

Ventura County Urban County Entitlement Area

2016-17 Annual Action Plan

May 2016

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

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Executive Summary

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

1. Introduction

In 1974 the Housing and Community Development Act was passed by the United States Congress and signed into law, which created the Community Development Block Grant (CDBG) Program. The Ventura Urban County Entitlement Area (EA) is comprised of the unincorporated areas and the cities of Fillmore, Moorpark, Ojai, Port Hueneme, and Santa Paula; the EA receives an annual formula allocation of funds under the CDBG program. These funds benefit low and moderate income neighborhoods and persons (with incomes up to 80 percent of the Area Median Income or AMI) and aid in the prevention and elimination of slum and blighted conditions. In 1992 the U. S. Congress created the HOME Investment Partnership Act Program (HOME) to expand affordable housing opportunities for low- and moderate-income people. The programs are administered by the U.S. Department of Housing and Urban Development (HUD).

The Ventura Urban County adopted a Regional Consolidated Plan in 2015 according to HUD requirements, which sets forth the County's overall five-year strategy for the expenditure of funds received through the CDBG, HOME, and Emergency Solutions Grant (ESG) programs. Each year, the County prepares an Action Plan which provides an explanation of the County's planned uses of funds and serves as the County's annual funding application to HUD. The Plan addresses efforts to overcome obstacles to meeting needs of underserved populations. All of the participating jurisdictions indicated continuing efforts to work with their respective Housing Elements and to pursue issues such as farm worker housing, density bonuses, condominium conversions, inclusionary housing and projects as appropriate.

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

2. Summarize the objectives and outcomes identified in the Plan

This could be a restatement of items or a table listed elsewhere in the plan or a reference to another location. It may also contain any essential items from the housing and homeless needs assessment, the housing market analysis or the strategic plan.

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

Annual Action Plan
2016

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

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

Outcome Categories - Activities will meet one of the following:

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

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

| Sort Order | Goal | Funding | Goal Outcome |
|------------|--|----------------------------------|-----------------------------|
| 1 | Increase the Availability of Housing | CDBG: \$318,971, HOME: \$418,424 | 87 Rental units constructed |
| 2 | Provide Services to the Homeless | CDBG: \$123,689 | 3,367 Persons Assisted |
| 3 | Improve Quality of Housing | CDBG: \$320,425 | 825 Households |
| 4 | Economic Development | CDBG: \$40,000 | 15 Businesses |
| 5 | Improve Infrastructure | N/A | N/A |
| 6 | Provide Non-Homeless Supportive Services | CDBG: \$110,500 | 2,235 Persons |
| 7 | Improve Public Facilities | CDBG: \$173,653 | 69,257 Persons |
| 8 | Planning and Administration | CDBG: \$290,981, HOME \$46,491 | |
| 9 | Fair Housing Opportunity | CDBG: \$21,271 | |

Table 1 - Summary of Objectives and Outcomes

3. Evaluation of past performance

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

The following information is not addressed in the Action Plan but is presented in the FY 2014-15 Consolidated Annual Performance and Evaluation Report (CAPER), which was the fifth and final report for the prior five-year Consolidated (Con) Plan. Overall, the Entitlement Area met or exceed its five-year goals, with the exception of economic development programs and public facilities as described below.

As detailed in the CAPER, the Entitlement Area met its five-year goals in the affordable housing categories for Housing Rehabilitation and Code Enforcement. Neither of our two housing rehabilitation programs were very active during the past year, although Habitat for Humanity's Preserve a Home project gained considerable momentum and is showing increasing demand and progress. The EA made good progress towards its Homebuyer and Housing Construction five-year goal, having met both Special Needs and Public Housing five-year goals.

Public Service Programs for Youth and General Public Services five-year goals were exceeded. Senior Public Service Programs were particularly successful, achieving a 120% accomplishment rate over the five-year period goal. Programs to assist homeless families and individuals also achieved 120% of the five-year period goal.

Public Facilities, including Parks and Recreations Facilities, barely fell short of annual and five-year goals, achieving 8 of 10 Public Facilities and 10 of 11 Parks and Recreation Facilities over all. The five-year goal for Infrastructure Improvements was achieved.

The County continues to fund a very successful micro-business development program, but fell short of its goal of aiding 41 businesses over the five-year period, serving only 17 in all. As detailed in the CAPER, the County discontinued CDBG funding for small business support, in favor of less restrictive funding sources. As a result, the number of jobs created or retained over the five-year period was 47, which was less than the goal of 57.

The Fair Housing Program exceeded their anticipated tenant/landlord counseling workload by 33%, which demonstrates an increasing need for programs to affirmatively further fair housing in the Entitlement Area.

Based on the successes and demand for various programs, and in light of the excessive levels of regulatory compliance requirements for HUD funding, the County is reviewing activities to determine the most efficient use of funds. CDBG is an extremely diverse program with opportunities to support community development and serve the needs of our low and moderate income residents in a variety of manners. However, subrecipients continue to struggle to provide activities that maximize resources due to massive levels of administrative support and the need for costly, specialized consultants. HOME funds are valued by public and affordable housing developers, since they provide much needed leveraging when applying for other funds. However, our HOME grant has been so greatly reduced that subrecipients are forced to weigh the benefits of their use with the fact that subgrants are small (typically about 2% of total project costs) and come with additional and unique regulatory compliance. In order to better serve our community needs, we are committed to identifying activities and subrecipients that can most efficiently use these much needed funds in the future.

4. Summary of Citizen Participation Process and consultation process

Summary from citizen participation section of plan.

As part of the Action Plan development, the County conducted a preliminary public hearing on November 4, 2015, at 9:00 a.m. to solicit input on the County's proposed uses of CDBG and HOME funds. On March 2, 2016 at 9:00 a.m., a second public hearing was held to discuss specific recommended projects to be funded by HUD CDBG and HOME funds. A public hearing was also conducted before the Board of Supervisors on May 3, 2016 for adoption of the Action Plan.

A 30-day public review of the Draft Action Plan was made available from April 1 through April 30, 2016 on the County website and at various public locations throughout the County, including each city hall within the Entitlement Area. Notification of each hearing and the availability of the Draft Action Plan was published in the Ventura County Star and posted on the County website. The public hearings were held at the County Government Center.

5. Summary of public comments

This could be a brief narrative summary or reference an attached document from the Citizen Participation section of the Con Plan.

All public comments were supportive of the Draft Action Plan priorities and funding recommendations. Comments received at these meetings are detailed in the Participation section of this plan.

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

There were no public comments that were not accepted.

7. Summary

The Ventura County EA has undertaken diligent and good faith efforts in outreaching to all segments of the community that may benefit from the CDBG, HOME, and ESG programs. The Action Plan outlines the County's planned uses of CDBG and HOME funds for the upcoming year.

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

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

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

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

Table 2 – Responsible Agencies

Narrative

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

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

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

HOME Administrator: Tracy McAulay, Management Analyst II; Tracy.McAulay@ventura.org, 805-654-2876

CoC and ESG Administrator: Tara Carruth, Management Analyst II; Tara.Carruth@ventura.org, 805-654-3838

Consolidated Plan Public Contact Information

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Ventura, CA 93009
805-654-2679

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

1. Introduction

Integral to the development of the 2016-17 Annual Action Plan was consultation and coordination with local agencies and organizations serving our target population; namely, those providing facilities and services to persons of low- and very-low income throughout our Entitlement Area. While formal public notices and notification about our annual funding cycle were published and distributed, coordination and consultation with these parties occurs throughout the year. With Ventura County Entitlement funding administered by the County Executive Office, the agency that provides oversight to all County operations, the program benefits from a number of methods for ongoing communication.

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

In addition to the Continuum of Care (specifically addressing coordination with housing, health, mental health and service agencies) discussed below, the County Executive Officer and his staff participate in monthly meetings of City Managers representing all ten cities in the County. Staff also monitor and participate in presentations to the Ventura Council of Governments with elected officials from all ten cities and the Board of Supervisors. These venues are ideal for discussing policy issues and coordinating efforts of countywide and regional importance. Staff also monitor policy and budget issues for the Board of Supervisors, with particular attention to those impacting our social service, law enforcement, and health care agencies who all provide essential services to our target population.

Describe coordination with the Continuum of Care and efforts to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans, and unaccompanied youth) and persons at risk of homelessness.

The Ventura County Continuum of Care consists of a Board of Directors established consistent with 24 CFR 578.5(b), with broad representation from government, service providers, emergency response, health care, clients, housing providers, business community, and several subcommittees including ones around housing, increasing income, and system performance. What's important about the CoC, is that the entire system is following the CoC's lead in pursuing projects that serve persons at highest risk (chronically homeless individuals and families, families with children, veterans, and unaccompanied youth), demonstrate maximum utilization of mainstream resources (i.e. non-HUD funding), and have successful outcomes. The Continuum of Care Alliance, a collaborative group dedicated to promoting a safe, desirable and thriving community, works to garner community-wide commitment to ending and preventing homelessness in all parts of the region. They meet quarterly, and meetings are open to the public. The forum is used as a platform for promoting their mission; the Alliance has seen growing interest and participation over the past year as agencies, organizations, and interested parties see the

benefits of improved coordination and communication. Entitlement communities use the venue to promote participation in their annual funding cycles, and the Ventura County Entitlement Area is no exception. Funding cycles, priorities, and opportunities for improved cooperation were shared at their Fall 2015 meeting which was attended by over 40 people representing more than 30 agencies.

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

The Ventura Entitlement Area did not receive an allocation despite assurances that ESG funds could be expected for a minimum of two consecutive years. Unfortunately, having issued an RFP for ESG funding and advised the CoC Board that they'd have a role in determining how funds were to be allocated, official award announcements did not include funds for our Entitlement Area.

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

Table 3 – Agencies, groups, organizations who participated

| | | |
|---|--|--|
| 1 | Agency/Group/Organization | COMMUNITY ASSISTANCE OF SANTA PAULA (CASP) |
| | Agency/Group/Organization Type | Services-Elderly Persons Food Pantries |
| | What section of the Plan was addressed by Consultation? | Non-Homeless Special Needs |
| | Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination? | Agency attended Public Hearing on November 4, 2015 and provided input on senior and food pantry needs. |
| 2 | Agency/Group/Organization | CITY IMPACT |
| | Agency/Group/Organization Type | Services-Children |
| | What section of the Plan was addressed by Consultation? | Non-Homeless Special Needs |
| | Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination? | Agency attended Public Hearing on November 4, 2015 and provided input on youth services needs. |
| 3 | Agency/Group/Organization | HABITAT FOR HUMANITY OF VENTURA COUNTY, INC. |
| | Agency/Group/Organization Type | Housing |
| | What section of the Plan was addressed by Consultation? | Public Housing Needs Non-Homeless Special Needs |
| | Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination? | Agency attended Public Hearing on November 4, 2015 and provided input on housing needs. |
| 4 | Agency/Group/Organization | INTERFACE |
| | Agency/Group/Organization Type | Services-Children Services-homeless |
| | What section of the Plan was addressed by Consultation? | Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs |
| | Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination? | Agency attended Public Hearing on November 4, 2015 and provided input on runaway and homeless youth shelter needs. |

| | | |
|---|--|--|
| 5 | Agency/Group/Organization | The John Stewart Company |
| | Agency/Group/Organization Type | Housing Services-homeless |
| | What section of the Plan was addressed by Consultation? | Public Housing Needs Homelessness Strategy |
| | Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination? | Agency attended Public Hearing on November 4, 2015 and provided input on need to partner with service providers. |
| 6 | Agency/Group/Organization | LONG TERM CARE OMBUDSMAN |
| | Agency/Group/Organization Type | Services-Elderly Persons Services-Health |
| | What section of the Plan was addressed by Consultation? | Non-Homeless Special Needs |
| | Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination? | Agency attended Public Hearing on November 4, 2015 and provided input on senior health services. |
| 7 | Agency/Group/Organization | PEOPLES SELF HELP |
| | Agency/Group/Organization Type | Housing Services-Persons with Disabilities Services-homeless Services-Health |
| | What section of the Plan was addressed by Consultation? | Public Housing Needs Homelessness Strategy |
| | Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination? | Agency attended Public Hearing on November 4, 2015 and provided input on homeless housing needs. |
| 8 | Agency/Group/Organization | PROJECT UNDERSTANDING |
| | Agency/Group/Organization Type | Housing |
| | What section of the Plan was addressed by Consultation? | Public Housing Needs |
| | Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination? | Agency attended Public Hearing on November 4, 2015 and provided input on housing needs. |

| | | |
|----|--|--|
| 9 | Agency/Group/Organization | Step Up Ventura |
| | Agency/Group/Organization Type | Services-Children Services-homeless |
| | What section of the Plan was addressed by Consultation? | Homeless Needs - Families with children |
| | Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination? | Agency attended Public Hearing on November 4, 2015 and provided input on homeless children and family needs. |
| 10 | Agency/Group/Organization | TURNING POINT FOUNDATION |
| | Agency/Group/Organization Type | Housing Services-Persons with Disabilities Services-homeless |
| | What section of the Plan was addressed by Consultation? | Homelessness Needs - Veterans |
| | Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination? | Agency attended Public Hearing on November 4, 2015 and provided input on homeless veterans needs. |

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

The County of Ventura Entitlement Area believes that we've reached out to and consulted with the key partners and organizations providing direct services to our target population. With the assumption of Collaborative Applicant status, communication and coordination across an even broader spectrum of partners has been achieved.

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

| Name of Plan | Lead Organization | How do the goals of your Strategic Plan overlap with the goals of each plan? |
|-------------------|--|---|
| Continuum of Care | Continuum of Care Alliance | Potential funding allocations to address homeless needs will complement the CoC Strategy. |
| Housing Elements | City Councils and Board of Supervisors | Promoting the development and/or preservation of affordable housing is integrally correlated with these documents. Involvement of staff from these organizations is not only important, but promoting advocacy from stakeholders has taken on increased importance as vacancy rates continue decline as rents increase. |

Table 4 – Other local / regional / federal planning efforts

Narrative

See discussions above.

AP-12 Participation - 91.105, 91.200(c)

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

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

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

Citizen Participation Outreach

| Sort Order | Mode of Outreach | Target of Outreach | Summary of response/attendance | Summary of comments received | Summary of comments not accepted and reasons | URL (If applicable) |
|------------|------------------|----------------------------------|---|--|--|---------------------|
| 1 | Public Hearing | Non-targeted/ broad community | As part of the Annual Action Plan development, the County conducted a preliminary public hearing at 9:00 a.m. on November 4, 2015, to solicit input on the County's proposed uses of CDBG and HOME funds for FY 2016-17. The public hearing was held at the County of Ventura Government Center. Approximately 35 persons were in attendance. | Six service providers spoke at the public hearing, and four others provided statement sheets. Each discussed the importance of their programs and the services they provide. | All comments were accepted and kept on file. | |
| 2 | Public Hearing | Non-targeted/broad community | At 9:00 a.m. on March 2, 2016, a second public hearing was held to discuss specific recommended projects to be funded in FY 2016-17 with HUD CDBG and HOME funds and to receive comments from the public. The hearing was held at the County of Ventura Government Center. Approximately 20 persons were in attendance. | Two providers spoke, expressing appreciation for the anticipated funding. One of the providers also expressed the frustration that the "on again/off again" ESG funding has created for them, especially considering CDBG public service funds are not sufficient to fill the gap created. | All comments were accepted and kept on file. | |

| 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) |
|------------|-------------------|-------------------------------|---|--|--|---|
| 3 | Internet Outreach | Non-targeted/b road community | The preliminary draft of the 2016-17 Annual Action Plan was made available for public review on the County website. Additionally, copies were available for review at the City Hall of each participating city in the EA. | No comments were received during the 30-day review period. | Not applicable. | http://www.ventura.org/community-development/hud-reports |
| 4 | Public Hearing | Non-targeted/b road community | On May 3, 2016, the County conducted the third and final public hearing before the Board of Supervisors to adopt the 2016-17 Annual Action Plan. | No comments were received. | Not applicable. | |

Table 5 – Citizen Participation Outreach

Expected Resources

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

Introduction

The Action Plan focuses on activities to be funded with the two entitlement grants (CDBG and HOME) from HUD. HUD allocates CDBG, ESG, and HOME funding to eligible jurisdictions on a formula basis, using factors such as population, income distribution, and poverty rate. The County of Ventura will not receive ESG entitlement funding for FY 2016-17.

Anticipated Resources

| Program | Source of Funds | Uses of Funds | Expected Amount Available Year 1 | | | | Expected Amount Available Reminder of ConPlan \$ | Narrative Description |
|---------|------------------|--|----------------------------------|--------------------|--------------------------|-----------|--|---|
| | | | Annual Allocation: \$ | Program Income: \$ | Prior Year Resources: \$ | Total: \$ | | |
| CDBG | public - federal | Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services | 1,561,260 | 0 | 0 | 1,561,260 | 4,683,780 | While CDBG funding is not strictly required to ensure matching funds, all of the public service funding is matched approximately 100%. Similarly, non-public service funding is allocated to projects that would not otherwise be able to successfully be completed with only local and/or state funding. In most cases, local jurisdiction general fund dollars make up a large part of the project budgets. |

| Program | Source of Funds | Uses of Funds | Expected Amount Available Year 1 | | | | Expected Amount Available Reminder of ConPlan \$ | Narrative Description |
|---------|------------------|---|----------------------------------|--------------------|--------------------------|-----------|--|---|
| | | | Annual Allocation: \$ | Program Income: \$ | Prior Year Resources: \$ | Total: \$ | | |
| HOME | public - federal | Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA | 464,915 | 20,000 | 0 | 484,915 | 1,709,808 | While HOME funds have a mandatory match requirement of 25% as outlined below, experience indicates that HOME funds allocated to local projects are leveraged by millions of dollars, often from tax credit financing. |

| Program | Source of Funds | Uses of Funds | Expected Amount Available Year 1 | | | | Expected Amount Available Reminder of ConPlan \$ | Narrative Description |
|---------|------------------|---|----------------------------------|--------------------|--------------------------|-----------|--|---|
| | | | Annual Allocation: \$ | Program Income: \$ | Prior Year Resources: \$ | Total: \$ | | |
| ESG | public - federal | Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing | 0 | 0 | 0 | 0 | 0 | ESG funds have a mandatory match of 100%, but experience suggests that these projects are leveraged by significantly more money than what is required. Our ESG allocation, when received, is relatively small and therefore CDBG public service funds, general fund support, other state and federal grant funds, and faith-based funding augments ESG funding to make these projects feasible. |

Table 6 - Expected Resources – Priority Table

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

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

The HOME allocation is less than one third of the allocation in FY 2003-04. Less HOME funding directly impacts the County's ability to leverage

federal dollars for much needed affordable housing projects. In addition, the dissolution of RDAs caused a larger gap in resources that were once available for low-income housing. With the assistance of \$418,424 of HOME program funding, two rental projects were partially funded.

HOME funded projects will meet or exceed the 25% match requirements as shown below.

Total Matching Funds = \$104,606

Project: Vista Pacifica Apartments (Many Mansions) - \$209,212 HOME Allocation = \$52,303 Match Requirement which will be met by Non-Federal funds invested into the project.

Project: Rancho Verde Apartments (Housing Authority of the City of San Buenaventura) - \$209,212 HOME Allocation = \$52,303 Match Requirement which will be met by Non-Federal funds invested into the project.

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

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

Discussion

See discussions above.

