

Annual Action Plan
FY 2021-2022



Final
Amendment 1.0
May 26, 2021



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Version History

No.	Summary of Changes			
1	Published Draft for Public Comment:	3/27/21	Sent to HUD for Approval:	5/13/21
	Conducted Public Hearing:	4/27/21	Approved by HUD:	n/a
	Original 2021-2022 Annual Action Plan.			
2	Published Draft for Public Comment:	n/a	Sent to HUD for Approval:	5/26/21
	Conducted Public Hearing:	n/a	Approved by HUD:	
	Amendment 1 (Non-Substantial): Minor amendment to address increase in CDBG allocation for FY2021 to \$2,130,919			
3	Published Draft for Public Comment:		Sent to HUD for Approval:	
	Conducted Public Hearing:		Approved by HUD:	
	Amendment 2 (Substantial / Non-Substantial):			
4	Published Draft for Public Comment:		Sent to HUD for Approval:	
	Conducted Public Hearing:		Approved by HUD:	
	Amendment 3 (Substantial / Non-Substantial):			
5	Published Draft for Public Comment:		Sent to HUD for Approval:	
	Conducted Public Hearing:		Approved by HUD:	
	Amendment 4 (Substantial / Non-Substantial):			

Executive Summary

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

1. Introduction

Amendment

The City of Fontana completed a minor amendment to its FY2021 Annual Action Plan to reflect an increase in the CDBG allocation by approximately 1.5%. The City of Fontana was notified of the increased allocation on May 20, 2021. The City elected to proportionally increase the budget of its administration, public services and rental housing program. In accordance with the City’s Citizen Participation Plan and the regulations of 24 CFR Part 91, the increase to these three projects do not constitute a substantial amendment.

Original

The 2021-22 Action Plan is the City of Fontana’s Annual Plan for the investment of annual allocations of Community Development Block Grant (CDBG), Home Investment Partnerships (HOME) and Emergency Solutions Grant (ESG) funds from the U.S. Department of Housing and Urban Development (HUD) during the fiscal year 2021-2022. These grant programs are consistent with HUD’s national strategy to provide decent housing opportunities, a suitable living environment and economic opportunities—particularly for low- and moderate-income people.

In consideration of finite grant resources, the goals and projects within this Action Plan outline the areas and population segments with the greatest level of need for a particular program or activity and intends to invest grant resources in high leverage opportunities where data suggests that the City will be able to maximize the impact of every dollar. The Action Plan utilizes the priority needs identified in the 2020 – 2024 Consolidated Plan process, which identified the City’s priority needs, including the rationale for establishing allocation priorities and specific measurable goals to be addressed during the five year period.

Within the 2021-2022 Action Plan, the City proposes the following activities (revised):

2021-22 CDBG PROGRAM

Public Service Activities

Public Safety	\$279,637
Children’s After School Program	\$40,000

Capital Activities

Housing Rehabilitation Program	\$365,000
Rental Housing Acquisition/Rehabilitation Program	\$1,020,099

Program Administration Activities

CDBG Program Administration	\$388,683
Inland Fair Housing & Mediation Board: Fair Housing Services	\$37,500

2021-22 HOME PROGRAM

Housing Activities

Southridge Affordable Housing	\$1,957,196
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Program Administration Activities

HOME Program Administration	\$72,667
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2021-22 ESG PROGRAM

Homeless Activities

Homeless Prevention and Rapid Re-Housing	\$165,627
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ESG Administration	\$13,429
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2. Summarize the objectives and outcomes identified in the Plan

HUD's Community Planning and Development (CPD) Outcome Performance Measurement Framework classifies objectives in three categories: decent housing, a suitable living environment, and economic opportunity. Based on the Consolidated Plan process conducted in 2020, the City's current Strategic Plan identifies seven high priority needs to be addressed through the implementation of activities aligned with seven Strategic Plan goals.

The high priority needs for Fontana include:

- Preserve the supply of affordable housing
- Expand the supply of affordable housing
- Ensure equal access to housing opportunities
- Prevent and eliminate homelessness
- Provide public services for low-income residents
- Improve public facilities and infrastructure
- Provide for program administration

Consistent with HUD's national goals for the CDBG, ESG and HOME programs to provide decent housing opportunities, maintain a suitable living environment and expand economic opportunities for low- and moderate-income residents, the priority needs listed above will be addressed over the next five years through the implementation of CDBG, ESG and HOME funded activities aligned with the following seven measurable Strategic Plan goals:

- Affordable housing preservation
- Affordable rental housing development
- Fair housing services
- Homelessness prevention services

- Public Services for low-income families
- City of Fontana public facilities improvements
- Program administration

Activities proposed in the 2021 Action Plan address the following goals:

- Affordable housing preservation
- Affordable rental housing development
- Fair housing services
- Homelessness prevention services
- Public Services for low-income families
- Program administration

3. Evaluation of past performance

During the 2020 program year, the City of Fontana prioritized program activities to address the impacts of the COVID-19 pandemic within the City of Fontana. Activities included rental and mortgage assistance, small and microbusiness support, homeless prevention, and targeted public service activities.

Additionally, the City conducted the following projects:

1. Public Safety Assistance
2. Housing Rehabilitation
3. Southridge Affordable Housing development preparation
4. Homeless prevention/ rapid-rehousing

4. Summary of Citizen Participation Process and consultation process

In accordance with the City of Fontana's Citizen Participation Plan, the City conducted a 30-day public comment period from March 27 - April 27, 2021. The City conducted a public hearing on April 27, 2021 to receive comments on the draft Action Plan. As noted in the City's CPP, the second public hearing required during the program year is conducted during the CAPER process.

5. Summary of public comments

No comments received.

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

No comments received.

7. Summary

No comments received.

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
CDBG Administrator	FONTANA	Administrative Services
HOME Administrator	FONTANA	Administrative Services
ESG Administrator	FONTANA	Administrative Services

Table 1 – Responsible Agencies

Narrative

The City of Fontana Administrative Services Department is the lead agency responsible for the administration of the CDBG programs. The Housing Division (Housing Authority) under the Administrative Services Department is responsible for the day to day implementation of the programs and the development of the Five-Year Consolidated Plan and the Annual Action Plan. In addition, the City has contracted with MDG Associates, Inc. to prepare the 2021 Annual Action Plan.

In the development of this Consolidated Plan, MDG Associates, Inc. developed and implemented a comprehensive citizen participation and consultation process and conducted a needs assessment and market analysis to identify levels of relative need regarding affordable housing, homelessness, special needs, and community development. This information was gathered through consultation with public officials and local agencies, public outreach and community meetings, review of demographic and economic data, and housing market analysis.

In the implementation of the 2021 Annual Action Plan, the Administrative Services Department shall be responsible for all grants planning, management and monitoring duties necessary to comply with HUD regulations and City policy.

Consolidated Plan Public Contact Information

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Fontana, CA 92335
(909) 350-6739

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

1. Introduction

The City of Fontana consulted with representatives from multiple agencies, groups, and organizations involved in the development of affordable housing, creation of job opportunities for low- and moderate-income residents, and/or provision of services to children, elderly persons, persons with disabilities, persons with HIV/AIDS and their families, and homeless persons. To facilitate this consultation, the City solicited feedback through the following methods:

- Stakeholder surveys (web-based and paper-surveys)
- Individual stakeholder consultations
- Community meetings
- Public hearings
- Receipt of written comments

The input gathered from these consultation partners helped establish and inform the objectives and goals described in the Strategic Plan. Specific comments received from consultation partners are included in the Attachments section of the Consolidated Plan.

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

The City recognizes the importance of careful coordination and alignment among various service providers to maximize the effectiveness of their programs. As a result, during the development of this Consolidated Plan, the City consulted closely with organizations that provide assisted housing, health services and other community-focused agencies. Outreach efforts included surveys including specific questions associated with coordination, invitations to community meetings and follow-up in-person interviews where appropriate.

The City further recognizes the importance of continued coordination and alignment during the upcoming five-year planning period with these organizations and agencies. The City will continue strengthening relationships and alignment among these organizations.

