seven nights not residing in an emergency shelter, safe haven, or a place not meant for human habitation. The final rule also established recordkeeping requirements for documenting chronic homelessness.

❖ **Emergency Solutions Grant (Interim Rule) 24 CFR § 576**

The interim rule revises the Emergency Shelter Grants Program and renames it the Emergency Solutions Grants Program to broaden existing emergency shelter and homelessness prevention activities and to add short- and medium-term rental assistance and support services to rapidly rehouse homeless people. There is now a greater emphasis on helping people quickly regain stability in permanent housing after experiencing a housing crisis and/or homelessness. The key changes that reflect this new emphasis are the expansion of the homeless prevention component and the addition of the rapid rehousing assistance component.

❖ **Conforming Amendments to the Consolidated Plan (Interim Rule) 24 CFR § 91**

This interim rule updated the annual action plan requirements, revising the homeless needs narrative to describe the local one-year goals and specific action steps for reducing and ending homelessness. In addition, the ESG narrative section was revised to include new requirements such as written standards for the provision of ESG assistance, performance standards for evaluating ESG activities, and a homeless outreach and consultation strategy.

The annual report requirements were updated to include an evaluation of the jurisdiction's progress in meeting its specific objectives in reducing and ending homelessness. The ESG narrative section was also revised to include additional reporting information on ESG, including the evaluation of the outcomes for ESG activities measured under the new performance standards developed.

❖ **Homeless Management Information System**

The HEARTH Act requires that CoC and ESG funded projects participate in the Homeless Management Information System (HMIS). The HMIS component varies between the CoC and ESG Program regulations. County policy is to share HMIS funds with Subrecipients.

❖ **Continuum of Care (Interim Rule) 24 CFR § 578**

The Continuum of Care (CoC) Interim Rule was published on July 31, 2012 and took effect on August 30, 2012. The purpose of the regulation is to:

- ✓ Codify the CoC Planning Process;
- ✓ Return individuals and families who experience homelessness to permanent housing in less than 30 days;
- ✓ Consolidate the Supportive Housing Program (SHP), Shelter Plus Care Program (SPC) and the Section 8 Moderate Rehabilitation Program;
- ✓ Promote a community wide commitment to the goal of ending homelessness;
- ✓ Provide funding to quickly rehouse homeless individuals and families while minimizing trauma and dislocation;
- ✓ Promote access to mainstream benefits;
- ✓ Optimize self-sufficiency;
- ✓ Provide funding to support the CoC structure & process; and
- ✓ Codify the CoC structure & process.

❖ **Rural Housing Stability Assistance Program (Proposed Rule)**

The overall goal of the HEARTH Act is to reduce and ultimately end homelessness by reducing the duration of time people spend homeless and reducing recidivism back into homelessness. Currently, Ventura County has funding through the Emergency Solutions Grants Program and the Continuum of Care Program to undertake projects that work toward this goal.

II. Program Overviews

a. Emergency Solutions Grants Program

The Emergency Solutions Grants (ESG) Program is designed to respond to crisis and provide emergency assistance to prevent homelessness and enable homeless households to move toward independent living. ESG funds are authorized under the McKinney-Vento Homeless Assistance Act and are intended to help improve the quality of existing emergency shelters for the homeless, make additional shelters available, meet the costs of operating these facilities, rapidly rehouse homeless individuals and families, provide essential services to them, and to prevent homelessness. ESG projects will be required to assist people in moving to permanent housing and reduce the time spent in shelters and on the streets.

Recent changes to ESG funding have further defined the purpose and expanded the breadth of activities and going forward, the funds will be used for a variety of assistance, including: *Emergency Shelter, short- or medium-term Rental Assistance, Housing Search and Placement, and Housing Stability Case Management*. The Homelessness Prevention component includes various housing relocation and stabilization services and short- and medium-term rental assistance. The Rapid Rehousing component includes similar services and assistance to help people who are homeless move quickly into permanent housing and achieve stability in that housing. The funds under this program are intended to target households who would be unsheltered but for this assistance. The County of Ventura and the City of Oxnard are recipients of HUD ESG Program funds and will administer this award for eligible agencies referred to as Subrecipients. The County of Ventura acts as the administrative entity for State of California ESG funds. All funded agencies are required to follow federal guidelines in the implementation of ESG funding.

Policy on Project Selection

The County will notify community members and key stakeholders that ESG funding is available and will publish applications on the Ventura County CoC (www.venturacoc.org) website with a deadline for project applications to be submitted to the County. The CoC Data Performance & Evaluation Committee scores projects locally and recommends projects for funding. The CoC Data recommendations are taken to the CoC Board for final recommendations and approved by the local entity administering this funding (County Board of Supervisors or City of Oxnard).

b. Continuum of Care Program

The Continuum of Care (CoC) Program consists of projects that provide housing and supportive services to formerly homeless individuals and families. The goal of projects funded under the CoC Program is to assist households with attaining and sustaining permanent housing as quickly as possible. In Ventura County, CoC Program funds are currently used to support various projects, including Permanent Supportive Housing and Rapid Rehousing. In addition to these allowable project components, the interim rule also allows funding to be used to provide, to a limited degree, Prevention.

Ventura County is the Collaborative Applicant for the VCCoC. The County, along with non-profit entities, are directly awarded projects under the CoC Program. The County also passes funds on to subrecipients to carry out activities under the CoC Program.

Policy on Project Selection

Annually, HUD publishes a Notice of Funding Availability (NOFA) for the CoC Program competition. The County will notify community members and key stakeholders that the application is available and will publish all parts of the CoC Consolidated Application on the Ventura County CoC (www.venturacoc.org) website with a deadline for project applications to be submitted to the County. During this competitive process, the CoC develops objective scoring criteria based on the criteria from the NOFA and local priorities that are consistent with the Federal Strategic Plan to Prevent and End Homelessness. The CoC Data Performance & Evaluation Committee scores projects locally and recommends projects for inclusion in the application submitted to HUD. The CoC Board receives committee recommendations and makes final approval. The County shall notify project applicants in a timely manner, per the NOFA guidelines, whether the project application(s) will be included in the CoC Consolidated Application submission. If a project is not recommended for funding, the County will notify the project applicant, in writing, of this decision.

These guidelines will be updated as necessary throughout the grant period and will continue to expand and include a variety of project components. The County reserves the right to revise the guideline as deemed necessary and will to the extent practicable or as required by HUD, consult with the Ventura County Continuum of Care, ESG subrecipients, CoC recipients/subrecipients, homeless or formerly homeless or other interested parties.

III. Coordination Among Providers

The County and the Continuum of Care have been engaged in planning activities to:

- ✓ Increase systems coordination among the various housing and service providers;
- ✓ Improve access for participants;
- ✓ Better target funding; and
- ✓ Better address the housing and service needs in our community.

The County, CoC and ESG (Sub)/Recipients will coordinate and integrate, to the maximum extent practicable, CoC- and ESG-funded activities as well as other homeless programs within the area covered by the Ventura County CoC with other mainstream housing, health, social services, employment, education, and youth programs, including those identified in 24 CFR § 576.400(b) and (c).

a. Coordinated Entry and Assessment System

The Continuum of Care's Coordinated Entry System, Pathways to Home, has been developed in accordance with the HUD Continuum of Care Regulations. Participation in this system is mandatory for ESG and CoC (Sub)/Recipients. See the Ventura County Continuum of Care: Coordinated Entry Process and Policies, incorporated herein by reference.

The CoC uses the coordinated entry process to prioritize homeless persons within the CoC's geographic area. Prioritization is based on a specific and definable set of criteria that are documented, made publicly available and applied consistently throughout the CoC for all populations. The CoC prioritization policies and procedures are consistent with CoC and ESG written standards under 24 CFR 578(a) (9) and 24 CFR 576.4. The following criteria establish how homeless individuals/families will be prioritized for shelter and housing programs in the CoC. The VI-SPDAT will be used by the Coordinated Entry Assessment Sites to assess individuals experiencing homelessness. The first three serve as the primary methods of ranking individuals and the remaining two prioritizations serve as tie breakers if the first three prioritization methods result in tied rankings:

- 1. Chronic Homeless Status:** This first prioritization criteria focuses on those individuals with a disability who have experienced long-term or multiple episodes of homelessness and are generally those with the highest need and vulnerability. In addition, this population has been identified as being the largest user of homeless system resources. This will be determined by the documented length of time of homelessness (episodic or continuous) and the reported service needs of individuals including chronic health, mental health, substance use or other service needs that impact vulnerability. Persons with the document longest length of time homeless and documented highest service needs will receive first priority.
- 2. VI-SPDAT Score:** This second prioritization factor targets the most vulnerable clients in the homeless system as determined by their total VI-SPDAT score. VI-SPDAT score will be utilized in determining the ranking on the prioritization list in combination with the factors in the section above.
- 3. Length of Time Homeless:** The third prioritization factor is the length of time an individual has experienced homelessness, giving priority to the person that has experienced homelessness the longest.

4. **Service Level Needs:** The fourth prioritization factor targets individuals with medical needs who will be prioritized when they have behavioral health conditions or histories of substance use which may either mask or exacerbate medical conditions.
5. **Date of VI-SPDAT Assessment:** The final prioritization criteria will be the date of the individual's assessment, giving priority to the earliest date of assessment.

Prioritizing chronically homeless persons in CoC program-funded Permanent Supportive Housing beds dedicated or prioritized by persons experiencing chronic homelessness:

- 1 (a) First Priority—Homeless Individuals and Families with a Disability experiencing chronic homelessness that is based on the length of time in which an individual or family has resided in a place not meant for human habitation, a safe haven, or an emergency shelter and the severity of the individual or families' service needs.
- (b) If there is not a person that meets specific program eligibility criteria of a target population (i.e.: mental illness), the agency would then accept the next prioritized person on the list. This means, if the CoC has served everyone with self-reported target disability (i.e. mental illness), the agency may be referred another person that meets the chronic homeless status (i.e. with a different disability).

Prioritizing when there are no chronically homeless individuals and families within the VCCoC's geographic area:

1. First Priority—Homeless Individuals and Families with a Disability with long-term or multiple episodes of homelessness (may not meet chronic homelessness definition) and Severe Service Needs.
2. Second Priority—Homeless Individuals and Families with a Disability with Severe Service Needs.
3. Third Priority—Homeless Individuals and Families with a Disability Coming from Places Not Meant for Human Habitation, Safe Haven, or Emergency Shelter Without Severe Service Needs
4. Fourth Priority—Homeless Individuals and Families with a Disability Coming from Transitional Housing

Unsheltered persons receive first priority for emergency shelter and rapid re-housing. In order to expedite referrals in placing individuals with emergent needs, a direct referral for Transitional Housing can occur if there are three or more vacancies, with a case update at the next case conference meeting.

b. Fair Housing and Equal Opportunity

i. Affirmatively Furthering Fair Housing

Recipients shall market housing and supportive services to eligible persons regardless of race, color, national origin, religion, sex, age, familial status, or handicap; and, shall provide program applicants and participants with information, in writing, on their rights and remedies under applicable federal, state, and local fair housing and civil rights laws. 24 CFR § 578.93(c). Subrecipients shall submit these written materials to the County as an attachment to the Subrecipient's Management Plan, as required by the Statement of Work (Exhibit B) of the Contract, effective FY2013. The County shall review these documents for potential violations of fair housing laws and shall assist Subrecipients in coming into compliance with this requirement. If the County encounters a condition or action that

impedes fair housing choice, the County shall work with the applicable jurisdiction(s) that provided the Certification of Consistency with the Consolidated Plan to address and remedy the violation(s). 24 CFR § 578.93(c)(2).

ii. **Integration and Accessibility**

Housing and supportive services must be offered in an integrated manner, such that persons with disabilities may enjoy a meaningful life within the community. See *Olmstead v. L.C.* (527 U.S. 581 (1999) 138 F.3d 893). Recipients shall offer housing and supportive services to enable individuals with disabilities to interact with nondisabled persons to the fullest extent possible. 24 CFR § 578.93(d). Reasonable accommodations and modifications must be offered when appropriate. See [Reasonable Accommodations and Modifications below](#).

iii. **Reasonable Accommodations and Modifications for Persons with Disabilities**

Recipients are required to provide reasonable accommodations and modifications for persons with disabilities. A reasonable accommodation is defined as changing the rules, policies, or services so that a person with a disability has equal opportunity to use and enjoy a dwelling unit or common space. Permitting a person with a disability to have a service animal is an example of a reasonable accommodation. A reasonable modification is defined as modifying a structure so that a person with a disability has the full enjoyment of the housing and related facilities. Installing a grab bar in the bathroom of a person with a disability is an example of a reasonable modification. For federally-funded housing, the recipient bears the burden of paying for the modification. Recipients must inform applicants during the intake process of their right to request a reasonable accommodation or modification.

iv. **Discrimination Based on Household Composition**

A recipient receiving funds under the ESG or CoC Programs cannot discriminate against a group of persons presenting as a family based on the composition of the family, the age of any members of the family, the disability status of any members of the family, marital status, actual or perceived sexual orientation, or gender identity. However, housing *may* be limited to families with children who are under the age of 18.

Refer to the Equal Access to Housing in HUD Programs Regardless of Sexual Orientation or Gender Identity Final Rule, "Equal Access Rule," (77 FR 5662) and HUD's Frequently Asked Question regarding the definition of "family,"

<https://www.hudexchange.info/faqs/1529/how-is-the-definition-of-family-that-was-included>.

v. **Preventing Involuntary Family Separation**

In an effort to maintain family unity, for housing serving families with children, the age and gender of a child under age 18 shall not be used as a basis for denying any family's admission. 24 CFR § 578.93(e). Additionally, recipients may not deny admission to any member of the family (e.g., 15-year old son). If a family is involuntarily separated for any reason, a report must be sent to the Ventura County Continuum of Care staff. Please contact Tara Carruth at 805-654-3838 or tara.carruth@ventura.org

vi. **Guidance for Placement for Transgender Persons in Single-Sex Emergency Shelters and Other Facilities**

Recipients operating ESG-single-sex emergency shelters (or other ESG- and/or CoC facilities) must follow HUD's guidance regarding placement for transgender persons, [HUD Notice CPD-15-02](#), and the Equal Access Rule.

A recipient that makes decisions about eligibility for or placement into single-sex emergency shelters (or other facilities) must place an applicant or participant in a shelter (or facility) that corresponds to the gender with which the person identifies, taking health and safety concerns into consideration. This placement should not be based on complaints of another person when the sole stated basis of the complaint is an applicant's or participant's non-conformance with gender stereotypes. A recipient must not ask an applicant or participant to provide anatomical information or documentation, physical or medical evidence of the person's gender identity. The recipient must take reasonable steps to address safety and privacy concerns; the recipient should provide for privacy in bathrooms and dressing areas. For instance, recipients may install privacy curtains or partitions.

vii. **Prioritized Subpopulations and Fair Housing Implications**

Recipients shall comply with applicable civil rights laws, including the Fair Housing Act. Within this framework, these standards establish subpopulations to be prioritized for housing and services that align with the identified needs of the local community and the goals of the Federal Strategic Plan to End Homelessness. Subpopulations may be prioritized as long as doing so does not discriminate against any protected class under federal nondiscrimination laws in 24 CFR § 5.105; subpopulations may also be prioritized according to who needs the specialized supportive services that are offered by the project. 24 CFR § 578.93(b)(2) and (7).

1. *Dedicated versus Prioritized*

Projects and/or beds that are *dedicated* to serving a specific subpopulation must continue serving only this subpopulation. (For instance, a Permanent Supportive Housing project that is dedicated to serving chronically homeless individuals must continue serving only chronically homeless individuals). Projects and/or beds that are not currently dedicated to serving a specific subpopulation must give the designated subpopulations priority for admission, in the order established by these standards, when a bed becomes available through turnover. This means that if two otherwise eligible individuals are seeking admission into the program, one who falls within the designated prioritized subpopulation and one who does not, the individual who is in the designated prioritized subpopulation must be given priority for admission. **For both dedicated and prioritized beds, if there are no persons on a waiting list or applying for entrance to the program who fall within the dedicated or first priority subpopulation, recipients should not hold the unit vacant, but instead should serve the next prioritized subpopulation who may benefit from the services being provided.**

2. *Fair Housing Implications*

The Local Standards establish priority subpopulations by project type (i.e. Permanent Supportive Housing); recipients may not set more restrictive priorities unless a federal statute or executive order specifically authorizes this limitation, or unless expressly authorized by 24 CFR § 578.93(b)(1) to (7). For instance, while a Permanent Supportive

Housing project may prioritize chronically homeless persons with a qualifying disability per the Local Standards, beds may not be reserved to persons with a *specific* disability (i.e. physical disability). If an individual who is otherwise qualified but who does not have a *physical* disability seeks admission and would benefit from the services offered, this person may not be excluded from the project. Alternatively, for example, recipients may reserve beds for persons with HIV/AIDS if the housing also receives funding from the Housing Opportunities for People with AIDS program (HOPWA).

c. Marketing and Outreach

The Continuum of Care has developed marketing strategies for the purpose of fair and equal access to services. Outreach includes information flyers available at services sites and public locations, direct outreach to people on the street, announcements at public meetings, quarterly educational training to service providers, updated CoC website with resource materials, and a contract with 2-1-1 to assist with the coordinated entry process and refer people to the appropriate services. The coordinated entry process is linked to street outreach efforts to prioritize people in the same manner as any other person seeking services through other means.

IV. Policies & Procedures

In order to best meet the needs of the community and in accordance with 24 CFR § 576 and 24 CFR § 578, the following policies and procedures have been established to ensure consistent practices in regard to admission, service requirements, duration of assistance, and exiting for all homeless housing projects within the Ventura County Continuum of Care. All projects must incorporate the Coordinated Entry prioritization standards for the project type. Refer to the Coordinated Entry Assessment Policies and Procedures, which are incorporated by reference.

a. Emergency Shelter / Safe Haven

The overarching goal of shelter projects is to reduce the time spent homeless. Emergency Shelter funds are intended to respond to crisis and provide short-term emergency assistance to enable homeless households to move toward independent living by obtaining permanent housing as quickly as possible. Safe Havens serve a hard-to-reach homeless population with severe mental illness with the goal of permanent housing placement.

i. Admission

To the extent practicable, recipients will prioritize individuals and families who are currently living in Ventura County who have an identified prior residence as living in places not designed for, or not ordinarily used as, a regular sleeping accommodation including a car, a park, an abandoned building, a bus or train station, an airport, or a campground. Recipients that are defined as Victim Service Providers will exclusively serve individuals and families who are fleeing or attempting to flee domestic violence. *See Section IV, Victim Service Providers, and Table 6.2, Category 4, for additional details.* If an unaccompanied minor youth enters an emergency shelter, the shelter provider must notify Children & Family Services within 24 hours and follow the Ventura County Youth Emergency Shelter guidelines. All participants served in Emergency Shelter must meet the appropriate eligibility requirements as described in Section VI, [Participant Eligibility](#). Safe Haven projects serve literally homeless persons with severe and persistent mental illness, as defined by the CoC Program interim rule.

ii. Service Requirement

Each participant will be assessed to identify needs and barriers to obtain housing and increase self-sufficiency. An initial evaluation and assessment must be completed in HMIS at program entry, including verifying and documenting eligibility. If a participant's stay in Emergency Shelter is longer than 30 days, then the recipient must reassess and document the need for continued services every 30 days while the participant continues in shelter. The reassessment must show that the participant needs additional time in shelter to obtain other housing, and would be unsheltered without ESG assistance. Safe Haven projects must provide 24-hour residence for eligible persons for an unspecified period, have an overnight capacity limited to 25 or fewer persons, and provide low-demand services and referrals for the residents.

Obtaining appropriate housing, particularly permanent housing, and addressing the most immediate and manageable barriers is the priority for emergency shelters and safe havens. Given the expected short-period of assistance in emergency shelters, the focus is on those barriers that can be addressed during the timeframe of assistance. Each participant in both emergency shelters and safe haven projects will have a housing stability/service plan

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that may include longer-term solutions to other barriers or risk-factors that might destabilize a household after assistance has ended. *See Section XIV, [Recordkeeping Requirements](#)*. This plan is to be completed at program entry and updated at least every 30 days for Emergency Shelter. The plan will be derived from the assessment and include at a minimum, housing stability goals and other goals as appropriate to the essential services identified in the Subrecipient's Application and Statement of Work (Exhibit B) of the Contract. Each participant will participate in developing her/his own individualized housing stability/service plan to obtain housing and maintain housing stability after funded assistance ends.

Recipients may use their current evaluation and assessment form, reassessment form, tracking method, and housing stability/service plan, or develop new forms or other tracking methods. The evaluation, assessment, reassessment, housing stability/service plan, and goals must be documented according to the recipient's protocols for documentation, and at a minimum must be in a format that is readily available for monitoring. Essential services must be tied directly to the needs and barriers identified in the assessment and recipients are encouraged to build on the participants' strengths to attain housing stability and increase self-sufficiency.

iii. [Lease Requirement](#)

Participants must *not* be required to sign a lease or occupancy agreement. For additional information, refer to Section XIII, [Housing Requirements](#).

iv. [Duration of Assistance](#)

Emergency Shelters must operate a maximum 90-day project model. To the extent practicable, participants will be assisted in obtaining housing within 30 days of entry into the emergency shelter. All shelters will strive to reduce the average length of stay. However, participants may stay longer in order to prevent them from becoming homeless, on the streets, or other places not meant for human habitation. Safe Haven projects must provide 24-hour residence for eligible persons for an unspecified period and strive for permanent housing placement.