Annual Goals and Objectives

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

Goals Summary Information

| Sort Order | Goal Name | Start Year | End Year | Category | Geographic Area | Needs Addressed | Funding | Goal Outcome Indicator |
|------------|----------------------------------|------------|----------|-----------------------------------|-----------------|----------------------------------|------------------------------------|--|
| 1 | Increase Availability of Housing | 2015 | 2019 | Affordable Housing | | Increase Availability of Housing | CDBG: \$318,971 HOME: \$418,424 | Rental units constructed: 87 Household Housing Unit |
| 2 | Provide Services to the Homeless | 2015 | 2019 | Homeless | | Provide Services to the Homeless | CDBG: \$123,689 | Public service activities other than Low/Moderate Income Housing Benefit: 3367 Persons Assisted |
| 3 | Improve Quality of Housing | 2015 | 2019 | Affordable Housing | | Improve Quality of Housing | CDBG: \$320,425 | Homeowner Housing Rehabilitated: 8 Household Housing Unit Housing Code Enforcement/Foreclosed Property Care: 825 Household Housing Unit |
| 4 | Economic Development | 2015 | 2019 | Non-Housing Community Development | | Economic Development | CDBG: \$40,000 | Businesses assisted: 15 Businesses Assisted |
| 5 | Improve Infrastructure | 2015 | 2019 | Non-Housing Community Development | | Improve Infrastructure | | |

| Sort Order | Goal Name | Start Year | End Year | Category | Geographic Area | Needs Addressed | Funding | Goal Outcome Indicator |
|------------|--|------------|----------|-----------------------------------|-----------------|--|-----------------------------------|---|
| 6 | Provide Non-Homeless Supportive Services | 2015 | 2019 | Non-Homeless Special Needs | | Provide Non-Homeless Supportive Services | CDBG: \$110,500 | Public service activities other than Low/Moderate Income Housing Benefit: 2235 Persons Assisted |
| 7 | Improve Public Facilities | 2015 | 2019 | Non-Housing Community Development | | Improve Public Facilities | CDBG: \$173,653 | Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 69257 Persons Assisted |
| 8 | Planning and Administration | 2015 | 2019 | Administration | | Planning and Administration | CDBG: \$290,981 HOME: \$46,491 | |
| 9 | Fair Housing Opportunity | 2015 | 2019 | Non-Homeless Special Needs | | Fair Housing Opportunity | CDBG: \$21,271 | |

Table 7 – Goals Summary

Goal Descriptions

| | | |
|---|-------------------------|---|
| 1 | Goal Name | Increase Availability of Housing |
| | Goal Description | Increase the availability of affordable ownership and rental housing through affordable housing construction. |
| 2 | Goal Name | Provide Services to the Homeless |
| | Goal Description | Provide housing opportunities and supportive services for the homeless and persons at risk of homelessness. |

| | | |
|---|-------------------------|---|
| 3 | Goal Name | Improve Quality of Housing |
| | Goal Description | Improve the quality and accessibility of ownership and rental housing through housing rehabilitation activities. |
| 4 | Goal Name | Economic Development |
| | Goal Description | Enhance economic development opportunities for lower and moderate income residents. |
| 5 | Goal Name | Improve Infrastructure |
| | Goal Description | Improve or construct infrastructure that will benefit lower and moderate income residents and persons with special needs. |
| 6 | Goal Name | Provide Non-Homeless Supportive Services |
| | Goal Description | Provide supportive services for lower and moderate income residents, persons with disabilities, seniors, youth, and other special needs populations. |
| 7 | Goal Name | Improve Public Facilities |
| | Goal Description | Improve or construct public facilities that support lower and moderate income residents and persons with special needs. |
| 8 | Goal Name | Planning and Administration |
| | Goal Description | The Ventura County Entitlement Area will implement the goals and objectives of the Consolidated Plan by delivering a variety of housing and community development programs and activities. It will continue to comply with the planning and reporting requirements of the Consolidated Plan regulations and CDBG regulations. Annually, the Entitlement Area will monitor its use of CDBG funds to ensure effective and appropriate use of funds. |
| 9 | Goal Name | Fair Housing Opportunity |
| | Goal Description | Promote equal housing opportunity for all residents. |

Table 8 – Goal Descriptions

AP-35 Projects - 91.220(d)

Introduction

The County is continuing to focus on addressing basic needs, directing funds primarily towards food, shelter, and jobs. In this challenging economic environment, and with ever decreasing resources, the County is committed to providing these basic services to our most vulnerable citizens.

In an effort to increase the efficiency of grant management, we are consolidating our grant awards to larger projects. This ultimately has resulted in no grant award below \$20,000, in an attempt to make the most efficient use of taxpayer dollars.

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

Table 9 – Project Information

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

The priorities outlined above reflect this year's emphasis on the development of new affordable rental housing for persons of very low and extremely low income, outreach and engagement to persons who are homeless, and the retention of existing housing stock affordable to our low-income residents. Other priorities include infrastructure and public facilities in low-income neighborhoods to support them in their communities. Key obstacles include lack of sufficient funding to satisfy unmet need, very low vacancy rates and lack of affordable rental housing.

AP-38 Project Summary

Project Summary Information

Table 10 – Project Summary

| | | |
|---|--|---|
| 1 | Project Name | Affordable Housing Development |
| | Target Area | |
| | Goals Supported | Increase Availability of Housing |
| | Needs Addressed | Increase Availability of Housing |
| | Funding | CDBG: \$318,971 HOME: \$418,424 |
| | Description | This program includes real property acquisition, pre-construction, site preparation, construction, relocation and other costs related to the development of new, or conversion of existing property, into affordable housing. The purpose of the program is to increase the region's stock of affordable ownership, rental, and special needs housing. |
| | Target Date | 6/30/2018 |
| | Estimate the number and type of families that will benefit from the proposed activities | 87 low, extremely low, and moderate income families. |
| | Location Description | Piru, Ventura, and Oxnard. |
| | Planned Activities | Cabrillo Economic Development Corporation – Bridgeview Apartments: The Bridgeview Apartment development, located in the unincorporated area of Piru, will construct 24 new rental units; 23 for low-income families and one for an apartment manager. It will include six (6) one-bedroom, six (6) two-bedroom, and twelve (12) three-bedroom apartments. All units would be 100% restricted to low income families at or below 50% AMI; 20 units would be at or below 50% AMI; and 3 would be at or below 30% AMI. There are also plans for open space, a tot lot, BBQ area, and a community center. Funding is being included here because the 2015-16 Action Plan was amended to move CEDC's allocation to 2016-17. |

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| | <p>CDBG: \$318,971</p> <p>GOI: Rental units constructed, 23</p> <p>Housing Authority of the City of San Buenaventura - Rancho Verde Apartments: HACSB proposes to construct a 24-unit project, designated for farmworker households and restricted to households who earn no more than 50% of area median income. Unit amenities will include a kitchen, bathroom, bedroom(s), dining and living room space, coat closet, private patio/balcony space. Bike storage will be provided onsite as well as generous courtyards, common laundry, and a community building onsite. The project will be designed to offset between 80% and 100% of projected energy consumption and will be designed to L.E.E.D. for HOMES Platinum design standards. A rich array of services have been identified for future households including homeownership counseling, access to the Calvans farmworker vanpool program, and computer learning services. HOME funds will be used for predevelopment and construction soft and hard costs.</p> <p>HOME: \$209,212</p> <p>GOI: Rental units constructed, 24</p> <p>Many Mansions - Vista Pacifica Apartments: Many Mansions, a certified Community Housing Development Organization (CHDO), is proposing to build 40 new affordable family rental units with 1 onsite manager. There will be 20 two-bedroom units, 16 three-bedroom units and 4 four-bedroom units (handicap accessible) with 8 @ 50% AMI, and 32 @ 60% AMI. The homes will range from 1,057 to 1,625 square feet. Each 'townhouse' style unit will be three stories and will have a separate ground level garage. On-site amenities will include: an interior courtyard, playground, on-site community room, laundry room, and a picnic/BBQ area. The site is also walking distance to a park, elementary school, medical clinic, and shopping.</p> <p>HOME: \$209,212</p> <p>GOI: Rental units constructed, 40</p> |
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|---|--|--|
| 2 | Project Name | Homeless Services and Street Outreach |
| | Target Area | |
| | Goals Supported | Provide Services to the Homeless |
| | Needs Addressed | Provide Services to the Homeless |
| | Funding | CDBG: \$123,689 |
| | Description | In addition to immediate food and shelter assistance, homeless families and individuals can benefit from a variety of supportive services. Homeless service programs provide mobile outreach and intensive case management, including information and referrals along with brief interventions to homeless Ventura County residents. These programs are often coordinated with other emergency and transitional housing programs, and may include supportive services to persons and/or families in permanent housing. |
| | Target Date | 6/30/2017 |
| | Estimate the number and type of families that will benefit from the proposed activities | 3,367 homeless persons and families will be served. |
| | Location Description | Throughout the Entitlement Area. |
| | Planned Activities | <p>Catholic Charities – Moorpark Community Service Center: The Moorpark Community Service Center, also known as Moorpark Pantry Plus, provides essential safety net services and special outreach programs to stabilize low-income households in Moorpark and the surrounding area. The center provides supplemental food, clothing, eviction prevention assistance, utility assistance, and holiday programs, along with information and referrals.</p> <p>CDBG: \$20,000</p> <p>GOI: Public service activities other than Low/Moderate Income Housing Benefit, 2,962 Persons Assisted</p> |

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| | <p>County of Ventura Human Services Agency – Homeless Services Program: This program provides countywide outreach and case management services for homeless and at-risk of homelessness persons, assisting them to move from crisis situations into housing. The Agency’s 12 service centers located throughout Ventura County are well positioned to cross refer homeless persons to a variety of financial benefits and to problem solve programs, along with information and referrals.</p> <p>CDBG: \$40,500</p> <p>GOI: Public service activities other than Low/Moderate Income Housing Benefit, 360 Persons Assisted</p> <p>Peoples' Self Help Housing - El Patio Hotel: The project provides a combination of supportive services along with permanent affordable housing creating an environment where formerly homeless individuals become stable in housing and continually increase their independence and self-sufficiency. The facility offers 41 single-room, furnished efficiency studios for individuals who are disabled, chronically homeless, and/or very low-income. 16 units are dedicated to referrals from Ventura County Behavioral Health, 2 units are ADA accessible, and 28 units have project-based Section-8 vouchers through the Housing Authority of the City of San Buenaventura.</p> <p>CDBG: \$20,000</p> <p>GOI: Public service activities other than Low/Moderate Income Housing Benefit, 27 Persons Assisted</p> <p>Turning Point Foundation - Our Place Safe Haven Shelter: Funds will support the only year round Homeless Shelter for mentally ill homeless persons requiring a high level of supervision and support. The program has ten beds and a drop in center. They provide counseling, job search and case management services, referrals, and upon discharge, housing services on an as-needed basis.</p> <p>CDBG: \$43,189</p> <p>GOI: Public service activities other than Low/Moderate Income Housing Benefit, 18 Persons Assisted</p> |
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| 3 | Project Name | Emergency Solutions Grant Projects |
| | Target Area | |
| | Goals Supported | Provide Services to the Homeless |
| | Needs Addressed | Provide Services to the Homeless |
| | Funding | : |
| | Description | HUD requires all ESG-funded activities to be consolidated under one project. ESG funds may be used for activities that: engage homeless individuals and families living on the street; improve the number and quality of emergency shelters for homeless individuals and families; help operate these shelters; provide essential services to shelter residents; rapidly re-house homeless individuals and families; prevent families and individuals from becoming homeless. Up to 7.5% of ESG funds can be used to support general administration of the program. |
| | Target Date | 6/30/2017 |
| | Estimate the number and type of families that will benefit from the proposed activities | None. |
| | Location Description | Not applicable. |
| | Planned Activities | The County did not receive its anticipated allocation of ESG funds for the 2016-17 cycle. As a result, we used CDBG Public Service funds to partially fund one of the three applicants who depend on our ESG allocation. This in turn reduced allocations to our CDBG public service providers. |

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| 4 | Project Name | Housing Rehabilitation Programs |
| | Target Area | |
| | Goals Supported | Improve Quality of Housing |
| | Needs Addressed | Improve Quality of Housing |
| | Funding | CDBG: \$190,425 |
| | Description | These programs are designed to retain and improve the existing housing stock, eliminate substandard housing or conditions that threaten residents' health and safety, and improve/enhance community neighborhoods. Programs typically use deferred loans or grants to finance repair and renovation work for owner-occupied single family detached homes, or owners of multi-family rental properties. Qualified repairs include, but are not limited to: plumbing/sewer, electrical, roofing, painting, windows and doors, pest damage repair, structural repairs, and kitchen and bathroom remodeling. |
| | Target Date | 6/30/2017 |
| | Estimate the number and type of families that will benefit from the proposed activities | Eight (8) low and very low income families. |
| | Location Description | Throughout the Entitlement Area. |
| | Planned Activities | <p>Habitat for Humanity Preserve a Home: This program reaches out to owner occupied low and very low income families and individuals that have home rehabilitation needs and otherwise are not able to perform the work on their own or pay full cost for a general contractor. Homeowners must participate in program, providing sweat equity or other public service hours. Services include work such as paint application, landscape work and/or clean-up when coupled with other rehab activities, grab bar installation, wheelchair ramp construction, and other home improvement work needed for building code compliance.</p> <p>CDBG: \$190,425</p> <p>GOI: Homeowner Housing Rehab, 8 units</p> |

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| 5 | Project Name | Code Enforcement |
| | Target Area | |
| | Goals Supported | Improve Quality of Housing |
| | Needs Addressed | Improve Quality of Housing |
| | Funding | CDBG: \$130,000 |
| | Description | These programs operate through a combination of regular neighborhood canvassing and surveying, systematic inspections and response to citizen complaints. Particular emphasis is placed on property maintenance, landlord training, resident safety, eradication of substandard building conditions, and abatement of inoperative and abandoned vehicles. Brochures may also be provided, informing property owners of available financial assistance such as housing rehabilitation programs. |
| | Target Date | 6/30/2017 |
| | Estimate the number and type of families that will benefit from the proposed activities | 825 low, extremely low, and moderate income families. |
| | Location Description | The cities of Port Hueneme and Santa Paula. |
| | Planned Activities | <p>City of Port Hueneme Code Enforcement: According to the 2011-13 American Community Survey 3-Year Estimates, 24.9% of occupied housing units in Port Hueneme were built between 1940 and 1959 and 50.1% were built between 1960 and 1979. This means that 75% of occupied housing units in Port Hueneme are between 33 and 72 years of age. As housing is subject to gradual deterioration over time, it is necessary to enforce the city's property maintenance ordinance, zoning regulations, and building codes to eradicate blighting influences and arrest deterioration in the city's mature neighborhoods.</p> <p>CDBG: \$50,000</p> <p>GOI: Housing Code Enforcement, 700</p> |

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| | <p>City of Santa Paula Housing Code Enforcement Program: The Code Enforcement Program helps relieve overcrowded living conditions, corrects unsafe living conditions and property maintenance issues and provides guidance for housing construction projects by ensuring proper permits are issued, inspections conducted and city building and municipal codes are followed. The City, which qualifies as Area Benefit, has aging housing stock and high overcrowded conditions resulting in residents, especially low income families, living in unsafe housing that must be addressed.</p> <p>CDBG: 80,000</p> <p>GOI: Housing Code Enforcement, 125</p> |
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| 6 | Project Name | Small Business and Micro Enterprise Technical Assistance and Loan Programs |
| | Target Area | |
| | Goals Supported | Economic Development |
| | Needs Addressed | Economic Development |
| | Funding | CDBG: \$40,000 |
| | Description | The County may utilize CDBG funds for activities that assist small businesses, leading to the creation and retention of jobs in the Urban County. |
| | Target Date | 6/30/2017 |
| | Estimate the number and type of families that will benefit from the proposed activities | 15 low, extremely low, and moderate income businesses and their families. |
| | Location Description | Throughout the Entitlement Area. |
| | Planned Activities | <p>Women's Economic Ventures – Micro Business Development Program: WEV assists individuals in developing skills to start a business of their own. Micro Business Training Programs include a 14-week Self Employment Training (SET) course in English, and two Spanish-language programs: a 10-week SET course and a 4-week Business Basics course. In addition to training, ongoing business support micro loans for startup and expansion of up to \$50,000 are available through the Small Business Loan Fund.</p> <p>CDBG: \$40,000</p> <p>GOI: Businesses assisted, 15</p> |

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| 7 | Project Name | Infrastructure |
| | Target Area | |
| | Goals Supported | Improve Infrastructure |
| | Needs Addressed | Improve Infrastructure |
| | Funding | : |
| | Description | Public infrastructure, which includes local street systems as well as water and sewer systems, is critical to the welfare and safety of all residents. Funds may be used for upgrades and rehabilitation of Urban County infrastructure. |
| | Target Date | 6/30/2017 |
| | Estimate the number and type of families that will benefit from the proposed activities | None. |
| | Location Description | Not applicable. |
| | Planned Activities | No infrastructure projects are planned for 2016-17. |

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| 8 | Project Name | Senior Services |
| | Target Area | |
| | Goals Supported | Provide Non-Homeless Supportive Services |
| | Needs Addressed | Provide Non-Homeless Supportive Services |
| | Funding | CDBG: \$110,500 |
| | Description | Seniors are among the County's most frail and vulnerable residents. The County may use CDBG funds to support programs that provide assistance for the elderly living in long term care facilities or with terminal illnesses, nutrition and meal programs, educational and social opportunities, and information and referral services. |
| | Target Date | 6/30/2017 |
| | Estimate the number and type of families that will benefit from the proposed activities | These programs anticipate serving 2,235 seniors. |
| | Location Description | Throughout the Entitlement Area. |
| | Planned Activities | <p>City of Port Hueneme - Senior Activities/Nutrition Program: Primary services include a home-delivered meals program, limited health services, Grey Law legal assistance, visual aid counseling, professional tax advice, senior exercise programs and referrals for other senior-related issues.</p> <p>CDBG: \$30,000</p> <p>GOI: Public service activities other than Low/Moderate Income Housing Benefit, 225 Persons Assisted</p> <p>City of Santa Paula – Senior Center Coordinator: The coordinator position is the main staff person for the Santa Paula Senior Center, which provides information and assistance Monday through Friday at no cost to low income, disabled or other senior citizens who walk in or call and need referrals to social services programs. Services include access to nutritious food, legal services, medical care, and social services and</p> |

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| | <p>other benefits.</p> <p>CDBG: \$25,500</p> <p>GOI: Public service activities other than Low/Moderate Income Housing Benefit, 1,150 Persons Assisted</p> <p>HELP of Ojai - Isolated Senior Support Program: This program, new for 2016-17, will provide case worker visits and emergency checks for isolated seniors in the Ojai valley area. Working with Adult Protective Services, the program will provide needed support designed to keep seniors healthy and safe to the degree possible.</p> <p>CDBG: \$20,000</p> <p>GOI: Public service activities other than Low/Moderate Income Housing Benefit, 110 Persons Assisted</p> <p>Long Term Care Services of Ventura County – Ombudsman Program: The Ombudsman is the federally mandated advocate for elderly persons living in long term care facilities. He/she makes unscheduled, unannounced visits to the facilities and works with the elderly residents investigating complaints and resolving issues on their behalf. The 9,500 elderly persons living in 232 long term care facilities in Ventura County and attending Adult Day Health Care facilities are their target population.</p> <p>CDBG: \$35,000</p> <p>GOI: Public service activities other than Low/Moderate Income Housing Benefit, 750 Persons Assisted</p> |
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|---|--|---|
| 9 | Project Name | Public Facilities |
| | Target Area | |
| | Goals Supported | Improve Public Facilities |
| | Needs Addressed | Improve Public Facilities |
| | Funding | CDBG: \$335,423 |
| | Description | Public facilities often house services essential to the health and well-being of residents. It is, therefore, important for these facilities to be safe, accessible, and able to meet the needs of any resident or employee who will use them. Funds will be used to upgrade and rehabilitate these facilities. |
| | Target Date | 6/30/2017 |
| | Estimate the number and type of families that will benefit from the proposed activities | These programs will assist an estimated 69,257 persons, of which 51,537 are low to moderate income. |
| | Location Description | Throughout the Entitlement Area. |
| | Planned Activities | <p>City of Fillmore - Fire Engine: This funding will provide payment for the third year of a six-year lease for the purchase of a new fire engine which will enable the department to provide improved critical fire and emergency medical services to the Fillmore community, of which over 51% are low/mod income residents.</p> <p>CDBG: \$57,292</p> <p>GOI: Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit, 15,375 Persons Assisted, of which 8,705 are low to moderate income.</p> <p>City of Santa Paula - Fire Engine: This funding will provide payment for the third year lease payment of a new fire engine which will enable the department to provide improved critical emergency fire and medical services to the community of Santa Paula, of which 60% are low/mod income residents.</p> |

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| | | <p>CDBG: \$63,390</p> <p>GOI: Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit, 31,210 Persons Assisted, of which 20,160 are low to moderate income.</p> <p>FOOD Share - Solar Project: Funding for the installation of a 200kW solar energy system to provide electrical power to the warehouse and office facility.</p> <p>CDBG: \$214,741</p> <p>GOI: Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit, 22,672 Persons Assisted, all of whom are low to moderate income.</p> |
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| 10 | Project Name | Planning and Administration |
| | Target Area | |
| | Goals Supported | Planning and Administration |
| | Needs Addressed | Planning and Administration |
| | Funding | CDBG: \$290,981 HOME: \$46,491 |
| | Description | Up to 20% of CDBG and 10% of HOME funds can be used by the County to support the general administration of these programs. During the five-year Consolidated Plan period, the County (as grantee) will provide all administration for these programs in compliance with program regulations and requirements. Subrecipients will administer their respective projects and programs in compliance with program regulations and requirements, with oversight provided by the County. |
| | Target Date | 6/30/2017 |
| | Estimate the number and type of families that will benefit from the proposed activities | Not applicable. |
| | Location Description | Ventura County Government Center 800 South Victoria Avenue Ventura, CA 93009 |
| | Planned Activities | County of Ventura: County staff will provide all administration for these programs in compliance with program regulations and requirements. |

| | | |
|----|--|---|
| 11 | Project Name | Fair Housing Opportunity |
| | Target Area | |
| | Goals Supported | Fair Housing Opportunity |
| | Needs Addressed | Fair Housing Opportunity |
| | Funding | CDBG: \$21,271 |
| | Description | Provide fair housing services to residents. |
| | Target Date | 6/30/2017 |
| | Estimate the number and type of families that will benefit from the proposed activities | Approximately 200 residents. |
| | Location Description | Throughout the Entitlement Area. |
| | Planned Activities | County of Ventura: The Urban County sets aside a portion of its CDBG Planning and Administration budget for fair housing. Ventura County currently contracts with the Housing Rights Center (HRC) to provide fair housing services to its residents. HRC provides telephone and in-person counseling to both tenants and landlords regarding their respective rights and responsibilities under California law and local city ordinances. In addition to answering basic housing questions, counselors commonly cite specific civil codes that pertain to the client's matter and/or provide sample letters that discuss a particular issue. HRC investigates housing discrimination complaints brought under both State and Federal fair housing laws. The Agency also develops and distributes written materials that describe the applicable laws that protect against housing discrimination and ways to prevent housing injustices. HRC also offers Fair Housing Certification Training for housing industry professionals. |

AP-50 Geographic Distribution - 91.220(f)

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

The Ventura County Entitlement Area does not prioritize funding by geographic area, nor does it include any target areas. Therefore, this section does not apply.