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

San Bernardino County’s homeless Continuum of Care (CoC) is comprised of a network of public, private, faith-based, for-profit, and non-profit service providers who utilize several federal, state and local resources to provide services for homeless people. The region’s municipalities, including the City of Fontana, also provide resources for services that assist the homeless and those at risk of becoming homeless. The non-

profit and faith-based community plays a key role in the current CoC system. Hundreds of agencies throughout the County provide programs ranging from feeding the homeless on the street to creating permanent supportive housing opportunities. These services are available to homeless families with children, and single men and women. The non-profit and faith-based community also serves special needs populations, such as victims of domestic violence, veterans, the disabled and youth.

The CoC guides the development of homeless strategies and the implementation of programs to end homelessness throughout the region. The City provided a detailed questionnaire to the CoC to identify the CoC's perceived needs in the county and its objectives to address the needs of different homeless persons populations, specifically chronically homeless families and individuals, families with children, veterans, unaccompanied youth and persons at risk of homelessness. Following the delivery and response to this questionnaire, the City followed up with the CoC to clarify existing needs and objectives and understand opportunities for collaboration and coordination during the five-year planning process.

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

In the development of the 2020-2024 Consolidated Plan, the City of Fontana consulted 84 housing, social services, governmental and other entities involved in housing and community development in Fontana and throughout the region to obtain valuable information on the priority needs in Fontana and how CDBG, ESG and HOME and other resources should be invested to provide decent affordable housing, a suitable living environment and economic opportunities for low- and moderate-income residents. The San Bernardino County Continuum of Care (CoC) was consulted directly in person, by telephone and email to discuss performance standards, outcomes, and policies and procedures for HMIS.

Last year after undertaking a competitive procurement process, the City entered into a two-year agreement with Water of Life Church to receive ESG funds to prevent homelessness and operate a rapid rehousing program. Upon satisfactory performance, the Agreement had a provision that could extend it for an additional two years through June 30, 2022. The Water of Life Church must comply with the City's performance standards and achieve established outcomes. Upon expiration of the agreement, the City will again follow its policies and procedure in procuring services and award a contract to the most qualified nonprofit(s).

The table below provides a listing of the entities consulted as part of this planning process.

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

1	Agency/Group/Organization	San Bernardino County Interagency Council on Homelessness
	Agency/Group/Organization Type	Services-homeless Regional organization
	What section of the Plan was addressed by Consultation?	Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	In person, personal calls, sent letter and e-mail with copy of Needs Survey as well as link to the survey. Through this consultation, Fontana preserved lines of communication between the stakeholder and the City to be an active participant in housing and community development planning in the jurisdiction. Fontana sought specific input, feedback, and recommendations related to the topics highlighted above from this stakeholder.
2	Agency/Group/Organization	Palm Communities
	Agency/Group/Organization Type	Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Sent letter and e-mail with copy of Needs Survey as well as link to the survey. Through this consultation, Fontana opened or preserved lines of communication between the stakeholder and the City to be an active participant in housing and community development planning in the jurisdiction. Fontana sought specific input, feedback, and recommendations related to the topics highlighted above from this stakeholder.
3	Agency/Group/Organization	San Bernardino County Housing Authority
	Agency/Group/Organization Type	PHA
	What section of the Plan was addressed by Consultation?	Public Housing Needs

	How was the Agency/Group/ Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Personal call, emails and sent letter and e-mail with copy of Needs Survey as well as link to the survey. Through this consultation, Fontana preserved lines of communication between the stakeholder and the City to be an active participant in housing and community development planning in the jurisdiction. Fontana sought specific input, feedback, and recommendations related to the topics highlighted above from this stakeholder.
4	Agency/Group/Organization	City of Fontana Housing Authority
	Agency/Group/Organization Type	PHA
	What section of the Plan was addressed by Consultation?	Public Housing Needs
	How was the Agency/Group/ Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Personal calls and sent letter and e-mail with copy of Needs Survey as well as link to the survey. Through this consultation, Fontana preserved lines of communication between the stakeholder and the City to be an active participant in housing and community development planning in the jurisdiction. Fontana sought specific input, feedback, and recommendations related to the topics highlighted above from this stakeholder.
5	Agency/Group/Organization	Fontana Unified School District
	Agency/Group/Organization Type	Services-Children Services-Education Other government - Local
	What section of the Plan was addressed by Consultation?	Public Services
	How was the Agency/Group/ Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Sent letter and e-mail with copy of Needs Survey as well as link to the survey. Through this consultation, Fontana preserved lines of communication between the stakeholder and the City to be an active participant in housing and community development planning in the jurisdiction. Fontana sought specific input, feedback, and recommendations related to the topics highlighted above from this stakeholder.
6	Agency/Group/Organization	Water of Life Church
	Agency/Group/Organization Type	Services-Homeless

	What section of the Plan was addressed by Consultation?	Homeless Needs-Chronically homeless Homeless Needs-Veterans Homeless Needs-Families with Children
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Sent letter and e-mail with copy of Needs Survey as well as link to the survey. Through this consultation, Fontana preserved lines of communication between the stakeholder and the City to be an active participant in housing and community development planning in the jurisdiction. Fontana sought specific input, feedback, and recommendations related to the topics highlighted above from this stakeholder.
7	Agency/Group/Organization	BOYS AND GIRLS CLUB OF FONTANA
	Agency/Group/Organization Type	Services-Children
	What section of the Plan was addressed by Consultation?	Other-Public Services
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Sent letter and e-mail with copy of Needs Survey as well as link to the survey. Through this consultation, Fontana opened or preserved lines of communication between the stakeholder and the City to be an active participant in housing and community development planning in the jurisdiction. Fontana sought specific input, feedback, and recommendations related to the topics highlighted above from this stakeholder.
8	Agency/Group/Organization	Jamboree Housing
	Agency/Group/Organization Type	Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Sent letter and e-mail with copy of Needs Survey as well as link to the survey. Through this consultation, Fontana preserved lines of communication between the stakeholder and the City to be an active participant in housing and community development planning in the jurisdiction. Fontana sought specific input, feedback, and recommendations related to the topics highlighted above from this stakeholder.
9	Agency/Group/Organization	California Apartment Association
	Agency/Group/Organization Type	Services-Housing

	What section of the Plan was addressed by Consultation?	Housing Needs Assessment
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Sent letter and e-mail with copy of Needs Survey as well as link to the survey. Through this consultation, Fontana preserved lines of communication between the stakeholder and the City to be an active participant in housing and community development planning in the jurisdiction. Fontana sought specific input, feedback, and recommendations related to the topics highlighted above from this stakeholder.
10	Agency/Group/Organization	OPARC
	Agency/Group/Organization Type	Services-Persons with Disabilities
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Sent letter and e-mail with copy of Needs Survey as well as link to the survey. Through this consultation, Fontana opened or preserved lines of communication between the stakeholder and the City to be an active participant in housing and community development planning in the jurisdiction. Fontana sought specific input, feedback, and recommendations related to the topics highlighted above from this stakeholder.
11	Agency/Group/Organization	Inland Regional Center
	Agency/Group/Organization Type	Services-Persons with Disabilities
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Sent letter and e-mail with copy of Needs Survey as well as link to the survey. Through this consultation, Fontana opened or preserved lines of communication between the stakeholder and the City to be an active participant in housing and community development planning in the jurisdiction. Fontana sought specific input, feedback, and recommendations related to the topics highlighted above from this stakeholder.
12	Agency/Group/Organization	Foothill AIDS Project
	Agency/Group/Organization Type	Services-Persons with HIV/AIDS

	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Sent letter and e-mail with copy of Needs Survey as well as link to the survey. Through this consultation, Fontana opened or preserved lines of communication between the stakeholder and the City to be an active participant in housing and community development planning in the jurisdiction. Fontana sought specific input, feedback, and recommendations related to the topics highlighted above from this stakeholder.
13	Agency/Group/Organization	OPTION HOUSE
	Agency/Group/Organization Type	Services-Victims of Domestic Violence
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Sent letter and e-mail with copy of Needs Survey as well as link to the survey. Through this consultation, Fontana opened or preserved lines of communication between the stakeholder and the City to be an active participant in housing and community development planning in the jurisdiction. Fontana sought specific input, feedback, and recommendations related to the topics highlighted above from this stakeholder.
14	Agency/Group/Organization	FRAZEE COMMUNITY CENTER
	Agency/Group/Organization Type	Services-homeless
	What section of the Plan was addressed by Consultation?	Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Sent letter and e-mail with copy of Needs Survey as well as link to the survey. Through this consultation, Fontana opened or preserved lines of communication between the stakeholder and the City to be an active participant in housing and community development planning in the jurisdiction. Fontana sought specific input, feedback, and recommendations related to the topics highlighted above from this stakeholder.