The County works with the Continuum of Care community stakeholders to develop policies for the maximum allowable length of stay in emergency shelters as well as to identify benchmarks to enhance efficient utilization of the homeless services system. These policies and benchmarks will be updated during the applicable funding rounds. Updates will be communicated through revisions to these Local Standards and in Subrecipient contracts.

v. [Exiting](#)

To the degree practicable, participants exiting emergency shelter and safe havens will be assisted in accessing housing that best fits their needs, with a preference for assisting participants to access permanent housing. Exits may also include participants entering treatment facilities to address mental health, substance abuse, or medical needs; recipients will coordinate with the treatment provider to support a successful transition. When possible, housing options or other resources should be provided at exit, so that participants have knowledge of where to go when treatment is completed.

vi. [Performance Measures](#)

Emergency Shelter and Safe Haven programs will be evaluated on HUD's System

Performance Measures and reported on a quarterly basis to ensure they are operating efficiently. The CoC staff will lead the evaluation efforts, with guidance from the CoC Data Committee.

System Performance Measure 1: Length of Time Persons Remain Homeless

System performance measure one evaluates length of time homeless, measuring the average and median length of time people spend in homeless situations (including Emergency Shelters / Safe Havens). This measure focuses on whether that time period is getting shorter, staying the same, or getting longer.

System Performance Measure 7: Successful Placement in Permanent Housing

System performance measure seven focuses on how successful emergency shelter projects are at helping people move off the "street" and towards permanent housing. This is important because people living on the street and in places not meant for human habitation are at an increased risk of death. This measure calculates the percent of Emergency Shelter and Safe Haven clients who have exited to a permanent housing destination as recorded in HMIS during the report period. The measure is looking for an increase in the percentage of people who exit to permanent housing destinations from an emergency shelter or safe haven project during the reporting period.

b. Transitional Housing

The policies and procedures in this Section b apply only to Transitional Housing that is filled through Pathways to Home.

i. Admission

To the extent practicable, recipients will prioritize individuals and families who are currently living in Ventura County; cannot be more appropriately served by another program or system of care; have an identified prior residence as living in places not designed for, or not ordinarily used as, a regular sleeping accommodation including a car, a park, an abandoned building, a bus or train station, an airport, or a campground; lack a support network and have no other options or resources for housing. Transitional Housing is reserved for persons with high barriers who require longer-term interventions. All participants served in Transitional Housing must meet the appropriate eligibility requirements as described in Section VI, [Participant Eligibility](#).

ii. Service Requirement

For Transitional Housing projects, supportive services must be made available to participants throughout the duration of their residence in the project. Services must be necessary to assist participants to obtain and maintain permanent housing. Each participant must have an individual support plan in place, derived from recipients' ongoing, at least annual, assessment of participant needs and services must be adjusted accordingly. See Section XIV, [Recordkeeping Requirements](#).

iii. Lease Requirement

Participants must sign a lease or occupancy agreement that is for a term of at least one (1) month but no more than twenty-four (24) months and cannot be extended. For additional

information, refer to Section XIII, [Housing Requirements](#).

iv. [Duration of Assistance](#)

Transitional Housing facilitates the movement of homeless households to permanent housing within 24 months of entry. Efforts should be made to move persons to permanent housing within 6 months of entering transitional housing. Services may also be provided to former residents of Transitional Housing for no more than 6 months after leaving Transitional Housing to assist their adjustment to independent living.

v. [Exiting](#)

The sole purpose of Transitional Housing is to assist participants to obtain permanent housing. Except in extenuating circumstances, participants will exit transitional housing to permanent housing within 24 months.

c. [Homelessness Prevention \(ESG Only\)](#)

Homelessness Prevention is intended to prevent households from moving into emergency shelter or other homeless situations.

i. [Admission](#)

Prevention assistance will be prioritized for individuals and families who are currently living in Ventura County, cannot be more appropriately served by another program or system of care, lack a support network and have no other options or resources for housing. Prevention projects must collect documentation that participants would become homeless for this assistance. All participants served under Prevention must meet the appropriate eligibility requirements as described in Section VI, [Participant Eligibility](#).

ii. [Service Requirement](#)

Prevention projects must require the participant to develop a plan on how they will retain permanent housing after assistance ends and to meet with a case manager not less than once per month* to assist the participant in maintaining long-term housing stability as set forth in 24 CFR § 576.401 (e)(1)(i). See *Section XIV, Recordkeeping Requirements*.

***Exception:** Recipients that also receive funding under the Violence Against Women Act of 1994 (VAWA) or the Family Violence Prevention and Services Act (FVSP) are exempt from the requirement to meet with participants monthly because these programs prohibit making housing conditional on the participant's acceptance of services. See § 576.401(e)(2). See also [Victim Service Providers](#).

Re-evaluation of eligibility is required for Prevention; re-evaluation must occur at least every three (3) months. Re-evaluations must be documented in each participant's file and demonstrate that the participant lacks sufficient resources and support networks necessary to retain housing without assistance. Re-evaluations must also demonstrate that the household's annual income is less than or equal to 30% of the Area Median Income (AMI). Projects must follow evaluation and participant eligibility rules and regulations as set forth in 24 CFR § 576.401(a) through (e).

All supportive services will be provided as necessary to help participants maintain permanent housing, or move as quickly as possible into permanent housing and achieve stability in that housing. Supportive services are limited with ESG funds and may be used

only to provide housing relocation and stabilization services. Prevention assistance must be provided in accordance with the housing relocation and stabilization services requirements in 24 CFR § 576.104 and 576.105, the short- and medium-term rental assistance requirements in 24 CFR § 576.106, and the written standards and procedures established under 24 CFR § 576.400.

Rent Subsidy Models

Prevention funds are used to assist participants to remain in permanent housing and regain stability. Or, where the current housing does not meet the participant's needs, the participant may move to more suitable housing. Funds may be used to provide short-term (up to 3 months) or medium-term (4 to 24 months) rental assistance over a 3-year period. Funding requirements may be further limited or defined by the Ventura County Continuum of Care in NOFA's or RFP's but at a minimum, all participants served in Prevention projects must have an identified rent subsidy model prior to receiving assistance or moving into a unit and this must be consistent throughout their term of service. The steps must be known (and documented) in advance and act as deadlines for increasing income. Whether the rent subsidy is based on participants' income or a fixed rate, the subsidy declines in "steps" until the participants assume full responsibility for monthly housing costs either by:

- Using a fixed timeline; or
- When the participant has reached specific goals

Rent assistance will be graduated, so the participants' share of rent will increase until they pay full rent. Should participants experience a situation that prevents them from achieving the graduated subsidy goal, then the subsidy may be extended or adjusted with a revised graduated subsidy established. Participants must be in compliance with the program and working on their housing stability plan to be considered for an extension or revised graduated subsidy plan.

Participants may receive up to two subsequent financial assistance payments after their graduated subsidy has ended if they were compliant with their housing stability plan and they experienced a hardship that prevented them from making their payment. Hardships may include a job loss or reduction in pay/hours, medical expenses, or other similar situation. The participant must not have exited the program to receive assistance. However, at no time may the rental assistance exceed 24 months in any three (3) year period.

iii. Lease Requirement

For ESG-Homelessness Prevention, participants must sign a legally binding, written lease agreement; however, there are no requirements regarding a minimum term or other standards. For additional information, refer to Section XIII, [Housing Requirements](#).

iv. Duration of Assistance

For participants seeking permanent housing, housing stability case management may not exceed 30 days. Once permanent housing is obtained, rental assistance may not exceed 24 months during any three (3) year period, although the assistance may be further limited or defined by the Ventura County Continuum of Care. A graduated subsidy model must be identified and applied to all participants as outlined above in Section c.ii, [Service Requirement](#).

v. **Exiting**

Prior to the assistance ending, a plan must be in place that identifies how the participant will maintain stability in permanent housing. If the participant is not yet able to retain permanent housing, they will be re-assessed. Participants may receive additional assistance to prevent them from becoming homeless, on the streets, or other places not meant for human habitation. However, participants may not receive more than 24 months of rental assistance in any three (3) year period.

vi. **Performance Measures**

Homeless Prevention programs will be evaluated on HUD's System Performance Measures and reported on a quarterly basis to ensure they are operating efficiently. The CoC staff will lead the evaluation efforts, with guidance from the CoC Data Committee.

System Performance Measure 5: Number of Persons who Become Homeless for the First Time

System performance measure five evaluates the number of persons who become homeless for the first time during the reporting period. This measure focuses on whether that number is getting larger, staying the same, or getting smaller. The goal of this measure is to reduce every year the number of people who become homeless for the first time.

d. **Rapid Rehousing**

Rapid Rehousing is a type of permanent housing that offers supportive services, as needed, and/or short-term (up to three (3) months) or medium-term (three (3) to 24 months) rental assistance in order to help homeless individuals or families move as quickly as possible into permanent housing and achieve stability. 24 CFR § 578.37(a)(1)(ii). Participants may locate housing of their choice in the private rental market within Ventura County.

Rapid Rehousing projects must comply with the [Office of Community and Homeless Services \(OCHS\) Rapid Rehousing Guide](#), which is incorporated herein by reference.

i. **Admission**

Rapid Rehousing assistance will be prioritized for individuals and families who are currently living in Ventura County, cannot be more appropriately served by another program or system of care, lack a support network and have no other options or resources for housing. Persons who have been homeless previously, have received Prevention assistance in the past, or have a history of chronic homelessness will be prioritized. Rapid Rehousing projects must collect documentation that participants would become homeless but for this assistance. In addition to the general priority established above, Rapid Rehousing assistance will be prioritized for individuals and families with the highest vulnerability score based on a Coordinated Entry Prioritization Assessment. Homeless veteran households will be further prioritized. All participants served under Rapid Rehousing must meet the appropriate eligibility requirements as described in Section VI, [Participant Eligibility](#), and as further described in the [Rapid Rehousing Guide](#).

ii. **Service Requirement**

Refer to the Rapid Rehousing Guide.

iii. **Lease Requirement**

Refer to the [Rapid Rehousing Guide](#). For CoC-Rapid Rehousing, participants must sign a lease that is for an initial term of one (1) year, that is terminable only for cause, and that automatically renews upon expiration (goes month-to-month). For ESG-Rapid Rehousing, participants must sign a legally binding, written lease agreement; however, there are no requirements regarding a minimum term or other standards. For additional information, refer to Section XIII [Housing Requirements](#).

iv. **Duration of Assistance**

Refer to the [Rapid Rehousing Guide](#).

v. **Exiting**

Refer to the [Rapid Rehousing Guide](#).

vi. **Performance Measures**

Rapid Rehousing programs will be evaluated on HUD's System Performance Measures and reported on a quarterly basis to ensure they are operating efficiently. The CoC staff will lead the evaluation efforts, with guidance from the CoC Data Committee.

System Performance Measure 7: Successful placements to permanent housing destinations.

System performance measure seven focuses on how successful Rapid Rehousing projects are at helping people exit to permanent housing. This measure is looking for an increase in the percentage of people who exit to positive destinations from a Rapid Rehousing project during the reporting period.

e. **Permanent Supportive Housing (CoC only)**

Permanent Supportive Housing provides assistance to individuals with disabilities and families in which one adult or child has a disability. The policies and procedures in this Section e apply to all Permanent Supportive Housing within the Ventura County Continuum of Care.

i. **Admission**

Permanent Supportive Housing will be prioritized for families and individuals currently residing in Ventura County; who are and have been living in places not designed for, or not ordinarily used as, a regular sleeping accommodation including a car, a park, an abandoned building, a bus or train station, an airport, or a campground; who cannot be more appropriately served by another program or system of care and have no other options or resources for housing; and, who meet the criteria of chronic homelessness. Permanent Supportive Housing projects will also be prioritized for individuals and families with the highest vulnerability score based on VI-SPDAT score. All participants served in Permanent Supportive Housing must meet the appropriate eligibility requirements as described in Section VI, [Participant Eligibility](#).

In addition to the general priority established above, Permanent Supportive Housing projects will utilize the following order of priority based on HUD Notice: <https://www.hudexchange.info/resources/documents/notice-cpd-16-11-prioritizing-persons-experiencing-chronic-homelessness-and-other-vulnerable-homeless-persons-in-psh.pdf>

Severe Service Needs

The most severe service needs, which should be identified and verified through data-driven methods, means that at least one (1) of the following is true:

- History of high utilization of crisis services, which include but are not limited to, emergency rooms, jails, and psychiatric facilities; or
- Significant health or behavioral health challenges or functional impairments which require a significant level of support in order to maintain permanent housing.

The determination must not be based on a specific diagnosis or disability type, but only on the severity of needs of the individual. Refer to the nondiscrimination and equal opportunity requirements in 24 CFR 5.105 (a).

If no chronically homeless individuals or families are on the waiting list or applying for entrance to the program, Permanent Supportive Housing projects will prioritize homeless persons with disabilities who have been residing on the streets or in emergency shelter on less than four (4) separate occasions in the last three (3) years, but where the cumulative total length of the occasions equals at least 12 months. If no such individuals or families are on the waiting list or applying for entrance to the program, Permanent Supportive Housing projects will then utilize the following order of priority:

1. *Homeless persons with a disability and the most severe service needs.*
Persons in a place not meant for human habitation, safe haven, or emergency shelter, with the most severe service needs as defined in the paragraph above.
2. *Homeless persons with a disability with a long period of continuous or episodic homelessness.*
Persons in a place not meant for human habitation, safe haven, or emergency shelter continuously for at least six (6) months or on at least three (3) separate occasions in the last three (3) years where the cumulative total is at least six (6) months.
3. *Homeless persons with a disability coming from places not meant for human habitation, safe havens, or emergency shelters.*
4. *Homeless persons with a disability coming from transitional housing.*
Persons that entered transitional housing directly from a place not meant for human habitation, safe haven, or emergency shelter.

ii. [Service Requirement](#)

Permanent Supportive Housing projects must offer voluntary supportive services for the participants that enable them to live as independently as is practicable throughout the duration of their residence in the project. Each participant must have an individual support plan in place, derived from recipients' ongoing, at least annual, assessment of participants' needs and services must be adjusted accordingly. See [Section XIV, Recordkeeping Requirements](#). Services must be necessary to assist participants obtain and maintain housing.

iii. **Lease Requirement**

Participants must sign a lease that is for an initial term of one (1) year, that is terminable only for cause, and that automatically renews upon expiration (goes month-to-month). For additional information, refer to Section XIII [Housing Requirements](#).

iv. **Duration of Assistance**

There is no designated length of stay for participants of this type of housing.

Participants receiving rental assistance are permitted to be out of their unit for the purpose of brief institutional stays (jail, hospital, treatment) for a period not to exceed 90 days per occurrence.

v. **Exiting**

Permanent Supportive Housing is intended to be available to participants for as long as it provides housing assistance that meets their needs. Successful exits from Permanent Supportive Housing include:

- Owned by client, no ongoing housing subsidy
- Owned by client, with ongoing housing subsidy
- Exiting to another permanent supportive housing program
- Rental by client, no ongoing housing subsidy
- Rental by client, other (non-VASH) ongoing housing subsidy
- Staying or living with family or friends, for a permanent tenure
- Exiting with a VASH subsidy

vi. **Performance Measures**

Permanent Supportive Housing programs will be evaluated on HUD's System Performance Measures and reported on a quarterly basis to ensure they are operating efficiently. The CoC staff will lead the evaluation efforts, with guidance from the CoC Data Committee.

System Performance Measure 2: The extent to which persons who exit homelessness from permanent housing destination return to homelessness

System performance measure two evaluates recidivism, measuring the percent of returns to homelessness in people who exited to permanent housing. Specifically, this measure looks at returns over three time periods as well as the overall number of returns over two years:

- Number returning to homelessness in less than 6 months
- Number returning to homelessness from 6 to 12 months
- Number returning to homelessness from 13 to 24 months
- Total number of returns to homelessness over 2 years

System Performance Measure 4: Employment and income growth for homeless persons

System performance measure four focuses on the increase in the percent of adults who gain or increase employment or non-employment cash income over time.

System Performance Measure 7: Successful placement in or retention of permanent housing

System performance measure seven focuses on how successful Permanent Supportive Housing projects are at helping people exit to or remain in permanent housing. This measure is looking for an increase in the percentage of people who remain in a Permanent Supportive Housing project during the reporting period.

f. Street Outreach

Street Outreach is intended to serve unsheltered homeless individuals and families with a focus on achieving placement into permanent housing. The policies and procedures in this Section f apply to all Street Outreach within the Ventura County Continuum of Care.

i. Service Requirement

Street Outreach program staff engage unsheltered homeless individuals and families for the purpose of providing immediate support, intervention, and connections with homeless assistance programs, mainstream social services and housing programs. The staff will utilize the Vulnerability Index Service Prioritization Decision Assistance Tool (VI-SPDAT) to determine the level of need and assist with referrals to services.

Essential services must be tied directly to the needs and barriers identified in the VI-SPDAT assessment by addressing urgent physical needs. Case management includes assessing housing and service needs, arranging, coordinating and monitoring the delivery of individualized services to meet the needs of the program participant.

Services for special populations include services for homeless youth, victim services, services for people living with HIV/AIDS, LGBTQ populations, persons with mental illness, and disabled persons, so long as the costs of providing these services are one of the eligible Street Outreach activities. The term victim services means services that assist program participants who are victims of domestic violence, dating violence, sexual assault, or stalking, including services offered by rape crisis centers and domestic violence shelters.

ii. Duration of Assistance

Street Outreach must be provided to homeless individuals and families for at least the period during which grant funds are provided. Each subrecipient has been given a project goal to serve a certain number of beneficiaries within the contract year.

iii. Exiting

To the degree practicable, participants exiting Street Outreach will be assisted in accessing housing that best fits their needs, with a preference for assisting participants to access permanent housing. Exits may also include participants entering treatment facilities to address mental health, substance abuse, or medical needs; recipients will coordinate with the treatment provider to support a successful transition. When possible, housing options or other resources should be provided at exit, so that participants have knowledge of where to go when treatment is completed.

iv. Performance Measures

Street Outreach programs will be evaluated on HUD's System Performance Measures and reported on a quarterly basis to ensure they are operating efficiently. The CoC staff will lead the evaluation efforts, with guidance from the CoC Data Committee.

System Performance Measure 2: The extent to which persons who exit homelessness from street outreach to permanent housing destination return to homelessness.

System performance measure two evaluates recidivism, measuring the percent of returns to homelessness in people who exited from street outreach to permanent housing. Specifically, this measure looks at returns over three time periods as well as the overall number of returns over two years:

- Number returning to homelessness in less than 6 months
- Number returning to homelessness from 6 to 12 months
- Number returning to homelessness from 13 to 24 months
- Total number of returns to homelessness over 2 years

System Performance Measure 7: Successful placements from street outreach to acceptable destinations.

System performance measure seven focuses on how successful street outreach projects are at helping people move off the "street" and towards permanent housing, recognizing this process may be direct or may involve other temporary situations along the way. This is important because people living on the street and in places not meant for human habitation are at an increased risk of death. This measure calculates the percent of street outreach clients who had a positive exit as recorded in HMIS during the report period. Most destinations that move a client off the street are considered positive exits, with some minor exceptions, like jail or prison, and other places not meant for human habitation. The measure is looking for an increase in the percentage of people who exit to positive destinations from a street outreach project during the reporting period.

Positive Exits Include:

- Emergency shelter, including hotel or motel paid for with emergency shelter voucher
- Foster care home or foster care group home
- Hotel or motel paid for without emergency shelter voucher
- Moved from one HOPWA funded project to HOPWA TH
- Psychiatric hospital or other psychiatric facility
- Safe haven
- Staying or living with family, temporary tenure (e.g. room, apartment or house)
- Staying or living with friends, temporary tenure (e.g. room, apartment or house)
- Substance abuse treatment facility or detox center
- Transitional housing for homeless persons (including homeless youth)
- All permanent housing destinations

Negative Exits Include:

- Jail, prison or juvenile detention facility
- Place not meant for human habitation
- Client doesn't know, client refused, data not collected, no exit interview completed, or other

Exits that should be removed from the Denominator Include:

- Hospital or other residential non-psychiatric medical facility
- Residential project or halfway house with no homeless criteria

g. All Project Types

Safeguards, Safety and Needs of Special Populations

i. Victim Service Providers

The term 'victim service provider' means a private nonprofit organization whose primary mission is to provide services to victims of domestic violence, dating violence, sexual assault, or stalking. Such organizations include rape crisis centers, battered women's shelters, domestic violence transitional housing programs, and other programs (Section 401(32) McKinney-Vento Act).

Projects serving individuals or families qualified under Category 4 of the Defining "Homeless" Rule (persons fleeing or attempting to flee violent situations) must follow all related federal and state laws, follow confidentiality policies, and have written policies and procedures regarding the provision of specific services to meet the safety and special needs of this population.

ii. Veterans

Projects serving homeless veterans must prioritize those veterans who are ineligible for Veterans Affairs (VA) services, and work closely with the local Department of Veterans Affairs and coordinate resources with VA-funded housing and services (e.g. HUD-VASH, Supportive Services for Veteran Families (SSVF)). Veterans must be screened for eligibility for VA-funded housing and/or services.

Veterans who choose to enter transitional housing must be placed as a short-term option while working on a permanent housing solution. A monthly review of their individualized service and housing plan must be completed by the provider.

iii. Youth

HUD's definition of youth includes unaccompanied children under age 18 or youth between the ages of 18 and 24. Projects serving youth must prioritize youth based upon vulnerability to victimization, length of time homeless, unsheltered homeless, lack of access to family and community support networks, and current or past sexual exploitation.

It is important to note that youth are not responsible for obtaining their own eligibility documentation; instead, intake workers are responsible for documenting the youth's eligibility (including homelessness status). Further, intake workers must consider the youth's safety concerns before contacting third parties: intake workers must *not* contact anyone that the youth does not want contacted because of fears for his/her safety.