Geographic Distribution

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

Table 11 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

Discussion

Affordable Housing

AP-55 Affordable Housing - 91.220(g)

Introduction

The Entitlement Area strives to promote affordable housing through housing rehabilitation as well as ownership and rental housing stock expansion, including public and special needs housing. The Entitlement Area's one year goals are described in the following table. These estimates do not include emergency or transitional shelters, social services, or code enforcement activities.

| One Year Goals for the Number of Households to be Supported | |
|---|----|
| Homeless | 0 |
| Non-Homeless | 91 |
| Special-Needs | 4 |
| Total | 95 |

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

| One Year Goals for the Number of Households Supported Through | |
|---|----|
| Rental Assistance | 0 |
| The Production of New Units | 87 |
| Rehab of Existing Units | 8 |
| Acquisition of Existing Units | 0 |
| Total | 95 |

Table 13 - One Year Goals for Affordable Housing by Support Type

Discussion

The Bridgeview Apartments will add 23 units of affordable rental housing in Piru. Rancho Verde will provide 24 units of affordable housing in Ventura, designated for farmworker households. Vista Pacifica in Oxnard will create 40 new family rental units, 4 of which will be handicap accessible.

In addition, the County supports Habitat for Humanity's "Preserve a Home" program. It is anticipated that eight (8) homes in the Entitlement Area will be rehabilitated during the upcoming year.

AP-60 Public Housing - 91.220(h)

Introduction

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

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

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

Although the SPHA does not own or operate any public housing units, it does own and operate six affordable housing complexes with a total of 66 units for seniors and families. They also act as Administrative Managing Partner of the Harvard Place Apartments, a 40-unit affordable rental development for persons with special needs.

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

Area Housing Authority of the County of Ventura (AHA)

The AHA encourages the formation of site-based Resident Councils, which are composed of residents in each of the public housing complexes. This council helps to enhance the quality of life of the residents, and recommends the appointment of one Resident Commissioner who sits on the AHA's Board of Commissioners.

In conjunction with Ventura County social services agencies and the community at large, the Resident Services Department also provides access and information on employment, and tutoring, parenting skills, wellness programs, health screening, adult and child protective services, food banks, safety, and anti-fraud presentations. In addition, AHA works with the Ventura Unified School District and the Superintendent of Schools Office to provide a summer lunch program and operate an after-school program which consists of tutoring, recreation, and other activities.

Transportation services are provided to residents for doctor's appointments, group grocery shopping, pharmacies, and other locations. Referrals to supportive services are offered to seniors through the Case Management Program. The program links residents with resources in the community including Meals on Wheels, Senior Share Program, HICAP information, safety and nutrition education, and assistance with medical and Medicare questions. Summer employment training is available to Public Housing residents in partnership with the Ventura Unified School District. Residents are trained in the areas of food safety, reporting, and interviewing skills. At the Charles Street Terrace Apartments in Moorpark, California Lutheran University students assist children ages 10 and under with homework assistance in a positive atmosphere. Through partnerships with various agencies, full or partial recreational scholarships are provided to youth who wish to participate in local sports or activities. The Youth Outreach Program addresses the needs of both the non-involved and difficult-to-reach youth in the Conejo Valley, targeting youth between the ages of 12 and 17 years of age.

Housing Authority of the City of Port Hueneme (PHHA)

In order to address the needs of the residents in Public Housing, the PHHA plans to establish a Resident Council this coming year, which will be composed of residents from both public housing complexes. The PHHA hopes to enhance the lives of its residents by establishing this Council.

Santa Paula Housing Authority (SPHA)

In accordance with the City of Santa Paula's General Plan to increase affordable housing rental units, alleviate household overcrowding and overpayment; and the County's objective to end homelessness, the SPHA intends to achieve and maintain a 99% utilization rate of the tenant based program; construct 11 additional affordable rental units (the project is in pre-development and includes special needs units) by leveraging funds (Federal, State, tax credit equity investor, grants and bank); continue to acquire land suitable for affordable housing development; and explore opportunities offered by the State of California's low cost loan programs, directed towards special needs, homeless and veterans.

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

Area Housing Authority of the County of Ventura (AHA)

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

The AHA encourages clients who have been assisted under the Section 8 Program for at least one year in becoming homebuyers through HUD's Section 8 Homeownership Program. Participants must be first-

time homebuyers, with no one in the household having owned a home within the past three years. The program requires that a participant have a minimum down payment of 3% of the home's purchase price and good credit. Approximately 10 participants have been enrolled in the Section 8 Homeownership Program. In addition, 23 Section 8 clients have successfully left the program and become first-time homeowners, without AHA assistance.

Housing Authority of the City of Port Hueneme (PHHA)

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

Santa Paula Housing Authority (SPHA)

The SPHA encourages resident interaction with social services and staff through quarterly events, and makes available portability opportunities for program participants in other jurisdictions. As Successor Housing Agency to the City of Santa Paula Redevelopment Agency, the SPHA continues to administer the First Time Home Buyers and Housing Preservation Programs, and accommodates inquiries for possible home ownership by directing residents to agencies offering counseling and other available opportunities. Under the California Housing and Community Development/Supportive Housing Multifamily Housing Program (project lender), the SPHA utilizes County facilities to educate and improve self management skills of developmentally and psychically disabled residents.

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

Not Applicable.

Discussion

Area Housing Authority of the County of Ventura (AHA)

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

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

respect. AHA continues its efforts to enhance affordable housing through collaborative efforts with other local agencies.

AHA maintains a partnership with the Ventura County Human Services Agency and the Housing Authorities of the cities of Oxnard, San Buenaventura, and Santa Paula to provide housing assistance for welfare-to-work families. In conjunction with the CalWORKS program, this consortium identifies strategies, such as applying for additional Section 8 vouchers, to facilitate stable, affordable housing for families trying to focus on employment and self-sufficiency issues.

It actively seeks donors for Charitable Remainder Trusts by contacting attorneys and certified Public Accountants in Ventura County and placing ads in newspapers or publishing articles on AHA community work/involvement.

Housing Authority of the City of Port Hueneme (PHHA)

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

Santa Paula Housing Authority (SPHA)

The SPHA administers subsidized rental housing programs for Section 8 Tenant Based Vouchers/Certificates, Project Based Section 8 Vouchers, and affordable housing owned by the Authority. Under the Section 8 Voucher Program, the Authority provides affordable housing for 600 families, with an additional 1,250 applicants on the waiting list. As a means of providing program participants additional housing opportunities, the Administrative Plan was amended allocating a portion of Tenant Based vouchers to "Project Based". To date, the Authority has constructed three such multifamily projects for low income seniors totaling 34-units, with another 11-units in pre-development.

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

Introduction

The Countywide Continuum of Care (CoC) is focused on developing and implementing a Coordinated Entry system to improve access to services for individuals and families experiencing homelessness. The Coordinated Entry system will also help the system prioritize housing resources for the most vulnerable of the homeless population. Over the next year, the CoC plans to roll out a Coordinated Entry System in phases. Case managers and outreach workers will begin using the VI-SPDAT as a prioritization tool. All CoC funded beds will be filled utilizing the Coordinated Entry system in the next year. The CoC will advocate for other community housing programs and resources to dedicate housing resources to this system to work towards reducing and ending homelessness in the community.

Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including

Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs

Individuals and families experiencing homelessness can seek services through multiple homeless services providers as well as community and government social service programs. Outreach workers from government agencies and non-profit organizations along with volunteers from the faith-based communities are engaging individuals on the streets and connecting them to services. Seasonal shelters are another location where individuals are engaged and connected. Implementation of the VI-SPDAT will allow for a universal tool across the CoC in addressing individual needs. In a system with limited resources, the VI-SPDAT will begin to prioritize services for the most vulnerable of the population.

The Ventura County CoC is increasing outreach and collaboration with healthcare and behavioral health providers. Community paramedics, behavioral health outreach workers and the Healthcare for the Homeless program are partnering with the CoC to complete the VI-SPDAT and connect individuals to appropriate services.

Addressing the emergency shelter and transitional housing needs of homeless persons

There is very limited access to emergency shelter within Ventura County. The Ventura County Rescue Mission in Oxnard provides the largest number of year-round shelter beds in the community. Seasonal shelters operate from December 1-March 31 in various regions of the county. A runaway/homeless youth shelter has shown great success thus far in reconnecting youth with their families and is on target to double the number of youth served this year. Transitional Housing programs are working to reduce length of stay in transitional programs to move individuals and families to permanent housing. The CoC will be utilizing the Coordinated Entry System to prioritize emergency shelter and transitional housing beds and working to move individuals more quickly to permanent housing.

Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again

The CoC is implementing a Coordinated Entry System (CES) called “Pathway to Home” to allow for easy access to services at any entry point in the system. The Coordinated Entry System is utilizing the VI-SPDAT tool to prioritize permanent supportive housing for the most vulnerable of the chronically homeless population. CoC funded permanent supportive housing projects are implementing the Housing First approach that involves moving persons directly from the streets/shelters into permanent housing accompanied by home-based supportive services. The CoC partners are filling units through the CES with a prioritized by-name list. The Coordinated Entry system is working to develop a Case Management Care Coordination model that will provide wrap around services to each individual that is placed in a permanent supportive housing unit. Providing supportive services including behavioral health and healthcare services will promote keeping individuals housed and stable.

The CoC is working to improve partnerships with the West Los Angeles Veterans Affairs (VA) Department which provides services to the Veterans of Ventura County. The CoC requested Vets@Home technical assistance through HUD to focus on the goal of ending Veteran Homelessness. The CoC is working with the VA to create an Memorandum of Understanding to share data between groups and create a by-name list of veterans that are in need of housing. The CoC is focused on improving collaboration and data sharing with the VA and Supportive Services for Veteran Families (SSVF) providers. Within the CoC there is a VA Grant and Per Diem transitional housing program operated by Turning Point Foundation.

The CoC has engaged youth providers to focus on homeless youth and is bringing this partners together to make sure youth populations are served through the CES. There are limited youth-dedicated resources within the CoC and the youth shelter is for youth under the age of 18. The partners are focused on evaluating data and developing a prioritization process to serve the most vulnerable youth as well as exploring additional youth-focused resources.

Families are connected with Rapid Re-Housing assistance. A Rapid Re-housing program that was initially funded under the HPRP grant is continuing with county general funds, private funds and in-kind resources. As a result, the number of homeless families has decreased in recent years and the CoC is tracking data and prioritizing resources for unsheltered families.

Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); or, receiving

assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs.

The local Homeless Prevention and Rapid Re-housing Programs are operated by the same service provider that administered the HPRP Homeless Prevention Program. Eligible services include those that were eligible under HPRP and include 1) short-term rental assistance; 2) medium-term rental assistance; 3) security and utility deposits; 4) utility payments; 5) moving cost assistance; and 6) motel and hotel vouchers available only to program participants prior to move-in under the Rapid Re-housing Program. In addition, the same service provider recently received an allocation of \$750,000 from the County's General Fund to provide the same services noted above throughout the county.

CalWORKS Housing Support Program provides help to move homeless families into rental housing and connect families with resources to remain stably housed.

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

Discussion

See discussions above.

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

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

Introduction

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

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

Inclusionary Housing/Development Agreements: The County and cities of Moorpark, Ojai, Port Hueneme, and Santa Paula have some form of requirements for the inclusion of affordable housing in market-rate developments. Some jurisdictions also use development agreements to negotiate for affordable housing in large-scale developments or master-planned areas.

Expedited Review: Most communities provide expedited review to encourage affordable housing. For example, the County's Non-Coastal Zoning Ordinance was amended in 2003 to allow multi-family farm worker complexes and single farm worker dwelling units meeting certain criteria to be approved "over the counter" with a zoning clearance. The County also provides for expedited, non-discretionary review for construction of lower-income housing. Fillmore expedites the permit process for "green" buildings and gives priority to lower-income housing projects for building inspections that are carried out during various stages of the construction process. Such expedited review helps minimize unnecessary delays which add to the cost of construction by increasing holding costs.

Fair Housing Services: All jurisdictions within the Entitlement Area continue to promote fair housing by coordinating with the County for the administration of fair housing services by the Southern California Housing Rights Center (HRC).

Preservation of Existing Affordable Housing: All jurisdictions monitor the affordability covenants on existing affordable housing projects and continue to pursue funding and partnership with nonprofit developers to preserve the long-term affordability of existing units. The Entitlement Area also provides CDBG funds to Habitat for Humanity to assist in their Preserve a Home program, which helps to preserve existing homeowner properties.

Development Standards and Regulations: As part of their 2014-2021 Housing Element updates, all jurisdictions either have already completed amendments to their zoning codes to facilitate the construction of affordable housing and special needs housing, or specific timeline commitments have been made in the Housing Elements to complete such revisions to the zoning codes. Such amendments

include provisions for emergency shelters, transitional housing, supportive housing, reasonable accommodation for persons with disabilities, and density bonuses. In addition, Fillmore permits the use of manufactured dwellings as single family residences outside of designated mobile home parks under certain circumstances. Santa Paula now includes specific zoning areas to allow for the creation of affordable housing for specific needs including transitional and supportive housing, emergency shelters, and migrant farmworker housing. A more detailed discussion of the jurisdictions' efforts is contained in the "2015 Regional Analysis of Impediments to Fair Housing Choice."

Reduction or Deferral of Fees: To facilitate affordable housing, most jurisdictions may consider reduction or deferral of development fees as a means of reducing cost of affordable housing construction.

Funding Resources: Jurisdictions are actively exploring funding programs available at the local, state, and federal levels for affordable housing.

Second Dwelling Units: The County allows for up to 1,200 square feet for second units, with ministerial "over-the-counter" approval. Fillmore plans to eliminate potential constraints toward the development of second units. The City of Ojai has created a Second Dwelling Compliance Program to legalize dwellings that have been constructed without record of permits. The City of Moorpark allows second dwelling units on lot sizes of 10,800 sq ft. or larger, with graduated sizes of the units ranging from 800 sq. ft. to 1,100 sq. ft. depending on the lot size.

Discussion

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

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

Fillmore increased its available buildable land by constructing levees, thereby reducing land costs.

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

Santa Paula recently granted inclusionary in-lieu fees to the Santa Paula Housing Authority to assist with the financing of new affordable rental developments designated for senior, veteran, and disabled residents. In addition, one affordable housing project for seniors (Oakwood Court) has been completed, with another ready for construction (Citricos de Santa Paula). Habitat for Humanity recently completed

four of eight single family affordable homes, as well (Trinity Lane).

The Entitlement Area jurisdictions are committed to ongoing review of regulations, ordinances, fees/exactions to ensure they do not unduly constrain the production, maintenance, and improvement of housing.

Ventura County Housing Trust Fund

The County of Ventura and Cities of Moorpark and Santa Paula support, both financially and with staff resources, the Ventura County Housing Trust Fund (VCHTF), a 501(c)(3) whose mission is to support more housing choices, by generating and leveraging financial resources, working in partnership with the public, private, and non-profit sectors throughout Ventura County. The VCHTF uses a revolving loan fund to provide below-market interest rate loans to developers producing new affordable housing in Ventura County.

Priority is given to projects that serve veterans, homeless, farmworkers, and young adults transitioning from foster care, as well as families and individuals at the lowest income levels.

The VCHTF has and continues to lobby for the establishment of a permanent source of funding for Housing Trust Funds in the State of California.

Ventura County Behavioral Health Department (VCBH)

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

In addition, through its Continuum of Care projects for the homeless, Ventura County Behavioral Health asserts and is committed to the Housing First approach by establishing a low barrier model toward homelessness. The focus is on assisting potential residents access and sustain permanent housing as quickly as possible. This means that a potential resident will not be screened out of processing due to little or no income; is active or has a history of substance abuse; has a criminal record (except state-mandated restrictions); and/or has a history of having been or currently a victim of domestic violence.

AP-85 Other Actions - 91.220(k)

Introduction

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

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

Obstacles to these actions are addressed, as well as proposed actions to overcome them.

Actions planned to address obstacles to meeting underserved needs

A lack of affordable housing is the most underserved need currently faced by the Entitlement Area jurisdictions. The County has a very low vacancy rate for rental properties, with higher than average costs. This creates a burden for low and moderate income households, as well as homeless individuals and families, or those on the verge of becoming homeless.

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

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

In February 2016 the Ventura County Board of Supervisors allocated \$1 million in general funds across three separate projects to support the development of 106 new units of very affordable rental housing for farmworkers. Two of these projects are located in the City of Ventura (Westview Village Revitalization Project and Rancho Verde Apartments) and one is in the City of Oxnard (Etting Road Farmworker Apartments), all three are pursuing tax crediting financing and USDA Section 514 Farmworker Housing grants.

Actions planned to foster and maintain affordable housing

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

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

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

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

Actions planned to reduce lead-based paint hazards

The Childhood Lead Poisoning Prevention Program continues to monitor the status of housing in Ventura County that are at risk for LBP hazard through providing testing for all children at risk due to their living situation. If a child is found with Lead Poisoning, the program provides medical case management and an environmental evaluation to determine the cause of the lead poisoning. Efforts are then initiated to contain and/or dispose of the source of the lead. Intensive outreach is provided throughout the community regarding the dangers of lead and how to recognize and prevent potential exposure. Education regarding anyone who has a potential of exposure, through remodeling, or other lead source is offered at a variety of venues, including the media, health fairs, and other community events. Specific activities include:

- Ensure that all medical providers in the County follow the mandated Statewide Targeted Blood Lead Screening Policy.
- Engage Ventura County's Medi-Cal Managed Care Program in the effort to encourage enrolled providers to test for lead, through outreach, education and routine collaborative activities.

- Ensure those children not in publicly funded programs be assessed for risk of lead poisoning by their providers at the appropriate ages as above.
- Provide case management services to children who meet case definition per CDC guidelines and to reduce environmental hazards.
- Provide case tracking services to those children with levels that are elevated but not high enough to meet state case criteria.
- Inform families and child caregivers who are responsible for children at risk about how to prevent lead exposure.
- Increase awareness of lead hazards among those local governmental agencies that can assist in decreasing lead exposures to children.
- Identify and inform CLPPP Branch of any newly suspected or newly identified sources of childhood lead exposure.
- Maintain contact with liaisons in other health programs and community groups to facilitate information-sharing and potential development of joint outreach and education programs.
- Continue to increase community awareness through outreach.
- Promote and maintain interagency collaboration between the local Ventura County Childhood Lead Poisoning Prevention Program (CLPPP) and the Environmental Health Division, and each of the perspective cities and/or County Code Enforcement and/or Building and Safety departments in order to address lead hazards and lead hazard controls.

Actions planned to reduce the number of poverty-level families

The Workforce Development Board (WDB) of Ventura County, formally the Workforce Investment Board (WIB), offers a valuable, no cost resource for employers and job seekers. Through the effective use of federal funds and strong partnerships with private and public sector providers, the WDB offers support that would be costly for individuals or businesses to receive from other sources. The WDB provides guidance for individuals needing help with job readiness, job placement or job transitions, and for employers seeking support for business services, recruitment, retention, or layoffs. In addition to providing services through the American Job Center of California, located at County Human Services Agency American Job Centers in Oxnard and Simi Valley, the WDB contracts with external providers for business services and for youth programs that provide after-school activities, job training and support services to low-income in-school youth and out-of-school youth.