15	Agency/Group/Organization	San Bernardino County Homeless Provider Network
	Agency/Group/Organization Type	Services-homeless
	What section of the Plan was addressed by Consultation?	Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Sent letter and e-mail with copy of Needs Survey as well as link to the survey. Through this consultation, Fontana preserved lines of communication between the stakeholder and the City to be an active participant in housing and community development planning in the jurisdiction. Fontana sought specific input, feedback, and recommendations related to the topics highlighted above from this stakeholder.
16	Agency/Group/Organization	COC SB County Office of Homeless Services
	Agency/Group/Organization Type	Services-homeless
	What section of the Plan was addressed by Consultation?	Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Sent letter and e-mail with copy of Needs Survey as well as link to the survey. Through this consultation, Fontana preserved lines of communication between the stakeholder and the City to be an active participant in housing and community development planning in the jurisdiction. Fontana sought specific input, feedback, and recommendations related to the topics highlighted above from this stakeholder.
17	Agency/Group/Organization	SAN BERNARDINO COUNTY LIBRARY
	Agency/Group/Organization Type	Services-Education Other government - County
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs

	How was the Agency/Group/ Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Sent letter and e-mail with copy of Needs Survey as well as link to the survey. Through this consultation, Fontana opened or preserved lines of communication between the stakeholder and the City to be an active participant in housing and community development planning in the jurisdiction. Fontana sought specific input, feedback, and recommendations related to the topics highlighted above from this stakeholder.
18	Agency/Group/Organization	Quality Management Group
	Agency/Group/Organization Type	Housing
	What section of the Plan was addressed by Consultation?	Housing Needs Assessment
	How was the Agency/Group/ Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Sent letter and e-mail with copy of Needs Survey as well as link to the survey. Through this consultation, Fontana preserved lines of communication between the stakeholder and the City to be an active participant in housing and community development planning in the jurisdiction. Fontana sought specific input, feedback, and recommendations related to the topics highlighted above from this stakeholder.
19	Agency/Group/Organization	San Bernardino County Superintendent of Schools
	Agency/Group/Organization Type	Services-Education
	What section of the Plan was addressed by Consultation?	Homeless Needs - Families with children Homelessness Needs - Unaccompanied youth
	How was the Agency/Group/ Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Sent letter and e-mail with copy of Needs Survey as well as link to the survey. Through this consultation, Fontana preserved lines of communication between the stakeholder and the City to be an active participant in housing and community development planning in the jurisdiction. Fontana sought specific input, feedback, and recommendations related to the topics highlighted above from this stakeholder.
20	Agency/Group/Organization	Chaffey College - Fontana Campus
	Agency/Group/Organization Type	Services-Education Other government - Local
	What section of the Plan was addressed by Consultation?	Other-Public Education

	How was the Agency/Group/ Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Sent letter and e-mail with copy of Needs Survey as well as link to the survey. Through this consultation, Fontana opened or preserved lines of communication between the stakeholder and the City to be an active participant in housing and community development planning in the jurisdiction. Fontana sought specific input, feedback, and recommendations related to the topics highlighted above from this stakeholder.
21	Agency/Group/Organization	CA SBDC Small Business Development Center
	Agency/Group/Organization Type	Services-Employment
	What section of the Plan was addressed by Consultation?	Economic Development
	How was the Agency/Group/ Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Sent letter and e-mail with copy of Needs Survey as well as link to the survey. Through this consultation, Fontana opened or preserved lines of communication between the stakeholder and the City to be an active participant in housing and community development planning in the jurisdiction. Fontana sought specific input, feedback, and recommendations related to the topics highlighted above from this stakeholder.
22	Agency/Group/Organization	Inland Empire Economic Partnership (IEEP)
	Agency/Group/Organization Type	Services-Employment
	What section of the Plan was addressed by Consultation?	Economic Development
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Sent letter and e-mail with copy of Needs Survey as well as link to the survey. Through this consultation, Fontana opened or preserved lines of communication between the stakeholder and the City to be an active participant in housing and community development planning in the jurisdiction. Fontana sought specific input, feedback, and recommendations related to the topics highlighted above from this stakeholder.
23	Agency/Group/Organization	San Bernardino County Workforce Investment Board
	Agency/Group/Organization Type	Services-Employment
	What section of the Plan was addressed by Consultation?	Economic Development

	How was the Agency/Group/ Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Sent letter and e-mail with copy of Needs Survey as well as link to the survey. Through this consultation, Fontana opened or preserved lines of communication between the stakeholder and the City to be an active participant in housing and community development planning in the jurisdiction. Fontana sought specific input, feedback, and recommendations related to the topics highlighted above from this stakeholder.
24	Agency/Group/Organization	Inland Fair Housing and Mediation Board (IFHMB)
	Agency/Group/Organization Type	Service-Fair Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth
	How was the Agency/Group/ Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Sent letter and e-mail with copy of Needs Survey as well as link to the survey. Through this consultation, Fontana opened or preserved lines of communication between the stakeholder and the City to be an active participant in housing and community development planning in the jurisdiction. Fontana sought specific input, feedback, and recommendations related to the topics highlighted above from this stakeholder.
25	Agency/Group/Organization	San Bernardino County Transitional Assistance Department
	Agency/Group/Organization Type	Services-Children Child Welfare Agency Other government - Local
	What section of the Plan was addressed by Consultation?	Public Services
	How was the Agency/Group/ Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Sent letter and e-mail with copy of Needs Survey as well as link to the survey. Through this consultation, Fontana opened or preserved lines of communication between the stakeholder and the City to be an active participant in housing and community development planning in the jurisdiction. Fontana sought specific input, feedback, and recommendations related to the topics highlighted above from this stakeholder.

26	Agency/Group/Organization	San Bernardino County Department of Behavioral Health
	Agency/Group/Organization Type	Publicly Funded Institution/System of Care
	What section of the Plan was addressed by Consultation?	Public Health
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Sent letter and e-mail with copy of Needs Survey as well as link to the survey. Through this consultation, Fontana opened or preserved lines of communication between the stakeholder and the City to be an active participant in housing and community development planning in the jurisdiction. Fontana sought specific input, feedback, and recommendations related to the topics highlighted above from this stakeholder.
27	Agency/Group/Organization	City of Fontana Chamber of Commerce
	Agency/Group/Organization Type	Business and Civic Leaders
	What section of the Plan was addressed by Consultation?	Economic Development
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Sent letter and e-mail with copy of Needs Survey as well as link to the survey. Through this consultation, Fontana opened or preserved lines of communication between the stakeholder and the City to be an active participant in housing and community development planning in the jurisdiction. Fontana sought specific input, feedback, and recommendations related to the topics highlighted above from this stakeholder.
28	Agency/Group/Organization	Southern CA Council of Governments (SCAG)
	Agency/Group/Organization Type	Regional organization
	What section of the Plan was addressed by Consultation?	Economic Development
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Sent letter and e-mail with copy of Needs Survey as well as link to the survey. Through this consultation, Fontana opened or preserved lines of communication between the stakeholder and the City to be an active participant in housing and community development planning in the jurisdiction. Fontana sought specific input, feedback, and recommendations related to the topics highlighted above from this stakeholder.