HUD's homeless assistance programs may provide emergency shelter or street outreach to unaccompanied youth who can self-certify their homelessness. CoC funded projects must be HUD approved to serve youth under Homeless Status Category 3; however, ESG funded projects do not require HUD approval for this category.

iv. High Needs

Projects serving individuals and families with very high needs must provide shelter and services that meet the special needs for these populations.

v. **Imminent Threat of Harm**

Participants who are receiving *Tenant-Based Rental Assistance* and have complied with all program requirements during their residence and who have been a victim of domestic violence, dating violence, sexual assault, or stalking, and who reasonably believe they are imminently threatened by harm from further domestic violence, dating violence, sexual assault, or stalking (which would include threats from a third party, such as a friend or family member of the perpetrator of the violence), if they remain in the assisted unit, and are able to document the violence and basis for their belief, may retain the rental assistance and move to a different Continuum of Care geographic area if they move out of the assisted unit to protect their health and safety. Recipients must retain a record of the Imminent Threat of Harm for both participants who enter and exit under provisions as described at 24 CFR § 578.51(c)(3).

vi. **Education Services**

The educational needs of children and youth must be accounted for, to the maximum extent practicable, and families with children and unaccompanied youth must be placed as close as possible to the school of origin so as not to disrupt the children's education. Projects that serve homeless families with children and/or unaccompanied youth must have policies and practices in place that are consistent with the laws related to providing education services to children and youth. These recipients must have a designated staff person to ensure that children and youth are enrolled in school and receive education services, as appropriate. 42 U.S.C. 11432 et. seq. Homeless families with children and unaccompanied youth must be informed of their eligibility for McKinney-Vento education services as well as other State and local education services. Recipients shall maintain documentation in the participant's case file to demonstrate that these requirements have been met and that applicants and participants understand their rights.

Collaboration with McKinney-Vento Local Education Liaisons

Recipients must document whether school-aged children are eligible for McKinney-Vento services and whether the child is connected with a local education liaison. If the child is not already engaged, recipients must refer the family directly to the liaison at their school of choice. All applicants/participants with school-aged children must be provided with documentation that explains their rights under the McKinney-Vento Act and that provides contact information for the liaison at every school district within Ventura County.

vii. **Low-Barrier and Housing First**

Recipients that indicated in the applicable CoC Project Application that the project would follow a Low-Barrier and Housing First approach must operate the project accordingly. All other projects are strongly encouraged to use a Low-Barrier and Housing First approach to facilitate homeless individuals' and families' rapid return to housing.

A housing first approach allows eligible homeless individuals and families to enter the project without barriers, such as income or sobriety requirements, or service participation requirements. Application and admission policies should be as streamlined and short as possible to move eligible individuals and families into permanent housing as quickly as possible. Projects using a housing first approach offer supportive services; however, participation in these services is based on the needs and desires of the program participant. To be considered Housing First, the project must follow a Low-Barrier approach (as

described below) *and must not* terminate participants from the program for the following reasons:

- Failure to participate in supportive services
- Failure to make progress on a service plan
- Loss of income or failure to improve income
- Being a victim of domestic violence
- Any other activity not covered in a lease agreement typically found in the project's geographic area

To be considered Low-Barrier, participants must *not* be screened out based on the following:

- Having too little or no income
- Active or history of substance abuse
- Having a criminal record with exceptions for state-mandated restrictions
- History of domestic violence (e.g., lack of a protective order, period of separation from abuser, or law enforcement involvement)

Persons may be terminated from the program *only* when violations of the lease are serious, and only in the most severe cases. Use of alcohol or drugs in of itself (without other lease violations) is not a reason for program termination. It is important to note that a participant may be evicted from the housing unit, but this does not mean that the recipient must terminate the participant from the program; the recipient may continue serving the participant in another housing unit.

V. Components and Eligible Activities

This section will help to determine and define the allowable activities within a project as defined by the project component under both ESG and CoC. Components define a type of project (e.g., Transitional Housing) and have a set of allowable activities (e.g., Supportive Services). Activities are a set of allowable costs. For example, a phone line for a case manager might be considered a Supportive Services activity under the Transitional Housing component for the CoC Program.

ESG and CoC Programs each have five (5) eligible components that are detailed in [Table 5.1](#) (ESG) and [Table 5.7](#) (CoC). Rapid Rehousing, Homeless Prevention and HMIS are allowable components of both funding sources; however, the activities that are allowable vary by Program. Street Outreach and Emergency Shelter are eligible under ESG only. Permanent Supportive Housing and Supportive Services Only are unique to the CoC Program. It is important to become familiar with the allowable activities under the funded component. The areas in grey are currently not being funded.

The funded components of a project are described in the contract with HUD for direct recipients or with Ventura County for Subrecipients.

a. Emergency Solutions Grant

i. Eligible ESG Components

| Table 5.1 | | ESG Eligible Components | | |
|-----------------|-------------------|-------------------------|-----------------|------|
| Street Outreach | Emergency Shelter | Homelessness Prevention | Rapid Rehousing | HMIS |

ii. Eligible ESG Activities

1. Street Outreach 24 CFR § 576.101 (ESG Only)

ESG funds may be used for costs of providing essential services necessary to reach out to unsheltered homeless people, referred to as Street Outreach. Eligible activities include engagement, case management, and transportation. Street outreach includes services that are unable to be provided to individuals or families due to their unwillingness to come to a shelter. Emergency health and mental health services may be eligible if these services are inaccessible or unavailable within the area.

| Table 5.2 | | ESG Street Outreach - Eligible Activities | | | |
|--------------------|-----------------|---|----------------|----------------------------------|----------------------------------|
| Essential Services | | | | | |
| Engagement | Case Management | Emergency Health Services | Transportation | Emergency Mental Health Services | Services for Special Populations |

2. [Emergency Shelter](#) 24 CFR § 576.102 (ESG Only)

Emergency Shelter is defined as any facility, where the primary purpose is to provide “a temporary shelter for the homeless in general, or for specific populations of the homeless people and which does not require occupants to sign leases or occupancy agreements. Any project that was funded under a Fiscal Year 2010 Emergency Solutions Grant may continue to be funded under ESG (24 CFR § 576.2).” However, because of the limited number of funding sources for which emergency shelter costs are eligible, Emergency Shelter will be prioritized for funding under ESG. Eligible activities include essential services, shelter maintenance, renovation and relocation assistance (576.408).

| Table 5.3 | | ESG Emergency Shelter – Eligible Activities | |
|---|---------------------------------------|---|---------------------------------------|
| Essential Services | | | |
| Case Management | Child Care | Education Services | Employment Assistance & Job Search |
| Outpatient Health Services | Legal Services | Life Skills Training | |
| Mental Health Services | Substance Abuse Treatment Services | Transportation | Services for Special Populations |
| Renovation | | | |
| Shelter Operations | | | |
| Assistance Required Under the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 | | | |

3. [Homelessness Prevention](#) 24 CFR § 576.103 (ESG Only)

Homelessness Prevention provides housing relocation, stabilization services and short- and medium-term rental assistance necessary to prevent an individual or family from moving into an emergency shelter or another place described in Category 1 of the Defining “Homeless” Rule, see [Table 6.2](#). The cost of homelessness prevention are only eligible to help the participant regain stability in the program participant’s current permanent housing or move into other permanent housing and achieve stability in the housing. ESG financial assistance cannot be provided to a program participant receiving the same type of assistance for the same period of time from another public program.

| Table 5.4 | | ESG Homelessness Prevention – Eligible Activities |
|-----------|--|---|
| | | Housing Relocation & Stabilization Services |
| | | Short- and/or Medium-Term Rental Assistance |

4. [Rapid Rehousing](#) 24 CFR § 576.104 (ESG)

Rapid Rehousing provides housing relocation, stabilization services and short- and medium-term rental assistance to help homeless individuals or families move as quickly as possible into permanent housing and achieve stability in that housing. *Please note: Rapid Rehousing varies between ESG and CoC Program Regulations. For a comparison of costs and activities between ESG and CoC Rapid Rehousing, see [Appendix D](#).*

| Table 5.5 | | ESG Rapid Re-Housing – Eligible Activities |
|-----------|--|---|
| | | Housing Relocation & Stabilization Services |
| | | Short- and/or Medium-Term Rental Assistance |

5. *HMIS Component 24 CFR § 576.107 (ESG)*

Section 416(f) of the McKinney-Vento Act requires for the first time that ESG-funded projects participate in the Homeless Management Information System (HMIS). The ESG interim rule makes certain costs eligible to the extent necessary to enable this participation. HUD published a proposed rule on HMIS, 24 CFR part 580, that will govern HMIS when it is published as final.

Please note: the HMIS Component varies between the ESG and CoC Program Regulations. See Section V.b for CoC information on the [HMIS component](#) and [HMIS eligible activities](#).

County policy is to share HMIS funds with Subrecipients. The amount available will be determined at the time of award and through the contracting process and shall be based upon funding available. If a Subrecipient receives funding allocated for HMIS costs, they must track the time spent entering HMIS data separately on a timesheet and provide back-up documentation when requested. A different line item will be provided on Subrecipient Invoices with the expectation of the HMIS time being reported separately.

6. *Administrative Costs (ESG)*

Eligible activities include accounting for the use of grant funds, preparing reports for submission to HUD, obtaining program audits, staff salaries associated with eligible administrative costs and ESG training for program administrator and case managers.

| <i>Table 5.6</i> | <i>ESG Administrative Costs</i> |
|--|---------------------------------|
| <i>Ventura County CoC retains all administrative funds to manage contracts, complete monitoring and cost reimbursement activities.</i> | |

b. Continuum of Care

i. Eligible CoC Components

| <i>Table 5.7</i> | <i>CoC Eligible Components</i> | | | |
|--|--------------------------------|--------------------------------|------|------------------------|
| Permanent Housing (PH) | Transitional Housing (TH) | Supportive Services Only (SSO) | HMIS | Prevention (HPC* Only) |
| Including: | | | | |
| PSH** RRH*** | | | | |
| <i>*High Performing Community (as designated by HUD)</i> <i>**Permanent Supportive Housing</i> <i>***Rapid Rehousing</i> | | | | |

1. *Permanent Housing 24 CFR § 578.37(a)(1)(CoC)*

Definition

Permanent Housing is community-based housing, the purpose of which is to provide housing without a designated length of stay. Under the CoC Program, Permanent Housing includes both Permanent Supportive Housing and Rapid Rehousing.

a. Permanent Supportive Housing 24 CFR § 578.37(a)(1)(i)(CoC)

Definition

Permanent Supportive Housing provides assistance to individuals with disabilities and families in which one adult or child has a disability. Supportive Services designed to meet the needs of the participant must be made available to the participant.

b. Rapid Rehousing 24 CFR § 578.37(a)(1)(ii)(CoC)

Definition

CoC funds under Rapid Rehousing may be used to provide supportive services and/or short-term (up to 3 months), and/or medium-term (3 to 24 months) tenant-based rental assistance.

Please note: Rapid Rehousing varies between ESG and CoC Program Regulations. For a comparison of costs and activities between ESG and CoC Rapid Rehousing, see [Appendix D](#).

2. Transitional Housing 24 CFR § 578.37(a)(2)(CoC)

Definition

Transitional Housing is housing that facilitates the movement of homeless individuals and families to permanent housing within 24 months.

3. Supportive Services Only 24 CFR § 578.37(a)(3) (CoC)

Definition

Projects that contain a Supportive Services Only (SSO) component provide supportive services to unsheltered and sheltered homeless persons for whom the recipient is not providing housing or housing assistance. The lack of housing or housing assistance provision is the defining difference between a project that is considered to be an SSO project, versus a project that is considered to be a housing project even if the only activities funded under the CoC are services. The County is not currently funding projects for which this definition would apply.

4. HMIS 24 CFR § 578.37(a)(4)(CoC)

Under the CoC Program, only the Homeless Management Information System (HMIS) Lead, in this case Ventura County, may apply for a project with an HMIS component; however, HMIS may be an eligible cost for a recipient if permitted by the contract.

Please note: the HMIS Component varies between the ESG and CoC Program Regulations. See Section V.a for ESG information on [HMIS eligible activities](#) and Section V.b for CoC information on [HMIS eligible activities](#).

5. Prevention 24 CFR § 578.37(a)(5)(CoC)

Homelessness Prevention is an eligible component under the CoC Program only for Continuums of Care that are designated as a High Performing Community (HPC) as defined by Subpart E of 24 CFR § 578. Ventura County is not currently designated as an HPC.

ii. Eligible CoC Activities

The CoC Program allows for a number of different eligible activities. Each project's ability to

expend funds for the costs listed below is limited by the project's component, project application, Subrecipient Contract with the County and the NOFA.

Please note that the following is a list of all eligible activities under the CoC Interim Rule. Costs such as *CoC Planning Activities* and *UFA Costs* are eligible only if the County is funded for such activities, and then only the County, as the Collaborative Applicant, can bill to them. Acquisition, Rehabilitation, New Construction and Relocation are onetime costs and the County is not currently pursuing such activities due to limited funding. In the table below, activities have been shaded in grey to indicate that they are not billable.

| Table 5.8 | | CoC Eligible Activities | | | |
|-------------------------|--|-------------------------|------------------|-----------------|----------------|
| | | | | | |
| CoC Planning Activities | | UFA* Costs | | Acquisition | |
| Rehabilitation | | New Construction | | Leasing | |
| Rental Assistance | | Supportive Services | | Operating Costs | |
| HMIS | | Project Administration | Relocation Costs | | Indirect Costs |
| *Unified Funding Agency | | | | | |

As mentioned above, the CoC Program authorizes a variety of eligible activities; however, projects may charge costs to the grant only that are agreed upon in the contract between the Subrecipient and Ventura County or between the direct recipient and HUD. Therefore, activities that are not being utilized locally have not been included below.

| Table 5.9 CoC Eligible Activities* by Component | | | | |
|--|-------------------|---------|---------|----|
| | | PH: PSH | PH: RRH | TH |
| Housing Costs** | Leasing | X | | X |
| | Rental Assistance | X | X | X |
| | Operating | X | | X |
| Supportive Services | | X | X | X |
| HMIS | | X | X | X |
| Administration | | X | X | X |
| Indirect Costs | | X | X | X |
| * Refer to Eligible CoC Activities below. | | | | |
| **The following Housing Costs may not be combined in the same project: | | | | |
| - Rental Assistance and Leasing | | | | |
| - Rental Assistance and Operating | | | | |

1. *Leasing 24 CFR § 578.49 (CoC)*

Leasing funds under the CoC Program may be used to lease a structure or individual units to provide housing or supportive services to homeless persons. Funds cannot be used to lease units or structures owned by the recipient, Subrecipient, their parent organization(s), or other organizations more fully described in 24 CFR § 578.49(a) unless

2. *Rental Assistance 24 CFR § 578.51 (CoC)*

Rental assistance funds may be used to provide homeless individuals or families with short-, medium- or long-term rental assistance as outlined below. Rental assistance cannot be provided to participants who are already receiving rental assistance, or living

in a housing unit receiving rental assistance or operating assistance through other federal, State, or local sources.

Administering Rental Assistance

Contracting for and making rental assistance payments to landlords, as well as conducting [Housing Quality Standards](#) (HQS) Inspections are considered to be a service delivery cost of rental assistance and is therefore an eligible cost under this section. Other eligible costs of administering rental assistance include: examining participant income and family composition; providing housing information and assistance; and receiving new participants into the program.

| Table 5.12 CoC Rental Assistance – Eligible Costs | | |
|--|---|--|
| <i>Length of Housing Assistance</i> | | |
| Short-Term <i>Up to 3 months</i> | Medium-Term <i>From 3 to 24 months</i> | Long-Term <i>>24 months</i> |
| <i>Model of Assistance</i> | | |
| Tenant Based <i>Participants choose unit</i> | Sponsor Based <i>Participants reside in housing owned or leased by Sponsor</i> | Project Based <i>Units are provided through a contract with the owner</i> |
| <i>Other Eligible Costs</i> | | |
| Vacancy Payment – up to 30 days following end of the month when unit vacated | Property Damage – may not exceed one month's rent; one-time cost per participant at the time participant exits unit | Security Deposits – not to exceed 2 months of rent |
| <i>Administering Rental Assistance – Eligible Costs</i> | | |
| Processing rental payments to landlords | Examining participant income and family composition | Providing housing information and assistance |
| Inspecting units for compliance with Housing Quality Standards (HQS) | | Receiving new participants into the program |

| Table 5.13 CoC Rental Assistance – Key Requirements | |
|--|--|
| Unit Rent Standard | The unit rent must be reasonable in comparison to similar units and cannot exceed comparable, unassisted units. See <i>Section XIII.d, Rent Reasonableness and Fair Market Rent</i> . |
| Unit Lease – Lease and Rental Assistance Agreement | Participants must have a lease agreement with the landlord/owner of housing. In addition, recipients may make rental assistance payments only to landlords/owners with whom the recipient has a rental assistance agreement. The rental assistance agreement must include the terms under which rental assistance will be provided, the term of the agreement, that the landlord/owner will provide the recipient with a copy of all written notices to the participant (including notices to vacate, notices of noncompliance, etc.). See <i>Section XIII.e, Housing Agreements</i> . |
| Participant Rent | Except in Rapid Rehousing projects, participants must contribute toward their rent in accordance with 3(a)(1) of the U.S. Housing Act of 1937 (42 USC 1437a(a)(1)). Changes to rental payment amounts must be made as changes in income are identified (no less than annually). For further guidance on calculating rent, refer to Section X.g, Calculating Rent (or Occupancy Charge) . |

3. *Supportive Services 24 CFR § 578.53 (CoC)*

Supportive Services funds may be used to provide supportive services that address the special needs of participants. Services must be limited to those which assist participants in obtaining and maintaining housing. Ongoing, at least annual, assessments of service needs are required and services should be adjusted accordingly. Where supportive services are provided within a facility not contained in a housing structure, the costs of operation of the facility are eligible, including maintenance, repair, building security, utilities and equipment.

The following table is a complete list of eligible costs under this component. See 24 CFR § 578.53(e) for additional details about what these costs include.

| Table 5.14 CoC Supportive Services – Eligible Costs | | |
|---|------------------------------|--------------------------------------|
| Annual Assessment of Service Needs | Assistance with Moving Costs | Case Management |
| | Food | Housing Search & Counseling Services |
| Employment Assistance & Job Training | Outpatient Services | Outreach Services |
| | Education Services | Legal Services |
| Mental Health Services | Substance Abuse | Transportation |
| Child Care | Treatment Services | |
| Life Skills Training | Utility Deposits | Direct Provision of Services |

4. *Operating Costs 24 CFR § 578.55 (CoC)*

Operating funds may be used to pay the day-to-day costs of operation of transitional and permanent housing in a single structure or individual units. Operating costs for supportive service facilities are considered supportive services; see Section V.b, [Supportive Services](#).

| Table 5.15 | | CoC Operating – Eligible Costs | |
|--|--------------------------|--------------------------------|-----------|
| Model of Assistance | | | |
| Structure | | Individual Units | |
| Eligible Costs | | | |
| Repair & Maintenance | Property Tax & Insurance | Scheduled payments to | Security* |
| Electricity, Gas & Water | Furniture | reserve | Equipment |
| *Where >50% of the units are paid for with grant funds | | | |

*Where >50% of the units are paid for with grant funds

| Table 5.16 CoC Operating – Key Requirements | |
|---|--|
| Unit Rent Standard | Not applicable. |
| Unit Lease | Participants must have a lease or occupancy agreement with the recipient. See Section XIII.e, Housing Agreements . |
| Participant Rent | Agencies are not required to have participants pay rent, but if they choose to charge participants rent, the rent must be calculated in accordance with 24 CFR § 578.77, and cannot exceed the highest of 30% of the participant's adjusted monthly income, 10% of the participant's monthly income, or the welfare rent. For further guidance on calculating rent, refer to Section X.g, Calculating Rent (or Occupancy Charge) . Any participant rent that is collected is considered Program Income and must be used for eligible costs in accordance with 24 CFR § 578.97. |

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5. *HMIS 24 CFR § 578.57 (CoC)*

HMIS funds may be used to pay the costs of contributing data to the Ventura County Homeless Management Information System (HMIS).

Please note: the HMIS Component varies between the ESG and CoC Program Regulations. See Section V.a for ESG information on [HMIS eligible activities](#) and Section V.b for CoC information on the [HMIS component](#).

| Table 5.17 CoC HMIS – Eligible Costs | | | |
|--------------------------------------|--|--|--|
| Purchasing/Leasing Computer Hardware | Purchasing Software or Software Licenses | Purchasing/Leasing Equipment (telephones, fax machines, furniture) | Obtaining Technical Support |
| Leasing Office Space | Electricity, Gas, Water, Phone Service, High Speed Data Transmission | Salaries for Operating HMIS | Costs of Staff to Travel and Attend HUD Sponsored/ Approved Training on HMIS |
| Staff travel Costs to Conduct Intake | | Participation Fees Charged by the Lead | |

6. *Project Administration 24 CFR § 578.59 (CoC)*

CoC-funded projects may apply to use up to 10% of their project funds to pay for administrative costs. The NOFA may further limit project requests for administrative costs. For instance, during the FY2013 NOFA, local projects were limited to requesting no more than 7% in order to receive maximum points in this section of the application.

For projects through Ventura County, administrative funds are split between the County (50%) and the Subrecipient (50%) for all projects unless determined otherwise by the County and Subrecipient.