The Economic Development Collaborative-Ventura County (EDC-VC) focuses on attraction, retention and expansion of businesses in Ventura County through economic development programs that showcase the county's investment in cutting-edge business sectors and the high quality of life for residents. EDC-VC is funded through contributions from the County of Ventura, all 10 cities in the county and top-level private sector executives. EDC-VC promotes jobs and economic growth to maintain the county's

economic vitality through key programs and services such as business consulting and workshops, loans, Manufacturing Assistance Program, and G.E.T. Trade, the how-to on international trade.

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

Housing authorities help residents build for tomorrow through the Family Self-Sufficiency (FSS) Program. The FSS Program is a voluntary program designed and administered to help low-income, Section 8 families achieve economic self-sufficiency through education and job training. Four of the five housing authorities in this county have been working on the FSS Program through a joint Action Plan since its inception.

Through a broad network of services committed to FSS participants, the program assists participants in finding resources and services they need to become economically independent. Services might include: childcare, education, transportation, development of resumes, job training and placement, counseling, parenting skills, money management or credit counseling.

Actions planned to develop institutional structure

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

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

To address the diminishing resources for the development and retention of housing for low-income persons, the County of Ventura and the cities of Moorpark and Santa Paula have made financial

contributions to the newly incorporated 501(c)(3) Ventura County Housing Trust Fund. This organization, with broad representation from government representatives, housing developers and financing entities, provides short-term financing for the development of new rental properties for low-income persons with emphasis on farmworkers, veterans, youth and those who are homeless.

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

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

The Ventura County Entitlement Area facilitated the development of a regional Consolidated Plan with 9 of the 10 cities in the County participating (the only City that didn't join in the regional effort was Oxnard, and only because they had recently prepared the update to their plan). Furthermore, the County of Ventura is the Collaborative Applicant under the Countywide Continuum of Care. These two initiatives create an environment that dramatically improves coordination, communication and participation of all parties who address the needs of low-moderate income persons including homeless. The Countywide Continuum of Care Alliance includes participants from local housing authorities, mental health providers, public health and ambulatory care, local non-profit entities, faith community and others from around Ventura County. Oxnard and the County - the only ESG entitlement grantees in the County, are also active in the Continuum of Care.

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

The county also developed an Economic Vitality Plan to promote economic vitality by emphasizing internal operational efficiency and responsiveness, and external collaboration through quality partnerships. The primary goal is to increase the county-wide economic vitality and future revenues through economic development by supporting all cities in their efforts to expand their commercial tax bases and supporting the creation of quality jobs for local residents. This Plan was developed primarily for the benefit and economic well-being of current local residents and existing local businesses. This Plan was approved by the County Board of Supervisors in December 2015.

Discussion

See discussions above.

Program Specific Requirements

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

Introduction

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

Community Development Block Grant Program (CDBG)

Reference 24 CFR 91.220(l)(1)

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out.

| | |
|--|----------|
| 1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed | 0 |
| 2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan. | 0 |
| 3. The amount of surplus funds from urban renewal settlements | 0 |
| 4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan | 0 |
| 5. The amount of income from float-funded activities | 0 |
| Total Program Income: | 0 |

Other CDBG Requirements

| | |
|---|---------|
| 1. The amount of urgent need activities | 0 |
| 2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan. | 100.00% |

HOME Investment Partnership Program (HOME)
Reference 24 CFR 91.220(l)(2)

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

Other forms of investment available include Ventura County Housing Trust Fund, in-lieu fees, CDBG funding and other potential grant funding opportunities.

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

At this time, the County does not anticipate funding any projects for homebuyers in the upcoming grant year. Historically, recapture or resale provisions are unique to each project and are enforced through recordable grant agreements and/or promissory notes with affordability restrictions for the duration of the affordability period.

3. A description of the guidelines for resale or recapture that ensures the affordability of units acquired with HOME funds? See 24 CFR 92.254(a)(4) are as follows:

When providing HOME funds for a homebuyer activity, the County ensures there are contractual agreements in place with the developer and for each homebuyer, stating the resale or recapture and affordability requirements of the units and ensuring compliance through a Promissory Note secured by a Deed of Trust on the property. For each homebuyer project, either the resale or recapture provision will be used; both will never be implemented in the same project development.

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

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

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

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

The Ventura County Continuum of Care is establishing policies and procedures that include written standards, Coordinated Entry, HMIS standards and performance measures. The working document is attached as Appendix A.

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

The Continuum of Care is implementing a Coordinated Entry system in phases. The CoC covers the entire geographic area of the County of Ventura which includes a total of 10 cities but 5 regional areas. The Ventura County CES "Pathways to Home" will include full HMIS integration. This will create a virtual "front door" to the Homeless Services System. All providers will enter individuals requesting assistance into this system. Basic eligibility documentation, HUD data elements and the VI-SPDAT will be completed at this point. The goal will be to determine which agency can best meet that household's needs rather than if the household is eligible for that specific agency's services. The CoC and HMIS lead agency are currently receiving technical assistance from Bowman Services to fully integrate and build this system.

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

The CoC now has data-sharing within the HMIS system. The system is using the VI-SPDAT and a locally adopted prioritization process to fill all Permanent Supportive Housing units with the most vulnerable chronically homeless individuals. Housing First is being implemented system-wide. Committees have been established to focus on ending homelessness of veterans, chronically homeless individuals, families and youth.

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

A Request for Proposals was issued to allow any eligible organization to apply for funds. The information was advertised and posted on the community development website. An announcement was made through the Continuum of Care Alliance which includes various nonprofit and faith-based organizations and representatives.

4. If the jurisdiction is unable to meet the homeless participation requirement in 24 CFR 576.405(a), the jurisdiction must specify its plan for reaching out to and consulting with homeless or formerly homeless individuals in considering policies and funding decisions regarding facilities and services funded under ESG.

Not applicable.

5. Describe performance standards for evaluating ESG.

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

Discussion

CDBG

CDBG program income is typically received from loan repayments from various historical loan programs. Any program income received is generally reprogrammed during the year it is received, generally to an existing activity, and in accordance with the County's Citizen Participation Plan.

Anticipated program income for the upcoming cycle is both undependable and minimal, therefore has not been included in current year project funding.

Attachments

Grantee Unique Appendices

APPENDIX A

Ventura County Continuum of Care Alliance

Policies and Procedures

and

Written Standards for Providing Continuum of Care and
Emergency Solutions Grant Assistance

A-1



VENTURA COUNTY
**CONTINUUM OF
CARE ALLIANCE**

ENDING HOMELESSNESS
IN VENTURA COUNTY

Policies and Procedures

2016

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Annual Action Plan
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SECTION I. CONTINUUM OF CARE PROGRAM GRANT

Regulatory Citation: CFR 578.7, 578.7(a)(9)(iii) and (iv). 578.37(a)(1)(ii),

1.01 COLLABORATIVE APPLICANT

The Collaborative Applicant is the entity designated by the Ventura County Continuum of Care (VCCoC) to submit the CoC Registration for the City of Oxnard/San Buenaventura/Ventura County Continuum of Care (CA-611) and the CoC Program Homeless Assistance Grant Application on behalf of the CoC. The Collaborative Applicant shall be selected by the Continuum of Care Governance Board per the Ventura County CoC *Governance Charter*.

1.02 GRANT INVENTORY WORKSHEET

In consultation with each of the CoC's Program project applicants and the local HUD Community Planning and Development field office, the Collaborative Applicant is responsible to assure the timely submission and accuracy of the Grant Inventory Worksheet (GIW). The GIW is used to calculate the VCCoC's Annual Renewal Demand (ARD) for funding to be considered for the annual CoC Program Grant Competition.

1.03 PROJECT EVALUATION, MONITORING AND PERFORMANCE REPORTING

The Collaborative Applicant will utilize its Continuum of Care Planning Grant to provide program monitoring, evaluation and reporting of programs funded under the CoC Program Grant.

The Collaborative Applicant will review Annual Performance Reports and other documentation as necessary to measure the Continuum of Care's progress in meeting HUD CoC Program Grant goals and objectives.

The Ventura County Continuum of Care Governance Board may establish additional performance measurement requirements as necessary to report progress on local goals and objectives. Collaborative Applicant staff will communicate with CoC Program Recipient Agencies throughout each program year to ensure that they are aware of expected performance measures required by HUD and the Ventura County Continuum of Care Governance Board.

All CoC Program Grant Recipients and Subrecipients are required to provide the following documents to the Collaborative Applicant:

- Final eSNAPS Project Application
- Final eSNAPS C1.9a Technical Submission
- Leverage Documentation
- Match Documentation
- Quarterly report on LOCCS drawdowns of CoC Program funds

A. Quarterly Continuum of Care Annual Performance Reports

The Collaborative Applicant will provide Ventura County Continuum of Care Alliance quarterly reporting of aggregate performance of all CoC Program Grant Projects through a quarterly Annual Performance Report (APR) to measure progress in the annual performance goals established in the Continuum of Care Program Grant.

The quarterly reports will cover the following performance periods which will include the quarterly point in time occupancy dates measured in the HUD standardized Annual Performance Report and Annual Homeless Assessment Report (AHAR):

| Report Due Date | CoC Report Performance Coverage |
|-----------------|---------------------------------|
| October 15 | July - September |
| January 15 | October - December |
| April 15 | January - March |
| July 15 | April - June |

B. Mid-Term Program Evaluation Policy

The Collaborative Applicant will provide mid-term project evaluations of VCCoC Program projects to measure individual Recipient Agency progress in achieving project goals established in the VCCoC Program Application and the Recipient Agency Project. This evaluation assistance will be performed after six months of a program year for all program grants including one year renewals or multi-year projects.

1. Collaborative Applicant will contact agency at the midpoint of their operating term.
2. The Collaborative Applicant will review an APR from the HMIS system inclusive of program data from the operation start date to the midpoint review date. They will generate a mid-term project progress report that will include: progress in achieving project goals; contributions to meeting VCCoC level performance goals; and areas of concern for improvements. Examples of areas of concern include missing data elements within the HMIS, data not consistent with agency targets as outlined in the program's original agency application, or significant shortfalls in performance targets.
3. The Collaborative Applicant will submit the mid-term progress report to the Executive Director or designee of the Recipient Agency. Technical assistance will be provided upon request of the agency or as determined needful by the Collaborative Applicant. Technical assistance may include:
 - Review of client roles for accurate enrollment and exit documentation;
 - Supplemental HMIS training;
 - Review of agency records related to mainstream benefits enrollments, approvals and denials for the prior quarter.
4. The Collaborative Applicant will provide documentation of all program monitoring, evaluation and technical assistance for recipients and subrecipients and maintain copies of all reports and correspondence in the official VCCoC project files.

C. Annual Performance Reports (APR)

Annual Performance Reports are used in the development of annual project performance score cards and for the aggregate CoC-wide achievements in meeting HUD Goals and Objectives reported in the CoC Program Grant.

The Collaborative Applicant will work with each CoC Recipient in the preparation of their APR. Final APRs will be reviewed and approved by the Collaborative Applicant prior to submission in the HUD's electronic reporting system "eSNAPS" in order to confirm that data being reported to HUD is consistent with data reported in the local HMIS system.

1. APR Approval Procedures

- a) The Collaborative Applicant will contact the CoC Program Recipient Agency within one week of the expiration of each program year to initiate an APR data review and confirm APR due date.
- b) At initial APR data review, the Collaborative Applicant will provide a first draft APR to agency staff through the HMIS System and will include a report of any findings to be adjusted by agency staff. Examples of findings include missing data or data not consistent with agency targets as outlined in the program's original agency Continuum of Care Program application.
- c) The Collaborative Applicant will consult with Recipient Agency to determine a planned submission date of the APR to eSNAPS which will be set prior to the HUD submission deadline. This planned submission date will take into consideration time allotted for any corrections that need to be made to HMIS data prior to submission in eSNAPS.
- d) The Collaborative Applicant will conduct a final data review no later than the first week of the month of the HUD submission deadline to ensure that any necessary findings were corrected in HMIS and will send a final HMIS APR version to agency staff to be used for eSNAPS data entry.
- e) The Recipient Agency will send a copy of their eSNAPS APR to the Collaborative Applicant for verification prior to submitting to HUD.
- f) The Recipient Agency will use the Collaborative Applicant approved APR to complete their APR in eSNAPS and will send a final version of the eSNAPS generated APR to the Collaborative Applicant for the official VCCoC Planning files.

2. Annual Performance Scorecards for CoC Program Grant Competition

The Collaborative Applicant will draft an annual VCCoC Program Grant Project Scorecard template to be used as a tool for prioritization and funding in the CoC Program Grant local competition. The draft Scorecard will be approved by the VCCoC Governance Board prior to the CoC Program Grant local competition. Scorecard elements will reflect performance measures for both HUD and local CoC goals and objectives.

a.) VCCoC Program Projects Scorecard Procedures:

- The Collaborative Applicant will populate the individual Preliminary Project Scorecards for review by the recipient agency. Agencies will review for data accuracy and final performance measures will be confirmed from APR and other HMIS and Collaborative Applicant records.
- Agencies will have the opportunity to provide a narrative response to any performance measure as part of the final Project Scorecard.
- The complete scorecard with comments will be included in the local CoC Program competition application.

D. Actions Against Poor Performance

CoC Program recipients who do not meet local and/or HUD performance targets and/or do not meet expectations and compliance of program and grant management of their CoC programs, as documented in either or both the VCCoC Score Card or monitoring and evaluation reports, may be subject to having their projects reduced in whole or in part and reallocated to other projects during the Community Projects Review Committee local competition renewal process as allowed in a HUD Notice of Funding Availability. (Emergency Solutions Grant recipients and subrecipients actions against poor performance are detailed in the ESG section of the policies and procedures.)

E. Application for CoC Program Grant Funds

Upon HUD issuance of the CoC Program Grant Notice of Funding Availability (NOFA), the Collaborative Applicant will prepare a master timeline of the CoC Program Grant process and will conduct the following steps to assure a well communicated process for organizations to make application for CoC Program Funds to include, but not limited to:

1. Establish all application, review and announcement deadlines sufficient to achieve reasonable public participation in the grant process and allow for timely submission to HUD;
2. Issue the local request for proposals for CoC Program Funds;
3. Publicize the request for proposal announcement through the Collaborative Applicant website www.venturacoc.org and email broadcasts;
4. Conduct a briefing on the CoC Program Grant Application process in advance of deadlines;
5. Prepare applications for prioritization and ranking; and
6. Assist project applicants in the submission of application in eSNAPS.

F. CoC Project Ranking and Funding Decision Process

The VCCoC Governance Board shall appoint the Data Performance and Evaluation Advisory Committee, for the purpose of carrying out the project ranking and funding decisions for the Continuum of Care Program local competition. That Advisory Committee may also serve in other prioritization and funding allocation capacities as determined by the VCCoC Governance Board.

a) Conflicts of Interest

Members of the Data Performance and Evaluation Advisory Committee who are employees, contractors, or serve in any representative capacity of an applicant or subrecipient agency party to a funding application must recuse themselves from the Committee during the ranking and funding decision process.

b) CoC Program Grant Ranking and Prioritization Procedures

The Collaborative Applicant will provide training to the Data Performance and Evaluation Committee on the CoC Grant Process that will be open to the public. The training will follow HUD guidance and the prioritization and ranking rules within the CoC Program Notice of Funding Availability.

The Data Performance and Evaluation Advisory Committee will conduct two private meetings inclusive of Collaborative Applicant staff as part of the project review and selection process. The first meeting will involve receipt of all CoC Program Application Materials. The Committee Chair will provide final instruction to the committee on the review process. The second meeting will involve the final review, prioritization and funding decisions.

The Collaborative Applicant will prepare the project priority list and funding decision as instructed by the Committee. The list and Committee Chair's report will be presented at the next VCCoC Governance Board meeting. The VCCoC Governance Board will vote to accept the decisions of the Advisory Committee. The Governance Board is the final decision-making body for the determination of project priorities and funding levels.

G. CoC Program Rapid Rehousing Rental Assistance

Rapid Rehousing (RRH) Projects are designed to provide flexible programming that will expedite a household's ability to become self-sufficient through time-limited rental subsidy programs. Per 24

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CFR part 578.37(a)(1)(ii)), the VCCoC will establish annually priority populations to receive RRH assistance consistent with HUD Continuum of Care Program NOFA requirements and in response to analysis of active clients in HMIS, Point-in-Time Count data, housing inventory and unmet need reports.

The CoC has established a RRH Rental Assistance Subsidy Policy to determine the amount or percentage of rent each program participant must pay and the maximum amount or percentage of rental assistance that a program participant may receive. The VCCoC's Rapid Rehousing Rental Assistance Subsidy Policy also determines the maximum number of months that a program participant may receive rental assistance, the maximum number of times that a program participant may receive rental assistance, and the extent to which a program participant must share the cost of rent.

Continuum of Care Rapid Rehousing Program applicants must identify and select one of two rental subsidy program models for all their project participants upon initial CoC Program Grant application during the local competition. VCCoC approved subsidy models include the Income Based Subsidy and the Gradual Declining Subsidy.

Program Participants may participate in a RRH Program within the VCCoC Region a maximum of two times over a 24 month period including participation in an ESG Rapid Rehousing Program. Eligibility for frequency of participation will be determined by the Coordinated Entry System, review of client service history recorded in the HMIS and through consultation with any domestic violence Rapid Rehousing program.

1. Calculation of Eligible Participant Household Income

The calculation of household adjusted gross income must follow existing Continuum of Care Program Requirements. CoC Rapid Rehousing program participants adjusted gross household incomes must fall below or equal to 60% AMI. Household income will be recertified at least every 90 days to determine the appropriate level of rental subsidy.

2. Continuum of Care Rapid Rehousing Rental Subsidy Program

RRH Projects funded from CoC Program Funds must select one or separate the two models at program application and at program renewal and must apply that model to all clients within the CoC Rapid Rehousing project.

| RENTAL ASSISTANCE SUBSIDY MODEL | Rent to be Paid by Program Participant | Maximum Amount of Rental Assistance Received | Maximum Number of Months of Rental Assistance | Frequency of Income and Self-Sufficiency Assessments | Maximum Number of Months in Case Management |
|----------------------------------|--|---|--|---|---|
| Income Based Subsidy | 30% of Adjusted Gross household Income. \$0 minimum | Monthly Rent | 12 months (Short Term or Medium Term Programs) | First 90 days. Every 30 days from month 4 to program completion | 24 months |
| Gradual Declining Subsidy | 0% months 1-3 50% months 4-6 75% months 7-9 100% months 10-24 | 100% months 1-3 50% months 4-6 25% months 7-9 | 9 months (Medium Term Programs Only) | First 90 days. Every 30 days from month 4 to Program completion | 24 months |

Extensions – Extensions of rental assistance can be made for three additional months if the subrecipient agency has submitted its extension policy to the Collaborative Applicant at program start-up.

SECTION II. VENTURA COUNTY CONTINUUM OF CARE COORDINATED ENTRY SYSTEM

The VCCoC shall adopt the provisions and requirements set out in [HUD Notice CPD-14-012](#) for the *Prioritizing Persons Experiencing Chronic Homelessness and Other Vulnerable Homeless Persons in Permanent Supportive Housing and Recordkeeping Requirements for Documenting Chronic Homeless Status* as the baseline written standards for operations of the VCCoC Coordinated Entry System.

2.01. PURPOSE AND STANDARDS OF THE VCCoC COORDINATED ENTRY SYSTEM (CES)

A coordinated entry process is intended to increase and streamline access to housing and services for households experiencing homelessness, match appropriate levels of housing and services based on need, and prioritize persons with severe service needs for the most intensive interventions.

Provisions at 24 CFR 578.7(a)(8) requires that the CoC establish a coordinated entry process. The CES must incorporate and defer to any funding requirements established under the CoC Program interim rule, ESG Program interim rule, or a Notice of Funding Availability under which a project is awarded. In addition, the following are recommended as the minimum criteria for the effective implementation of a CoC's coordinated entry process.

- A. Standardized**—The CES process will rely upon a standardized method and criteria to determine the appropriate type of intervention for individuals or families. This standardized process encompass the CoC-wide use of the Vulnerability Index & Service Prioritization Decision Assistance Tool (VI-SPDAT), a standardized assessment tool, as well as data driven methods.
- B. Improves Data Management**—Individual tracking, resource allocation and planning, system monitoring, and reporting to the community and to funders is improved by use of a common, coordinated entry tool.
- C. Non-Directive**—The recommendations of the tool can be overridden by the judgment of qualified professionals, especially in where there are extenuating circumstances that are not assessed by the tool that are relevant to choosing appropriate interventions. Discretion must be exercised in a nondiscriminatory manner consistent with fair housing and civil rights laws and should be subject to appropriate review to ensure it is applied judiciously.
- D. Mainstream Resources**—Effective coordinated assessment facilitates meaningful coordination between the homeless response system and the intake processes for mainstream systems. Connections should be made to public housing authorities, multifamily housing, health and mental health care, the workforce development system, and with other mainstream income and benefits as appropriate and applicable.
- E. Align Interventions**—The various types of interventions that are available are aligned and used strategically.
- F. Leverage Local Attributes and Capacity**—The physical and political geography, including the capacity of partners in a community, and the opportunities unique to the community's context, should inform CES implementation.