29	Agency/Group/Organization	City of Fontana Police Department
	Agency/Group/Organization Type	Government – Local
	What section of the Plan was addressed by Consultation?	Public Safety Correctional program Homeless Assistance
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Sent letter and e-mail with copy of Needs Survey as well as link to the survey. Through this consultation, Fontana opened or preserved lines of communication between the stakeholder and the City to be an active participant in housing and community development planning in the jurisdiction. Fontana sought specific input, feedback, and recommendations related to the topics highlighted above from this stakeholder.
30	Agency/Group/Organization	Target Store (Fontana North)
	Agency/Group/Organization Type	Business Leaders
	What section of the Plan was addressed by Consultation?	Economic Development
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Sent letter and e-mail with copy of Needs Survey as well as link to the survey. Through this consultation, Fontana opened or preserved lines of communication between the stakeholder and the City to be an active participant in housing and community development planning in the jurisdiction. Fontana sought specific input, feedback, and recommendations related to the topics highlighted above from this stakeholder.

Table 2 - Agencies, groups, organizations who participated

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

The City attempts to maintain a current and comprehensive list of agencies, organizations and other stakeholders and invited representatives from each entity to participate in the planning process at multiple points in the planning process. If an agency did not attend meetings or participate in surveys, it was done so by the agency's choice.

If an agency or organization was not consulted and would like to be included in the City's list of stakeholders, the agency or organization may contact the CDBG Project Specialist at (909) 350-6625.

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

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	County of San Bernardino Department of Public Social Services - Homeless Programs Unit	The Homelessness Prevention Services goal of the Strategic Plan is consistent with the County of San Bernardino Homelessness Action Plan.
City of Fontana 2014-2021 Housing Element	City of Fontana Community Development Department	The goals of the Strategic Plan are consistent with the Housing Element with respect to affordable housing development, affordable housing preservation and furthering fair housing choice.

Table 3 – Other local/ regional/ federal planning efforts

Describe cooperation and coordination with other public entities, including the State and any adjacent units of general local government, in the implementation of the Consolidated Plan (91.215(l))

In the development of the 2020-2024 Consolidated Plan, the City afforded the following other public entities with the opportunity to provide input on the Consolidated Plan and welcomes their input concerning the future implementation of projects to address the nine Strategic Plan goals:

- City of Rialto
- City of Rancho Cucamonga
- City of San Bernardino
- Council on Aging
- County of San Bernardino
- Court Appointed Special Advocates (CASA)
- Federal Emergency Management Agency (FEMA)
- Fontana Unified School District
- Housing Authority of the County of San Bernardino
- Inland Empire Regional Broadband Consortium
- Inland Regional Center
- San Bernardino Associated Governments (SANBAG)
- San Bernardino County Economic Development Agency
- San Bernardino County Environmental Health Department
- San Bernardino County Public Health Department
- San Bernardino County Pre-School Services Department
- San Bernardino County Transportation Commission (RCTC)
- San Bernardino County Sheriff's Department (POP Program)
- San Bernardino County Victims Services
- Southern California Council of Governments (SCAG)
- State of California Department of Housing and Community Development
- State of California Employment Development Department
- U.S Department of the Interior – Bureau of Land Management

AP-12 Participation – 91.105, 91.200(c)

1. Summary of citizen participation process/Efforts made to broaden citizen participation

In accordance with the City of Fontana’s Citizen Participation Plan, the City conducts two public hearings during the program year to gather feedback on program activities, needs, and accomplishments. The City conducted its first public hearing to review the draft CAPER in December 2020. The second public hearing, to gather feedback on the draft Annual Action Plan, was conducted on April 27, 2021.

Additionally, the City made the draft Action Plan available for comment for a period of 30 days.

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Comment Period	All	The City conducted a 30-day comment period from March 27 - April 27, 2021.	No comments received.	n/a	n/a
2	Public Hearing (4/27/2021)	All	The City conducted a public hearing before City Council on April 27, 2021 to receive comments on the draft Annual Action Plan.	No comments received.	n/a	n/a

Table 4 – Citizen Participation Outreach

Expected Resources

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

Introduction

For the 2021-22 program year, the City will receive \$2,130,919 in CDBG funds, \$179,056 in ESG funds and \$726,670 in HOME funds and from HUD for the following program activities to be implemented from July 1, 2021 to June 30, 2022.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	<ul style="list-style-type: none"> • Admin and Planning • Housing • Public Improvements Public Services 	2,130,919	\$0	\$0	\$2,130,919	\$6,300,000	The expected amount available for the remainder of the Consolidated Plan period assumes level funding in future years.
HOME	public - federal	<ul style="list-style-type: none"> • Acquisition/ Rehabilitation Multifamily rental new construction 	726,670	\$0	\$1,303,193	\$2,029,863	\$2,100,000	The expected amount available for the remainder of the Consolidated Plan period assumes level funding in future years.
ESG	public - federal	Rapid re-housing & homeless prevention	179,056	\$0	\$0	\$179,056	\$530,000	The expected amount available for the remainder of the Consolidated Plan period assumes level funding in future years.

Table 5 - Expected Resources – Priority Table

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

To address housing and community development needs in Fontana, the City will leverage its CDBG and HOME entitlement grants with a variety of funding resources in order to maximize the effectiveness of available funds. The City's former Redevelopment Agency was the primary non-federal source of leveraged funds. With the elimination of the City's Redevelopment Agency, the City's ability to leverage federal funds has been substantially reduced. The City and its development partners will continue to seek new opportunities to leverage federal funds, such as the Low-Income Tax Credit program and U.S. Department of Housing and Urban Development Section 202 and 811 for the Elderly Program.

Federal Resources

- Continuum of Care (CoC) Program
- HUD Veterans Affairs supportive Housing (HUD-VASH)
- Supportive Housing for the Elderly (Section 202)
- Supportive Housing for Persons with Disabilities (Section 811)
- Housing Opportunities for Persons with AIDS (HOPWA)
- Youthbuild
- Federal Low-Income Housing Tax Credit Program

State Resources

- State Low-Income Housing Tax Credit Program
- CalHome Program
- Multifamily Housing Program (MHP)
- Housing Related Parks Grant
- CalHFA Single and Multi-Family Program
- Mental Health Service Act (MHSA) Funding
- Homeless Housing, Assistance and Prevention (HHAP) Program
- Homeless Emergency Aid Program (HEAP)
- California Emergency Solutions and Housing Program (CESH)

Local Resources

- San Bernardino County Homeless Partnership (SBCHP)
- Housing Authority of the County of San Bernardino (HACSB)
- Southern California Home Financing Authority (SCHFA) Funding
- San Bernardino County Continuum of Care Program

Matching Requirements

HOME:

HUD requires that the City provide a 25 percent match for their HOME annual allocation. In accordance with 24 CFR 92.222, satisfying the distress criteria established by the HOME Program regulations are provided a match reduction. The match reductions are granted due to fiscal distress, severe fiscal distress, and Presidential disaster declarations. When a local jurisdiction meets one of the distress criteria, it is determined to be in fiscal distress and receives a reduction of match. The City of Fontana has received a 50% match reduction from HUD, and therefore, will match 12.5% of HOME Funds using non-federal funds.

The City of Fontana leverages HOME funds with other local and private non-federal resources even though it has received a match reduction from the 25 percent matching requirement. Any funds that are used in a HOME activity in excess of the required match will be documented by the City and reported to HUD as part of the Consolidated Annual Performance and Evaluation Report (CAPER) each year.

ESG:

HUD requires that the City provide a match of 100 percent match for its total expenditures. The City requires that its ESG subrecipient provide the required match from its own resources in the form of cash and from qualified non-cash sources.

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

Fontana will comply with new State requirements under AB1486 and AB1255 to inventory and support developers to access and utilize surplus municipal and state land for the construction of affordable housing. If such sites are identified, the City will consider the use of HUD funding or other resources to assist with site preparation and/ or development. At this time, no publicly owned land or property is expected to be used to address the needs in this plan, unless the City addresses ADA Transition Plan needs with CDBG funds.