Staff and overhead costs directly related to carrying out eligible costs are considered eligible under those activities and are not considered project administration.

| Table 5.18 CoC Administrative Costs | | |
|--------------------------------------|---|---|
| General Management & Oversight | | |
| Preparing Budgets & Schedules | Assure Compliance | Development of Agreements to Carry Out Program Activities |
| Monitoring for Progress & Compliance | Preparing HUD Reports | Coordinating Resolution of Findings |
| Evaluating Results & Objectives | Managing/Supervising Staff Who Engage in General Management & Oversight | |
| Training on CoC Requirements | Environmental Reviews | |

7. *Indirect Costs 24 CFR §578.63*

Indirect costs are eligible under the CoC Program and must be in accordance with OMB Uniform Guidance.

VI. Participant Eligibility

Eligibility for assistance under CoC and ESG Programs is determined by HUD Regulations 24 CFR § 578, and 24 CFR § 576 respectively. Eligibility is further defined by project component. The table below provides an overview of eligibility by component and funding type. Eligibility may be further restricted by the contract.

a. Eligibility by Component

| Table 6.1 | | Eligibility By Component | | | | | |
|---|-----------|---------------------------|---|---|------------------------------|------------|-----------------------|
| Component | Funding | Homeless Status Category* | | | Income** | Disability | Chronic Homeless (CH) |
| | | 1 | 2 | 4 | | | |
| Shelter | ESG | X | X | X | N/A | | |
| Prevention | ESG | | X | X | X | | |
| RRH | ESG / CoC | X | | | Required at Revaluation Only | | |
| Transitional | CoC | X | X | X | N/A | | |
| PSH | CoC | X | | | N/A | X | Prioritized |
| PSH – CH Dedicated | CoC | X*** | | | N/A | X | X |
| X = Required N/A = Not Applicable *Homeless Status Categories are established by the Defining "Homeless" Rule; see Table 5.2 for corresponding categories **Participant's annual income may not exceed the specified % of median family income for the area (AMI), as determined by HUD ***Permanent Supportive Housing that is dedicated to chronically homeless households must serve only persons who qualify as chronically homeless who are coming from a place not meant for human habitation, safe haven, or emergency shelter. While persons in transitional housing are considered to be Category 1 homeless, they do not qualify as chronically homeless. | | | | | | | |

b. Homeless Eligibility Criteria

In order to receive assistance, persons must meet the HUD definition of homeless as detailed below in [Table 6.2](#) for the duration of their participation in ESG projects, and at entry for CoC projects.

| <i>Table 6.2</i> | | Homeless Eligibility Criteria | |
|------------------|--|--|--|
| Cat. | Description | Component | Criteria |
| 1 | Literally Homeless | <i>Emergency Shelter</i> <i>Transitional Housing</i> <i>Rapid Rehousing</i> <i>Permanent Supportive Housing</i> | A household is literally homeless if they lack fixed, regular & adequate nighttime residence, meaning: <ul style="list-style-type: none"> Sleeping in a place not designed for, or not ordinarily used as, a regular sleeping accommodation, including a car, a park, an abandoned building, a bus or train station, an airport, or a campground. Living in a shelter designated to provide temporary living arrangements, including congregate shelters, transitional housing, hotels/motels paid for by charitable organizations, or federal/state/local government programs. Exiting an institution such as a jail or hospital where they resided for 90 days or less AND was residing in an emergency shelter or place not meant for human habitation immediately before entering the institution. |
| 2 | Imminent Risk of Homelessness | <i>Emergency Shelter</i> <i>Transitional Housing</i> <i>Prevention</i> | A household that will imminently lose their primary nighttime residence provided that: <ul style="list-style-type: none"> The residence will be lost within 14 days of the application for assistance No subsequent residence has been identified; AND The individual or family lacks the resources or support networks needed to obtain other permanent housing |
| 3 | Unaccompanied Youth | | |
| 4 | Fleeing or Attempting to Flee Domestic Violence | <i>Emergency Shelter</i> <i>Transitional Housing</i> <i>Rapid Rehousing</i> <i>Prevention</i> | Households fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking or other dangerous or life threatening conditions related to violence, who: <ul style="list-style-type: none"> Have no identified subsequent residence; AND Lack the resources and support networks needed to obtain other permanent housing. |

c. Income 24 CFR § 576.103

Income limits are based on Area Median Income (AMI) and are updated at least annually by HUD. Projects that have an income eligibility requirement must ensure they are using the most current information available. Current income limits can be found at <http://www.huduser.org/portal/datasets/il.html>

d. Disability

In order to qualify for [Permanent Supportive Housing](#), the homeless household must have an adult or child member with a disability that meets the definition below (Docket No. FR-5333-F-02).

| Table 6.3 | Disability |
|--|---|
| Physical, Mental or Emotional Impairment | |
| A person shall be considered to have a disability if he or she has a disability that: | |
| (i) | is expected to be long-continuing or of indefinite duration; |
| (ii) | Substantially impedes the individual's ability to live independently; |
| (iii) | Could be improved by the provision of more suitable housing conditions; and |
| (iv) | Is a physical, mental, or emotional impairment, including impairment caused by alcohol or drug abuse, posttraumatic stress disorder, or brain injury. |
| Developmental Disability | |
| A person will also be considered to have a disability if he or she has a developmental disability, as defined in section 102 of the Developmental Disabilities Assistance and Bill of Rights Act of 2000 (42 U.S.C. 15002) | |
| HIV/AIDS | |
| A person will also be considered to have a disability if he or she has acquired immunodeficiency syndrome (AIDS) or any conditions arising from the etiologic agent for acquired immunodeficiency syndrome, including infection with the human immunodeficiency virus (HIV). | |
| Other Considerations | |
| Notwithstanding the preceding provisions of this definition, the term <i>person with disabilities</i> includes, except in the case of the Single Room Occupancy (SRO) component, two or more persons with disabilities living together, one or more such persons living with another person who is determined to be important to their care or well-being, and the surviving member or members of any household described in the first sentence of this definition who were living, in a unit assisted under this part, with the deceased member of the household at the time of his or her death. (In any event, with respect to the surviving member or members of a household, the right to rental assistance under this part will terminate at the end of the grant period under which the deceased member was a participant.) | |

e. Chronic Homelessness

Some projects under the CoC Program are specifically dedicated to or prioritized for persons with a disability who have had several episodes of homelessness or an extended duration of homeless, which is referred to as *Chronic Homelessness*. The 2010 Federal Strategic Plan to Prevent and End Homelessness prioritized ending chronic homelessness by 2015; in February 2015, this goal was revised to 2017. The local 2010 Point in Time Count demonstrated that 234 individuals were experiencing chronic homelessness at the time of the count; in 2012 the number had dropped to 163.

i. Definition of Chronic Homelessness 24 CFR § 578.3

A homeless individual with a [disability](#) who lives in a place not meant for human habitation, a safe haven, or in an emergency shelter and who has been homeless and living or residing in a place not meant for human habitation, a safe haven, or in an emergency shelter

continuously for at least twelve (12) months or on at least four (4) separate occasions in the last three (3) years, as long as the combined occasions equal at least twelve (12) months and each break in homelessness separating the occasions included at least seven (7) consecutive nights of not living in a place not meant for human habitation, a safe haven, or in an emergency shelter.

A person who meets the chronic homeless definition as described above, but who has been residing in an institutional care facility, including a jail, substance abuse or mental health treatment facility, hospital, or other similar facility, for fewer than 90 days, and who was on the streets or in emergency shelter immediately before entering the institution, also qualifies as chronically homeless.

Chronically homeless persons also includes a family with an adult head of household (or if there is no adult in the family, a minor head of household) who meets all the criteria of chronic homelessness, including a family whose composition has fluctuated while the head of household has been homeless.

| Table 6.4 | | Duration of Homelessness |
|---|---|---|
| Duration | Definition | |
| Continuous, for at least twelve (12) months | | |
| On the streets or in emergency shelter continuously, without a break, for at least twelve (12) months | | |
| Continuous | A stay on the streets or in emergency shelter without a break. | |
| Break | At least seven (7) or more consecutive nights not residing on the streets or in emergency shelter. Stays in institutional care facilities for fewer than 90 days do not constitute a break in homelessness, but rather such stays are included in the 12-month total, as long as the individual was living or residing in a place not meant for human habitation, a safe haven, or an emergency shelter immediately before entering the institutional care facility. | |
| Twelve (12) Continuous Months | Twelve (12) consecutive calendar months. NOTE: If the person has a documented encounter with a homeless service provider on a single day within a given month, this is sufficient to consider the person homeless for the entire calendar month, unless there is evidence of a break in homelessness. This applies ONLY if the encounter is documented by third-party documentation – a self-declaration is insufficient. | |
| At least four (4) separate occasions in the last three (3) years where the combined occasions equal at least twelve (12) months | | |
| On the streets or emergency shelter on four (4) separate, distinct, and sustained occasions in the last three (3) years, as long as the combined occasions equal at least twelve (12) months and each break in homelessness separating the occasions included at least seven (7) consecutive nights of not living in a place not meant for human habitation, a safe haven, or in an emergency shelter | | |
| Occasion | Separate and Distinct | Stay on the streets or in emergency shelter is interrupted by a Break (period of seven (7) or more consecutive nights residing in a place other than on the streets or in emergency shelter). |
| | Sustained | Stay on the streets or in emergency shelter is more at least one (1) night. |
| Three (3) years | Thirty-six (36) consecutive calendar months | |
| Twelve (12) Total Months | Four (4) separate occasions on the streets or emergency shelter that equal a cumulative total of twelve (12) months, meaning twelve (12) calendar months. | |

ii. **Chronically Homeless Veterans**

The Department of Veteran's Affairs (VA) conducts an initial verification of status and subsequently provides services to qualified veterans through a single episode of care. This VA "episode of care" may consist of services provided by different VA providers and/or different VA programs. Veterans who have been identified as chronically homeless through the VA's initial intake maintain this status throughout his/her episode of VA care. Therefore, projects that are dedicated to or prioritized for chronically homeless persons may serve a person documented as chronically homeless by the VA, no matter the services received during his/her episode of VA care (i.e., a project may serve a person identified as chronically homeless by the VA, even if (s)he was in VA-transitional housing).

iii. **Chronic Homelessness and Rapid Rehousing**

Persons identified as chronically homeless prior to enrolling in a rapid rehousing project *maintain* their status as chronically homeless while they receive rapid rehousing assistance. However, chronic homelessness must be documented (as described in Section VII, [Documentation Standards](#)) prior to entering the rapid rehousing program. Therefore, projects that are dedicated to or prioritized for chronically homeless persons may serve a person who is receiving rapid rehousing assistance as long as his/her chronic homeless status was documented prior to entering the rapid rehousing project.

f. **Special Considerations for Serving a Person Who May be Undocumented**

Eligibility for the receipt of public benefits is restricted by The Personal Responsibility and Work Opportunity Reconciliation Act of 1996 which provides that people who are undocumented are not to receive public benefits. The Act further specifies how to inquire into a person's status. However, programs that are necessary for the protection of life or safety, which provide short-term shelter or housing assistance, non-cash services at the community level, which is not means-tested are exempt.

This exemption does not apply to permanent housing programs however. HUD clarifies this matter through the SHP Desk Guide as such, "[...] nonprofit organizations are not required to, but may, verify an applicant's citizenship or immigration status before providing assistance. If a nonprofit elects to verify citizenship or immigration status, they must follow the procedures required by the Act and should consult with their legal counsel on how to comply."

g. **Special Considerations for Households if Individual Members are Residing in Different Places**

Persons presenting together as a household may be served together, regardless of marital status, actual or perceived sexual orientation, or gender identity. Refer also to Section III.b.iv, [Discrimination Based on Household Composition](#).

The implications of this are that household members may be residing in different places at entry. In order to determine the household's eligibility for assistance, the recipient must determine eligibility based on the status of:

1. The adult head of household; or
2. The minor head of household when no adult is present.

If there is more than one (1) adult in the household, the household may choose which adult is considered to be the head of household for the purposes of determining eligibility.

Please note that the person, whose eligibility qualifies the entire household, must meet all of the applicable eligibility requirements for the project.

Refer also to HUD's Frequently Asked Question,
<https://www.hudexchange.info/faqs/2318/how-should-recipients-determine-a-familys-eligibility-for-assistance/>.

VII. Documentation Standards for Eligibility for Assistance

a. Eligibility Overview

Participants must be deemed eligible as described in Section VI, [Participant Eligibility](#). The tables below describe the required documentation for each funding source and project component and details the type of documentation required to meet federal requirements and local standards. Required documentation must be clearly noted and documented in the participant's case file. The County has developed standard forms that may be used by recipients to document eligibility; these forms are located on the County's Continuum of Care Program website.

b. Homeless Verification

Intake staff are required to document homelessness for all persons seeking assistance. Determination and documentation of eligibility must be based on homeless status at intake; intake is the time the individual or family enters the project and begins receiving assistance under the grant program.

Unless otherwise noted, the general order of priority for obtaining evidence is third-party documentation first, intake worker observations second, and certification by the person seeking assistance third. However, for homeless assistance projects that provide emergency assistance, such as emergency shelter and street outreach, a lack of third-party documentation must not prevent an individual or family from being immediately admitted. Persons seeking emergency assistance may certify his/her homelessness via sign-in sheet.

| Table 7.1 | | Homeless Verification - Documentation | |
|-----------|--------------------|---------------------------------------|---|
| Cat. | Description | Component | Documentation |
| 1 | Literally Homeless | Emergency Shelter | 1. Written observation by outreach worker of the conditions where the individual or family is living; OR |
| | | Rapid Rehousing | 2. Written referral by another housing or service provider; OR |
| | | Transitional Housing | 3. Certification by the household seeking assistance/self-declaration*. |
| | | Permanent Supportive Housing | 4. For households exiting an institution – one of the above AND discharge paperwork or written/oral referral, OR written record of intake worker's due diligence to obtain evidence AND self-declaration* by individual that they exited institution. |

| | | | |
|--|--|---|---|
| 2 | Imminent Risk of Homelessness | Emergency Shelter Prevention Transitional Housing | 1. Court order resulting from an eviction action notifying the household they must leave; OR 2. For household leaving hotel/motel that they were paying for, evidence that they lack the financial resources to stay; OR 3. Documented and verified oral statement; AND a. Certification that no subsequent residence is identified; AND b. Self-declaration* or other written documentation that the individual lacks the financial resources and support necessary to obtain permanent housing. |
| 4 | Fleeing/Attempting to Flee Domestic Violence | Emergency Shelter Prevention Transitional Housing | For victim service providers: Self-declaration/oral statement by the household seeking assistance which states: they are fleeing, they have no subsequent residence, and they lack resources. The statement must be certified by intake worker. For non-victim service providers: 1. Self-declaration/oral statement by household seeking assistance which states: they are fleeing, they have no subsequent residence, and they lack resources. 2. If the household is not jeopardized, the oral statement that the household is fleeing must be verified by intake worker or by written referral by an organization from which assistance was sought for domestic violence. |
| *Self-Declarations must generally be accompanied by intake worker documentation of due diligence to obtain third-party verification. | | | |

Due Diligence

Written documentation of due diligence must describe efforts to obtain third-party documentation (e.g. phone logs, email correspondence, copies of certified letters), and must be signed and dated by intake staff as true and complete.

Due diligence is not defined by HUD; locally, it is interpreted to mean making reasonable attempts to obtain third-party documentation. Intake workers must document these reasonable attempts, the outcome of the effort, and obstacles encountered. "Reasonable attempts" means that the intake worker, with the assistance of the applicant, creates a comprehensive list of third parties who may have knowledge of the applicant's homelessness, and that more than one (1) attempt was made to contact each identified third-party.

c. Disability Verification

| <i>Table 7.2</i> | <i>Disability Verification</i> |
|--|--------------------------------|
| 1. Written verification of the disability from a professional licensed* by the state to diagnose and treat the disability and his or her certification that the disability is expected to be long-continuing or of indefinite duration and substantially impedes the individual's ability to live independently; OR | |
| 2. Written verification from the Social Security Administration; OR | |
| 3. The receipt of a disability check; OR | |
| 4. Intake staff-recorded observation of a disability that, no later than 45 days of the application for assistance, is confirmed and accompanied by evidence (as outlined in this table number 1, 2, 3 or 5)**; OR | |
| 5. Other documentation approve by HUD. | |
| *An exception to the licensing requirement is made only for persons certified as a Chemical Dependency Professional (CDP), as defined in Chapter 18.205 RCW; this exception does not extend to a certified Chemical Dependency Professional – Trainee (CDP-T). | |
| **Recipients are discouraged from admitting participants into their project without confirmation of a qualifying disability and documented evidence of that disability. Recipients that choose to admit participants under Category 4 of the table above, do so at their own risk. If confirmation of disability and evidence are not attained within 45 days, the recipient will not be reimbursed for costs incurred for that participant. | |

d. Special Considerations for Documenting Chronic Homelessness

For each person applying to the project, written documentation must be provided by an appropriate third party that verifies the person's status as chronically homeless. Letters may be written and signed by either homeless shelter providers, homeless outreach workers or other homeless service providers. An HMIS printout that demonstrates that the individual or family meets the criteria for chronic homelessness may be substituted for a letter. Letters and HMIS printouts must:

- ✓ Be on letterhead stationery with the name, address and phone number of the agency;
- ✓ Contain the full name of the participant;
- ✓ Contain dates verifying the timeframe of homelessness including both a start date and completion date; and
- ✓ Be signed by a staff member whose title appears on the letter.

If all other efforts to obtain third-party documentation have been exhausted and unsuccessful, a participant self-declaration may be used in the absence of any other documentation. However, this should be a rare exception to the composition of most homelessness records for participants; recipients must document their attempts to obtain documentation in order to demonstrate due diligence and must document the severity of the situation in which the individual has been living. Self-declarations should be used only in the rarest and most extreme cases (e.g. where the individual has been in a place not meant for human habitation in a secluded area without any contact with anyone for that period). For at least 75 percent of the chronically homeless households assisted by a recipient in a project during an operating year, no more than three (3) months of living on the streets or emergency shelter may be documented by self-declaration.

Recipients should expect that chronic homeless documentation for the majority of participants will be pieced together from several sources.

i. Documenting Duration of Homelessness

To properly document the length of time homeless, documentation must include the start and end date of each occasion of homelessness.

| Table 7.3 Documenting Duration of Homelessness | |
|---|---|
| Definition | Documentation |
| Continuous, for at least twelve (12) months: On the streets or emergency shelter continuously, without a break, for at least twelve (12) months. | At least nine (9) of the 12 months must be documented through third-party documentation. Breaks in homelessness may be documented through self-certifications. |
| At least four (4) separate occasions in the last three (3) years: On the streets or emergency shelter on four (4) separate, distinct, and sustained occasions in the last three (3) years. | <u>NOTE: third-party documentation of a single encounter with a homeless service provider on a single day within one (1) month is sufficient to consider an individual as homeless and living or residing in a place not meant for human habitation, a safe haven, or an emergency shelter for the entire calendar month (e.g., a documented encounter on May 5, 2015, counts for May 1 to May 31, 2015).</u> |

ii. Documenting Disability

Refer to Disability Verification, Table 7.2 above.

iii. Documenting Severity of Service Needs for Prioritization

Chronically homeless individuals or families with the most severe service needs must be prioritized for permanent supportive housing projects. Severe service needs must be identified and verified through data-driven methods such as an administrative data match or through the use of a standardized assessment tool that can identify the severity of needs, such as the Investing in Futures Housing Assessment. This determination must be based on the severity of the needs of the individual, not on a specific diagnosis or disability type.

Further information regarding documenting Chronic Homelessness can be found in HUD's Notice on Prioritizing Persons Experiencing Chronic Homelessness and Other Vulnerable Homeless Persons in Permanent Supportive Housing and Recordkeeping Requirements for Documenting Chronic Homeless Status, located at:

<http://portal.hud.gov/hudportal/documents/huddoc?id=14-12cpdn.pdf>

Refer also to HUD's Defining Chronic Homelessness Final Rule, located at: <https://www.hudexchange.info/resources/documents/Defining-Chronically-Homeless-Final-Rule.pdf>

VIII. Changes in Household Composition

Projects are frequently targeted to serving specific homeless populations and/or subpopulation(s) per the project application, contract, and/or applicable regulations. For instance, one project may be targeted to serve homeless individuals while another may be targeted to serve homeless families with children. Please note that in targeting services to a specific population, recipients must comply with all applicable fair housing and civil rights laws. Occasionally, a household that is enrolled in the project subsequently desires to change their household composition (e.g., add or remove a household member). Recipients must follow these policies and procedures in approving or disapproving requests to change household composition.

For the purposes of these Local Standards, the following definitions apply.

| Table 8.1 | | Applicable Definitions | | |
|------------|---|---|---|---|
| Definition | | Description | | |
| Family | Family includes, but is not limited to, regardless of marital status, actual or perceived sexual orientation, or gender identity, any <i>group of persons</i> presenting for assistance together with or without children and irrespective of age, relationship, or whether or not a member of the household has a disability. A child who is temporarily away from the home because of placement in foster care is considered a member of the family. Refer also to Section III.b.iv, <u>Discrimination Based on Household Composition</u> . | | | |
| | Projects serving families may be targeted to serve households with children, households without children, or households with only children; however, projects may not discriminate against homeless households with children. | | | |
| | A household with children is composed of at least one adult and one child (minor under the age of 18). | A household without children is composed of multiple adults, but no children under the age of 18. | | A household with only children is composed of multiple persons, all of whom are under age 18. |
| Individual | An individual is a single person, who may be an elderly person, displaced person, disabled person, near-elderly person, or any other single person. | | | |
| | Projects serving individuals may be targeted to serve households without children or households with only children; however, projects may not discriminate against homeless households with children. | | | |
| | A household without children is composed of a single adult only. | | A household with only children is composed of a single person under age 18. | |

a. Documenting Homelessness

At project entry, intake staff *must* obtain documentation of homelessness (or chronic homelessness) for the head of household (or other household member, as applicable) in order to establish eligibility. After enrollment, new household members *may* be permitted to join the household. However, minimum considerations should be taken into account. Refer to Section VIII.b, Household Composition Considerations.