- G. Assess Program Capacity**—Assess the variety and capacity of programs in the community to identify and fill critical gaps in housing and service resources and to ensure that there is a range of options needed for the CES to work well.
- H. Outreach**—The CES should ensure that connections and ongoing engagement occurs with those not accessing services and housing on their own. Often, these are the highest need and most at-risk people in communities.
- I. Privacy Protections**—Protections should be in place to ensure proper use of the information with consent from the client. Assessment should also be conducted in a private location.
- J. Fair Housing and Civil Rights**—Protections should be in place to ensure compliance with all civil rights requirements, including, but not limited to, the [Fair Housing Act](#), [Title VI of the Civil Rights Act of 1964](#), and [Section 504 of the Rehabilitation Act of 1973](#). The assessment tool should not seek disability-related information that is unnecessary for determining the need for housing-related services. The coordinated entry process should ensure that program participants are informed of rights and remedies available under applicable federal, state, and local fair housing and civil rights laws, in accordance with the requirement at [24 CFR 578.93\(c\)\(3\)](#).
- K. Training**—Initial and ongoing training on the use of the VI-SPDAT should be provided to those parties that will be administering the assessment.
- L. Accessible and Well-Advertised**—The assessment must be well advertised and easily accessed by people seeking services or housing. The assessment must be conducted in a manner that is accessible for individuals with disabilities, ensures meaningful program access for persons with Limited English Proficiency, and is affirmatively marketed in order to reach eligible persons who are least likely to seek assistance in the absence of special outreach, in accordance with [24 CFR 578.93\(c\)\(1\)](#).
- M. Prioritization**—When resources are scarce, the coordinated assessment process should prioritize who will receive assistance based on their needs. Coordinated assessment should never result in long waiting lists for assistance. Instead, when there are many more people who are assessed to receive an intervention than there are available openings, the process should refer only individuals with the greatest needs.
- N. Inform system change efforts**—Information gathered during the coordinated assessment process should identify what types of programs are most needed in the community and be used by the CoC and other community leaders to allocate resources.

2.02. OPERATING THE COORDINATED ENTRY SYSTEM

The Collaborative Applicant will be responsible for implementation of the CES to serve the Continuum of Care and provide a system and mechanism for targeting use of Continuum of Care Program and Emergency Solutions Grant resources. When fully implemented, the CES will include:

- Information about available services and programs for persons experiencing a housing or homeless crisis;
- Uniform intake, assessment and screening tools and processes;
- Real-time knowledge about program inventories and capacity;
- Coordinated referrals to receive prevention, housing or related services;
- Enrollment prioritization and waitlist management for housing programs.

2.03. PRIORITIZATION FOR CoC ASSISTANCE

The VCCoC Governance Board will adopt written standards for establishing eligibility and prioritization of clients for assistance. These standards will be specific and detailed, address any unique eligibility requirements for assistance (e.g., disability or subpopulation), reflect the homeless population and subpopulations within the VCCoC as reported by the Collaborative Applicant, and reflect the housing and service resources available within the VCCoC, and reflect local and national targeting priorities.

These written standards will be in compliance with HUD [Notice CPD-14-012](#) issued on July 28, 2014.

A. Priorities for Permanent Supportive Housing (PSH)

VCCoC Goals of prioritization written standards are to establish an order of priority for dedicated and prioritized PSH beds to ensure that those persons with the most severe service needs are given first priority; and to inform the selection process for PSH assistance not dedicated or prioritized for chronic homelessness to prioritize persons who do not yet meet the definition of chronic homelessness but are most at risk of becoming chronically homeless.

The CoC shall also develop uniform recordkeeping requirements for all recipients of CoC Program funded PSH for documenting chronically homeless status of program participants when required to do so as well as provide guidance on recommended documentation standards that the VCCoC may require of its recipients of CoC Program-funded PSH that will be required before assigning CoC Funded PSH Beds.

Key Terms and Definitions for Prioritization

Housing First. An approach in which housing is offered to people experiencing homelessness without preconditions (such as sobriety, mental health treatment, or a minimum income threshold) or service participation requirements and in which rapid placement and stabilization in permanent housing are primary goals. PSH projects that use a Housing First approach promote the acceptance of applicants regardless of their sobriety or use of substances, completion of treatment, or participation in services. All recipients of CoC Program-funded PSH should follow a Housing First approach to the maximum extent practicable.

Chronically Homeless. The definition of “chronically homeless” currently in effect for the CoC Program is that which is defined in the CoC Program interim rule at [24 CFR 578.3](#), which states that a chronically homeless person is:

1. An individual who:
 - Is homeless and lives in a place not meant for human habitation, a safe haven, or in an emergency shelter; and
 - Has been homeless and living or residing in a place not meant for human habitation, a safe haven, or in an emergency shelter continuously for at least one year or on at least four separate occasions in the last 3 years, where the cumulative total of the four occasions is at least one year. Stays in institutions of 90 days or less will not constitute as a break in homelessness, but rather such stays are included in the cumulative total; and
 - Can be diagnosed with one or more of the following conditions: substance use disorder, serious mental illness, developmental disability (as defined in section 102 of the [Developmental Disabilities Assistance Bill of Rights Act of 2000](#) (42 U.S.C. 15002)), post-traumatic stress disorder, cognitive impairments resulting from brain injury, or chronic physical illness or disability;
2. An individual who has been residing in an institutional care facility, including a jail, substance abuse or mental health treatment facility, hospital, or other similar facility, for fewer than 90 days and met all of the criteria in paragraph (1), before entering that facility; or
3. A family with an adult head of household (or if there is no adult in the family, a minor head of household) who meets all of the criteria in paragraph (1) of this definition, including a family whose composition has fluctuated while the head of household has been homeless.

Severity of Service Needs. For the purposes of prioritization, severity of service needs means an individual for whom at least one of the following is true:

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

Severe service needs as defined above should be identified and verified through data-driven methods such as an administrative data match between the HMIS and institutional providers or through the use of the VI-SPDAT. The determination must not be based on a specific diagnosis or disability type, but only on the severity of needs of the individual.

1. Dedication and Prioritization of Permanent Supportive Housing Strategies to Increase Number of PSH Beds Available for Chronically Homeless Persons

There are two significant ways in which the VCCoC can increase progress towards ending chronic homelessness using existing CoC Program-funded PSH:

- a) **Increase the number of CoC Program-funded PSH beds that are dedicated to persons experiencing chronic homelessness.**

Dedicated PSH beds are required through the project’s grant agreement with HUD to only

be used to house persons experiencing chronic homelessness unless there are no persons within the VCCoC that meet that criteria. If this occurs, the recipient may then follow the order of priority in these written standards. The bed will continue to be a dedicated bed, however, so when that bed becomes vacant again it must be used to house a chronically homeless person unless there are still no persons who meet that criterion within the VCCoC's geographic area as documented through the HMIS and the Coordinated Entry System. These PSH beds are reported as "CH Beds" on a VCCoC's Housing Inventory Count (HIC) maintained by the Collaborative Applicant. A CoC may increase the number of CoC Program-funded PSH beds that are dedicated to persons experiencing chronic homelessness when it's recipients of non-dedicated CoC Program-funded PSH request a grant amendment to dedicate one or more of its beds for this purpose. A recipient of CoC Program-funded PSH is prohibited from changing the designation of the bed from dedicated to non-dedicated without a grant agreement amendment. Similarly, if a recipient of non-dedicated PSH intends to dedicate one or more of its beds to the chronically homeless it may do so through a grant agreement amendment.

b) Prioritize non-dedicated PSH beds for use by persons experiencing chronic homelessness.

Prioritization means implementing an admissions preference for chronically homeless persons for CoC Program-funded PSH beds. Recently, in the CoC Program Competition, CoCs are scored on the extent to which they are willing to commit to prioritizing chronically homeless persons in a percentage of their non-dedicated PSH beds with the highest points going to CoCs that committed to prioritize the chronically homeless in 85 percent or more of their non-dedicated CoC Program-funded PSH. Further, project applicants for CoC Program-funded PSH must indicate the number of non-dedicated beds that would be prioritized for use by persons experiencing chronic homelessness. These projects are now required to prioritize chronically homeless persons in their non-dedicated CoC Program-funded PSH beds. PSH beds that are included in the calculation for the CoCs commitment in the CoC Application cannot revise their application to reduce the number of prioritized beds; however, recipients of PSH that are currently not dedicated to the chronically homeless may choose to prioritize additional beds. All recipients of CoC Program-funded PSH are encouraged to prioritize the chronically homeless as beds become vacant to the maximum extent practicable.

VCCoC wide performance will be expected to meet or exceed the goals established in the CoC Application and should continue to prioritize persons experiencing chronic homelessness in their CoC Program-funded PSH until there are no persons within the VCCoC's geographic area who meet that criteria. Further, to the extent that CoCs incorporate this order of priority into the CoCs written standards, recipients of CoC Program-funded PSH will also be required to follow this criterion included in those standards.

2. Order of Priority in CoC Program-funded Permanent Supportive Housing Beds dedicated to Persons Experiencing Chronic Homelessness and Permanent Supportive Housing Prioritized for Occupancy by Persons Experiencing Chronic Homelessness

Recipients of CoC Program-funded PSH are required to follow the order of priority when selecting participants for housing in accordance with the VCCoC's written standards, in accordance with [Notice CPD-14-012](#), and in a manner consistent with their current grant agreement. For CoC Program-funded PSH that is dedicated or prioritized for persons experiencing chronic homelessness, the following order of priority will be documented and implemented through the Coordinated Entry System Documentation of Priority Status (DOPS) ([Attachment G](#)) managed by the Collaborative Applicant.

- a) **Priority One—Chronically Homeless Individuals and Families with the Longest History of Homelessness and with the Most Severe Service Needs.** A chronically homeless individual or head of household as defined in [24 CFR 578.3](#) for whom both of the following are true:
- i) The chronically homeless individual or head of household of a family has been homeless and living in a place not meant for human habitation, a safe haven, or in an emergency shelter for at least one year either continuously or on at least four separate occasions in the last three years, where the cumulative total length of the four occasions equals at least one year;
 - ii) The CoC or CoC Program Recipient has identified the chronically homeless individual or head of household, who meets all of the criteria in paragraph (1) of the definition for chronically homeless, of the family as having severe service needs (see Section 2.03.A of this Notice for definition of severe service needs).
- b) **Priority Two—Chronically Homeless Individuals and Families with the Longest History of Homelessness.** A chronically homeless individual or head of household, as defined in [24 CFR 578.3](#), for which both of the following are true:
- i) The chronically homeless individual or head of household of a family has been homeless and living in a place not meant for human habitation, a safe haven, or in an emergency shelter for at least one year either continuously or on at least four separate occasions in the last three years, where the cumulative total length of the four occasions equals at least one year; and
 - ii) The CoC or CoC Program Recipient has not identified the chronically homeless individual or the head of household, who meets all of the criteria in paragraph (1) of the definition for chronically homeless, of the family as having severe service needs.

- c) **Priority Three—Chronically Homeless Individuals and Families with the Most Severe Service Needs.** A chronically homeless individual or head of household as defined in [24 CFR 578.3](#) for whom both of the following are true:
- i) The chronically homeless individual or head of household of a family has been homeless and living or residing in a place not meant for human habitation, a safe haven, or in an emergency shelter on at least one year either continuously or on at least four separate occasions in the last three years, where the total length of those separate occasions equals **less than** one year; and
 - ii) The CoC or CoC Program Recipient has identified the chronically homeless individual or the head of household, who meets all of the criteria in paragraph (1) of the definition for chronically homeless, of the family as having severe service needs.
- d) **Priority Four—All Other Chronically Homeless Individuals and Families.** A chronically homeless individual or head of household as defined in [24 CFR 578.3](#) for whom both of the following are true:
- i) The chronically homeless individual or head of household of a family has been homeless and living in a place not meant for human habitation, a safe haven, or in an emergency shelter for at least one year either continuously or on at least four separate occasions in the last three years, where the cumulative total length the four occasions is **less than** one year; and
 - ii) The CoC or CoC Program Recipient has **not** identified the chronically homeless individual or the head of household, who meets all of the criteria in paragraph (1) of the definition for chronically homeless, of the family as having severe service needs.

Where a CoC or a recipient of CoC Program-funded PSH beds that are dedicated or prioritized is not able to identify chronically homeless individuals and families as defined in [24 CFR 578.3](#) within the CoC, the order of priority in PSH beds not dedicated or prioritized for persons experiencing chronic homelessness below (2.03.A.3) may be followed.

Recipients of CoC Program-funded PSH should follow the order of priority above while also considering the goals and any identified target populations served by the project. For example, a CoC Program-funded PSH project that is permitted to target homeless persons with a serious mental illness that has been identified as a project that will prioritize a portion or all of its turnover beds to persons experiencing chronic homelessness should follow the order of priority under the definition of **Priority One** to the extent in which persons with serious mental illness meet the criteria.

Recipients must exercise due diligence when conducting outreach and assessment to ensure that persons are served in the order of priority in this policy. The CoC recognizes that some persons, particularly those living on the streets or in places not meant for human habitation, might require significant engagement and contacts prior to their entering housing and recipients **are not required** to keep units vacant where

there are persons who meet a higher priority within the CoC and who have not yet accepted the PSH opportunities offered to them. Street outreach providers should continue to make attempts to engage those persons and the CoC and CoC Program-funded PSH providers are encouraged to follow a Housing First approach to the maximum extent practicable and for those projects that indicated in the CoC Project Application that they will follow a Housing First approach will be required to do so for both the entire operating year, as the CoC score for the CoC Program Competition is affected by the extent in which project applications indicate that they will follow this approach and this requirement will be incorporated into the recipient's grant agreement. For eligibility in dedicated or prioritized PSH serving chronically homeless households, the individual or head of household must meet all of the applicable criteria to be considered chronically homeless per [24 CFR 578.3](#).

3. Order of Priority in Permanent Supportive Housing Beds Not Dedicated or Prioritized for Persons Experiencing Chronic Homelessness

Recipients of CoC Program-funded PSH beds that are not dedicated or prioritized for persons experiencing chronic homelessness are required to follow the order of priority when selecting participants for housing in accordance with these written standards and in a manner consistent with their current grant agreement with HUD. This policy will allow for recipients of non-dedicated and non-prioritized PSH to offer housing to chronically homeless individuals and families first, but minimally would be required to place otherwise eligible households in an order that prioritizes, in a nondiscriminatory manner, those who would benefit the most from this type of housing, beginning with those ***most at-risk of becoming chronically homeless***. For eligibility in non-dedicated and non-prioritized PSH serving non-chronically homeless households, ***any household member with a disability*** may qualify the family for PSH.

- a) **Priority One – Homeless Individuals and Families with a Disability with the Most Severe Service Needs.** An individual or family that is eligible for CoC Program-funded PSH who has been living or residing in a place not meant for human habitation, a safe haven, or in an emergency shelter for any period of time, including persons exiting an institution where they have resided for 90 days or less but were living or residing in a place not meant for human habitation, a safe haven, or in an emergency shelter immediately prior to entering the institution and has been identified as having the most severe service needs.
- b) **Priority Two – Homeless Individuals and Families with a Disability with a Long Period of Continuous or Episodic Homelessness.** An individual or family that is eligible for CoC Program-funded PSH who has been living or residing in a place not meant for human habitation, a safe haven, or in an emergency shelter continuously for at least six months or on at least three separate occasions in the last three years where the cumulative total is at least six months. This includes persons exiting an institution where they have resided for 90 days or less but were living or residing in a place not meant for human habitation, a safe haven, or in an emergency shelter immediately prior to entering the institution and had been living or residing in one of those locations for at least six months or on at least three separate occasions in the last three years where the cumulative total

is at least six months.

- c) **Priority Three – Homeless Individuals and Families with Disability Coming from Places Not Meant for Human Habitation, Safe Havens, or Emergency Shelters.** An individual or family that is eligible for CoC Program-funded PSH who has been living in a place not meant for human habitation, a safe haven, or an emergency shelter. This includes persons exiting an institution where they have resided for 90 days or less but were living or residing in a place not meant for human habitation, a safe haven, or in an emergency shelter immediately prior to entering the institution.
- d) **Priority Four – Homeless Individuals and Families with a Disability Coming from Transitional Housing.** An individual or family that is eligible for CoC Program-funded PSH who is coming from transitional housing, where prior to residing in the transitional housing lived on streets or in an emergency shelter, or safe haven. This priority also includes homeless individuals and homeless households with children with a qualifying disability who were fleeing or attempting to flee domestic violence, dating violence, sexual assault, or stalking and are living in transitional housing—all are eligible for PSH even if they did not live on the streets, emergency shelters, or safe havens prior to entry in the transitional housing.

Recipients of CoC Program-funded PSH should follow the order of priority above while also considering the goals and any identified target populations served by the project. For example, in CoC Program-funded PSH where the beds are not dedicated or prioritized and which is permitted to target homeless persons with a serious mental illness should follow the order of priority under **Priority One** to the extent in which persons with serious mental illness meet the criteria.

Due diligence should be exercised when conducting outreach and assessment to ensure that persons are served in the order of priority in this Policy, and as adopted by the CoC. HUD recognizes that some persons, particularly those living on the streets or in places not meant for human habitation, might require significant engagement and contacts prior to their entering housing and recipients are not required to keep units vacant where there are persons who meet a higher priority within the CoC and who have not yet accepted the PSH opportunities offered to them. Street outreach providers should continue to make attempts with those persons using a Housing First approach to place as few conditions on a person's housing as possible.

B. Prioritization of Services for Families with Children: Prevention, Rapid Rehousing, Transitional Housing

For homeless households with children, agencies will initially engage the family to determine if there are **diversion** resources to avoid a stay in emergency shelter.

If the household is living in an unsheltered situation, there is no required waiting period prior to the start of the prioritization process. Outreach, or other relevant staff, may begin the prioritization process immediately.

If an extended stay in emergency shelter is necessitated, agencies will conduct the HMIS based **"Housing Assessment Form"** (HAF) (or the Domestic Violence shelter equivalent assessment) no

later than the **7th night** of shelter to determine housing options and severity of housing barriers.

If during the HAF assessment and case management interview, it is determined that the family presents with documentable disabling conditions and episodic homelessness, the agency will pursue the DOPS and severity of service needs process for prioritization for permanent supportive housing protocol described above.

If the HAF assessment and case management interview determines that the family presents with barriers and service needs that are manageable with resources provided by the CoC's Rapid Rehousing Programs, they will be referred or placed on the prioritization list for those resources.

If the HAF assessment and interview with the family determines that the family presents with more substantial barriers and service needs that are better managed with resources provided by the CoC's Transitional Housing Programs, they will be referred or placed on the prioritization list for those resources.

Prioritization Lists for Rapid Rehousing and Transitional Housing will be managed by the Collaborative Applicant and all clients on the lists will be reviewed and updated at least every 90 days.

C. Prioritization of Services for Individuals Unaccompanied by children for Homeless Prevention, Rapid Rehousing, and Transitional Housing

For homeless individuals unaccompanied by children, agencies, as able with shelter based staff resources, initially engage the individual to determine if there are **diversion** resources to avoid a stay in emergency shelter.

If an extended stay in emergency shelter is necessitated, agencies will conduct the HMIS based "**Housing Assessment Form**" (HAF) (or the Domestic Violence shelter equivalent assessment) no later than the **30th night** of shelter to determine housing options and severity of housing barriers.

If during the HAF assessment and case management interview, it is determined that the individual presents with documentable disabling conditions and episodic homelessness, the agency will pursue the DOPS and severity of service needs process for prioritization for permanent supportive housing protocol described above.

If the HAF assessment and case management interview determines that the individual presents with barriers and service needs that are manageable with resources provided by the CoC's Rapid Rehousing Programs, they will be referred or placed on the prioritization list for those resources.

If the HAF assessment and case management interview determines that the individual presents with more substantial barriers and service needs that are better managed with resources provided by the CoC's Transitional Housing Programs, they will be referred or placed on the prioritization list for those resources.

Prioritization Lists for Rapid Rehousing and Transitional Housing will be managed by the Collaborative Applicant and all clients on the lists will be reviewed and updated at least every 90 days.

D. Prioritization of Housing for Subpopulations: Domestic Violence and Transition-Aged Youth

- **Victims of Domestic Violence, Dating Violence, Sexual Assault, or Stalking.** Persons who present through the Coordinated Assessment System or at emergency shelters who are victims of domestic violence, dating violence, sexual assault, or stalking will be immediately referred to the Domestic Violence resources for a safety assessment. If the assessment results in the household not being referred to a domestic violence shelter, the Coordinated Entry System or receiving agency will proceed with the standard methods of assessment and prioritization and the victimization experience will be considered in the assessment and service needs evaluation.
- **Transitional Age Youth.** Persons who present through the Coordinated Entry System or at emergency shelters who are transitional age youth, between the ages of 18 – 24, will be immediately referred to appropriate young adult services for assessment. If the assessment results in the household not being referred to services provided by specialized young adult agencies, the Coordinated Entry System or agency will proceed with the standard methods of assessment and prioritization and the age of the youth will be considered in the assessment and service needs evaluation.