Annual Goals and Objectives

AP-20 Annual Goals and Objectives

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Affordable Housing Preservation	2020	2024	Affordable Housing	Citywide	Preserve the supply of affordable housing	CDBG: \$365,000	Homeowner Housing Acquired/ Rehabilitated: 10 Housing Units
2	Fair Housing Services	2020	2024	Affordable Housing	Citywide	Ensure equal access to housing opportunities	CDBG: \$37,500	Other: 90 persons
3	Public Services for low-income residents	2020	2024	Non-Housing Community Development	Citywide	Provide public services to low-income residents	CDBG: \$319,637	Public service activities other than Low/Moderate Income Housing Benefit: 2,200 Persons Assisted
4	Homelessness Prevention Services	2020	2024	Homeless	Citywide	Prevent and eliminate homelessness	ESG: 179,056	Homelessness Prevention: 100 Persons Assisted Rapid Rehousing: 50 Households Assisted
5	Affordable Rental Housing Development	2020	2024	Affordable Housing	Citywide	Expand the supply of affordable housing	HOME: 1,303,193 CDBG: \$1,020,099	Rental units constructed: 11 Housing Units. Units acquired/ rehabbed: 2 housing units
6	City of Fontana CDBG and HOME Program Administration	2020	2024	Program Administration	N/A	Comply with federal CDBG and HOME statutes and regulations	CDBG: \$388,683 HOME: \$72,667	Program Administration

Table 6 – Goals Summary

Goal Descriptions

1	Goal Name	Affordable Housing Preservation
	Goal Description	The City will provide CDBG funds to eligible low- and moderate-income homeowners within the City of Fontana with grants and zero percent deferred-interest loans to make health and safety, code compliance and other improvements to their properties thereby preserving the affordable housing stock in the City. The rehabilitation would include providing lead-based paint education, inspection, testing and abatement as part of any rehabilitation.
2	Goal Name	Fair Housing Services
	Goal Description	This program will provide fair housing services including education, outreach, enforcement, landlord/tenant counseling, and mediation services for the residents of the City of Fontana. Fontana residents are provided services at the Inland Fair Housing and Mediation Board office located in the City of San Bernardino.
3	Goal Name	Public Services for low-income families
	Goal Description	These programs will provide services to low- and moderate-income families with a range of public services including but not limited to youth services, childcare and crime prevention.
4	Goal Name	Homelessness Prevention Services
	Goal Description	These programs will support a continuum of services to prevent and eliminate homelessness including but not limited to homeless prevention and rapid rehousing programs. If and when necessary, Fontana will use HUD funding to address urgent issues and conditions impacting the health and safety of homeless residents and those at risk of becoming homeless.
5	Goal Name	Affordable Rental Housing Development
	Goal Description	In partnership with housing developers, leverage HOME, CDBG and other housing funds in support of the development of new rental housing units affordable to households earning less than 30, 60 or 80 percent of Area Median Income (AMI) or the acquisition and rehabilitation of existing housing units affordable to household earning less than 80 percent of AMI. This also include the acquisition and rehabilitation of existing housing units to increase the supply of affordable housing for low- and moderate-income households.
6	Goal Name	City of Fontana CDBG and HOME Administration
	Goal Description	These funds will be used to comply with federal statutes and regulations pertaining to the CDBG and HOME Programs.

Table 7 - Goals Description

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

Through the FY2021 goals, the City will provide housing to 23 income-eligible households. Income limits of assisted households will be determined through the specific activities.

AP-35 Projects – 91.220(d)

Introduction

To address the high priority needs identified in the Strategic Plan to the 2020-2024 Consolidated Plan, the City of Fontana will invest CDBG, HOME, and ESG funds in projects that preserve affordable housing, provide fair housing services, provide services to low- and moderate-income residents, provide public services to low- and moderate-income residents, prevent homelessness, preserve neighborhoods, and improve public facilities and infrastructure. Together, these projects will address the housing and community development needs of Fontana residents-particularly those residents residing in the low- and moderate-income CDBG Target Areas.

Projects

#	Project Name
1	Fair Housing Services
2	Affordable Rental Housing Development
3	Housing Preservation
4	Public Services for low-income families
5	Homeless Assistance (ESG21 Fontana)
6	Program Administration

Table 8 - Project Information

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

Based on the Strategic Plan, the City is allocating 100 percent of its 2021 CDBG funds (excluding Program Administration) to projects and activities that benefit low- and moderate-income people. The primary obstacles to meeting the underserved needs of low- and moderate-income people include lack of funding from federal, state and other local sources and the high cost of housing that is not affordable to low-income people. Since housing continues to be the greatest need, the City will be allocating most of its allocation to address housing needs and therefore not be investing in projects addressing Public Facilities and Infrastructure Improvements needs. The City will continue investing 2021 CDBG funds in projects that provide neighborhood services for low- and moderate-income people and those with special needs, and projects that prevent homelessness.

AP-38 Project Summary

Project Summary Information

1	Project Name	Fair Housing Services
	Target Area	Citywide
	Goals Supported	Fair Housing Services
	Needs Addressed	Ensure equal access to housing opportunities
	Funding	CDBG: \$37,500
	Description	Fulfill the HUD regulatory mandate to affirmatively further fair housing choice through the provision of fair housing education, counseling, anti-discrimination and landlord-tenant mediation services.
	Target Date	6/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	90 low- and moderate-income people
	Location Description	Citywide
	Planned Activities	Fair Housing Services (90 People) \$37,500
2	Project Name	Affordable Rental Housing Development
	Target Area	Citywide
	Goals Supported	Affordable Rental Housing Development
	Needs Addressed	Expand the supply of affordable housing
	Funding	HOME: \$1,957,196 (includes \$109,001 CHDO set-aside as well as unallocated HOME program income and prior year resources (\$1,303,193)) CDBG: \$1,020,099
	Description	HOME funds in support of the development of new rental housing units affordable to households earning less than 30, 60 or 80 percent of Area Median Income (AMI) as part of the Southridge Phase 1 project development. CDBG funds in support of the acquisition/rehabilitation of existing housing units affordable to household earning less than 80 percent of AMI.
	Target Date	6/30/2022

	Estimate the number and type of families that will benefit from the proposed activities	11 affordable housing units constructed for lower income families 2 affordable housing units acquired and rehabbed for lower income families.
	Location Description	11 units on the west side of Sierra north of Jurupa Acquisition/rehabilitations on 2 scattered sites
	Planned Activities	Southridge Apartment Project (11 households) HOME funds Scattered Site Acquisition/Rehabilitation (2 households) CDBG funds
3	Project Name	Housing Preservation
	Target Area	Citywide
	Goals Supported	Affordable Housing Preservation
	Needs Addressed	Preserve the supply of affordable housing
	Funding	CDBG: \$365,000
	Description	Preserve the quality of existing owner-occupied dwellings through rehabilitation including lead-based paint education, inspection, testing and abatement.
	Target Date	6/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	10 low- and moderate-income households
	Location Description	Citywide
	Planned Activities	Housing Rehabilitation Program (10 Households) \$365,000
4	Project Name	Public Services for low-income families
	Target Area	Citywide
	Goals Supported	Public Services for low- and moderate-income families
	Needs Addressed	Provide public services to low-income residents
	Funding	CDBG: \$319,637
	Description	Provide low- and moderate-income families with a range of public services necessary to prevent homelessness and ameliorate the effects of poverty.
	Target Date	6/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	20,200 Persons

	Location Description	Citywide
	Planned Activities	Public Safety Program (20,000 persons) \$279,637 Recreational Scholarship and recreational program costs for low-moderate-income residents (including groups such as seniors, youths and other groups identified by the City (200 persons) \$40,000
5	Project Name	Homeless Assistance (ESG21 Fontana)
	Target Area	Citywide
	Goals Supported	Homelessness Prevention Services
	Needs Addressed	Prevent and eliminate homelessness
	Funding	ESG: \$179,056
	Description	Support a continuum of services in San Bernardino County to prevent and eliminate homelessness including but not limited to homeless prevention and rapid rehousing programs
	Target Date	6/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	150 persons
	Location Description	Citywide
6	Planned Activities	Rapid Re-Housing (50 persons) \$82,813 Homeless Prevention (100 persons) \$82,814 ESG Program Administration \$13,429
	Project Name	Program Administration
	Target Area	Citywide
	Goals Supported	All
	Needs Addressed	All
	Funding	CDBG: \$388,683 HOME: \$72,667
	Description	Provide for the administration of the CDBG and HOME programs.
	Target Date	6/30/2022

	Estimate the number and type of families that will benefit from the proposed activities	Other
	Location Description	Citywide
	Planned Activities	Administration of CDBG and HOME programs, projects, and activities.