If the original household seeks to add member(s) to the household, intake staff should, to the extent possible, obtain documentation of homelessness (or chronic homelessness) for any new members of the household. This is particularly important in the event of a household break-up subsequent to enrollment: the project is permitted to continue serving (albeit separately) those household members that continue to need the housing/services offered and whose eligibility was documented at entry.

b. Household Composition Considerations

Changes in household composition raise several issues that must be considered prior to permitting the change. Refer to the Table below for examples of minimum considerations.

| <i>Table 8.2</i> | <i>Minimum Considerations</i> |
|----------------------------------|--|
| Consideration | Description |
| Fair Housing | Projects must follow fair housing laws and requirements. Refer to Section III.b., <u>Fair Housing and Equal Opportunity</u> . |
| Eligibility | The new family member(s) need not meet the eligibility requirements of the project, unless expressly required by the application, contract, or regulation, as long as the head of household's eligibility was documented at entry. Refer to Section VI, <u>Participant Eligibility</u> . |
| Terms of Occupancy | The terms of occupancy (i.e., lease agreement) must not prohibit a change in household composition. Refer to Section XIII.e, <u>Housing Agreements</u> . |
| Housing Requirements | The unit must meet all applicable housing requirements, such as suitable dwelling size. Refer to Section XIII, <u>Housing Requirements</u> . |
| Rent or Occupancy Charges | The income of all household members must be considered where participants pay rent or an occupancy charge. Refer to Section X., <u>Determining Income and Calculating Participant Rent</u> . |

c. Transfers to Suitable Units

If a change in household composition causes the unit to be unsuitable (i.e., of unsuitable dwelling size, etc.), transfers to a suitable unit may be made within the same project. If the recipient cannot accommodate the household within the same project, the recipient must contact Ventura County for further guidance.

IX. Shared Housing

Projects may serve separate families in a shared housing situation; this is a situation where a family chooses to live in a unit with another family, both of whom do not wish to be considered together as one (1) family. This type of shared housing situation may be particularly appealing for participants of rapid rehousing projects, where the goal is for participants to maintain housing without an ongoing subsidy.

For shared housing situations, the following requirements must be followed.

| <i>Table 9.1</i> | <i>Shared Housing Requirements</i> |
|---|---|
| Requirement | Description |
| Choice | The decision to live in shared housing must be the families' choice. The separate families must also determine that they do not wish to be considered together as one (1) family. |
| Eligibility | For all project types, with the exception of rapid rehousing, each family must be eligible for the project (except for reasonable accommodations). For rapid rehousing projects, only the assisted family must be eligible. In a rapid rehousing project where an eligible family shares a housing unit with an ineligible family, assistance may not be provided on behalf of an ineligible family. Refer to Section VI, <u>Participant Eligibility</u> . |
| Housing Requirements | The unit must meet all applicable housing requirements, such as suitable dwelling size. Refer to Section XIII. |
| Unit Rent | The cost and size of the unit must be reasonable and appropriate. Refer to Section XIII.d., <u>Rent Reasonableness and Fair Market Rent</u> . |
| Rent or Occupancy Charges and Rent Subsidies | Where participants pay rent (or an occupancy charge) or receive a rent subsidy, each family's rent/rent subsidy will be calculated separately. The income of all family members must be considered where participants pay rent or an occupancy charge. Refer to Section X., <u>Determining Income and Calculating Participant Rent</u> . |

X. Determining Income and Calculating Participant Rent

a. Income Definition

Income must be calculated in accordance with 24 CFR § 5.609, and deductions must be made in accordance with 24 CFR § 5.611(a). Income is money that is paid to, or on behalf of, the head of household or spouse (even if temporarily absent) or to any other household member, and are anticipated to be received from a source outside the family during the 12-month period following admission or annual reexamination effective date; and which are not specifically excluded in 24 CFR § 5.609(c). Annual income also means amounts derived (during the 12-month period) from assets to which any member of the family has access.

Documents and information collected to verify income should be recent. Documentation dated within 30 days is acceptable. However, for public assistance benefits, (e.g., SSI, food stamps), a benefits statement received any time within the twelve months prior to the time of application and reflecting current benefits received by a household is allowed. A copy of a recent bank statement indicating direct deposit is also acceptable.

b. Income Inclusions Examples

| Table 10.1 | Income Inclusions Examples |
|------------|--|
| | <i>Not an exhaustive list; refer to 24 CFR § 5.609(b)</i> |
| (1) | The full amount, before any payroll deductions, of wages and salaries, overtime pay, commissions, fees, tips and bonuses, and other compensation for personal services; |
| (2) | The full amount of periodic payments received from social security, annuities, insurance policies, retirement funds, pensions, disability or death benefits and other similar types of periodic receipts, including lump sum payment for delayed start of a periodic payment; |
| (3) | Payments in lieu of earnings, such as unemployment and disability compensation, worker's compensation and severance pay; |
| (4) | Welfare assistance. Welfare or other payments to families or individuals, based on need, that are made under program funded, separately or jointly, by Federal, State or local governments (e.g., Social Security Income (SSI) and general assistance available through state welfare programs); |
| (5) | Periodic and determinable allowances, such as alimony and child support payments, and regular contributions or gifts received from persons not residing in the dwelling; |
| (6) | Net income from the operation of a business or profession; |
| (7) | Interest, dividends, and other net income of any kind from real and personal property; |
| (8) | All regular pay, special pay and allowances of a member of the Armed Forces, except special hostile fire pay. |

c. Income Exclusions

| Table 10.2 | | Income Exclusions |
|-------------------|---|---|
| | | <i>Not an exhaustive list; refer to 24 CFR § 5.609(c)</i> |
| (1) | Income from employment of children (including foster children) under the age of 18 years; | |
| (2) | Payments received for the care of foster children or foster adults (usually persons with disabilities, unrelated to the tenant family, who are unable to live alone); | |
| (3) | Lump-sum additions to family assets, such as inheritances, insurance payments (including payments under health and accident insurance and worker's compensation), capital gains and settlement for personal or property losses (except as provided in paragraph (b)(5) of this section); | |
| (4) | Amounts received by the family that are specifically for, or in reimbursement of, the cost of medical expenses for any family member; | |
| (5) | Income of a live-in aide, as defined in 24 CFR § 5.403; | |
| (6) | Subject to paragraph (b)(9) of this section, the full amount of student financial assistance paid directly to the student or to the educational institution; | |
| (7) | The special pay to a family member serving in the Armed Forces who is exposed to hostile fire; | |
| (8) | Amounts received under training programs funded by HUD; | |
| | Amounts received by a person with a disability that are disregarded for a limited time for purposes of Supplemental Security Income eligibility and benefits because they are set aside for use under a Plan to Attain Self-Sufficiency (PASS); | |
| | Amounts received by a participant in other publicly assisted programs which are specifically for or in reimbursement of out-of-pocket expenses incurred (special equipment, clothing, transportation, child care, etc.) and which are made solely to allow participation in a specific program; | |
| | Amounts received under a resident service stipend. A resident service stipend is a modest amount (not to exceed \$200 per month) received by a resident for performing a service for the PHA or owner, on a part-time basis, that enhances the quality of life in the development. Such services may include, but are not limited to, fire patrol, hall monitoring, lawn maintenance, resident initiatives coordination, and serving as a member of the PHA's governing board. No resident may receive more than one such stipend during the same period of time; | |
| | Incremental earnings and benefits resulting to any family member from participation in qualifying State or local employment training programs (including training programs not affiliated with a local government) and training of a family member as resident management staff. Amounts excluded by this provision must be received under employment training programs with clearly defined goals and objectives, and are excluded only for the period during which the family member participates in the employment training program; | |
| (9) | Temporary, nonrecurring or sporadic income (including gifts); | |
| (10) | Reparation payments paid by a foreign government pursuant to claims filed under the laws of that government by persons who were persecuted during the Nazi era; | |
| (11) | Earnings in excess of \$480 for each full-time student 18 years old or older (excluding the head of household and spouse); | |
| (12) | Adoption assistance payments in excess of \$480 per adopted child; | |
| (13) | Deferred periodic amounts from supplemental security income and social security benefits that are received in a lump sum amount or in prospective monthly amounts. | |
| (14) | Amounts received by the family in the form of refunds or rebates under State or local law for property taxes paid on the dwelling unit; | |
| (15) | Amounts paid by a State agency to a family with a member who has a developmental disability and is living at home to offset the cost of services and equipment needed to keep the developmentally disabled family member at home; or | |
| (16) | Amounts specifically excluded by any other Federal statute from consideration as income for purposes of determining eligibility or benefits under a category of assistance programs that includes assistance under any program to which the exclusions set forth in 24 CFR § 5.609(c) apply. | |

| Table 10.3 | | Mandatory Deductions |
|-----------------------------------|--|--|
| <i>Refer to 24 CFR § 5.611(a)</i> | | |
| (1) | \$480 for each dependent; | |
| (2) | \$400 for any elderly family or disabled family; | |
| (3) | The sum of the following, to the extent the sum exceeds three percent of annual income: | |
| | (a) | Unreimbursed medical expenses of any elderly family or disabled family; and |
| | (b) | Unreimbursed reasonable attendant care and auxiliary apparatus expenses for each member of the family who is a person with disabilities, to the extent necessary to enable any member of the family (including the member who is a person with disabilities) to be employed. This deduction may not exceed the earned income received by family members who are 18 years of age or older and who are able to work because of such attendant care or auxiliary apparatus; and |
| (4) | Any reasonable child care expenses necessary to enable a member of the family to be employed or to further his or her education. | |

d. Income Review Requirements

Refer to Section X.g., [Calculating Rent](#), for further detail. For projects providing rental assistance, participants must agree to supply the information or documentation necessary to verify the participant's income. Participants must also provide the recipient with information at any time regarding changes in income or other circumstances that may result in changes to a participant's contribution toward rent. Refer to 24 CFR § 578.77(c)(3).

| Table 10.4 | | Income Review Requirements |
|-------------------|-------------------|--|
| Funding | Activity | Frequency |
| ESG | Rental Assistance | Initially, annually and as changes in income are identified |
| CoC | Leasing | Initially, annually and per tenant request for change in household composition or decrease in income |
| | Operating | |
| | Rental Assistance | Initially, annually and as changes in income are identified |

e. Annualizing Wages and Periodic Payments

When calculating income based on hourly, weekly, or monthly payment information, add the gross amount earned in each payment period that is documented and divide by the number of payment periods. This provides an average wage per payment period. Depending on pay periods used by the employer or the schedule of periodic payments, the following calculations convert the average wage into annual income:

- ✓ Hourly Wage multiplied by Hours Worked per Week multiplied by 52 weeks
- ✓ Weekly Wage multiplied by 52 weeks
- ✓ Bi-Weekly (every other week) Wage multiplied by 26 bi-weekly periods
- ✓ Semi-Monthly Wage (twice a month) multiplied by 24 semi-monthly periods
- ✓ Monthly Wage multiplied by 12 months

Standards and procedures for documenting **Income** are further detailed in [Appendix A](#).

f. Calculating Rent (or Occupancy Charge)

Guidelines for charging participants rent (or an occupancy charge) are dependent on the funding source, component, and activity type. While participants *must* be charged rent in some circumstances (i.e., CoC-permanent supportive housing providing *rental assistance*), participants *may* be charged rent in other circumstances (i.e., CoC-*leased* permanent supportive housing); however, under no circumstances may participants be charged a “program fee.” A program fee includes any fee assessed by the recipient other than rent (or an occupancy charge); examples include: fees for laundry or cleaning services, child care, transportation, or case management.

| Table 10.5 | | Rent (or Occupancy Charge) Calculations | | |
|------------|--|---|--------------------------|--|
| Funding | Component | Activity | Required to Charge Rent? | Calculation |
| ESG | Rapid Rehousing | Rental Assistance | Yes | According to Rapid Rehousing Guide . |
| | Prevention | Rental Assistance | Yes | Prevention projects must use a Graduated Subsidy Model. Policies will be developed at the time that the Ventura County Continuum of Care chooses to fund projects under this component. |
| CoC | Rapid Rehousing | Rental Assistance | Yes | According to Rapid Rehousing Guide . |
| | Transitional Housing or Permanent Supportive Housing | Leasing | No, but may | May not exceed the highest of (rent may not be rounded up): 1) 30 percent of the family’s monthly adjusted income; 2) 10 percent of the family’s monthly income; or 3) If the family is receiving payments for welfare assistance from a public agency and a part of such payments, adjusted in accordance with the family’s actual housing costs, is specifically designated by such agency to meet the family’s housing costs, the portion of such payments which is so designated. |
| | | Operating | No, but may | |
| | | Rental Assistance | Yes | Rent must be calculated in accordance with section 3(a)(1) of the U.S. Housing Act of 1937 (42 USC 1437a(a)(1)): A family shall pay as rent the highest of the following amounts, rounded to the nearest dollar: A) 30 percent of the family’s monthly adjusted income; B) 10 percent of the family’s monthly income; or C) If the family is receiving payments for welfare assistance from a public agency and a part of such payments, adjusted in accordance with the family’s actual housing costs, is specifically designated by such agency to meet the family’s housing costs, the portion of such payments which is so designated. |

g. Utility Allowances

In calculating participant rent, a utility allowance must be applied where the cost of utilities (excluding telephone) are not included in the rent. The public housing authority establishes the utility allowance schedule annually for Ventura County. Apply the utility allowance for the appropriate unit size. Refer to Section XIII.b., [Suitable Dwelling Size](#).

This requirement is not applicable for ESG-Rapid Rehousing.

h. Program Income

Program income is considered to be any rent (or occupancy charges) and any other income that is received by the recipient directly generated by a grant-supported activity. Program income must be retained by the recipient, committed to the project, and used to cover any eligible costs (not limited to the costs identified in the project budget). For ESG-projects, program income may be used to meet the match requirement. By contrast, for CoC-projects, program income generally may *not* be used to meet the match requirement; however, for FY2015 and FY2016 CoC Program awards, HUD has permitted program income to be used as match: costs paid for by program income can be considered match for grants awarded in the FY2015 and FY2016 CoC Program Competition only, so long as the funds are expended on eligible CoC Program costs that supplement the recipient's project.

XI. Termination of Participation, Denial and Grievance Procedures

Recipients must have written termination, denial, and grievance policies and/or procedures. The policies and/or procedures should be readily available to applicants and participants of assistance. With the exception of high volume shelters where it is acceptable to have policies posted in a public place, applicants and participants must receive written information about program policies. It is important to effectively communicate these policies and/or procedures to ensure that they are fully understood.

✓ Denial and Grievance

Causes of denial of assistance include, but are not limited to, the person's ineligibility or failure to provide verifiable evidence of eligibility, etc. Established procedures should describe:

- Circumstances in which persons may not qualify or would be denied;
- Notification of denial; and
- A person's right to review a recipient's decision.

✓ Termination of Participation and Grievance

Involuntary termination from any project funded under the HEARTH Act places the participant at great risk because (s)he will likely exit to a place that is less safe than the project in which (s)he is currently participating. Termination is a last option. Recipients are encouraged to limit rules of participation to only that which constitutes immediate danger. For example, in a communal living project, it would not be appropriate to terminate a participant's housing because (s)he did not complete her/his chores. Recipients are encouraged to find other strategies to increase participants' contributions to their community by encouraging engagement rather than threatening loss of housing.

That being said, there may be instances where termination cannot be avoided. The written grievance procedure must include:

- Written notice to the participant containing a clear statement of the reason(s) for termination;
- A review of the decision, in which the participant is given the opportunity to present written or oral objections before a person other than the person (or a subordinate of that person) who made or approved the termination decision. This may include the participant's right to question or confront staff involved; and
- Prompt written notice of the final decision.

For projects where participants are required to request a review of the termination decision, participants must be given an adequate amount of time to submit their request. The review must be held at a mutually agreeable time.

XII. Confidentiality of Participant Records

Recipients must have policies and/or procedures to ensure that participant records, including electronic records, are maintained in a confidential manner as per RCW 43.185C.030, 24 CFR § 578.103(b), and 24 CFR § 576.500(x), and keep records or files pertaining to participants under lock and key with designated personnel only granted access to those documents. All records that contain protected identifying information (e.g. Name, Social Security Number, Date of Birth, etc.) of persons applying for and/or receiving housing and/or services must be kept secure and confidential.

The procedures must also ensure that the address or location of any family violence project will not be made public, except with written authorization of the person responsible for the operation of the project; and that the address or location of any housing of a participant will not be made public, except as provided under a preexisting privacy policy of the recipient and consistent with State and local laws regarding privacy and obligations of confidentiality.

XIII. Housing Requirements

a. Inspection Requirements

All housing assisted with ESG and CoC Program funds must meet the minimum housing standards; housing standards vary by Program and component type.

i. Emergency Shelter (ESG)

Projects that receive ESG funds for shelter operations must comply with minimum safety, sanitation and privacy standards as outlined in 24 CFR § 576.403. Inspections to ensure compliance must be done before assistance is provided and at least annually.

ii. Rapid Rehousing (ESG)

Projects providing ESG-Rapid Rehousing assistance are required to perform Habitability Standards inspections and maintain documentation of these inspections as defined in 24 CFR § 576.403(c). These inspections must be done before assistance is provided and at least annually. Recipients of ESG-Rapid Rehousing may adopt more stringent requirements that exceed or add to the requirements in 24 CFR § 576.403(c). HUD Housing Quality Standards (HQS) inspection procedures *are not* considered sufficient because HQS is less stringent in the areas of fire safety and interior air quality. However, the HQS form may be amended to include the more stringent safety and interior air quality requirements. A record of the inspections must be kept for each assisted unit and must be readily available.

iii. Transitional Housing, Permanent Supportive Housing, Rapid Rehousing (CoC)

All CoC-housing, including transitional housing, permanent supportive housing, and rapid rehousing must meet applicable housing quality standards (HQS) under 24 CFR § 578.75(b). HQS requirements are contained within 24 CFR § 982.401, which state the performance and acceptability criteria for the key aspects of housing quality listed in Table 11.1.

| <i>Table 13.1</i> | <i>Housing Quality Standards – Key Aspects</i> |
|------------------------------|--|
| Sanitary facilities | Food preparation and refuse disposal |
| Space and security | Thermal environment |
| Illumination and electricity | Structure and materials |
| Interior air quality | Water supply |
| Access | Site and neighborhood |
| Sanitary condition | Smoke detectors |

Physical inspections of units to ensure compliance with HQS must be completed prior to the issuance of assistance. Additionally, recipients must inspect all units at least annually (at least every twelve (12) months) to ensure ongoing compliance with HQS. Deficiencies must be remedied within thirty (30) days of inspection, with the exception of emergency failures, which must be corrected within twenty-four (24) hours, see below. Payment may not be issued beyond the annual recertification date for units that do not meet HQS.

For housing leased with CoC Program funds, or for which rental assistance payments are made with CoC funds, recipients must comply with applicable conflict of interest requirements and shall not conduct HQS inspections of property that the recipient or a related entity owns. See 24 CFR § 578.95(c).

Emergency Fails

The following deficiencies constitute an emergency fail and repairs must occur and be verified within twenty-four (24) hours (rather than the standard thirty (30) days) of inspection (24 CFR 982.401(a)).

- Lack of security for the unit
- Waterlogged ceiling in imminent danger of falling
- Major plumbing leaks or flooding
- Natural gas leaks or fumes
- Electrical problem which could result in shock or fire
- No heat when outside temperature is below 40°F and the temperature inside the unit is below 55°F
- Utilities not in service
- No running hot water
- Broken glass where someone could be injured
- Obstacle which prevents entrance or exit
- Lack of functioning toilet
- Inoperable smoke detector

b. Suitable Dwelling Size

Recipients must establish guidelines for establishing the appropriate unit size; these guidelines must be applied consistently for all participants of like size and household composition. Agency

standards cannot have a disproportionate impact on specific family composition (i.e., non-traditional households).

Participants must be placed in units that are of suitable size: the unit must have at least one (1) bedroom or living/sleeping room for each two (2) persons. 24 CFR § 578.75(c). Children of opposite sex, other than very young children, may not be required to occupy the same bedroom or living/sleeping room. 24 CFR § 578.75(c)(1).

Participants should be assisted in choosing a unit with the smallest number of bedrooms needed without overcrowding. Except in limited circumstances (i.e., request for reasonable accommodation, etc.), participants should not be assisted in units with a greater number of bedrooms than is needed.

If household composition changes during the term of assistance, households should be assisted in relocating to a more appropriately sized unit and continue to access appropriate services. 24 CFR § 578.75(c)(1). Refer also to Section VIII.c, [Transfers to Suitable Units](#).

c. **Lead-Based Paint Requirements**

Recipients must ensure that all participants who reside in housing that was constructed pre-1978 receive the "Protect Your Family" lead-based paint hazard brochure. In addition, owners must disclose the presence of lead-based paint and provide participants with any existing documentation on known lead-based paint hazards in the unit. Recipients must document that participants received this information and maintain this documentation in the participant files. Refer also to [Appendix C: Step by Step Guide to Compliance with Lead Based Paint Inspection Requirements](#).

i. **Visual Assessments**

The lead-based paint visual assessment requirement exists to protect vulnerable families from potential health hazards. To prevent lead poisoning in young children, recipients must comply with the Lead-based Paint Poisoning Prevention Act of 1973 and its applicable regulations found at 24 CFR § 35.

The applicable parts of 24 CFR § 35 are as such:

1. For ESG-funded shelters and housing occupied by project participants, recipients must comply with subparts A, B, H, J, K, M and R.
2. For CoC-funded housing that receives project-based or sponsor-based rental assistance, recipients must comply with subparts A, B, H, and R.
3. For CoC-funded residential property receiving leasing, services or operating costs, recipients must comply with subparts A, B, K and R.