E. Universal Assessment – Vulnerability Index and Service Prioritization Decision Assistance Tool (VI-SPDAT)

All Ventura County Continuum of Care (VCCoC) homeless services providers and key referring entities will utilize the Homeless Service Pre-Screening Tool ([Attachment A](#)) to gather preliminary information to help divert and direct individuals and families to the appropriate services. Ventura County is a large geographic area with 10 cities and unincorporated areas, all with different services. This tool will be used to direct individuals and families to agencies and services that provide emergency shelter, safe haven, bridge housing, transitional housing, homeless prevention services, rapid re-housing, permanent supportive housing and other housing options. Individuals who meet the definition of chronically homeless will be referred to a provider who will conduct the Vulnerability Index and Service Prioritization Decision Assistance Tool (VI-SPDAT). Staff administering the survey will also collect basic information on client needs and preferences for housing with the Housing Match Worksheet ([Attachment B](#)). Outreach teams will also complete the VI-SPDAT with individuals who meet the definition of chronically homeless. The VI-SPDAT will be used to help the VCCoC prioritize the limited resources and serve the most vulnerable persons in the community.

The survey takes from 15-45 minutes to administer on average and can be conducted by a provider trained on the survey and an HMIS training on how to record the survey results in the HMIS database. A printable copy of the survey can be found in the Provider section of the VCCoC website at www.venturacoc.org.

Everyone who administers the VI-SPDAT will receive standardized messaging “Suggested Coordinated Entry Messaging” form ([Attachment C](#)) so that the assessment process and results are communicated clearly and consistently across the community. Once an individual agrees to participate in the survey, a Release of Information (ROI) will need to be signed.

F. Release of Information

All providers participating in the Coordinated Entry System will utilize the same Release of Information (ROI) ([Attachment D](#)) to input all VI-SPDAT assessments within HMIS. The ROI is HIPAA compliant, reviewed by County Counsel and adopted by the Continuum of Care.

Individuals have the right to opt out of the data sharing part of the VI-SPDAT. Those who do not wish to complete the assessment or have data shared in HMIS may be referred to the CES Coordination Team.

All participating agencies in the Ventura County Coordinated Entry System will sign a Memorandum of Understanding (MOU) ([Attachment E](#)) that is an interagency data sharing agreement. This will allow for an open HMIS system with data sharing for improving continuity of care for individuals and families seeking homeless services.

G. Recordkeeping Requirements

Recordkeeping requirements for all recipients of CoC Program-funded PSH that are required to document a program participant's status as chronically homeless as defined in 24 CFR 578.3 and in accordance with [24 CFR 578.103](#). The VCCoC will maintain evidence through recordkeeping and documentation that the adopted orders of priority in Section B are being implemented.

1. VCCoC / Collaborative Applicant Records

In addition to the records required in [24 CFR 578.103](#), the VCCoC will maintain records of the following:

- a) **Evidence of written standards that incorporate the priorities in Section A and B above as adopted by the VCCoC.** Written evidence of CoC, or subcommittee, meeting minutes where written standards were adopted that incorporate the prioritization standards.
- b) **Evidence of a standardized assessment tool.** Use of a standardized assessment tool may be evidenced by written policies and procedures referencing a single standardized assessment tool that is used by all CoC Program-funded PSH recipients within the VCCoC's geographic area.
- c) **Evidence that the written standards were incorporated into the coordinated entry policies and procedures.** Incorporating standards into the coordinated entry policies and procedures may be evidenced by updated policies and procedures that incorporate the updated written standards for CoC Program-funded PSH developed and approved by the CoC.

2. Recipient Recordkeeping Requirements

In addition to the records required in [24 CFR 578.103](#), recipients of CoC Program-funded PSH that are required by grant agreement to document chronically homeless status of program participants in some or all of its PSH beds must maintain the following records:

- a) **Written Intake Procedures.** Recipients must maintain and follow written intake procedures to ensure compliance with the definition of chronically homeless per [24 CFR](#)

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[578.3](#). These procedures must establish the order of priority for obtaining evidence as: (1) third-party documentation, (2) intake worker observations, and (3) certification from the person seeking assistance. Records contained in an HMIS or comparable database used by victim service or legal service providers are acceptable evidence of third-party documentation and intake worker observations if the HMIS retains an auditable history of all entries, including the person who entered the data, the date of entry, and the change made; and if the HMIS prevents overrides or changes of the dates entries are made.

- b) **Evidence of Chronically Homeless Status.** Recipients of CoC Program-funded PSH whose current grant agreement includes beds that are dedicated or prioritized to the chronically homeless must maintain records evidencing that the individuals or families receiving the assistance in those beds meets the definition for chronically homeless at [24 CFR 578.3](#). Such records must include evidence of the homeless status of the individual or family, the duration of homelessness, and the disabling condition. When applicable, recipients must also keep records demonstrating compliance with paragraphs (2) and (3) of the definition. Service providers are urged to use the Chronically Homeless Qualification Checklist ([Attachment F](#))
- i) **Evidence of homeless status.** Evidence of an individual or head of household's current living situation may be documented by a written observation by an outreach worker, a written referral by housing or service provider, or a certification by the household seeking assistance that demonstrates that the individual or head of household is currently homeless and living in a place not meant for human habitation, in an emergency shelter, or a safe haven. For paragraph (2) of the definition for chronically homeless at [24 CFR 578.3](#), for individuals currently residing in an institution, acceptable evidence includes:
- Discharge paperwork or a written or oral referral from a social worker, case manager, or other appropriate official of the institution, stating the beginning and end dates of the time residing in the institution that demonstrate the person resided there for less than 90 days. All oral statements must be recorded by the intake worker; or
 - Where the evidence above is not obtainable, a written record of the intake worker's due diligence in attempting to obtain the evidence described in paragraph 2.b.i. above and a certification by the individual seeking assistance that states that they are exiting or have just exited an institution where they resided for less than 90 days; and
 - Evidence that the individual was homeless and living in a place not meant for human habitation, a safe haven, or in an emergency shelter, and met the criteria in paragraph (1) of the definition for chronically homeless in [24 CFR 578.3](#), immediately prior to entry into the institutional care facility.
- ii) **Evidence of the duration of the homelessness.** Recipients documenting chronically homeless status must also maintain the evidence described in paragraph 2.b.i. or in paragraph this section below:

- **Evidence that the homeless occasion was continuous, for at least one year.**

Using any combination of allowable documentation, recipients must provide evidence that the homeless occasion was continuous, for a year period, without a break in living or residing in a place not meant for human habitation, a safe haven, or in an emergency shelter. For the purposes of this Policy, a break is considered at least seven or more consecutive nights not residing in a place not meant for human habitation, in shelter, or in a safe haven.

At least nine months of the one year period must be documented by one of the following: (1) HMIS data, (2), a written referral, or (3) a written observation by an outreach worker. In only rare and the most extreme cases, HUD would allow a certification from the individual or head of household seeking assistance in place of third-party documentation for up to the entire period of homelessness. Where third-party evidence could not be obtained, the intake worker must obtain a certification from the individual or head of household seeking assistance, and evidence of the efforts made to obtain third-party evidence as well as documentation of the severity of the situation in which the individual or head of household has been living. An example of where this might occur is where an individual has been homeless and living in a place not meant for human habitation in a secluded area for more than one year and has not had any contact with anyone during that entire period.

Note: A single encounter with a homeless service provider on a single day within one month that is documented through third-party documentation is sufficient to consider an individual or family as homeless for the entire month unless there is any evidence that the household has had a break in homeless status during that month (e.g., evidence in HMIS of a stay in transitional housing).

- **Evidence that the household experienced at least four separate homeless occasions over 3 years.**

Using any combination of allowable documentation, the recipient must provide evidence that the head of household experienced at least four, separate, occasions of homelessness in the past three years.

Generally, at least three occasions must be documented by either: (1) HMIS data, (2) a written referral, or (3) a written observation. Any other occasion may be documented by a self-certification with no other supporting documentation. In only rare and the most extreme cases, HUD will permit a certification from the individual or head of household seeking assistance in place of third-party documentation. Where third-party evidence could not be obtained, the intake worker must obtain a certification from the individual or head of household seeking assistance, and must document efforts made to obtain third-party evidence, and document of the severity of the situation in which the individual has been living. An example of where this might occur is where an individual has been homeless and living in a place not meant for human habitation in a secluded area for more than one occasion of

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homelessness and has not had any contact with anyone during that period.

iii) **Evidence of diagnosis with one or more of the following conditions: substance use disorder, serious mental illness, developmental disability (as defined in [Section 102 of the Developmental Disabilities Assistance Bill of Rights Act of 2000 \(42 U.S.C. 15002\)](#), post-traumatic stress disorder, cognitive impairments resulting from brain injury, or chronic physical illness or disability.** Evidence of this criterion must include one of the following:

- Written verification of the condition from a professional licensed by the state to diagnose and treat the condition;
- Written verification from the Social Security Administration;
- Copies of a disability check (e.g., Social Security Disability Insurance check or Veterans Disability Compensation);
- Intake staff (or referral staff) observation that is confirmed by written verification of the condition from a professional licensed by the state to diagnose and treat the condition that is confirmed no later than 45 days of the application for assistance and accompanied with one of the types of evidence above; or
- Other documentation approved by HUD.

c) **Coordinated Entry System Prioritization**

The order of priorities established in the VCCoC Coordinated Entry System Policies and Procedures for CoC Program-funded PSH may demonstrate that they are following the CoC established requirement by maintaining the following evidence:

i) **Evidence of Cumulative Length of Occasions.** For recipients providing assistance to households using the selection Priority One through Four for both dedicated and non-dedicated PSH beds, the recipient must maintain the evidence of each occasion of homelessness as required, which establishes how evidence of each occasion of homelessness, when determining whether an individual or family is chronically homeless, may be documented. However, to properly document the length of time homeless, it is important to document the start and end date of each occasion of homelessness and these occasions must cumulatively total a period of one year. In order to properly document the cumulative period of time homeless, at least nine months of the one year period must be documented through third-party documentation unless it is one of the rare and extreme cases described above (*Evidence that the household experienced at least four separate homeless occasions over 3 years*). For purposes of this selection priority, a single encounter with a homeless service provider on a single day within one month that is documented through third-party documentation is sufficient to consider an individual or family as homeless for the entire month unless there is any evidence that the household has had a break in homeless status during that month (e.g., evidence in HMIS of a stay in transitional housing).

ii) **Evidence of Severe Service Needs.** Evidence of severe service needs is that by which the recipient is able to determine the severity of needs using data-driven methods such as an administrative data match or through the use of a standardized assessment conducted by a qualified professional.

iii) **Evidence that the Recipient is Following the CoC's Written Standards for Prioritizing Assistance.** Recipients must follow the CoC's written standards for prioritizing assistance, as adopted by the CoC. In accordance with the CoC's adoption of written standards for prioritizing assistance, recipients must in turn document that the CoC's revised written standards have been incorporated into the recipient's intake procedures and that the recipient is following its intake procedures when accepting new program participants into the project.

The VCCoC Governance Board shall approve a Coordinated Entry System Memorandum of Understanding that will detail the responsibilities for utilization, documentation and compliance with prioritization standards adopted and included in the VCCoC Coordinated Entry System Policies and Procedures. The Coordinated Entry System Memorandum of Understanding shall be a required agreement for all CoC Program and Emergency Solutions Grant grantees, sub grantees, recipients and subrecipients.

d) Operating Procedures for the Documentation of Priority Status (DOPS)

The Documentation of Priority Status process requires that agency staff, through the HMIS system, request of the CES Coordination Team via the Collaborative Applicant to review submissions of documentation of homelessness, disability, veteran status, households with children and other sub-population to verify the level of Priority based on the criteria established by these Policies. Priorities will be confirmed by the CES Coordination Team, recorded on the client record in HMIS and documented through a signed DOPS form ([Attachment G](#)). The CES Coordination Team will review all documents and assessments and categorize the client based on the Priority One through Four categories described above for Permanent Supportive Housing.

This Priority Status Classification will be documented in the HMIS as P1, P2, P3 and P4 etc. and have an additional Severity of Need Score that will encompass the Prioritized Waiting List.

The Collaborative Applicant will maintain the Prioritized Waiting lists to assist CoC and ESG recipients in identifying clients with the highest levels of need in appropriate housing interventions.

i) Documentation of Priority Status Lists

CoC Program-funded PSH projects will accept referrals only through a single prioritized waiting list that is created through the CoCs coordinated assessment process. This process is known as the *Documentation of Priority Status*. This process will ensure that CoC Program-funded PSH is being used most effectively. Project-level waiting lists will be based on this master priority status list, and not on the date in which they first applied for housing assistance.

ii) Dispute Classification of Priority Status

Agencies that believe that the DOPS priority classification is not accurate, or believe that the client or household should be reconsidered for other circumstances of severity of service needs may request a DOPS Reconsideration to the Collaborative Applicant or other designee appointed by the Collaborative Applicant or Continuum of Care Governance Board.

iii) DOPS Updates

The CES Coordination Team will review a household's Documentation of Priority Status every 90 days. Collaborative Applicant staff may at any time request a DOPS update if a client or households homeless or disability status changes to seek a higher priority. All reconsiderations or updates must comply with all recordkeeping and documentation set forth in these Policies and Procedures and consistent with the [HUD Notice CPD-14-012](#).

e) Nondiscrimination Requirements

CoCs and recipients of CoC Program-funded PSH must continue to comply with the nondiscrimination provisions of Federal Civil Rights Laws, including, but not limited to, the [Fair Housing Act](#), [Section 504 of the Rehabilitation Act](#), [Title VI of the Civil Rights Act](#), and [Titles II or III of the Americans with Disabilities Act](#), as applicable.

SECTION III. CONTINUUM OF CARE PLANNING

3.01. VCCoC STRATEGIC PLAN

The Collaborative Applicant, in collaboration with the HMIS Lead and Advisory Committee Chairs, will be responsible for drafting an annual Continuum of Care Strategic Plan to be reviewed and approved by the VCCoC Governance Board. The plan will contain at minimum:

- HUD Goals
- Continuum of Care Goals
- HUD Objectives
- Continuum of Care Local Objectives
- Action Items that identify who and what steps will be taken to address the objectives and achieve the goals
- Performance measures

3.02. SYSTEM WIDE PERFORMANCE MEASUREMENTS

The Collaborative Applicant will be charged with collecting and reporting Continuum of Care System Performance Measures. These measure will include at minimum:

- Length of time persons remain homeless;
- The extent to which persons who exit homelessness to permanent housing destinations return to homelessness;
- Number of homeless persons;
- Jobs and income growth for homeless persons in CoC Program-funded projects;
- Number of persons who become homeless for the first time;
- Homelessness prevention and housing placement of persons defined by Category 3 of HUD's homeless definition in CoC Program-funded projects;
- Successful housing placement.

The purpose of these measures is to provide a more complete picture of how well our community is preventing and ending homelessness. The number of homeless person's measure directly assesses the VCCoC's progress toward eliminating homelessness by counting the number of people experiencing homelessness both at a point in time and over the course of a year. The six other measures help the VCCoC understand how well they are reducing the number of people who become homeless and helping people become quickly and stably housed.

Reductions in the number of people becoming homeless are assessed by measuring the number of persons who experience homelessness for the first time, the number who experience subsequent episodes of homelessness, and homelessness prevention and housing placement for people who are unstably housed (Category 3 of HUD's homelessness definition). Achievement of quick and stable housing is assessed by measuring length of time homeless, employment and income growth, and placement when people exit the homelessness system.

The performance measures are interrelated and, when analyzed relative to each other, provide a more complete picture of system performance. Data Quality and Standards are addressed in the HMIS policies and procedures.

3.03. NEEDS AND GAPS ANALYSIS

The Collaborative Applicant is responsible for conducting and reporting to the VCCoC Governance Board an annual gaps and needs analysis of housing and services in the homeless system of care. The Collaborative Applicant may use HMIS data, performance data, and point in time surveys, agency surveys for data collection.

3.04. POINT-IN-TIME COUNT

The Continuum of Care Collaborative Applicant will lead the Continuum of Care in conducting an annual point in time count of the homeless in compliance with HUD standards.

The sheltered count will be conducted using the HMIS system and its equivalent for non-contributing HMIS organizations. The unsheltered count will be conducted using a comprehensive geographical blitz strategy.

The Collaborative Applicant will report the results of the point in time count at the first VCCoC Alliance meeting following the count.

The Collaborative Applicant is responsible for reporting the point in time findings to HUD accurately and on time through the Homeless Data Exchange system (HDX). The Collaborative Applicant is the recognized administrator and manager of the VCCoC's HDX account.

3.05. HOUSING INVENTORY CHART (HIC)

In consultation with each CoC Program project applicant's, the Collaborative Applicant is responsible to assure the timely submission and accuracy of the Housing Inventory Chart (HIC). The HIC represents the official inventory of housing available within the CoC for emergency shelter, safe haven, transitional, permanent supportive, permanent, and other permanent housing exclusively for persons experiencing homelessness. The HIC is used to calculate the VCCoC's unmet need for housing, calculating beds dedicated and prioritized for the chronically homeless.

SECTION IV. EMERGENCY SOLUTIONS GRANT

Policy Requirement: The CoC must consult with State and local government Emergency Solutions Grants (ESG) program recipients within the CoC's geographic area on the plan for allocating ESG program funds and reporting on and evaluating the performance of ESG program recipients and subrecipients.

4.01. CONSULTATION WITH ESG GRANTEEES

ESG Grantees will submit to the Collaborative Applicant an annual ESG program calendar to include critical dates, deadlines, and public participation opportunities for:

- ESG Allocation Process
- Consolidated Action Plan
- CAPER

Local ESG recipients will submit to the VCCoC Collaborative Applicant a description of the ESG Grant Allocation Process no less than 30 days prior to the ESG Recipient's public release of the ESG request for proposal. Local ESG recipients will provide a draft version of the RFP to the Collaborative Applicant no later than five business days from finalization in order to receive input on priorities and performance measurements and consistency with the Continuum of Care and HUD funding priorities and targeted populations for assistance.

4.02. ESTABLISHING PRIORITIES

Funding priorities and targeted populations for assistance will be established annually within the first quarter of the calendar year. These priorities will be established with input from HUD, the Collaborative Applicant, ESG recipients and subrecipients, and consumers.

Local government ESG recipients will attend the Ventura County Continuum of Care Alliance Annual Meeting.

4.03. PROCESS FOR MONITORING ESG RECIPIENTS AND SUBRECIPIENTS

ESG Recipients will provide the VCCoC with a copy of all ESG subrecipient executed contracts within 10 business days of execution in order to maintain an accurate inventory of assistance available for the Coordinated Entry System and set up of ESG program and reporting tools in the HMIS system.

ESG Recipients will provide the Collaborative Applicant with an annual monitoring schedule. The Collaborative Applicant will cooperate with ESG Recipients in providing needed performance or client HMIS information.

The VCCoC Collaborative Applicant will conduct at least an annual monitoring of ESG recipients to review timely expenditure of funds.

4.04. REPORTING PERFORMANCE

The VCCoC Collaborative Applicant will produce quarterly and end of program year ESG recipient and subrecipient reports generated by the HMIS system. VCCoC – wide standard ESG performance metrics will be established in the first quarter of the calendar year through consultation with ESG recipients and approved by the VCCoC Governance Board.

| Report Due Date | ESG Report Performance Coverage |
|-----------------|---------------------------------|
| October 15 | July - September |
| January 15 | October - December |
| April 15 | January - March |
| July 15 | April - June |

The VCCoC Collaborative applicant will provide ESG Recipients with required Consolidated Action Plan and CAPER data no later than 45 days prior to the final HUD submission deadline.

4.05. STANDARDS FOR PROVISION OF ESG FUNDS ADMINISTERED BY THE VCCoC

The Continuum of Care Board has appointed the Collaborative Applicant as the designated representative to enter into contract with the California Department of Housing and Community Affairs to administer the ESG program funds designated to the City of Oxnard/San Buenaventura/Ventura County CoC (CA-611). Standards for access to assistance funded by this program are as follows:

1. Eligible Organizations that may apply for ESG Funding Administered by the VCCoC

The subrecipient must be a private, non-profit organization, as defined by the Internal Revenue Service tax code, evidenced by having a Federal Identification Number, filed articles of incorporation, and written organizational by-laws.