Table 9 - Project Summary

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

Assistance will be primarily directed to low- and moderate-income persons or households, however all public facility improvement project funds will be directed within CDBG eligible Census tracts and block groups. These areas are comprised of low- and moderate-income Census tract Block Groups centered on the central part of Fontana and the Census tract Block Groups along Sierra Avenue to include the southeastern section of the City. Residents of these eligible areas have median incomes substantially below the citywide median household income of \$64,304.

Geographic Distribution

Target Area	Percentage of Funds
Citywide	100%

Table 10 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

Based on the Strategic Plan, the City is allocating 100 percent of its non-administrative CDBG funds and 100 percent of its HOME investments funds for program year 2021 to projects and activities that benefit low- and moderate-income people. While the City targets public facility activities in eligible areas, the City does not target specific neighborhoods with concentrated investment and instead evaluates funding on a citywide basis when determining eligibility. The City is not requesting approval of a Neighborhood Revitalization Strategy Area as part of this Plan.

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

Four high priority affordable housing needs are identified in the 2020-2024 Consolidated Plan and four Strategic Plan goals are established to provide the framework necessary to invest CDBG and HOME funds to address the affordable housing needs of the City.

Expand the Supply of Affordable Housing

Based on evaluation of 2011-2015 ACS and CHAS data, there is a high need for housing units affordable for households earning less than 80 percent of AMI. Of the 18,289 households earning 0-80 percent of AMI in the City, 13,988 are cost burdened households—meaning households paying more than 30 percent of their income for housing. Additionally, 7,815 of the cost burdened households are considered severely cost burdened households—meaning that they pay more than 50 percent of their income for housing. Of the 7,815 severely cost burdened households, 3,950 are renters. Of those severely cost burdened renter households, 4,180 households earn less than 50 percent of AMI and are considered the most at risk of becoming homeless.

Preserve the Supply of Affordable Housing

As the City's housing stock ages, a growing percentage of housing units may need rehabilitation to allow them to remain safe and habitable. The situation is of particular concern for low- and moderate-income homeowners who are generally not in a financial position to properly maintain their homes.

The age and condition of Fontana's housing stock is an important indicator of potential rehabilitation needs. Commonly, housing over 30 years of age needs some form of major rehabilitation, such as roof replacement, foundation work and plumbing systems. Housing over 15 years of age will generally exhibit deficiencies in terms of paint, weatherization, heating / air-conditioning systems, hot water heaters and finish plumbing fixtures.

According to CHAS data showing the year that housing units were built categorized by owner and renter tenure:

- 8,665 or 27.1 percent of the 31,945 owner-occupied housing units in Fontana were built 39 or more years ago (built prior to 1980).
- 14,160 or 44.3 percent of the 31,945 owner-occupied housing units built between 15 and 39 years ago (built between 1980 and 1999).
- 6,665 or 40.3 percent of the 18,029 renter-occupied housing units in Fontana were built 39 or more

years ago (built prior to 1980).

- 7,125 or 39.5 percent of the 18,029 renter-occupied housing units in Fontana were built between 15 and 39 years ago (built between 1980 and 1999).

Preservation of the physical and functional integrity of existing housing units occupied by low- and moderate-income households is a cost-effective way to invest limited resources to retain existing housing units that are already affordable to low- and moderate-income households in the community. Addressing substandard housing conditions through housing preservation activities provide that all economic segments of the community have the means to ensure that their property meets local standards and that all Fontana residents have the opportunity to live in decent housing.

One Year Goals for the Number of Households to be Supported	
Homeless	0
Non-Homeless	23
Special-Needs	0
Total	23

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

One Year Goals for the Number of Households Supported Through	
Rental Assistance	11
The Production of New Units	0
Rehab of Existing Units	10
Acquisition of Existing Units	2
Total	23

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

AP-60 Public Housing – 91.220(h)

Introduction

The City of Fontana Housing Authority was formed in 1994 under State of California Housing Authority Law to actively improve existing neighborhoods and develop affordable housing opportunities using local, state and federal resources. The Fontana Housing Authority does not administer Section 8 and does not own HUD Public Housing; however, the City is within the service area of the Housing Authority of the County of San Bernardino (HACSB) for the purposes of Section 8 and Public Housing.

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

During the 2021 program year, HACSB will continue providing housing and public services to existing residents of HUD Public Housing units and HACSB-owned affordable housing units. To enhance the quality of HUD Public Housing units, HACSB anticipates completing the process of converting its original 1,215 HUD Public Housing units currently under HACSB's management and control to Section 8 units as part of HUD's Rental Assistance Demonstration (RAD) program. Additionally, the last time the HACSB opened enrollment for its waitlist for tenant-based rental assistance (Section 8) units was in February 2019. The HACSB is currently not taking applications.

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

HACSB encourages residents to be actively involved in the community and in the management of public housing developments through resident councils and numerous opportunities for feedback such as community meetings and surveys. The HACSB and the City of Fontana also actively encourage and promote public housing residents to explore homeownership opportunities and programs through HACSB's Homeownership Assistance Program targeted at current residents. HACSB also encourages and supports residents in participating in homebuyer counseling programs and recommends residents use the family self-sufficiency escrow account to save money towards homeownership.

As of December 2017, HACSB's Homeownership program is the second largest in the state by the families participating in the program and is 31st nationwide among nearly 700 agencies with homeownership programs. Since 2002, 248 families have become homeowners through the Housing Authority's Homeownership Assistance Program, which provides mortgage assistance to working families for up to 15 years and families with disabilities for up to 30 years.

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

Not applicable. HACSB is considered a High Performing PHA.

Discussion

HACSB is well-positioned to maintain and expand the supply of affordable housing units in the City of Fontana and throughout San Bernardino County through its partnerships with the State of California, San Bernardino County Department of Community Development and Housing, the City of Fontana, other cities throughout the county and Housing Partners I, a nonprofit affiliate of the Housing Authority.

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

Introduction

The City will invest ESG funds during the 2021 program year to address high priority needs identified in the 2020-2024 Consolidated Plan including preventing homelessness and providing assistance to those who have become homeless. This will be accomplished through homeless prevention programs, emergency shelter and transitional housing.

Homelessness Prevention Services

According to the results of the most recent data available from the bi-annual Point-in-Time Homeless Count (PIT Count) held on January 24, 2019, on any given night in San Bernardino County, approximately 2,607 people are homeless. To address incidences of homelessness in Fontana and to prevent extremely low-income Fontana families from becoming homeless, the City places a high priority on programs that work to prevent homelessness or rapidly connect homeless individuals with housing and supportive services. To address this need, the City will support a continuum of services in the City of Fontana utilizing its ESG funds and through the San Bernardino County CoC to prevent and eliminate homelessness including, but not limited to, homelessness prevention programs, emergency shelter programs and transitional housing. Using ESG funds, the City will invest in homelessness prevention services through the Water of Life's Rapid Rehousing and Homeless Prevention Program that anticipates serving 150 unduplicated people per year.

Services for Residents with Special Needs

Analysis of available data and consultation with organizations providing services for special needs populations revealed a high need for a range of additional services including, but not limited to, those concerned with developmentally disabled adults. To address these needs, the City will support two activities that provide services to developmentally disabled adults. The Housing Rehabilitation Program will provide grants and deferred loans to complete necessary improvements to the dwelling to make the unit accessible. In addition, the City's policy for its new rental housing construction program includes a requirement to set aside a minimum number of units exclusively set aside for persons with disabilities. The Agreement between the City and Related for the Southridge Housing Project includes a provision requiring compliance with Title VIII of the Civil Rights Act of 1968 as amended, including Public Law 90-234. Therefore, the Southridge project will comply and address the accessibility needs of persons with disabilities.

Describe the jurisdiction's one-year goals and actions for reducing and ending homelessness including reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs

Due to the rise in the homeless population within the City of Fontana and the amount of resources being drawn upon to deal with the homeless population, the Fontana Police Department Bike Unit has

transitioned to traditional patrol units and has been renamed as the Multiple Enforcement Team. There are 7 sworn officers assigned to the MET Unit (1 sergeant, 1 corporal and 5 officers). The primary mission of the MET Unit is to provide a balanced approach in traditional law enforcement services, along with conducting outreach, education and providing resources to the homeless population. The goals of the MET Unit are to reduce crime relating to homelessness, calls for service, resources to medical professionals and city staff.