A lead-based paint visual assessment must be completed for all units that meet the three following conditions:

1. The household moving into or remaining in their current unit is being assisted with either ESG rent/utility assistance, ESG arrears assistance, CoC rent assistance, or it is a residential property using CoC funds to fund leasing, services or operating costs.
2. The unit was constructed prior to 1978.
3. A child under the age of six or a pregnant woman is, or will be, living in the unit.

For units and facilities that meet these conditions, recipients must conduct a visual assessment at least annually. For rental units, a visual assessment must be conducted prior to providing rent assistance and on an annual basis thereafter (as long as assistance is provided). The recipient must maintain the record on file with the inspection's record and readily available for review.

Visual assessments must be conducted by a HUD-Certified Visual Assessor. Agency staff may complete the Visual Assessment Training at <http://www.hud.gov/offices/lead/training/visualassessment/h00101.htm>. The certificate of completion must be maintained on record and readily available for review. For rental units, documentation must be kept with the HQS or Habitability Standards Worksheet and maintained in the participant file.

ii. Exceptions to the Requirement

There are certain exceptions to the requirement. Visual assessments are not triggered under the following circumstances:

- It is a zero-bedroom or SRO-sized unit;
- X-ray or laboratory testing of all painted surfaces by certified personnel has been conducted in accordance with HUD regulations and the unit is officially certified to not contain lead-based paint;
- The property has had all lead-based paint identified and removed in accordance with HUD regulations;
- The unit has already undergone a visual assessment within the past 12 months –obtain documentation that a visual assessment has been conducted; or
- It meets any of the other exemptions described in 24 CFR § 35.115(a).

If any of the conditions outlined above are met, recipients need to document the condition.

d. Rent Reasonableness and Fair Market Rent

Where applicable, adherence to rent reasonableness and/or Fair Market Rent (FMR) must be determined before assistance is provided and no less than annually.

When determining rent reasonableness and Fair Market Rent, recipients must compare the unit's gross rent with the applicable standard. Gross rent includes the entire housing cost: rent plus the cost of any utilities that must (according to the lease) be the responsibility of the tenant. Utilities include gas, electric, water, sewer, and trash, and exclude telephone, cable, or satellite television service, and internet service.

Rent Reasonableness

All ESG- and CoC-units and structures for which rent is paid must be reasonable in relation to rents being charged for comparable unassisted units in the same market; reasonable rents must also not exceed rents currently being charged by the same owner for comparable unassisted units.

Fair Market Rent

Annually (effective October 1), HUD determines Fair Market Rent (FMR) by geographic area; FMRs are based on the results of a local rent survey and reflect the gross rent estimates (rent plus the cost of all tenant-paid utilities, except telephones, cable or satellite television service, and internet service). Ventura County falls within the Ventura County HUD Metro FMR Area.

Fair market rents are published here: <http://www.huduser.gov/portal/datasets/fmr.html>

| Table 13.2 Unit Rent Standard By Component | | | |
|---|----------------|---|----------------------------|
| Activity | Funding | Requirement | Frequency of Review |
| Leasing | CoC | <p>Rent Reasonable The unit's gross rent must be rent reasonable. Units with gross rents that exceed rent reasonableness standards may not be leased with CoC funds.</p> <p>Fair Market Rent As long as the unit's gross rent is rent reasonable, the gross rent may exceed FMR; however, the amount paid with CoC-leasing funds may not exceed the current published FMR. Therefore, if the gross rent exceeds FMR, CoC leasing funds may pay for a portion of the rent up to the FMR amount and the difference must be paid with other, non-CoC funds.</p> <p>Maximum CoC-Leasing Payment The maximum amount of rent that can be paid for with CoC-leasing funds is the lower of the rent reasonableness standard and FMR.</p> | Initially, Annually |
| Rental Assistance | CoC | <p>Rent Reasonable The unit's gross rent must be rent reasonable. Units with gross rents that exceed rent reasonableness standards may not be assisted with CoC-rental assistance funds.</p> <p>Fair Market Rent As long as the unit's gross rent is rent reasonable, the gross rent and the amount paid with CoC-rental assistance funds may exceed FMR.</p> <p>Maximum CoC-Rental Assistance The maximum amount of rental assistance that can be paid for with CoC-funds is the rent reasonableness standard.</p> | Initially, Annually |
| Rental Assistance | ESG | <p>Rent Reasonable The unit's gross rent must be rent reasonable. Units with gross rents that exceed rent reasonableness standards may not be assisted with ESG-rental assistance funds.</p> | Initially, Annually |

| | | | |
|--|--|--|--|
| | | <p>Fair Market Rent The unit's gross rent must be equal to or less than the FMR. Units with gross rents that exceed FMR may not be assisted with ESG-rental assistance funds.</p> <p>Maximum ESG-Rental Assistance The maximum amount of rental assistance that can be paid for with ESG-funds is the lower of the rent reasonableness standard and FMR.</p> | |
|--|--|--|--|

e. Housing Agreements

Different types of housing agreements are required depending on the component and activity.

i. Lease Agreements

Participants must have a written lease agreement with the landlord/owner of the housing unit (or for CoC-leasing projects, a written sublease with the recipient). For CoC-permanent housing, in addition to the minimum requirements listed below, the lease must be for a term of at least one (1) year that is renewable (for a minimum term of one (1) month) and terminable only for cause. For CoC-transitional housing, in addition to the minimum requirements listed below, the lease must be for a term of at least one month that ends in 24 months and cannot be extended.

At a minimum, written lease agreements must contain:

- Name of participant
- Name of landlord/owner
- Address of dwelling unit
- Occupancy (who is permitted to live at the dwelling unit)
- Term of agreement (lease start and end dates)
- Dwelling unit rent and date due
- Deposits (if any, and for what/term)
- Signature of participant/date
- Signature of landlord/owner/date

ii. Master Lease Agreements (Coc Leasing)

Where units or structures are leased with CoC leasing funds, the recipient must have a master lease agreement with the landlord/owner. For CoC-leasing projects, the lease agreement between the recipient and participant is a sublease agreement; therefore, the master lease agreement must permit subleases. The master lease must be written, legally binding, and must allow the required lease agreement provisions (as described above) to be met.

iii. Rental Assistance Agreements (ESG- and CoC-Rental Assistance)

Recipients may make rental assistance payments only to landlords/owners with whom the recipient has a rental assistance agreement. The rental assistance agreement must include the terms under which rental assistance will be provided, the term of the agreement, that the landlord/owner will provide the recipient with a copy of all written notices to the

participant (including notices to vacate, notices of noncompliance, etc.). For a sample rental assistance agreement, refer to Attachment B.

XIV. Recordkeeping Requirements

In order to receive assistance, the following information must be documented in the participant file. Documentation must be retained for five (5) years after the expenditure of all funds from the grant under which the participant was served, unless a greater period of time is specified in the contract.

a. Initial Consultation & Eligibility Determination

The participant must lack sufficient resources and support networks to obtain/retain housing and this must be documented in the file. The participant must receive an initial consultation and eligibility assessment to determine housing status eligibility (and other eligibility requirements, as applicable) and the appropriate type of assistance needed to regain stability in permanent housing.

b. Income and Participant Rent

Please see Section X, Determining Income and Calculating Participant Rent, for full detail. Income documentation and completed calculations of participant rent must be maintained in each participant file; forms must be signed and dated by the staff person who completed the calculation.

c. Housing Stability Plan

The Housing Stability Plan (ESG-Emergency Shelter, ESG-Prevention, CoC- and ESG-Rapid Rehousing) must include:

- ✓ Needs assessment to identify barriers and specific housing and self-sufficiency goals
- ✓ Action steps to retain permanent housing after assistance ends
- ✓ Households receiving assistance from a victim service provider may be exempted from the case management requirement.

d. Individual Support Plan

The Individual Support Plan (CoC-Transitional Housing and CoC-Permanent Supportive Housing) must include:

- ✓ Problem Identification
- ✓ Goals
- ✓ Action Plan
- ✓ Outcomes

Per 24 CFR § 578.53, projects must complete an assessment of the service needs of participants at least annually. Services must be adjusted accordingly.

e. Assistance in obtaining mainstream and other resources

Participants must receive appropriate supportive services and referrals essential to achieving independent living through other federal, state, local, and private assistance.

f. Proof of Complete Inspection

Please see Section XIII, Housing Requirements, for full detail.

- ✓ Habitability (ESG)
- ✓ Housing Quality Standards (CoC)

Completed inspection forms must be retained in the file and must contain the date the inspection was performed and the signature of the staff person who performed the inspection.

g. Proof of Complete Lead Based Paint Visual Assessment

See Section XIII, Housing Requirements, for full detail. Completed assessments must be retained in the file and must contain the date the inspection was performed and the signature of the staff person who performed the inspection.

h. Rent Reasonableness and Fair Market Rent

See Section XIII, Housing Requirements, for full detail.

Rent Reasonableness

Documentation of rent reasonableness ensures that rents being paid are reasonable in relation to rents being charged for comparable unassisted units in the same market. Please see Appendix B for further detail.

Recipients must:

- ✓ Use the Rent Reasonableness Certification Form (Attachment A) to document rent reasonableness
- ✓ Retain a copy of each Ventura County Rent Reasonableness Survey every year, beginning in
- ✓ Retain documentation of any supplemental documents used to compare rents i.e. copies of advertisements for properties for rent, etc.

Fair Market Rent

Recipients must ensure that client files contain applicable FMR data to document the FMR for the participant's unit size and geographic area.

Recipients must:

- ✓ Use the Rent Reasonableness Certification Form (Attachment A) to document FMR

i. Housing Agreements

See Section XIII, Housing Requirements, for full detail. Fully executed housing agreements must be maintained for each unit that is assisted.

j. Case Notes and record of services received

Files must contain case notes that align with either the Housing Stability Plan or the Individual Support Plan, be legible, dated and contain a record of the staff member responsible for each note.

k. Homeless Management Information System (HMIS)

Agencies providing CoC and ESG assistance must enter client-level data into the HMIS system for reporting data to HUD. A comparable database may be used to collect data for domestic violence or victim services. Emergency Shelter, Homelessness Prevention, Rapid Re-Housing and Street Outreach must be tracked in the HMIS system. Further information is detailed in section XVI.

XV. Reporting Requirements

Subrecipients shall follow the reporting requirements as outlined in the contract or MOU.

Recipients shall participate in Ventura County Continuum of Care activities, which includes participation in planning activities, and the annual Point-in-Time (PIT) count of the homeless. Recipients will complete the Ventura County Annual Homeless Housing Inventory Chart (HIC), which includes data on beds, units, HMIS participation, services, and financial data on all projects.

An Annual Performance Report (APR) is currently required for the CoC Program and will be required for ESG. An ESG CAPER report will be required. With the exception of Victim Service Providers, which are required to track required data in a comparable database, the majority of the data required for the APR will be generated from the Homeless Management Information System (HMIS). Recipients are required to report on financial data and provide narratives regarding their project(s). ESG Subrecipients are required to complete and submit a semi-annual budget report. The details of these reports will be outlined in future drafts of these guidelines. The most recent APR must be submitted to HUD no later than 90 days from the date of the end of the project's grant term.

Subrecipients will report Match detail in a format prescribed by the CoC. 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. Please reference CFR 576.201 for further information on matching requirements.

Subrecipients will report Program Income detail on their monthly or quarterly invoice to the County.

The County reserves the right to request additional information or prescribe or change reporting requirements.

XVI. Homeless Management Information Systems Participation

Recipients will participate in the Ventura County Homeless Management Information System ("Ventura County HMIS") which is administered by the County's Human Services Agency. Ventura County HMIS is an electronic database that collects data on homeless persons who receive outreach, homelessness prevention and intervention services, emergency shelter, transitional housing, supportive services not linked with housing, and permanent supportive housing.

HMIS Participation will include:

- Technical set up;
- Staff training;
- Development of and adherence to an HMIS implementation schedule;
- Adherence to the requirements set forth in the Ventura County HMIS Policy and Procedures Manual including:
 - Confidentiality
 - Privacy and Security Protocols
 - Adherence to the Data Quality Plan
- Adherence to the requirements set forth in the "Agency Partner Agreement" and "User Policy, Code of Ethics and Responsibility Statement" executed by the Recipient and the Recipient's staff.

XVII. Performance Standards

Ventura County, as the Collaborative Applicant (CA), establishes performance standards for CoC- and ESG-funded projects in consultation with its Subrecipients. Performance standards are established by project type, based upon HUD's national targets, as well as local targets that account for the unique needs of the homeless population and subpopulations within the Ventura County. To set these performance targets, the CoC reviews HUD established performance areas, including those for High-Performing Communities and those included in the application review criteria in the CoC Notice of Funding Availability (NOFA), as well as HMIS and performance data for CoC- and ESG-funded projects. See the Ventura County Continuum of Care Performance Standards, incorporated herein by reference.

The County will monitor project performance on an ongoing basis through HMIS data as well as annually through the Annual Performance Report (APR). In addition:

- Annually, for CoC-funded projects, after HUD has published the Notice of Funding Availability (NOFA), the CoC Data, Performance & Evaluation Committee scores projects locally and recommends projects for funding. See *Section II, Policy on Project Selection*. Project data, including project performance, is compiled for County and PRC review.
- Once Subrecipients are selected and projects begin operating, the County utilizes a Program Monitoring Tool – Subrecipient Risk Assessment to assess whether Subrecipients qualify as "high risk," which is determined, in part, by a review of project performance.

The County will take the following action against poor performers:

- Provide technical assistance (TA)

- Provide a corrective action plan if:
 - o TA is not implemented by the Subrecipient; or
 - o The poor performance is of serious concern; or
 - o Prior TA was not followed by the Subrecipient.
- Review all necessary materials and conduct on-site visit(s) as needed
- Follow contracting procedures for suspension or termination of the Contract if the Subrecipient fails to respond and correct the issue(s)
- Request funds be returned if necessary and appropriate.

Appendix A

Income Eligibility Documentation Standards

While Ventura County has established standards for various types of income, the County recognizes that in some instances only applicant self-declaration may be possible. This method should be used only as a *last resort* when all other verification methods are not possible or reasonable. **When using applicant self-declaration, Projects must document why a higher verification standard was not used. Be sure to include this in the case file.**

Gross Income is the amount of income earned before any deductions (such as taxes and health insurance premiums) are made.

Current Income is the income that the household is currently receiving. Income recently terminated should not be included.

| Type of Income | Acceptable Types of Documentation |
|--|---|
| Wages and Salary | <p>Obtain copy of most recent pay stub(s) and include in participant file.</p> <p><i>OR Written 3rd Party Verification</i></p> <p>Mail, fax or email verification of income request to employer. At a minimum, written verification must include: name of employer and participant name, pay amount and frequency, average hours worked per week, amount of any additional compensation and be signed and dated by employer. Copy kept in participant file.</p> <p><i>OR Oral 3rd Party Verification</i></p> <p>Contact the employer by phone or in person. At a minimum, oral verification must include: name of employer and participant name, pay amount and frequency, average hours worked per week, amount of any additional compensation and be signed and dated by staff who obtained the information. Copy kept in participant file.</p> <p><i>OR Self Declaration</i></p> <p>Obtain signed and dated self-declaration from the participant. At a minimum must include source of income, income amount and frequency, and be signed. Copy kept in participant file. Case manager must document attempts to obtain written and oral verification.</p> |
| Self-Employment and Business Income | <p>Obtain copy of most recent federal and state tax return from the applicant and keep copy in participant file.</p> <p><i>OR Self Declaration</i></p> <p>Obtain signed and dated self-declaration from the participant. At a minimum must include source of income, income amount and frequency and be signed. Copy kept in participant file. Case manager must document attempts to obtain written and oral verification.</p> |

| | |
|---|---|
| Interest and Dividend Income | <p>Obtain copy of most recent interest or dividend income statement from participant and keep copy in participant file.</p> <p><i>OR</i></p> <p>Obtain copy of most recent federal and state tax return from the applicant and keep copy in participant file.</p> <p><i>OR Self Declaration</i></p> <p>Obtain signed and dated self-declaration from the participant. At a minimum must include source of income, income amount and frequency and be signed. Copy kept in participant file. Case manager must document attempts to obtain written and oral verification.</p> |
| Pension/Retirement Income | <p>Obtain copy of most recent payment statement or benefit notice from Social Security, pension provider or other source. Copy kept in participant file.</p> <p><i>OR Written 3rd Party Verification</i></p> <p>Mail, fax or email verification of income request to Social Security, pension provider or other source. At a minimum, written verification must include: name of income source, income amount and be signed and dated by income source representative. Copy kept in participant file.</p> <p><i>OR Oral 3rd Party Verification</i></p> <p>Contact the source by phone or in person. At a minimum, oral verification must include: Name of income source, income amount and be signed and dated by income source representative. Copy kept in participant file.</p> <p><i>OR Self Declaration</i></p> <p>Obtain signed and dated self-declaration from the participant. At a minimum must include source of income, income amount and frequency and be signed. Copy kept in participant file. Case manager must document attempts to obtain written and oral verification.</p> |
| Unemployment and Disability Income | <p>Obtain copy of most recent payment statement and or benefit notice. Copy kept in participant file.</p> <p><i>OR Written 3rd Party Verification</i></p> <p>Mail, fax or email verification of income request to unemployment administrator, workers compensation administrator of former employer. At a minimum, written verification must include: name of income source, income amount and be signed and dated by income source representative. Copy kept in participant file.</p> <p><i>OR Oral 3rd Party Verification</i></p> <p>Contact the source by phone or in person. At a minimum, oral verification must include: Name of income source, income amount and be signed and dated by income source representative. Copy kept in participant file.</p> |

| | |
|---|---|
| | <p><i>OR Self Declaration</i></p> <p>Obtain signed and dated self-declaration from the participant. At a minimum must include source of income, income amount and frequency and be signed. Copy kept in participant file. Case manager must document attempts to obtain written and oral verification.</p> |
| TANF/Public Assistance | <p>Obtain copy of most recent payment statement and or benefit notice. Copy kept in participant file.</p> <p><i>OR Written 3rd Party Verification</i></p> <p>Mail, fax or email verification of income request to welfare administrator. At a minimum, written verification must include: name of income source, income amount and be signed and dated by income source representative. Copy kept in participant file.</p> <p><i>OR Oral 3rd Party Verification</i></p> <p>Contact the source by phone or in person. At a minimum, oral verification must include: name of income source, income amount and be signed and dated by income source representative. Copy kept in participant file.</p> <p><i>OR Self Declaration</i></p> <p>Obtain signed and dated self-declaration from the participant. At a minimum must include source of income, income amount and frequency and be signed. Copy kept in participant file. Case manager must document attempts to obtain written and oral verification.</p> |
| Alimony, Child Support, Foster Care Payments | <p>Obtain copy of most recent payment statement, notices or orders. Copy kept in participant file.</p> <p><i>OR Written 3rd Party Verification</i></p> <p>Mail, fax or email verification of income request to child support enforcement agency, court liaison or other source. At a minimum, written verification must include: name of income source, income amount and be signed and dated by income source representative. Copy kept in participant file.</p> <p><i>OR Oral 3rd Party Verification</i></p> <p>Contact the source by phone or in person. At a minimum, oral verification must include: name of income source, income amount and be signed and dated by income source representative. Copy kept in participant file.</p> <p><i>OR Self Declaration</i></p> <p>Obtain signed and dated self-declaration from the participant. At a minimum must include source of income, income amount and frequency and be signed. Copy kept in participant file. Case manager must document attempts to obtain written and oral verification.</p> |

Appendix B

Rent Reasonableness Policies and Procedures

(Adapted from HUD's Homeless Prevention Rapid Re-Housing Grant Guidelines)

Determining and Documenting Rent Reasonableness: Determining and documenting rent reasonableness is required under CoC and ESG for leasing and rental assistance projects. Rent reasonableness must be documented prior to executing the lease for an assisted unit and at least annually thereafter. Recipients must document the assisted unit's rent reasonableness using the Rent Reasonableness Certification form; this completed form must be maintained in each client file to demonstrate that the assisted unit met the rent reasonableness standard.

Below describes the methodology, staffing, data sources, documentation requirements, and special circumstances that recipients must use to determine and document rent reasonableness.

Methodology: In order to demonstrate that the assisted unit is rent reasonable, recipients must compare the assisted unit's rent to the rent of at least **three (3)** comparable unassisted units in the area *and* must also compare the assisted unit's rent to rents currently being charged by the same owner for comparable unassisted units. Methodologies for obtaining comparable rents include:

- Utilizing the Dupre & Scott Rent Reasonableness Survey (in order to be considered reliable, the survey must indicate that at least three (3) buildings were surveyed);
- Obtaining comparable rents on a unit-by-unit basis from other data sources when the Rent Reasonableness Survey is considered unreliable; and
- Obtaining documentation from property owners/managers on current rents charged in comparable unassisted units.

Staffing: The responsibility of determining and documenting rent reasonableness should be assigned to program staff in the following order of preference:

1. Staff conducting the housing inspection will be responsible for determining and documenting rent reasonableness.
2. The case manager will be responsible for determining and documenting rent reasonableness.