Proposed use of ESG funds should address the Continuum of Care Strategic Plan, identified gaps and needs, or meet other identified needs of the VCCoC.

Further, ESG subrecipients must meet the following criteria to become eligible for assistance under one or multiple activities:

a) Street Outreach ([24 CFR 576.101](#)) Essential Services

Related to reaching out to unsheltered homeless individuals and families, connecting them with emergency shelter, housing, or critical services, and providing them with urgent, non-facility-based care. Eligible costs include engagement, case management, emergency health and mental health services, transportation, and services for special populations.

b) Emergency Shelter ([24 CFR 576.102](#))

Any facility with primary purpose to provide a temporary shelter for the homeless in general or for specific populations of the homeless and which does not require occupants to sign leases or occupancy agreements. Any project funded as an emergency shelter.

i) Renovation

Includes major rehabilitation or conversion of a building to serve as an emergency shelter. The emergency shelter must be owned by a government entity or private nonprofit organization. The shelter must serve homeless persons for at least 3 or 10 years, depending on the type of renovation and the value of the building. Note: Property acquisition and new construction are ineligible ESG activities.

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ii) Essential Services

Includes case management, child care, education services, employment assistance and job training, outpatient health services, legal services, life skills training, mental health services, substance abuse treatment services, transportation, and services for special populations.

iii) Shelter Operations

Includes maintenance, rent, repair, security, fuel, equipment, insurance, utilities, food, furnishings, and supplies necessary for the operation of the emergency shelter. Where no appropriate emergency shelter is available for a homeless family or individual, eligible costs may also include a hotel or motel voucher for that family or individual.

c) Homeless Prevention (24 CFR 576.03)

Housing relocation and stabilization services and short-and/or medium-term rental assistance as necessary to prevent the individual or family from moving to an emergency shelter, a place not meant for human habitation, or another place described in paragraph (1) of the homeless definition.

- The costs of homelessness prevention are only eligible to the extent that the assistance is necessary to help the program participant regain stability in their current housing or move into other permanent housing and achieve stability in that housing. Eligible costs include:
 - Rental Assistance: rental assistance and rental arrears;
 - Financial Assistance: rental application fees, security and utility deposits, utility payments, last month's rent, moving costs;
 - Services: housing search and placement, housing stability case management, landlord-tenant mediation, tenant legal services, credit repair.

d) Rapid Re-Housing (24 CFR 576.04)

Housing relocation and stabilization services and/or short-and/or medium-term rental assistance as necessary to help individuals or families living in shelters or in places not meant for human habitation move as quickly as possible into permanent housing and achieve stability in that housing.

- **Eligible costs include:**
 - Rental Assistance: rental assistance and rental arrears;
 - Financial assistance: rental application fees, security and utility deposits, utility payments, last month's rent, moving costs;
 - Services: housing search and placement, housing stability case management, landlord-tenant mediation, tenant legal services, credit repair.

e) Data Collection (24 CFR 576.07)

- ESG funds may be used to pay for the costs of participating in and contributing to the HMIS designated by the Continuum of Care.

2. Ineligible Organizations

An organization will not be eligible to apply for ESG funds if it meets one or more of the following conditions:

- Outstanding audit or monitoring finding with any existing ESG or CoC Program Grantee, unless appropriately addressed by a corrective action plan;
- Current appearance on the List of Suspended and Debarred Contractors;
- Terms and conditions of any existing ESG or CoC Program Grantee that are not in full compliance; or
- History of non-performance with contracts with any ESG or CoC Program Grantee

4.06. STANDARDS FOR THE PROVISION OF ESG ASSISTANCE ADMINISTERED BY THE CoC

These standard policies and procedures shall be followed for evaluating individuals' and families' eligibility for assistance under ESG.

Per [24 CFR 576.401](#) ESG subrecipients must conduct an initial evaluation to determine each individual or family's eligibility for ESG assistance and the amount and types of assistance the individual or family needs to regain stability in permanent housing.

ESG subrecipients must reevaluate the program participant's eligibility and the types and amounts of assistance the participant needs; **not less than once every three months** for participants who are receiving homelessness prevention assistance and rapid re-housing assistance. Evidence of reevaluation will be documented in the HMIS (or its equivalent).

At the sub-recipient's discretion, reevaluations may be conducted more frequently than required by [24 CFR 576.401](#) and may also be incorporated into the **case management process which must occur not less than monthly** for homelessness prevention and rapid re-housing participants – See [24 CFR 576.401](#) (e) (i). Regardless of which timeframe is used, reevaluations, must at minimum, establish that:

The program participant does not have an annual income that exceeds 30 percent of median family income for the area, as determined by HUD; and the program participant lacks sufficient resources and support networks necessary to retain housing without ESG assistance. To determine if an individual or family is income eligible, the sub-recipient must examine an individual or family's annual income to ensure that it does not exceed the most current area income limits as posted on: <http://www.huduser.org/datasets/il.html>

When the program participant's income or other circumstances change (e.g. changes in household composition) that affects the program participant's need for assistance under ESG, the sub-recipient must reevaluate the program participant's eligibility and the amount and types of assistance the program participant needs.

Terminating ESG Assistance - [24 C.F.R. 576.402](#). ESG Subrecipients must provide a copy of their agency termination policy to the Collaborative Applicant. The policy should include, at minimum, the following provisions:

1. *In general.* If a program participant violates program requirements, the recipient or subrecipient may terminate the assistance in accordance with a formal process established by

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the recipient or subrecipient that recognizes the rights of individuals affected. The recipient or subrecipient must exercise judgment and examine all extenuating circumstances in determining when violations warrant termination so that a program participant's assistance is terminated only in the most severe cases.

2. *Program participants receiving rental assistance or housing relocation and stabilization services.* To terminate rental assistance or housing relocation and stabilization services to a program participant, the required formal process, at a minimum, must consist of:
 - a) Written notice to the program participant containing a clear statement of the reasons for termination;
 - b) A review of the decision, in which the program participant is given the opportunity to present written or oral objections before a person other than the person (or a subordinate of that person) who made or approved the termination decision; and
 - c) Prompt written notice of the final decision to the program participant.
3. *Ability to provide further assistance.* Termination under this section does not bar the recipient or subrecipient from providing further assistance at a later date to the same family or individual.

When the resulting termination of participation results in the risk of homelessness, the subrecipient should convey the circumstances and refer the client to the Coordinated Assessment system.

- a) **Standards for targeting and providing essential services related to street outreach.**

ESG funding may be used for costs of providing essential services necessary to reach out to unsheltered homeless people; connect them with emergency shelter, housing, or critical services; and provide urgent, non-facility-based care to unsheltered homeless people who are unwilling or unable to access emergency shelter, housing, or an appropriate health facility. For the purposes of this section, the term “unsheltered homeless people” means individuals and families who qualify as homeless under paragraph (1) (i) of the “homeless” definition under [24 CFR Part 576.2](#). As outlined in [24 CFR Part 576.101](#), essential services consist of:

- i) Engagement;
- ii) Case management;
- iii) Emergency health services – only when other appropriate health services are inaccessible or unavailable within the area;
- iv) Emergency mental health services – only when other appropriate mental health services are inaccessible or unavailable within the area;
- v) Transportation; and
- vi) Services for special populations.

ESG subrecipients must determine an individual's or family's vulnerability and unwillingness or inability to access emergency shelter, housing, or an appropriate health facility, prior to providing essential services under this component to ensure that ESG funding is used to assist those with the greatest need for street outreach assistance.

b) Policies and procedures for admission, diversion, referral, and discharge by emergency shelters

i) Emergency Shelter Definition

The term Emergency Shelter was revised by [24 CFR Part 576.2](#) to mean “any facility, the primary purpose of which is to provide a temporary shelter for the homeless in general or for specific populations of the homeless and which does not require occupants to sign leases or occupancy agreements.” This definition excludes transitional housing.

ii) Admission, Diversion, Referral and Discharge

Shelter stays should be avoided, if possible, and when not possible, limited to the shortest time necessary to help participants regain permanent housing. Consistent with Section (a) of this document, ESG subrecipients must conduct an initial assessment consistent with the VCCoC Coordinated Entry System to determine if they should be admitted to an emergency shelter, diverted to a provider of other ESG-funded or CoC Program-funded components, such as rapid re-housing or homeless prevention assistance, or referred for other mainstream resources.

iii) ESG subrecipients must determine that individuals and families meet category (1), (2), (3), or (4) of the Homeless Definitions listed below and use the VCCoC Coordinated Entry System assessment tools to evaluate an individual’s or family’s homeless risk to ensure that only those individuals or families that have the greatest need for emergency shelter assistance receive ESG funded assistance.

- Category 1 – Literally Homeless
- Category 2 – Imminent Risk of Homeless
- Category 3 – Homeless under Other Federal Statutes
- Category 4 – Fleeing/Attempting to Flee DV

iv) Safety and Shelter Needs of Special Populations

- ESG funding may be used to provide services for homeless youth, victim services, and services for people living with HIV/AIDS, so long as the costs of providing these services are eligible under the regulations for the emergency shelter component found at [24 CFR Part 576.102](#).
- Consistent with ESG recordkeeping and reporting requirements found at [24 CFR Part 576.500](#), ESG subrecipients must develop and apply written policies to ensure the safety of program participants through the following actions:
 - All sub-grantees will take appropriate measures to provide for client confidentiality. Grantees and sub-grantees will develop and implement procedures to guarantee the confidentiality of records concerning program participants. All records containing personally identifying information (as defined in HUD’s standards for participation, data collection, and reporting in a local HMIS) of any individual or family who applies for and receives ESG assistance will be kept secure and

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confidential;

- The address or location of any domestic violence, dating violence, sexual assault, or stalking shelter project assisted under the ESG will not be made public, except with written authorization of the person responsible for the operation of the shelter; and
- The address or location of any housing of a program participant, including youth, individuals living with HIV/AIDS, victims of domestic violence, dating violence, sexual assault, and stalking; and individuals and families who have the highest barriers to housing will not be made public, except as provided under a preexisting privacy policy of the sub-recipient and consistent with state and local laws regarding privacy and obligations of confidentiality.
- In addition, ESG subrecipients must adhere to the following ESG shelter and housing standards found at [24 CFR Part 576.403](#) to ensure that shelter and housing facilities are safe, sanitary, and adequately maintained:
 - **Lead-Based Paint Requirements.** The Lead-Based Paint Poisoning Prevention Act applies to all shelters assisted under ESG program and all housing occupied by program participants. All ESG subrecipients are required to conduct a Lead-Based Paint inspection on all units receiving assistance under the rapid re-housing AND homelessness prevention components if the unit was built before 1978 and a child under age of six or a pregnant woman resides in the unit.
 - **Structure and Materials.** The shelter building should be structurally sound to protect residents from the elements and not pose any threat to health and safety of the residents.
 - **Access.** The shelter must be accessible, and there should be a second means of exiting the facility in the case of emergency or fire.
 - **Space and Security.** Each resident should have adequate space and security for themselves and their belongings. Each resident must have an acceptable place to sleep.
 - **Interior Air Quality.** Each room or space within the shelter/facility must have a natural or mechanical means of ventilation. The interior air should be free of pollutants at a level that might threaten or harm the health of residents.
 - **Water Supply.** The shelter's water supply should be free of contamination.
 - **Sanitary Facilities.** Each resident should have access to sanitary facilities that are in proper operating condition. These facilities should be able to be used in privacy, and be adequate for personal cleanliness and the disposal of human waste.
 - **Thermal Environment.** The shelter/facility must have any necessary heating/cooling facilities in proper operating condition.
 - **Illumination and Electricity.** The shelter/facility should have adequate natural or artificial illumination to permit normal indoor activities and support health and safety. There should be sufficient electrical sources to permit the safe use of electrical appliances in the shelter.

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- o **Food Preparation.** Food preparation areas, if any, should contain suitable space and equipment to store, prepare and serve food in a safe and sanitary manner.
- o **Sanitary Conditions.** The shelter should be maintained in a sanitary condition.
- o **Fire Safety-Sleeping Areas.** There should be at least one working smoke detector in each occupied unit of the shelter facility. In addition, smoke detectors should be located near sleeping areas where possible. The fire alarm system should be designed for a hearing-impaired resident.
- o **Fire Safety.** There should be at least one working smoke detector in each common area.

4.07. STANDARDS FOR HOMELESS PREVENTION AND RAPID REHOUSING

ESG funded programs will adhere to the VCCoC Coordinated Entry System policies and procedures for documentation of homelessness, assessment of service needs and prioritization for ESG and CoC Funded assistance.

All ESG homelessness prevention ESG assistance is available to individuals and families below 30% of Area Median Income (AMI), and are homeless or at risk of becoming homeless.

- ESG funds can be used to prevent an individual or family from becoming homeless and regain stability in current housing or other permanent housing. Rapid re-housing funds can be used to assist individuals and families who are literally homeless progress toward permanent housing and achieve housing stability.
- Homeless Prevention Households will be **re-certified for continued eligibility no less than every 3 months.**
- Rapid Re-Housing Households will be **re-certified for continued eligibility no less than every 3 months.**
- Rent and utility costs

Standards for both homelessness prevention and rapid re-housing for determining the share of rent and utilities costs that each program participant must pay, if any, will be based on the following:

- Rental assistance cannot be provided for a unit unless the rent for that unit is at or below the current Fair Market Rent (FMR) limit, established by HUD.
- The rent charged for a unit must be reasonable in relation to rents currently being charged for comparable units in the private unassisted market and must not be in excess of rents currently being charged by the owner for comparable unassisted units. See [24 CFR 574.320](#).
- The rental unit must meet minimum habitability standards found at [24 CFR 576.403](#).
- There must be a rental assistance agreement and lease between the property manager and tenant as well as the owner of property and ESG sub-recipient.
- No rental assistance may be made to an individual or family that is receiving rental assistance from another public source for the same time period.
- Rental assistance may not be provided to a participant who is currently receiving replacement housing payments under Uniform Relocation Assistance

Per [24 CFR 576.106 \(e\)](#), ESG subrecipients may make rental assistance payments only to an owner with whom the sub-recipient has entered into a rental assistance agreement. The rental assistance agreement must set forth the terms under which rental assistance will be provided, including the requirements that apply under this section. The rental assistance agreement must provide that, during the term of the agreement, the owner must give the sub-recipient a copy of any notice to the program participant to vacate the housing unit, or any complaint used under state or local law to commence an eviction action against the program participant.

1. Length of assistance

Subject to the general conditions under [24 CFR 576.103](#) and [24 CFR Part 576.104](#), ESG subrecipients may provide a program participant with up to 24 months of rental assistance during any 3-year period. This assistance may be short-term rental assistance, medium-term rental assistance, payment of rental arrears, or any combination of this assistance.

- a) Short-term rental assistance is assistance for up to 3 months of rent.
- b) Medium-term rental assistance is assistance for more than 3 months but not more than 10 months of rent.
- c) Payment of rental arrears may consist of a one-time payment for up to 3 month of rent in arrears, including any late fees on those arrears.

The maximum amount of rental assistance provided, and an individual or household's level of responsibility for rent payments, over time, shall be determined by the ESG subrecipient and shall be reflective of the individual or family's need for rental assistance and the level of financial resources available to the ESG sub-recipient.

Rental assistance will end if and when another subsidy begins, such as Section 8 Housing Choice Voucher, public housing, project based rental subsidy, or other PSH subsidy.

2. Standards for determining the type, amount, and duration of housing stabilization and relocation services.

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

- a) Rental application fees
- b) Security deposits
- c) Last month's rent
- d) Utility deposits
- e) Utility payments
- f) Moving costs, and
- g) Some limited services costs

Consistent with [24 CFR 576.105 \(c\)](#), ESG subrecipients determine the type, maximum amount and duration of housing stabilization and relocation services for individuals and families who are in need of homeless prevention or rapid re-housing assistance through the initial evaluation, re-certification and ongoing case management processes.

Consistent with [24 CFR 576.105\(d\)](#), financial assistance for housing stabilization and relocation services cannot be provided to a program participant who is receiving the same type of assistance through other public sources or to a program participant who has been provided with replacement housing payments under the Uniform Relocation Act (URA) during the period of time covered by the URA payments.

4.08. ESG SUBRECIPIENT REPORTING REQUIREMENTS TO THE COLLABORATIVE APPLICANT

1. Reimbursement Requests

Monthly payment requests, expenditure reports, matching funds shall be submitted, in a format prescribed by the Collaborative Applicant, by the 10th day of the month after the reporting month's end, which identify the allowable expenditures incurred under an ESG contract.

Quarterly performance reports shall be submitted, in a format prescribed by the Collaborative Applicant, by the 10th day of the month after the quarter end, which identify the activities accomplished under the ESG subrecipient grant agreement with the Collaborative Applicant. Performance reports must be generated from the HMIS system (unless a recognized domestic violence provider agency).

The Ventura County ESG program year ends on June 30. At completion of all activities, a contract closeout report must be submitted within 30 days of the end of the contract. The subrecipient is required to supply such information, in such form and format as the Collaborative Applicant may require. All records and reports must be made available to any authorized Collaborative Applicant representative upon request and without prior notice.

All ESG Subrecipients must use the HMIS to report on clients served by the ESG program.

2. Matching Funds

The Collaborative Applicant will meet the required dollar-for-dollar ESG match requirement by requiring subrecipients to match their award dollar-for-dollar with eligible match sources on a monthly basis. The amount will be reported on the subrecipient's monthly report and reimbursement request form. The dollar-for-dollar match from subrecipients can be in cash expended for allowable costs identified by the [Uniform Administrative Requirements, cost Principles, and Audit Requirements for Federal Awards](#) ("OMB Super Circular"). Additionally, program income for the ESG program can also be used as match funds. Further, the value of any real property, equipment, goods, or services can also be used as dollar-for-dollar match.

The Collaborative Applicant will provide its own match for administrative funds.

3. Monitoring/ On-Site Visit

The three basic goals for oversight and monitoring of the progress and performance of ESG subrecipients include:

- a) Ensure that ESG funds are used effectively to assist homeless individuals and families and that the basic ESG program goals are met
- b) Ensure compliance with VCCoC Policies and Procedures and ESG regulations and program requirements in the usage of funds and in carrying out program activities
- c) Enhance and develop the management capacity of grantees or recipients

Monitoring of subrecipients will be conducted once a month for the first three months of the program year. Subsequent visits after the first three months will depend on sub-recipient performance and risk analysis. Monitoring can take a number of forms and can include review of reimbursement requests, monthly reports, performance measures, on-site assessments or a review of HMIS program data. If the Collaborative Applicant representatives have a concern or finding the following will take place:

- i) Concern
 - A concern is a deficiency in program performance not based on statutory, regulatory, or other program requirement (sanctions or corrective actions are not authorized for concerns).
 - The Collaborative Applicant will bring the concern to the attention of the subrecipient via formal letter sent certified mail and by email and recommend actions to address concerns and/or provide technical assistance.
 - Concerns do not require a formal written response to the Collaborative Applicant.
- ii) Finding
 - A finding is a deficiency in a subrecipient's program performance based on material noncompliance with a statutory, regulatory, or CoC program requirement for which sanctions or corrective actions are authorized.

- The Collaborative Applicant will provide documentation via formal letter sent certified mail and by email and will include:
 - o Condition
 - o Criteria
 - o Cause
 - o Effect
 - o Corrective action

iii) The subrecipient must respond to the Collaborative Applicant within ten (10) business days of notification by:

- Concurring and undertaking suggested corrective actions;
- Concurring and suggesting alternate corrective actions; and
- Providing additional information to address the finding.

Failure to provide written response to a finding may lead to a de-obligation of funds. However, upon receipt of the Notice of De-obligation, the Sub-recipient has thirty (30) days to submit a formal letter of appeal. The agency must:

- Submit the appeal on a formal letterhead, addressed to the Collaborative Applicant; and
- The letter of appeal must present a high level of detail and explanation and must include an attached budget of proposed spending and any other documentation addressing the corrective action that has been found delinquent.

The Collaborative Applicant will consult with the VCCoC Governance Board prior to taking de-obligation actions.

4. Recordkeeping Requirements

Financial records, supporting documents, statistical records, and all other records pertinent to an award shall be retained for a period of three years from the date of submission of the final expenditure.

5. Recording Services in HMIS

All ESG subrecipients must utilize the single HMIS system designated by the Continuum of Care Governance Board for the collection of client level data of participants and recipients of ESG assistance.

The VCCoC HMIS Lead will establish an HMIS dashboard for each ESG recipient to monitor subrecipient ESG program activity.

ESG subrecipients that represent domestic violence organizations are prohibited from entering data in the HMIS. The Collaborative Applicant will provide written documentation of compliance of the collection of required data collection through review and periodic examination of the alternate data source.