The Fontana Police Department has partnered with the following organizations to provide additional resources to the homeless population:

- San Bernardino County Department of Behavioral Health InnROADs Program (Innovative Remote Onsite Assistance Delivery)
- Destination: HOME (City of Fontana)
- CitiLink (Water of Life Church)

In addition to these organizations the San Bernardino County's Department of Behavioral Health has also assigned a member of their staff full time to the MET Unit, which will assist the City in providing mental health services to the homeless population out in the field. This will expedite the process and services in providing the much-needed mental health to the homeless population.

Since 2014, the City has worked with the San Bernardino County Sheriff's Department efforts in creating a specific unit to engage the homeless. The mission of The Homeless Outreach Proactive Enforcement (H.O.P.E.) Team is to balance proactive outreach with enforcement of the law, while connecting members of the homeless population with resources that may help them transition from homelessness. The ultimate goal is to reduce the rate of recidivism, incarceration, and reduce the current costs associated to homeless related crime. This team interacts with many agencies within the city of Fontana and partners with organizations who are using their resources to reduce the number of chronically homeless individuals and families in the community. The HOPE Team's goal is to go beyond the traditional response to homelessness by identifying problems, root causes and linking individual homeless people with agencies for help and housing. Through this investment in outreach, assessment and connection to appropriate resources, the City will significantly reduce the number of homeless occupying areas not meant for human habitation such as parks, alleys, canyons, commercial and industrial areas.

Addressing the emergency shelter and transitional housing needs of homeless persons

The City of Fontana through its ESG allocation, fund the Water of Life's Rapid Rehousing and Homelessness Prevention Program that provides emergency shelter and transitional housing to those in need of such services. In addition, the City supports the efforts of the San Bernardino County Continuum of Care (CoC) and its member organizations that address homelessness. As described earlier, the City supports local nonprofit agencies who provide emergency rental assistance and housing counseling to low-

and moderate-income residents to prevent homelessness.

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

As mentioned above, during the 2021 program year, the City will be using its CDBG funds for the Police Department's MET Team to address the needs of the homeless. The City's HOPE Team will connect chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth with available resources through the Riverside County CoC, which is comprised of a network of public, private, faith-based, for-profit, and non-profit service providers who utilize several federal, state and local resources to provide services for homeless people. The goal is to help unsheltered homeless people 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.

The non-profit and faith-based community plays a key role in the current CoC system. Hundreds of agencies throughout the County provide programs ranging from feeding the homeless on the street to creating permanent supportive housing opportunities. These services are available to homeless families with children, and single men and women. The non-profit and faith-based community also serves special needs populations, such as victims of domestic violence, veterans, the disabled and youth.

To prevent individuals and families who were recently homeless from becoming homeless again and to prevent individuals and families who are at risk of homelessness from becoming homeless, the City will provide ESG funds to the Water of Life that will provide assistance to help low- and moderate-income individuals and families housed in the event that circumstances beyond their control make it infeasible to stay current on their rent.

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 City will utilize its Emergency Solutions Grant funds to prevent homelessness and provide funding to Water of Life for its rapid rehousing program. This program will provide rental assistance and security deposits. The HEAP grant will assist lower income person with utility assistance. The CoC is also

developing resources of information (such as 2-1-1) to better serve individuals who are homeless or at risk of becoming homeless. In addition, the CoC is working to implement a database using real time information from intake and assessment that is housed in the Homeless Management Information System (HIMS). Collectively these strategies will help minimize duplication of effort and better connect the most vulnerable individuals and families, chronically homeless, and people at risk of becoming homeless to appropriate resources.

In addition, the City Police Department has a memorandum of understanding with the San Bernardino County Department of Behavioral Health to provide dedicated, nonfinancial office space for rapid access to those in mental health crisis through their Triage, Engagement and Support Teams (TEST) and their mobile Community Crisis Response Teams (CCRT).

Discussion

With limited ESG and CDBG resources available, the City is investing ESG funds through the grants made to Water of Life to prevent homelessness and provide rapid rehousing solutions for person living in Fontana. Additionally, the City is investing general funds through the Police Department budget to provide HOPE and MET Team officers that will connect unsheltered homeless individuals and families with emergency shelter, transitional housing and permanent housing opportunities, as well as other services to address special needs such as drug and alcohol rehabilitation and mental health services.

AP-75 Barriers to Affordable Housing – 91.220(j)

Introduction

A barrier to affordable housing is a public policy or nongovernmental condition that constrains the development or rehabilitation of affordable housing, such as land use controls, property taxes, state prevailing wage requirements, environmental protection, cost of land and availability of monetary resources. Barriers to affordable housing are distinguished from impediments to fair housing choice in the sense that barriers are lawful and impediments to fair housing choice are usually unlawful.

Based on information gathered during community meetings, the Consolidated Plan Needs Assessment Survey, the 2014-2021 Housing Element and market analysis, the primary barriers to affordable housing in Fontana are housing affordability and the lack of monetary resources necessary to develop and sustain affordable housing. The two barriers are related in the sense that demand for affordable housing exceeds the supply and insufficient resources are available to increase the supply of affordable housing to meet demand.

Actions it planned to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment

In the development of the 2014-2021 Housing Element, the City evaluated significant public policies affecting affordable housing development such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges and growth limitations. Based on this evaluation, the City determined that it has taken all necessary steps to ameliorate the negative effects of public policies that may have been a barrier to affordable housing. Moreover, the City is actively engaged with affordable housing developers concerning the siting of affordable housing and ensuring that the entitlement process runs smoothly from inception to completion.

Discussion

To address housing affordability and the lack of monetary resources for affordable housing, the 2020-2024 Consolidated Plan - Strategic Plan calls for the investment of a significant portion of CDBG and HOME funds for the development of 22 new affordable rental housing units during the five year period of the Consolidated Plan, the acquisition/rehabilitation of seven additional rental units and the rehabilitation and preservation of 100 existing affordable housing units over the next five years. Although the City no longer has access to Redevelopment Housing Set-Aside funds, the City will continue to leverage its CDBG and HOME funds to attract private and other available public resources, including land conveyed to the City for the purpose of affordable housing, to facilitate affordable housing development. This strategy will increase the supply of affordable housing and preserve existing affordable housing in the City.

AP-85 Other Actions – 91.220(k)

Introduction

In the implementation of the 2021 Annual Action Plan, the City will invest CDBG and HOME resources to address obstacles to meeting underserved needs, foster and maintain affordable housing, reduce lead-based paint hazards, reduce the number of poverty-level families, develop institutional structure and enhance coordination between public and private housing and social service agencies.

Actions planned to address obstacles to meeting underserved needs

The primary obstacles to meeting the underserved needs of low- and moderate-income people include lack of funding from federal, state and other local sources, the high cost of housing that is not affordable to low-income people and the lack of availability of home improvement financing in the private lending industry. To address these obstacles, the City is investing CDBG and HOME funds through the 2021 Action Plan in projects that provide grants and loans to low- and moderate-income homeowners for home improvements, projects that provide public and neighborhood services to low- and moderate-income people and those with special needs, and projects that prevent homelessness. To address underserved needs, the City is allocating 100 percent of its non-administrative CDBG and 100 percent of its HOME investments for program year 2021 to projects and activities that benefit low- and moderate-income people.

Actions planned to foster and maintain affordable housing

In the implementation of the 2021 Annual Action Plan, the City will invest CDBG funds to preserve and maintain affordable housing through the City of Fontana Residential Rehabilitation Program that will provide up to 20 grants and deferred loans of approximately \$25,000 to low- and moderate-income owners of single-family housing.

Actions planned to reduce lead-based paint hazards

The Residential Lead Based Paint Hazard Reduction Act of 1992 (Title X) emphasizes prevention of childhood lead poisoning through housing-based approaches. To reduce lead-based paint hazards, the City of Fontana Housing Rehabilitation Program will conduct lead-based paint testing and risk assessments for each property assisted that was built prior to January 1, 1978 and will incorporate safe work practices or abatement into the scope of work as required to reduce lead-based paint hazards in accordance with 24 CFR Part 35.