Strategies for Determining Appropriate Comparable Properties: Each and every certification of rent reasonableness must consider the following:

- **Location:** It is important that, not only are the properties close in proximity, but that they have similar access to services such as bus lines, grocery stores, etc. and are within the same school boundaries where possible.
- **Square Footage**
- **Unit Type:** Single Family, Duplex, Town House, Low-Rise, High-Rise, Manufactured Home, etc.
- **Quality and Condition of the Unit:** Quality of floor coverings, cabinets, appliances, windows and doors as well as how well the unit has been maintained may make units more or less desirable and may affect the amount of rent the unit commands.
- **Accessibility**
- **Amenities/Facilities:**
The following amenities/facilities may have an effect on the amount of rent the unit commands assuming that it is in good repair and desirable within the market:
 - Garbage Disposal
 - Dishwasher
 - Off-Street Parking
 - Storage Outside of Unit

- Washer/Dryer in Unit
- Patio/Balcony/Deck
- Fenced Yard
- Playground
- Covered/Garage Parking
- Laundry Facilities
- Club House
- Pool
- Fireplace
- *Age of the Unit and Year of Renovation*
- *Utilities*

Data Sources: Acceptable data sources used in determining rent reasonableness include the following:

- Dupre & Scott Rent Reasonableness Survey;
- Newspaper ads (including internet versions of newspaper ads);
- Classified Ads;
- Weekly or monthly neighborhood or shopper newspapers that have rental listings;
- "For Rent" signs in windows or on lawns;
- Real estate agents; and
- Property management companies that handle rental property.
- Rental Listing websites including:
 - www.apartmentguide.com
 - www.apartments.com
 - www.forrentmag.com
 - www.move.com/apartment/main.aspx

Utilizing the Dupre & Scott Rent Reasonableness Survey: The Dupre & Scott Rent Reasonableness Survey is updated every spring. The survey is a helpful way to understand the overall rental market of an area and can be a good starting point for certifying rent reasonableness. The certifier must follow these steps in utilizing the survey:

- Correctly identify the area the proposed unit is in according to the "Ventura County Areas for Data Presentation" section of the survey;
- Navigate to the appropriate pages which list the data for the identified area;
- Identify the correct unit size based on the number of bedrooms;
- Identify the correct building type based on the number of units the building contains;
- The average rent is listed on the right hand side of the page on the corresponding row of the survey.

Important factors to consider when utilizing the survey:

- Some unit types and areas have very limited data. This may be because the area has few rental units, such as Area 8: Goldbar/Sultan. Or, it may be that the unit type is not common, such as a one bedroom, one unit building. Each building type under each unit type lists the number of buildings that were included in the survey. If less than three (3) buildings were included in that data point, further analysis is necessary to properly document rent reasonableness; this analysis must be documented on the Rent Reasonableness – Supplemental form.
- For the Rent Reasonableness Survey, Dupre & Scott have defined building types as follows:
 - Buildings with fewer than 20 units:
 - Single family home
 - Duplex
 - Triplex
 - 4-19 unit complexes
 - Building with 20 or more units:
 - Lo-rise building: 20 or more units and one (1) or two (2) stories tall
 - High-rise building: 20 or more units and three (3) or more stories

It is important to note that the Dupre & Scott building type definitions differ from the definitions under the Housing Quality Standards (HQS) and the utility allowance schedule. For the purposes of verifying rent reasonableness, the building, for example, may be considered a high rise, but for HQS and utility allowance, it may be considered a low-rise. The building type for HQS and utility allowance must match, but may be different than rent reasonableness.

Data in Rural Areas: While there may be fewer rental units in rural areas than in urban and suburban areas, it is possible to find comparable rents or establish rent payment standards for different unit types located in these areas.

- One source of rental housing data for rural areas may be the U.S. Department of Agriculture's Rural Development Agency. USDA provides direct and guaranteed loans for single and multi-family housing development in rural areas as well as for farm laborers. Contact information for Rural Development State and Local Offices or USDA Service Centers is available at http://www.rurdev.usda.gov/recd_map.html. Each Rural Development Office, if it has a Rural Housing component, should have information on the types of rental housing available in various communities throughout the state, as well as unit sizes and rents.
- Another potential source of comparable rent data are real estate agents. Local real estate agents are not only knowledgeable about real estate prices but often are a source of information on rental housing in the area. They may be able to extrapolate rent comparables based on the general cost of housing in the area. To find real estate agents active in particular communities, Projects can consult the National Association of Realtors on the web at <http://www.realtor.org/>. For demographic information on the housing stock, market trends, etc., projects should access <http://www.realtor.org/research>.

Strategy for Addressing Special Cases: There may be instances where the above methodology and process is not sufficient to establish rent reasonableness for a particular unit.

For example, staff may find in rural areas that there are only one or two comparable units instead of the three (3) units specified by the protocol.

Recipients may use alternative methods to determine and document rent reasonableness in the following circumstance:

- In rural areas where it may be difficult to find three (3) comparable units.
- In assessing units with an accessibility feature that the tenant requires due to a disability where it may be difficult to find three (3) comparable units.

Documentation Requirements: The following documentation is required to determine rent reasonableness and must be kept in the participant file:

- Rent Reasonableness Certification Form
- Rent Reasonableness – Supplemental and backup documentation (i.e., copies of advertisements of units for rent, etc.) used to compare rents

Agencies must maintain a copy of the Dupre and Scott Rent Reasonableness Survey in the event of an audit.

Special Note Regarding Fair Market Rent: The gross rent (rent + utility allowance) for units receiving rental assistance from ESG funds, and leasing funds from the CoC Program cannot exceed the HUD Determined Fair Market Rent (FMR). Programs using rental assistance funds from the CoC Program should generally not exceed FMR.

Appendix C

Step by Step Guide to Compliance with Lead Based Paint Inspection Requirements

Childhood lead poisoning is a major environmental health problem in the United States, especially for low-income families in poor living conditions. If not detected early, children with high levels of lead in their bodies can suffer from damage to the brain and nervous system, behavioral and learning problems (such as hyperactivity), slowed growth, hearing problems, and headaches. To prevent lead-poisoning in young children, Lead/Sub Grantees must comply with the Lead-Based Paint Poisoning Prevention Act of 1973 and its applicable regulations found at 24 CFR § 35, Parts A, B, M, and R.

Disclosure Requirements

Disclosure requirements are triggered for ALL properties constructed prior to 1978. These requirements require that lessors (property owners or managers) provide tenants with:

- Disclosure form for rental properties disclosing the presence of known and unknown lead-based paint;
- A copy of the "Protect Your Family from Lead in the Home" pamphlet.

Both the disclosure form and pamphlet are available at:
<http://www.hud.gov/offices/lead/enforcement/disclosure.cfm>

Sharing this information with your participants (or ensuring they have received it from property owners/managers) is an easy thing to do. This is an important opportunity to educate participants about the potential hazards related to lead and their rights as tenants. Informed tenants are more likely to watch for potential problems in their home and proactively work with landlords to address any issues.

Visual Assessment

Visual assessments are only triggered under certain circumstances:

- The leased property was constructed before 1978;
AND
- A child under the age of six (6) will be living in the unit occupied by the household receiving assistance.

Determining the Age of the Unit

Projects should use formal public records, such as tax assessment records, to establish the age of a unit. These records include the year built or age of the property and are available online at:
<http://assessor.countyofventura.org/research/propertyinfo.asp>

Remember to print out a copy of the screenshot for the case file. If you have trouble finding this information online, contact your local Office of Tax and Revenue for assistance. If not available online, the information is public and can be requested from the local authorities. (Note, the taxing authority and the assessment entity may be separate governmental entities and office names vary by locality).

Conducting a Visual Assessment

A visual assessment must be conducted prior to providing rent assistance to the unit and on an annual basis thereafter (as long as assistance is provided). Visual assessments must be conducted by a HUD-Certified Visual Assessor. It is important to note that a HUD-Certified Visual Assessor is not equivalent to a Certified Clearance Examiner. Anyone may become a HUD-Certified Visual Assessor by successfully completing a 20-minute online training on HUD's website at:

<http://www.hud.gov/offices/lead/training/visualassessment/h00101.html>

The training teaches individuals how to identify deteriorated paint and how deteriorated paint must be treated. Projects may choose to have their program staff complete the visual assessments, or they may procure services from a contractor.

Making Assistance Determinations

If a visual assessment reveals problems with paint surfaces, Project cannot approve the unit for assistance until the deteriorating paint has been repaired. At this point, Projects must make a decision: work with the property owner/manager to complete needed paint stabilization activities and clearance, work with the household to locate a different (lead-safe) unit, or refer the participant to a different program if assistance cannot be provided.

Locating a Certified Lead Professional and Further Training

To locate a certified lead professional in your area:

- Call your state government (health department, lead poison prevention program, or housing authority).
- Call the National Lead Information Center at 1-800-424-LEAD (5323).
- Go to the US Environmental Protection Agency website at <http://cfpub.epa.gov/flpp/> and click on "certified abatement/inspection firms."

Lead professionals, training providers, and HUD-sponsored Lead Safe Work Practices training listings can be accessed at www.leadlisting.org or 1-888-LEADLIST.

For more information on the Federal training and certification program for lead professionals, contact the National Lead Information Center (NLIC) at <http://www.epa.gov/lead/pubs/nlic.html> or 1-800-424-LEAD to speak with an information specialist.

The Lead Safe Housing Rule as well as a HUD training module to help recipients of funds effectively implement the requirements of the Lead Safe Housing Rule in their programs can be accessed at <http://www.hud.gov/offices/cpd/affordablehousing/training/web/leadsafe/>

Appendix D

Comparison of Rapid Rehousing Under ESG and CoC

| | <i>Rapid Rehousing – Eligible Costs</i> | |
|---|---|--|
| | ESG - RRH | CoC - RRH |
| Rental Assistance | <ul style="list-style-type: none"> • Short-term (up to 3 months) • Medium-term (4 to 24 months) • Rent Arrears (one-time for up to 6 months, including late fees) | <ul style="list-style-type: none"> • Short-term (up to 3 months) • Medium-term (4 to 24 months) |
| Type of Rental Assistance | <ul style="list-style-type: none"> • Tenant based • Project based | <ul style="list-style-type: none"> • Tenant based only |
| Housing Relocation and Stabilization Services | <p>Financial Costs</p> <ul style="list-style-type: none"> • Rental application Fees • Security Deposits (up to 2 months) • Last month's rent • Utility Deposits and payments (up to 24 months, including 6 months of arrears) • Moving costs <p>Service Costs</p> <ul style="list-style-type: none"> • Housing Search and Placement • Housing stability case management • Mediation • Legal services • Credit repair • Budgeting • Money Management | <p>Financial Assistance</p> <ul style="list-style-type: none"> • Security deposits (up to 2 months) • First and last month's rent <p>Supportive Services</p> <ul style="list-style-type: none"> • Case management • Child Care • Education services • Employment assistance and job training • Food • Housing search and counseling services, including mediation, credit repair, and payment of rental application fee • Legal services • Life skills training • Mental health services • Moving costs • Outpatient health services • Outreach services • Substance abuse treatment services • Transportation • Utility deposits |

| | Rental Assistance Overview | |
|----------------------------|--|--|
| | ESG – RRH Rental Assistance (24 CFR § 576.104) | CoC – RRH Rental Assistance (24 CFR § 578.37(a)(1)(ii)) |
| Housing Standards | Units must pass HUD Habitability Standards | Units must pass HUD <u>Housing Quality Standards</u> (HQS) |
| Fair Market Rent (FMR) | Rental unit may cover up to FMR for rental unit | Rent Reasonableness is the rent standard |
| <u>Rent Reasonableness</u> | Units must comply with HUD's rent reasonableness standards | Units in a structure must comply with HUD's rent reasonableness standards |
| Lease Requirements | <ul style="list-style-type: none"> • A written lease between the owner and the participant is required for TBRA and PBRA. • For participants living in housing with PBRA, the lease must have an initial term of one year. There is no minimum lease period for TBRA. • The only exception to the written lease requirement is in the case of rental assistance provided solely for rental arrears. | Participants receiving TBRA must sign a lease of at least one year that is renewable (for a minimum term of one month) and terminable only for cause. |
| Written Standards | <p>Recipients and Subrecipients must implement written policies and procedures for:</p> <ul style="list-style-type: none"> • Determining and prioritizing which eligible families and individuals will receive RRH assistance • Determining the amount or percentage of rent and utilities each participant must pay • Determining how long a particular participant will be provided with rental assistance and whether and how the amount of that assistance will be adjusted over time | <p>Recipients and Subrecipients must consistently follow policies and procedures established for:</p> <ul style="list-style-type: none"> • Determining and prioritizing which eligible families and individuals will receive RRH assistance • Determining the amount or percentage of rent each participant must pay • Determining the maximum amount or percentage of rental assistance that a participant may receive • Determining the maximum number of months that a participant may receive rental assistance • Determining the maximum number of times that a participant may receive rental assistance • Determining the extent to which a participant must share the cost of rent |

Rent Reasonableness Certification

Tenant Name _____

I. Unit Information

Proposed Unit Address and Number

Landlord Name and Address

Date Unit Built: _____ Number of Bedrooms _____ Square Feet _____
Amenities, unit condition, and accessibility (i.e. handicap, etc): _____

II. Establishing Gross Rent

1. Type of Unit (Garden, High Rise, Duplex, Town House, Single Family etc.): _____
2. Published Fair Market Rent (FMR): \$ _____
3. Owner's Proposed Contract Rent: \$ _____
 - (a) Allowance for tenant-furnished utilities, if any \$ _____
 - (b) Gross Rent \$ _____
4. Owner's Most Recent Rent Charged \$ _____
 - (a) Did this rent include all utilities? ____ Yes ____ No (If No, explain) _____
 - (b) Amount of increase over rent, if any? \$ _____
 - (c) Reason for rent increase? _____
 - (d) Owner's reason for increase in rent justified? Yes ____ No ____
Does this rent include all utilities? ____ Yes ____ No (If No, explain) _____
 - (e) What method was used to determine that the rent being proposed for this unit is not more than the amount charged for other unassisted units? _____

III. Rent Survey

According to the Ventura County Rent Reasonableness Survey, which area is this unit located in? # _____
What is the Average Rent for this area according to the Survey? \$ _____
Is the Proposed Rent less than the Avg. Rent for the Area?

- ____ Yes (Stop here, complete and sign the certification at the end of the document)
____ No (If No, the unit may not be Rent Reasonable, further analysis is required. Do not sign below. Complete and attach Supplemental Section IV)

Based on the Rental Survey, I have determined that the proposed rent for the unit [] IS [] IS NOT reasonable.

Staff Signature: _____ Date: _____

This form was created based on the most up to date information available. Agencies are responsible for ensuring that their methods of determining rent reasonableness comply with the most recent guidance available and complies with applicable regulations and contractual obligations.

Rent Reasonableness - Supplemental

IV. Comparable Units (Supplemental Analysis)

The Proposed Rent for the unit was above the Average Rent for the Area according to the Survey, due to the following factors:

The survey contained less than 3 buildings for this unit type in this area and therefore is unreliable.
 The unit is significantly newer than the units that were surveyed or has recently been renovated.
 The unit has better than average amenities.
 The unit is Accessible.
 Other. Explain: _____

The specific units listed below are a more accurate reflection of the market for the proposed unit.

| | Proposed Unit | | Unit #1 | | Unit #2 | | Unit #3 | |
|---|---------------|--|---------|--|---------|--|---------|--|
| Source of Information | | | | | | | | |
| Address | | | | | | | | |
| Number of Bedrooms/Bathrooms | | | | | | | | |
| Square Feet | | | | | | | | |
| Type of Unit (Low-Rise, Hi-Rise, Single Family, Duplex etc.) | | | | | | | | |
| Housing Condition | | | | | | | | |
| Location/Accessibility | | | | | | | | |
| Amenities (List): | | | | | | | | |
| | | | | | | | | |
| | | | | | | | | |
| | | | | | | | | |
| | | | | | | | | |
| Yr Built/Renovated | | | | | | | | |
| Utilities Not Included in Rent (E,W,S,G,T) | | | | | | | | |
| Unit Rent | \$ | | \$ | | | | \$ | |
| Utility Allowance | \$ | | \$ | | | | \$ | |
| Gross Rent | \$ | | \$ | | | | \$ | |
| Handicap Accessible? | | | | | | | | |

Based on a comparison with rents for comparable units, I have determined that the proposed rent for the unit [] IS [] IS NOT reasonable.

Staff Signature: _____

Date: _____

Rental Assistance Agreement

This Rental Assistance Agreement is entered into between

_____ (“Agency”) and _____ (“Owner”).

The purpose of this Agreement is to assist the Household identified in Section I below to lease a decent, safe, and sanitary dwelling unit from Owner. Agency will make rental assistance payments to the Owner on behalf of Household in accordance with this Agreement.

I. Dwelling Unit and Household

This Agreement applies only to the Household and Dwelling Unit designated below. Owner has leased the Dwelling Unit to the Household through a separate and distinct lease agreement.

Dwelling Unit (“Unit”)

Head of Household

II. Term of Agreement

The term of this Agreement shall begin on _____ and shall end upon 30 days written notice from Agency.

III. Rental Assistance Payment

The Agency agrees to pay a portion, as determined and calculated solely by the Agency, of the Unit rent. This amount is subject to change at any time during the term of this Agreement. Any portion of the rent that is paid by Agency will be paid to Owner on or about the first day of the month for which the Unit rent is due. The rental assistance payment is equal to the difference between the Unit rent and the rent paid by the Household; at no time shall the rent paid by the Household and the rental assistance payment exceed the Unit rent. The Agency assumes no obligation for the Unit rent, or payment of any claim by the Owner against the Household, for damages or other amounts owed to the Owner.

IV. Notification to the Agency

During the term of this Agreement, Owner agrees to provide Agency with a copy of the following documentation:

- A. Amendments to the lease agreement between the Owner and the Household, including but not limited to, changes in rent, utilities, ownership or mailing address; and
- B. Notices to the Household, including but not limited to, notices to comply, terminations of tenancy, or eviction.

Agency:

Signature

Typed/Printed Name of Representative

Date

Landlord/Owner:

Signature

Typed/Printed Name of Representative

Date


Appendix C: Grantee SF424s and Certifications

Grantee SF-424's and Certification(s)

OMB Number: 4040-0044
Expiration Date: 10/31/2019

| Application for Federal Assistance SF-424 | | |
|--|--|--|
| * 1. Type of Submission: <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Change/Corrected Application | | |
| * 2. Type of Application: <input type="checkbox"/> New <input checked="" type="checkbox"/> Continuation <input type="checkbox"/> Revision | | |
| * 3. Date Received: <input type="text"/> | | |
| 4. Applicant Identifier: <input type="text"/> | | |
| 5a. Federal Entity Identifier: <input type="text"/> | | 5b. Federal Award Identifier: <input type="text"/> |
| State Use Only: | | |
| 6. Date Received by State: <input type="text"/> | | 7. State Application Identifier: <input type="text"/> |
| B. APPLICANT INFORMATION: | | |
| * a. Legal Name: <input type="text"/> | | |
| * b. Employer/Agency Identification Number (EIN/AIN): <input type="text"/> | | * c. Organization DUNS: <input type="text"/> |
| d. Address: | | |
| * Street: <input type="text"/> | | |
| * Street 2: <input type="text"/> | | |
| * City: <input type="text"/> | | |
| * County: <input type="text"/> | | |
| * State: <input type="text"/> | | |
| * Zip: <input type="text"/> | | |
| * Country: <input type="text"/> | | |
| * Zip/Postal Code: <input type="text"/> | | |
| e. Organizational Unit: | | |
| Department Name: <input type="text"/> | | Division Name: <input type="text"/> |
| f. Name and contact information of person to be contacted on matters involving this application: | | |
| * First Name: <input type="text"/> | | * Last Name: <input type="text"/> |
| * Title: <input type="text"/> | | * Email: <input type="text"/> |
| * Phone Number: <input type="text"/> | | |
| * Fax Number: <input type="text"/> | | |
| * Email: <input type="text"/> | | |

| Application for Federal Assistance SF-424 | |
|---|--|
| * 8. Type of Applicant 1: Select Applicant Type: <input type="text" value="6: County Government"/> | |
| Type of Applicant 2: Select Applicant Type <input type="text"/> | |
| Type of Applicant 3: Select Applicant Type <input type="text"/> | |
| * Other response: <input type="text"/> | |
| * 10. Name of Federal Agency: <input type="text" value="U.S. Department of Housing and Urban Development"/> | |
| 11. Catalog of Federal Domestic Assistance Number: <input type="text" value="14.318"/> | |
| CFDA Title <input type="text" value="Community Development Block Grant/Entitlement Grants"/> | |
| * 12. Funding Opportunity Number: <input type="text"/> | |
| * Title: <input type="text"/> | |
| 13. Competition Identification Number: <input type="text"/> | |
| Title: <input type="text"/> | |
| 14. Areas Affected by Project (Cities, Counties, States, etc.): <input type="text"/> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/> | |
| * 15. Descriptive Title of Applicant's Project: <input type="text" value="Ventura County's 2018-19 Annual Action Plan-Community Development Block Grant Program, benefiting the cities of Fillmore, Moorpark, Ojai, Santa Barbara, and San Marcos, a County wide supported area."/> | |
| Attach supporting documents as specified in agency instructions. <input type="button" value="Add Attachments"/> <input type="button" value="Delete Attachments"/> <input type="button" value="View Attachments"/> | |

| | |
|---|---|
| Application for Federal Assistance SF-424 | |
| 16. Congressional Districts Of: | |
| * a. Applicant: CA-014 | * b. Program/Project: 04-074 |
| Attach an additional list of Program/Project Congressional Districts if needed. | |
| <input type="text"/> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/> | |
| 17. Proposed Project: | |
| * a. Start Date: 07/01/2018 | * b. End Date: 06/30/2019 |
| 18. Estimated Funding (\$): | |
| * a. Federal: | 1,532,044.00 |
| * b. Applicant: | |
| * c. State: | |
| * d. Local: | |
| * e. Other: | |
| * f. Program Income: | |
| * g. TOTAL: | 1,532,044.00 |
| 19. Is Application Subject to Review By State Under Executive Order 12372 Process? | |
| <input type="checkbox"/> a. This application was made available to the State under the Executive Order 12372 Process for review on: <input type="text"/> | |
| <input checked="" type="checkbox"/> b. Program is subject to E.O. 12372 but has not been selected by the State for review | |
| <input type="checkbox"/> c. Program is not covered by E.O. 12372 | |
| 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.) | |
| <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | |
| If "Yes", provide explanation and attach: | |
| <input type="text"/> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="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 28, Section 1001) | |
| <input checked="" type="checkbox"/> I AGREE | |
| <small>** The list of certifications and assurances, or an itemized one where you may obtain this list, is contained in the accompanying agency specific instructions.</small> | |
| Authorized Representative: | |
| Print: | Mr. Michael |
| Middle Name: | |
| Last Name: | Michael |
| Suffix: | |
| * Title: | Council Member of Council |
| * Telephone Number: | 602-631-2001 |
| * Fax Number: | 602-631-2005 |
| * Email: | Michael.Michael@cityofphoenix.gov |
| * Signature of Authorized Representative: |  |
| * Date Signed: | 07/17/2018 |

Ventura County Congressional Districts – continued


CA-025

CA-026

CA-030

| Application for Federal Assistance SF-424 | | |
|---|--|---|
| *1. Type of Submission: <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application | | |
| *2. Type of Application: <input type="checkbox"/> New <input checked="" type="checkbox"/> Continuation <input type="checkbox"/> Revision | | |
| *3. Date Received: <input type="text"/> | | |
| 4. Applicant Use Only: <input type="text"/> | | |
| 5a. Federal Entity Identifier: <input type="text"/> | | 5b. Federal Award Identifier: <input type="text"/> |
| State Use Only: a. Date Received by State: <input type="text"/> | | |
| 7. State Application Identifier: <input type="text"/> | | |
| 8. APPLICANT INFORMATION: | | |
| *a. Legal Name: <input type="text"/> | | |
| *b. Employer/Employee Identification Number (EIN): <input type="text"/> | | *c. Organization DUNS: <input type="text"/> |
| d. Address: | | |
| *8. a. b. c. d. e. f. g. h. i. j. k. l. m. n. o. p. q. r. s. t. u. v. w. x. y. z. <input type="text"/> | | |
| *9. a. b. c. d. e. f. g. h. i. j. k. l. m. n. o. p. q. r. s. t. u. v. w. x. y. z. <input type="text"/> | | |
| *10. a. b. c. d. e. f. g. h. i. j. k. l. m. n. o. p. q. r. s. t. u. v. w. x. y. z. <input type="text"/> | | |
| *11. a. b. c. d. e. f. g. h. i. j. k. l. m. n. o. p. q. r. s. t. u. v. w. x. y. z. <input type="text"/> | | |
| *12. a. b. c. d. e. f. g. h. i. j. k. l. m. n. o. p. q. r. s. t. u. v. w. x. y. z. <input type="text"/> | | |
| *13. a. b. c. d. e. f. g. h. i. j. k. l. m. n. o. p. q. r. s. t. u. v. w. x. y. z. <input type="text"/> | | |
| *14. a. b. c. d. e. f. g. h. i. j. k. l. m. n. o. p. q. r. s. t. u. v. w. x. y. z. <input type="text"/> | | |
| *15. a. b. c. d. e. f. g. h. i. j. k. l. m. n. o. p. q. r. s. t. u. v. w. x. y. z. <input type="text"/> | | |
| *16. a. b. c. d. e. f. g. h. i. j. k. l. m. n. o. p. q. r. s. t. u. v. w. x. y. z. <input type="text"/> | | |
| *17. a. b. c. d. e. f. g. h. i. j. k. l. m. n. o. p. q. r. s. t. u. v. w. x. y. z. <input type="text"/> | | |
| e. Organizational Unit: | | |
| Department Name: <input type="text"/> | | Division Name: <input type="text"/> |
| f. Name and contact information of person to be contacted on matters involving this application: | | |
| *18. a. b. c. d. e. f. g. h. i. j. k. l. m. n. o. p. q. r. s. t. u. v. w. x. y. z. <input type="text"/> | | |
| *19. a. b. c. d. e. f. g. h. i. j. k. l. m. n. o. p. q. r. s. t. u. v. w. x. y. z. <input type="text"/> | | |
| *20. a. b. c. d. e. f. g. h. i. j. k. l. m. n. o. p. q. r. s. t. u. v. w. x. y. z. <input type="text"/> | | |
| *21. a. b. c. d. e. f. g. h. i. j. k. l. m. n. o. p. q. r. s. t. u. v. w. x. y. z. <input type="text"/> | | |
| *22. a. b. c. d. e. f. g. h. i. j. k. l. m. n. o. p. q. r. s. t. u. v. w. x. y. z. <input type="text"/> | | |
| *23. a. b. c. d. e. f. g. h. i. j. k. l. m. n. o. p. q. r. s. t. u. v. w. x. y. z. <input type="text"/> | | |
| *24. a. b. c. d. e. f. g. h. i. j. k. l. m. n. o. p. q. r. s. t. u. v. w. x. y. z. <input type="text"/> | | |
| *25. a. b. c. d. e. f. g. h. i. j. k. l. m. n. o. p. q. r. s. t. u. v. w. x. y. z. <input type="text"/> | | |
| *26. a. b. c. d. e. f. g. h. i. j. k. l. m. n. o. p. q. r. s. t. u. v. w. x. y. z. <input type="text"/> | | |
| *27. a. b. c. d. e. f. g. h. i. j. k. l. m. n. o. p. q. r. s. t. u. v. w. x. y. z. <input type="text"/> | | |
| *28. a. b. c. d. e. f. g. h. i. j. k. l. m. n. o. p. q. r. s. t. u. v. w. x. y. z. <input type="text"/> | | |
| *29. a. b. c. d. e. f. g. h. i. j. k. l. m. n. o. p. q. r. s. t. u. v. w. x. y. z. <input type="text"/> | | |
| *30. a. b. c. d. e. f. g. h. i. j. k. l. m. n. o. p. q. r. s. t. u. v. w. x. y. z. <input type="text"/> | | |
| *31. a. b. c. d. e. f. g. h. i. j. k. l. m. n. o. p. q. r. s. t. u. v. w. x. y. z. <input type="text"/> | | |
| *32. a. b. c. d. e. f. g. h. i. j. k. l. m. n. o. p. q. r. s. t. u. v. w. x. y. z. <input type="text"/> | | |
| *33. a. b. c. d. e. f. g. h. i. j. k. l. m. n. o. p. q. r. s. t. u. v. w. x. y. z. <input type="text"/> | | |
| *34. a. b. c. d. e. f. g. h. i. j. k. l. m. n. o. p. q. r. s. t. u. v. w. x. y. z. <input type="text"/> | | |
| *35. a. b. c. d. e. f. g. h. i. j. k. l. m. n. o. p. q. r. s. t. u. v. w. x. y. z. <input type="text"/> | | |
| *36. a. b. c. d. e. f. g. h. i. j. k. l. m. n. o. p. q. r. s. t. u. v. w. x. y. z. <input type="text"/> | | |
| *37. a. b. c. d. e. f. g. h. i. j. k. l. m. n. o. p. q. r. s. t. u. v. w. x. y. z. <input type="text"/> | | |
| *38. a. b. c. d. e. f. g. h. i. j. k. l. m. n. o. p. q. r. s. t. u. v. w. x. y. z. <input type="text"/> | | |
| *39. a. b. c. d. e. f. g. h. i. j. k. l. m. n. o. p. q. r. s. t. u. v. w. x. y. z. <input type="text"/> | | |
| *40. a. b. c. d. e. f. g. h. i. j. k. l. m. n. o. p. q. r. s. t. u. v. w. x. y. z. <input type="text"/> | | |
| *41. a. b. c. d. e. f. g. h. i. j. k. l. m. n. o. p. q. r. s. t. u. v. w. x. y. z. <input type="text"/> | | |
| *42. a. b. c. d. e. f. g. h. i. j. k. l. m. n. o. p. q. r. s. t. u. v. w. x. y. z. <input type="text"/> | | |
| *43. a. b. c. d. e. f. g. h. i. j. k. l. m. n. o. p. q. r. s. t. u. v. w. x. y. z. <input type="text"/> | | |
| *44. a. b. c. d. e. f. g. h. i. j. k. l. m. n. o. p. q. r. s. t. u. v. w. x. y. z. <input type="text"/> | | |
| *45. a. b. c. d. e. f. g. h. i. j. k. l. m. n. o. p. q. r. s. t. u. v. w. x. y. z. <input type="text"/> | | |
| *46. a. b. c. d. e. f. g. h. i. j. k. l. m. n. o. p. q. r. s. t. u. v. w. x. y. z. <input type="text"/> | | |
| *47. a. b. c. d. e. f. g. h. i. j. k. l. m. n. o. p. q. r. s. t. u. v. w. x. y. z. <input type="text"/> | | |
| *48. a. b. c. d. e. f. g. h. i. j. k. l. m. n. o. p. q. r. s. t. u. v. w. x. y. z. <input type="text"/> | | |
| *49. a. b. c. d. e. f. g. h. i. j. k. l. m. n. o. p. q. r. s. t. u. v. w. x. y. z. <input type="text"/> | | |
| *50. a. b. c. d. e. f. g. h. i. j. k. l. m. n. o. p. q. r. s. t. u. v. w. x. y. z. <input type="text"/> | | |

| Application for Federal Assistance SF-424 | |
|---|--|
| * 9. Type of Applicant 1: Select Applicant Type: <input type="text" value="State/County/Local Government"/> | |
| Type of Applicant 2: Select Applicant Type: <input type="text"/> | |
| Type of Applicant 3: Select Applicant Type: <input type="text"/> | |
| * Other (specify): <input type="text"/> | |
| * 10. Name of Federal Agency: <input type="text" value="U.S. Department of Housing and Urban Development"/> | |
| 11. Catalog of Federal Domestic Assistance Number: <input type="text" value="14.371"/> | |
| CHW Title: <input type="text" value="Emergency Solutions Grant Program"/> | |
| * 12. Funding Opportunity Number: <input type="text"/> | |
| * Title: <input type="text"/> | |
| 13. Competition Identification Number: <input type="text"/> | |
| Title: <input type="text"/> | |
| 14. Areas Affected by Project (Cities, Counties, States, etc.): <input type="text"/> <div> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/> </div> | |
| * 15. Descriptive Title of Applicant's Project: <input type="text" value="Ventura County FY 2018-19 Annual Action Plan: Emergency Solutions Grant Program: Beneficial the cities of Fillmore, Moorpark, Ojai, Santa Barbara, & Santa Maria, A County and incorporated areas."/> | |
| Attach supporting documents as specified in agency instructions. <div> <input type="button" value="Add Attachments"/> <input type="button" value="Delete Attachments"/> <input type="button" value="View Attachments"/> </div> | |

| Application for Federal Assistance SF-424 | |
|---|---|
| 16. Congressional Districts Of: | |
| * a. Applicant: <input type="text" value="CA-001"/> | * b. Program/Project: <input type="text" value="27-001"/> |
| Attach an additional list of Program/Project Congressional Districts, if needed. | |
| <input type="button" value="Previous Congressional District Attachment"/> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/> | |
| 17. Proposed Project: | |
| * a. Start Date: <input type="text" value="07/01/2011"/> | * b. End Date: <input type="text" value="12/31/2015"/> |
| 18. Estimated Funding (\$): | |
| * a. Federal: | <input type="text" value="15,000,000"/> |
| * b. Applicant: | <input type="text"/> |
| * c. State: | <input type="text"/> |
| * d. Local: | <input type="text"/> |
| * e. Other: | <input type="text"/> |
| * f. Program Income: | <input type="text"/> |
| * g. TOTAL: | <input type="text" value="15,000,000"/> |
| 19. Is Application Subject to Review By State Under Executive Order 12372 Process? <input type="checkbox"/> a. This application was made available to the State under the Executive Order 12372 Process for review on <input type="text"/> . <input checked="" type="checkbox"/> b. Program is subject to E.O. 12372 and has not been selected by the State for review. <input type="checkbox"/> c. Program is not covered by E.O. 12372. | |
| 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.) <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No * Yes: provide explanation and attach: <input type="text"/> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="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 assurance" 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 28, Section 1001) <input checked="" type="checkbox"/> I AGREE <small>"The list of certifications and assurance, or certification where you may obtain this list, is contained in the announcement or agency specific notice, etc."</small> | |
| Authorized Representative: | |
| Title: <input type="text" value="Rep."/> | * First Name: <input type="text" value="Michael"/> |
| Middle Name: <input type="text"/> | |
| * Last Name: <input type="text" value="Powers"/> | |
| Suffix: <input type="text"/> | |
| * Title: <input type="text" value="County Executive Officer"/> | |
| * Telephone Number: <input type="text" value="015-554-2661"/> | * Fax Number: <input type="text" value="015-554-2108"/> |
| * Email: <input type="text" value="Michael.Powers@CA001.CDC"/> | |
| * Signature of Authorized Representative:  | * Date Signed: <input type="text" value="05/11/2011"/> |

Ventura County Congressional Districts – continued

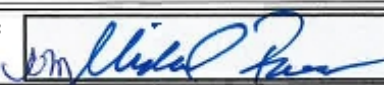
CA-025

CA-026

CA-030

| Application for Federal Assistance SF-424 | | |
|---|--|--|
| *1. Type of Submission: <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application | | |
| *2. Type of Application: <input type="checkbox"/> New <input checked="" type="checkbox"/> Continuation <input type="checkbox"/> Revision | | |
| *3. Date Received: <input type="text"/> | | |
| 4. Applicant Identifier: <input type="text"/> | | |
| 5a. Federal Entity Identifier: <input type="text"/> | | |
| 5b. Federal Award Identifier: <input type="text"/> | | |
| State Use Only: 6. Date Received by State: <input type="text"/> | | |
| 7. State Application Identifier: <input type="text"/> | | |
| B. APPLICANT INFORMATION: | | |
| *a. Legal Name: <input type="text"/> | | |
| *b. Employer/Employee Identification Number (EIN/TIN): <input type="text"/> | | |
| *c. Organizational DUNS: <input type="text"/> | | |
| d. Address: | | |
| * Street: <input type="text"/> | | |
| Street2: <input type="text"/> | | |
| * City: <input type="text"/> | | |
| County/Parish: <input type="text"/> | | |
| * State: <input type="text"/> CA: California | | |
| Province: <input type="text"/> | | |
| * County: <input type="text"/> CA: Contra Costa | | |
| * Zip/Post Code: <input type="text"/> 94509-1140 | | |
| e. Organizational Unit: | | |
| Department Name: <input type="text"/> | | |
| Division Name: <input type="text"/> | | |
| f. Name and contact information of person to be contacted on matters involving this application: | | |
| Title: <input type="text"/> | | |
| * First Name: <input type="text"/> | | |
| Middle Name: <input type="text"/> | | |
| * Last Name: <input type="text"/> | | |
| Suffix: <input type="text"/> | | |
| Title: <input type="text"/> | | |
| Organizational Affiliation: <input type="text"/> | | |
| * Telephone Number: <input type="text"/> | | |
| Fax Number: <input type="text"/> | | |
| * Email: <input type="text"/> | | |

| Application for Federal Assistance SF-424 | |
|---|--|
| * 9. Type of Applicant 1: Select Applicant Type: <input type="text" value="City County Government"/> | |
| Type of Applicant 2: Select Applicant Type: <input type="text"/> | |
| Type of Applicant 3: Select Applicant Type: <input type="text"/> | |
| * Other (specify): <input type="text"/> | |
| * 10. Name of Federal Agency: <input type="text" value="U.S. Department of Housing and Urban Development"/> | |
| 11. Catalog of Federal Domestic Assistance Number: <input type="text" value="14.225"/> | |
| CFDA Title: <input type="text" value="HOME Investment Partnerships Program"/> | |
| * 12. Funding Opportunity Number: <input type="text"/> | |
| * Title: <input type="text"/> | |
| 13. Competition Identification Number: <input type="text"/> | |
| Title: <input type="text"/> | |
| 14. Areas Affected by Project (Cities, Counties, States, etc.): <input type="text"/> <div> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/> </div> | |
| * 15. Descriptive Title of Applicant's Project: <input type="text" value="Ventura County FY 2018-19 Annual Section 830-ECDF Investment Partnership Program benefiting the cities of Fillmore, Moorpark, Ojai, Santa Paula, Arroyo Grande, a County unincorporated areas."/> | |
| Attach supporting documents as specified in agency instructions <div> <input type="button" value="Add Attachments"/> <input type="button" value="Delete Attachments"/> <input type="button" value="View Attachments"/> </div> | |

| Application for Federal Assistance SF-424 | |
|--|--|
| 16. Congressional District Of: | |
| * a. Applicant <input type="text" value="CA-004"/> | * b. Program/Project <input type="text" value="CA-C21"/> |
| Attach an additional list of Program/Project Congressional Districts if needed. | |
| <input type="text" value="Ventura County Congressional Districts.pdf"/> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/> | |
| 17. Proposed Project: | |
| * a. Start Date: <input type="text" value="07/01/2018"/> | * b. End Date: <input type="text" value="06/30/2019"/> |
| 18. Estimated Funding (\$): | |
| * a. Federal | <input type="text" value="85,707,000"/> |
| * b. Assistance | <input type="text"/> |
| * c. State | <input type="text"/> |
| * d. Local | <input type="text"/> |
| * e. Other | <input type="text"/> |
| * f. Program Income | <input type="text"/> |
| * g. TOTAL | <input type="text" value="85,707,000"/> |
| 19. Is Application Subject to Review By State Under Executive Order 12372 Process? <input type="checkbox"/> a. This application was made available to the State under the Executive Order 12372 Process for review on <input type="text"/> <input checked="" type="checkbox"/> b. Program is subject to E.O. 12372 but has not been selected by the State for review. <input type="checkbox"/> c. Program is not covered by E.O. 12372. | |
| 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.) <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No * Yes: provide explanation and attach <input type="text"/> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="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 accepted 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 28, Section 1001) <input checked="" type="checkbox"/> ** I AGREE ** The list of certifications and assurances, or an internal file where you may locate this list, is contained in the announcement or agency specific instructions. | |
| Authorized Representative: | |
| Prefix <input type="text" value="Mr."/> | * First Name <input type="text" value="Michael"/> |
| Middle Name <input type="text"/> | |
| * Last Name <input type="text" value="Pomeroi"/> | |
| Suffix <input type="text"/> | |
| * Title: <input type="text" value="County Executive Director"/> | |
| * Telephone Number: <input type="text" value="805-621-2611"/> | * Fax Number: <input type="text" value="805-621-2109"/> |
| * Email: <input type="text" value="Michael.Pomeroi@ventura.org"/> | |
| * Signature of Authorized Representative:  | * Date Signed: <input type="text" value="5/21/18"/> |

Ventura County Congressional Districts – continued

CA-025

CA-026

CA-030

CERTIFICATIONS

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

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

Anti-displacement and Relocation Plan -- It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, and implementing regulations at 49 CFR 24; and it has in effect and is following a residential anti-displacement and relocation assistance plan required under section 104(d) of the Housing and Community Development Act of 1974, as amended, in connection with any activity assisted with funding under the CDBG or HOME programs.

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

1. No Federal appropriated funds have been paid or will be paid, by or on behalf of 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 JICQWA funds are consistent with the strategic plan.

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



Signature/Authorized Official

Date: 5/17/18

Michael Powers, County Executive Officer

Specific CDBG Certifications

The Jurisdiction 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 24 CFR 570.2 and 24 CFR 91.105)

Following a Plan -- It is following a current consolidated plan for 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(s) 2017-18 (a period specified by the grantee consisting of one, two, or three specific consecutive program years), 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, H, J, K and R;

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



Signature/Authorized Official

Date: 5/17/18

Michael Powers, County Executive Officer

OPTIONAL CERTIFICATION
CDBG

Submit the following certification only when one or more of the activities in the action plan are designed to meet other community development needs having a particular urgency as specified in 24 CFR 570.208(c):

The grantee hereby certifies that the Annual Plan includes one or more specifically identified CDBG-assisted activities which 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 to meet such needs.



Signature/Authorized Official

Date: 5/17/18

Michael Powers, County Executive Officer

Specific HOME Certifications

The HOME participating jurisdiction certifies that:

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

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

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

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



Signature/Authorized Official

Date: 5/17/18

Michael Powers, County Executive Officer

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

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

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

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

Confidentiality – The jurisdiction has established and is implementing procedures to ensure the confidentiality of records pertaining to any individual provided family violence prevention or treatment services under any project assisted under the ESG program, including protection against the release of the address or location of any family violence shelter project, except with the written authorization of the person responsible for the operation of that shelter.

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

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

Discharge Policy – The jurisdiction will establish and implement, to the maximum extent practicable and where appropriate policies and protocols for the discharge of persons from

publicly funded institutions or systems of care (such as health care facilities, mental health facilities, foster care or other youth facilities, or correction programs and institutions) in order to prevent this discharge from immediately resulting in homelessness for these persons.



Signature/Authorized Official

Date: 5/17/18

Michael Powers, County Executive Officer

HOPWA Certifications

The HOPWA grantee certifies that:

Activities -- Activities funded under the program will meet urgent needs that are not being met by available public and private sources.

Building -- Any building or structure assisted under that program shall be operated for the purpose specified in the plan:

1. For at least 10 years in the case of assistance involving new construction, substantial rehabilitation, or acquisition of a facility.
2. For at least 3 years in the case of assistance involving non-substantial rehabilitation or repair of a building or structure.



Signature/Authorized Official

Date: 5/17/18

Michael Powers, County Executive Officer

APPENDIX TO CERTIFICATIONS

INSTRUCTIONS CONCERNING LOBBYING:

A. Lobbying Certification

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