Actions planned to reduce the number of poverty-level families

The implementation of CDBG, ESG and HOME activities meeting the goals established in the 2020-2024 Consolidated Plan - Strategic Plan and the 2021 Annual Action Plan will help to reduce the number of poverty-level families by:

- Supporting activities that expand the supply of housing that is affordable to low- and moderate-income households
- Supporting activities that preserve the supply of decent housing that is affordable to low- and moderate-income households
- Supporting a continuum of housing and public service programs to prevent and eliminate homelessness
- Supporting housing preservation programs that assure low income households have a safe, decent and appropriate place to live
- Supporting public services for low- and moderate-income residents including those with special needs and those at-risk of homelessness offered by nonprofit organizations receiving ESG funds

In addition to these local efforts, mainstream state and federal resources also contribute to reducing the number of individuals and families in poverty. Federal programs such as the Earned Income Tax Credit and Head Start provide pathways out of poverty for families who are ready to pursue employment and educational opportunities. Additionally in California, the primary programs that assist families in poverty are CalWORKS, CalFresh (formerly food stamps) and Medi-Cal. Together, these programs provide individuals and families with employment assistance, subsidy for food, medical care, childcare and cash payments to meet basic needs such as housing, nutrition and transportation. Other services are available to assist persons suffering from substance abuse, domestic violence and mental illness.

In addition, the City intends to implement Opportunity Zones in an effort to promote business development and expansion opportunities and in the process, create increase the number of jobs available to lower income persons.

Actions planned to develop institutional structure

The institutional delivery system in Fontana is high-functioning and collaborative—particularly the relationship between local government and the nonprofit sector comprised of a network of capable non-profit organizations that are delivering a full range of services to residents. Strong City departments anchor the administration of HUD grant programs and the housing, community and economic development activities that are implemented by the City. support and enhance this existing institutional structure, the City of Fontana will collaborate with affordable housing developers and nonprofit agencies receiving CDBG and HOME funds through the 2021 Annual Action Plan to ensure that the needs of low- and moderate-income residents are met as envisioned within the 2020-2024 Consolidated Plan - Strategic Plan.

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

To enhance coordination between public and private housing and social service agencies, the City will continue consulting with and inviting the participation of a wide variety of agencies and organizations involved in the delivery of housing and supportive services to low- and moderate-income residents in Fontana—particularly the CDBG Target Areas.

Discussion:

In the implementation of the 2021 Annual Action Plan, the City will invest CDBG, ESG and HOME resources to address obstacles to meeting underserved needs, foster and maintain affordable housing, reduce lead-based paint hazards, reduce the number of poverty-level families, develop institutional structure and enhance coordination between public and private housing and social service agencies.

Program Specific Requirements

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

Introduction

In the implementation of programs and activities under the 2021 Annual Action Plan, the City of Fontana will follow all HUD regulations concerning the use of program income, forms of investment, overall low- and moderate-income benefit for the CDBG program and recapture requirements for the HOME program.

Eligible applicants for CDBG and ESG assistance include subrecipients who may carry out programs to benefit program beneficiaries on behalf of the City. Applications from interested subrecipients may be solicited by the City directly or via published Notices of Funds Availability at the discretion of the City. Eligible beneficiaries for CDBG or HOME funded housing rehabilitation or first-time homebuyer programs include households earning less than 80 percent of AMI. Developers for HOME-assisted rental housing development projects shall be selected via an application and underwriting process determined by the City based on the regulatory requirements applicable to the prospective project based on the nature and scope of the proposed development. Opportunities for leveraging and matching funds shall be emphasized in the selection of affordable housing Developers. Selection of affordable rental housing development projects shall be based on project feasibility; funding availability; and City needs as determined by staff and the City Council.

Prospective subrecipients, beneficiaries and developers may obtain more information on the Fontana Housing Department / Housing Authority website at www.fontana.org.

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)

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

The City will not use any other forms of investment beyond those identified in Section 92.205.

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:

During the 2021 program year, the City of Fontana will not implement any HOME-assisted homebuyer activities. In the future, should the City choose to implement a homebuyer assistance activity, the City will incorporate a recapture requirement into written agreements and long-term affordability covenants as required by 24 CFR 92.254.

The recapture provision ensures that all or a portion of the City's HOME assistance to homebuyers or homeowners is recaptured if the housing does not continue to be the principal residence of the family for the duration of the applicable period of affordability. In establishing this provision, the City is subject to the limitation that when the recapture requirement is triggered by a sale (voluntary or involuntary) of the housing unit, and there are no net proceeds or the net proceeds are insufficient to repay the HOME investment due, the City can only recapture a portion of the net proceeds, if any. The net proceeds are the sales price minus superior loan repayment (other than HOME funds), capital improvements, and any closing costs.

In the event of a mortgage default, the City has the right of first refusal before foreclosure and may use additional HOME funds to acquire the housing in order to preserve the housing's affordability.

However, notwithstanding a foreclosure situation, the City intends to recapture all or some of its HOME funds invested during or at the end of the established affordability period, if practicable. Recaptured HOME funds consist of loan payments (including interest) and/or a loan payoff, upon sale if the assisted owner is no longer residing in the assisted residence or for any other breaches of the agreement with the City. Recaptured funds may be used for any HOME eligible activity.

These recaptured funds are identified in the City's accounting system by a unique recaptured revenue object number. Any recaptured funds will be used by the City before any additional HOME funds.

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:

See above.

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

The City does not intend to use HOME funds under the 2021 Annual Action Plan to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds.

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

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

The Written Standards for Providing ESG Assistance are included in Appendix C.

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

The County of San Bernardino coordinates homeless services with both entitlement and non-entitlement cities through its Department of Behavioral Health Office of Homeless Services (OHS). This office is the designated administrative authority, or Lead Agency, over the County's Continuum of Care (CoC) System. The County oversees ESG grant distribution for its Service Area, which encompasses all unincorporated areas along with 12 non-entitlement cities within the county (the County Consortium). County ESG grant sub-recipients are required to coordinate with and report their homeless services data to the Homeless Management Information System (HMIS) for use by the County's OHS and its CoC. The HMIS maintains exceptions for victim service providers as set forth under 24 CFR 576.400(d).

A "211" Homeless Services 24-hour phone information system is available to assist in referring County residents to service providers within a callers' geographic region. Due to the widespread and diverse geographic regions of the County Service Area, a centralized intake system is not feasible. However, the County is pursuing the development of a coordinated standardized intake form for use by its ESG grant service providers.

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

The City solicited applications for ESG funds through a Request for Proposals (RFP) process. Respondents were required to submit proposals for homeless prevention and rapid-rehousing activities. Respondents were required to have experience with providing these eligible activities, and already participate in, or be willing to participate in the County Homeless Provider Network and HMIS in conjunction with the COC. The applications were reviewed by an Evaluation Committee, which was made up of no less than one homeless person or formally homeless person. The successful applicant (Water of Life) entered into a three-year subrecipient agreement with the City to carry-out the ESG eligible activities.

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.

As part of the process of making sub-awards, the City included a formerly homeless person on the Evaluation Committee to assist in reviewing applications and making funding recommendations.

Describe performance standards for evaluating ESG.

The City and the COC will continue to work together to develop performance standards that provide a measure to evaluate each ESG subrecipients effectiveness, such as how well the service provider succeeded at (1) targeting those who need the assistance most; (2) reducing the number of people living on the streets or emergency shelters; (3) shortening the time people spend homeless; and (4) reducing each program participant's housing barriers or housing stability risks. These performance standards will be incorporated into the City's Subrecipient Agreement, and to the extent possible, will be tracked and measured in HMIS.

Current Performance Standards for the ESG grant are shown in the attached table labeled "ESG Performance Standards." As previous performance accounting was based upon the Homeless Prevention and Rapid-Re-Housing (HPRP) program, which operated under a different set of regulations, these performance standards will be refined as the program progresses.