SECTION V. EDUCATIONAL ACCESS POLICY

The Ventura County Continuum of Care does not restrict the exercise of rights provided by the education subtitle of the [McKinney-Vento Homeless Assistance Act as amended by S.896 The Homeless Emergency Assistance and Rapid Transition to Housing \(HEARTH\) Act of 2009](#) and/or other laws pertaining to the provision of educational and related services to individuals and families experiencing homelessness.

CoC and ESG funding recipients are required to inform families and unaccompanied youth of all rights as stated in the McKinney-Vento Act. Furthermore, programs shall collaborate with local school district homeless liaison(s) to allow for a smooth transition to continued service and support for educational needs.

Project sponsors of CoC- and ESG-funded programs that provide housing or services to families will designate a staff person to be responsible for ensuring that children being served in the program are enrolled in school and connected to appropriate services in the community, including early childhood programs such as Head Start, part C of the Individuals with Disabilities Education Act, and programs authorized under the HEARTH Act.

Shelter operators will take the educational needs of children into account when families are placed in emergency or transitional shelter and will, to the maximum extent practicable, place families with children as close as possible to their school of origin so as not to disrupt such children's education.

VENTURA COUNTY HOMELESS SERVICES PRE-SCREENING TOOL

Name: _____ Phone Number: _____

If no phone number, best way to contact: _____

Number of Adults: _____ Number and Ages of Children: _____

Current City of Residence: _____

Do you have housing but are at risk of losing it soon?

- ☐ Yes: *Please contact HPRP*
☐ No:

Are you fleeing a domestic violence (DV) situation?

- ☐ Yes: *Call a DV Resource Number below*
☐ No:

Do you need assistance finding secure housing tonight?

- ☐ Yes: *Please contact a service provider/emergency shelter located in your city*
☐ No:

Are you residing temporarily in an emergency shelter, hotel/motel, with a friend, in a car, living outdoors or in a place not meant to be housing?

- ☐ Yes: *Answer the next question*
☐ No:

Do you have a disabling condition?

- ☐ Yes: *Answer next question*
☐ No: *contact a service provider located in your city*

Length of time experiencing homelessness?

- ☐ 12 months or longer/ 4 or more times in 3 years (refer for VI-SPDAT)
☐ Less than 12 months

Regional Homeless Assistance Phone Numbers:

- ☐ **Simi Valley/Moorpark**
Samaritan Center 805/579-9166
- ☐ **Thousand Oaks/Westlake Village/Newbury Park**
Lutheran Social Services 805-497-6207
- ☐ **Oxnard/Port Hueneme/Camarillo**
Society St. Vincent de Paul 805-204-4626
Community Action: 805/204-4626
- ☐ **Ventura**
(Homeless 2 Home): 805/639-3600
(Turning Point Foundation): 805) 652-2151
- ☐ **Ventura County (Human Services Agency):**
HPRP: 805/385-8585
- ☐ **Domestic Violence Issues (County-wide):**

Interface Children & Family Services - Domestic Violence Advocate 1-800-636-6738
Coalition for Family Harmony - Domestic Violence Hotline 1-800-300-2181

Organization use only:

Referring Organization: _____ Date: _____

Representative Name: _____ Phone Number: _____



Housing Match Worksheet

| | |
|--|--------------|
| Date completed: | |
| Contact information What city/region of Ventura County do you live in? | |
| How many months have you stayed in that city/community? | _____ months |
| Is this the same region that you are looking to be housed? | |
| If no, what community are you looking to be housed in? What community, if any, will you not accept offers for housing in? | |
| If you were able to locate housing, do you have money saved for move-in or housing? | |
| Have you ever been evicted from housing or abandoned a unit with your name on the lease? | |
| If yes, approximate month/year of eviction | |
| Have you had any evictions from Public Housing units? | |
| If yes, was it due to fraud? | |
| Do you owe money to a previous landlord? | |
| Have you ever been convicted of a felony? | |
| If yes, please describe the convictions: | |
| If yes, what was the month and date of the conviction: | |
| Have you been convicted of a violent felony? | |
| Have you ever been convicted of arson? | |
| Are you currently on probation or parole? | |
| Do you have a pet? | |
| If yes, is this a certified service/support animal? | |
| Do you have other requirements or requests around permanent housing that we need to be aware of? | |



Standardized Messaging for VI-SPDAT

Giving the right message about coordinated entry will be essential to its success. It is important to be clear about the benefits to participating in the survey in order to encourage people to participate, but it is equally important to make sure that individuals understand that participating does not guarantee housing placement. It is also important to make sure people understand how and why their information will be shared.

Suggested Messaging:

"My name is _____ and I work with [organization name] and I'd love to tell you about a short survey that we can do together that will help us learn more about your current situation and will give us recommendations to help you move out of homelessness. It will help us identify your housing and service needs as we make a plan together. Some of the questions are personal in nature, but please know you can skip or refuse any question. The information is entered into HMIS a secure database that only authorized users can access.

- The short survey will take less than 30 minutes of your time.
- If you do not understand a question, let me know and I'll be happy to explain.
- It is important to answer questions as honestly as possible. Honest answers will help us better know how to assist you. You can skip any question you feel uncomfortable in answering.
- After we are done, I can share the recommendations with you and give you some resources that might be a good fit for you
- I want to make sure you know that there are very few housing resources that are connected to the survey.
- Your information will be shared with other providers who are doing these assessments in Ventura County. Your information is shared so that:
 1. You don't have to complete the survey multiple times
 2. Housing Providers can identify people for housing resources as housing becomes available
 3. Ventura County can identify the needs for housing. This information can help to be used to better plan how to increase housing resources and advocate for enough housing resources to end homelessness

Would you like to take the survey with me?

If yes, ask individual to sign release of information before completing the survey.



Ventura County Homeless Management Information System (VCHMIS)

**Participant Acknowledgement of and Authorization for Information
Collection and Sharing with Partner Agencies**

The _____ is a Partner Agency in the Ventura County Homeless Management Information System (VCHMIS). The U.S. Department of Housing and Urban Development (HUD) requires participant's personal information be collected and entered into VCHMIS in order for Ventura County to be eligible to receive HUD funding. VCHMIS and its Partner Agencies can then share client information electronically to collaborate more quickly and efficiently to provide comprehensive and coordinated services for the homeless and low-income households at risk of homelessness in Ventura County.

As a participant in our program, the information you provide will be collected and entered into VCHMIS and shared with Partner Agencies to provide services to help you achieve your goals. However, only authorized staff of Partner Agencies will be able to see your information, and those staff members have signed agreements to maintain the confidentiality of your information. VCHMIS has many security protections to ensure confidentiality of participant information from all but authorized staff of VCHMIS and of Partner Agencies.

You may refuse to provide information about yourself, and you may cancel this authorization to share information at any time by written request. Please note, however, that refusing to share your information may impede your access to shelter or services from certain HUD-funded programs, if VCHMIS participation is a requirement of such programs.

By signing this form, I acknowledge receiving this information and authorize my personal information to be collected and entered into VCHMIS and shared with authorized staff of VCHMIS and Partner Agencies.

NAME of Client/Guardian (printed)

Signature of Client or Guardian

Date

Witnessed by (Print Staff Member's Name)

Staff Member's Signature

Date

PLEASE FIND A LIST OF PARTICIPATING AGENCIES ON THE FOLLOWING PAGE

VCHMIS Participating Agencies

- County of Ventura, County Executive Office
- County of Ventura Human Services Agency, Homeless Services
- County of Ventura Human Services Agency, HMIS
- County of Ventura Human Services Agency, RAIN Transitional Living Center
- Housing Authority of the City of San Buenaventura
- Many Mansions
- The Salvation Army Southern California Division, Ventura TLC
- Turning Point Foundation
- Ventura County Behavioral Health
- Ventura County Health Care Agency
- Community Action of Ventura County
- Lutheran Social Services
- Project Understanding
- Samaritan Center
- Society of St. Vincent de Paul—Ventura County Center
- Kingdom Center



**Ventura County Continuum of Care
Inter-Agency Data Sharing Agreement**

By signing this Inter-Agency Data Sharing Agreement, the

Agency shall be designated a “participating agency” in the Ventura County Continuum of Care Collaborative. This “participating agency” agrees to share demographic and programmatic client data (when authorized to do so by the client) using the Ventura County Homeless Management Information System (HMIS). This “participating agency’s client data shall be shared with the following “participating agencies” that have also signed an Inter-Agency Data sharing Agreement on file with the County of Ventura County Executive Office and HMIS lead agency:

- ☐ All participating agencies in the Ventura County HMIS and Continuum of Care
- County of Ventura, County Executive Office
 - County of Ventura Human Services Agency, Homeless Services
 - County of Ventura Human Services Agency, HMIS
 - County of Ventura Human Services Agency, RAIN Transitional Living Center
 - Housing Authority of the City of San Buenaventura
 - Many Mansions
 - The Salvation Army Southern California Division, Ventura TLC
 - Turning Point Foundation
 - Ventura County Behavioral Health
 - Ventura County Health Care Agency
 - Community Action of Ventura County
 - Lutheran Social Services
 - Project Understanding
 - Samaritan Center
 - Society of St. Vincent de Paul—Ventura County Center
 - Kingdom Center

This agency has signed and shall comply with the Ventura County HMIS Policies and Procedures.

Uses of Shared HMIS Data:

- Coordinate housing services for families and individuals experiencing homelessness or facing eviction in Ventura County.
- Evaluate performance and progress towards community benchmarks
- Improve the programs and services available to Ventura County residents experiencing homelessness or a housing crisis
- Improve access to services for all Ventura County homeless and at-risk populations
- Reduce inefficiencies and duplication of services within Ventura County Continuum of Care
- Ensure that services are targeted to those most in need based of prioritizations set by CoC

- Ensure that clients receive the amount and type of services that best fits their needs and preferences
- Pursue additional resources for ending homelessness
- Advocate for policies and legislation that will support to end homelessness in Ventura County

Client Protection:

- Informed consent must be given by clients in order for their identifying information to be entered into HMIS and shared among “participating agencies” in the Ventura County HMIS. Non-identifying information may be entered into HMIS for all clients regardless of whether they give consent and regardless of their domestic violence status.
- Identifying client information will be shared only among the “participating agencies” listed above. At the time of informed consent, and at any point thereafter, the client has the right to see a current list of the participating agencies using the Ventura County HMIS that will have access to his/her data.
- As part of the informed consent process, clients shall be informed that additional agencies within the Ventura County HMIS may be added to the list of “participating agencies” at any given time; and that all these additional “participating agencies” may also have access to the client’s information.
- HMIS Users will maintain HMIS data in such a way as to protect against revealing the identity of clients to unauthorized agencies, individuals or entities.
- Clients may not be denied services based on their choice to withhold consent.

This agency shall defend, indemnify, and hold all other agencies harmless from any and all claims arising out of another agency’s negligent performance of this agreement. Any loss or liability to third parties or agencies resulting from negligent acts, errors or omissions of a Ventura County HMIS “participating agency” while acting within the scope of their authority under this agreement, shall be borne by that user exclusively.

Agreed to and signed by the following agency representative:

Printed Name and Title

Agency Name



Chronically Homeless Qualification Checklists

Instructions: This suggested checklist may be used as a guide for staff of a program serving chronically homeless persons to assure that participants meet program regulation eligibility. It should be accompanied by supporting documentation of both disability and homelessness. Together, these documents must be maintained in the client's file.

Client Name: _____

HUD's HEARTH definition of Chronically Homeless can be found at: 24 CFR 578.3 or Section 2.03.A of VCCoC's Policies and Procedures

Part I. A Disabling Condition. *Check appropriate box(es):*

- ☐ A diagnosable substance abuse disorder
- ☐ A serious mental illness
- ☐ A developmental disability
- ☐ A chronic physical illness or disability, including the co-occurrence of two or more of these conditions.

Part I is supported by a letter from a medical professional attesting to the presence of the condition.

- ☐ Yes
- ☐ No

Part II. Chronically Homelessness Status. *Check ONE:*

Has been continuously homeless for 1 year or more.

(HUD defines "homeless" as "a person sleeping in a place not meant for human habitation (e.g. living on the streets for example) OR living in a homeless emergency shelter.) Has had four (4) episodes of homelessness in the last three (3) years.

Part II is supported by Third Party Certification, which includes dates and locations of homelessness, from one or more of the following: *Check ALL that apply*

- ☐ Certification letter(s) from an emergency shelter for the homeless.
- ☐ Certification letter(s) from a homeless service provider or outreach worker.
- ☐ Certification letter(s) from any other health or human service provider.
- ☐ Certification Self-Statement signed by the client.

Staff Name and Title: _____

Organization: _____

Signature: _____ Date: _____

Chronically Homeless Third Party Verification

Instructions: This suggested template may be sent to homeless service providers requesting their verification of the chronically homeless status of an individual known to them. This template letter may be copied onto letterhead or recreated with the same content and printed on letterhead.

Date: _____

To:

Dear _____,

_____ has applied to receive the services of a McKinney-Vento funded program serving chronically homeless persons. To qualify, the homeless person must be determined to be chronically homeless as defined by the U.S. Department of Housing and Urban Development. Please complete this certification and fax it to my attention as soon as possible at the following **fax number:** (_____) _____.

This information will be used for the purpose of determining the chronic homeless status of the above-named homeless person. If you have any questions please do not hesitate to contact me at the following **telephone number:** (_____) _____.

Sincerely,

(Signature, Title and Agency of Case Manager)

I hereby authorize the release of the requested information.

(Signature of Client)

Date

Form (for those participants who are not receiving SSI) for Determination of Participant Eligibility in the HUD Programs that Require a Participant to be disabled.

The following client _____ is determined to be eligible. A person shall be considered to have a disability if such person has a physical, mental, or emotional **impairment, which is expected to be of long-continued and indefinite duration; substantially impedes his or her ability to live independently;** and is of such a nature that such ability, could be improved by more suitable housing conditions.

A person will also be considered to have a disability if he or she has a developmental disability, which is a severe, chronic disability that:

- Is attributable to a mental or physical impairment or combination of mental and physical impairments;
- Is manifested before the person attains age 22;
- Is likely to continue indefinitely;
- Results in substantial functional limitations in three or more of the Following areas of major life activity:
 - Self-care,
 - Receptive and expressive language,
 - Learning,
 - Mobility,
 - Self-direction
 - Capacity for independent living, and
 - Economic self-sufficiency; and
- Reflects the person's need for a combination and sequence of special, interdisciplinary, or generic care, treatment, or other services which are of lifelong or extended duration and are individually planned and coordinated.
- Notwithstanding the preceding provisions of this paragraph, the term person with disabilities includes, two or more persons with disabilities living together, one or more such persons living with another person who is determined to be important to their household described in the first sentence of this definition who were living, in a unit assisted under this part, with the deceased member of the household at the time of his or her death.

I have reviewed this definition and determined that: _____

_____ meets the above criteria.

Disability may include those with a disabling chemical dependency disability as a primary diagnosis for McKinney/Vento Act programs.]

Signed _____ date _____

Name and Professional Title (printed) _____

Documentation of a disability **must** come from a credentialed and licensed psychiatrist or medical professional trained to make such a determination or from the Social Security Administration) It is suggested that the diagnosis be included for an agency to make a reasonable assessment of needs.

Instructions: This Homelessness History Summary provides a suggested timeline to be used by grantees who receive funds for programs targeted to chronically homeless persons. It may be used to analyze whether or not the chronology of a homeless person's history meets the time frame for the definition of chronic homelessness.

Client:

| Time Period | Whereabouts | Documented? |
|------------------------------|--|-----------------|
| <i>Example: Jan. 1, 2005</i> | <i>Lifeline Shelter, Cleveland</i> | Yes / No Yes |
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[Type here]



ATTACHMENT G

Documentation of Priority Status

Client Name:

Client Date of Birth:

Client HMIS/ETO Number:

The Tarrant County Homeless Coalition Coordinated Assessment System office verifies that the above named client holds the following priority status documented in the HMIS as of [DATE HERE]:

☐ P1 – Priority 1

Individual with a disability that has been documented by a medical professional or receiving Supplemental Security Income or Social Security Disability Insurance benefits. Living or residing in a place not meant for human habitation, safe haven, or in emergency shelter for at least 2 years. P1 meets the federal definition of chronically homeless.

☐ P2 – Priority 2

Individual or a family with at least one individual or an individual that has been documented by a medical professional and is receiving Supplemental Security Income or Social Security Disability Insurance benefits. Living or residing in a place not meant for human habitation, safe haven, or in emergency shelter for at least 1 year or on at least 4 separate occasions in the last 3 years. P2 meets the federal definition of chronically homeless.

☐ P3 – Priority 3

Non-chronic homeless individual or household with children that is unsheltered or residing in an emergency shelter. They have been assessed and determined to be a priority sub-population:

- ☐ DV - Victims of Domestic Violence
- ☐ VET - Veteran
- ☐ HIV/AIDS
- ☐ FAM - Household with children under the age of 18

- ☐ MH – Mental Health
- ☐ UY – Unaccompanied Youth
- ☐ Other Priority

Determination: _____

☐ NP – Non Priority

Individual does not meet housing priority status. Reason for NP status.

Authorizing Official Signature

Ventura County Continuum of Care (CoC):

**Written Standards
for Providing Continuum of Care and Emergency Solutions Grant Assistance**

Written Standards for the following:

1. Permanent Supportive Housing;
2. Rapid Re-Housing;
3. Transitional Housing.

Currently under development:

4. Coordinated Entry;
5. Seasonal shelter;
6. Year-round shelter;
7. Bridge housing; and
8. Homeless prevention

I. Written Standards for Permanent Supportive Housing

- Policies and procedures for evaluating individuals' and families' eligibility for assistance under this part;
- Policies and procedures for determining and prioritizing which eligible individuals and families will receive permanent supportive housing assistance.
- Policies and procedures for matching eligible applicants with Permanent Supportive Housing (PSH) units.

A. Eligible clients

- Individuals and families who meet the HUD definition of chronically homeless are eligible for Permanent Supportive Housing.
 - All CoC funded permanent supportive housing beds will be filled with eligible chronically homeless individuals/families through the prioritization process of the Coordinated Entry System (CES).
 - All CoC funded permanent supportive housing beds that become vacant will be filled with eligible chronically homeless individuals/families through the prioritization process of the Coordinated Entry System (CES).

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B. Prioritizing Permanent Supportive Housing

Ventura County Continuum of Care's Coordinated Entry System includes prioritization for Permanent Supportive Housing (PSH) beds. Using the VI-SPDAT to evaluate the severity of service needs and length of time homeless, the CES uses this data to prioritize PSH beds for the most vulnerable chronically homeless persons in the service area.

The CoC has adopted HUD's recommendations below and when presented with two individuals who match for one unit, always using the tie-breaker of matching the individual with the highest medical vulnerability.

HUD's "Order of Priority in CoC Program-funded Permanent Supportive Housing" is as follows:

- First Priority—Chronically Homeless Individuals and Families with the Longest History of Homelessness and with the Most Severe Service Needs.
- Second Priority—Chronically Homeless Individuals and Families with the Longest History of Homelessness.
- Third Priority—Chronically Homeless Individuals and Families with the Most Severe Service Needs.
- Fourth Priority—All Other Chronically Homeless Individuals and Families.

HUD's "Order of Priority in Permanent Supportive Housing Beds Not Dedicated or Prioritized for Persons Experiencing Chronic Homelessness" is as follows:

- First Priority—Homeless Individuals and Families with a Disability with the Most Severe Service Needs.
- Second Priority—Homeless Individuals and Families with a Disability with a Long Period of Continuous or Episodic Homelessness.
- Third Priority—Homeless Individuals and Families with Disability Coming from Places Not Meant for Human Habitation, Safe Havens, or Emergency Shelters.
- Fourth Priority—Homeless Individuals and Families with a Disability Coming from Transitional Housing.

C. Recipient Recordkeeping Requirements

All funded agencies will keep record of the following to support following the written standards of the Ventura County CoC.

1. Documentation in HMIS of the VI-SPDAT score of the individual matched for housing.
2. Agency policies and procedures will include use of VI-SPDAT and following the CES protocol for filling vacant PSH beds.
 - Written Intake Procedures;
 - Verification of client income;
 - Verification of residency;
 - Verification of annual assessment
 - Evidence of Chronically Homeless Status
 - Evidence of homeless status
 - Evidence of the duration of the homelessness:
 - Evidence that the homeless occasion was continuous, for at least one year; or
 - Evidence that the household experienced at least four separate homeless occasions over 3 years;
 - Evidence of diagnosis with one or more of the following conditions: substance use disorder, serious mental illness, developmental disability (as defined in Section 102 of the Developmental Disabilities Assistance Bill of Rights Act of 2000 (42 U.S.C. 15002), post-traumatic stress disorder, cognitive impairments resulting from brain injury, or chronic physical illness or disability.

Written Standard #1: No Designated Length of Stay

- Program participants are provided housing without a designated length of stay that permits them to live as independently as possible. § 578.3

Written Standard #2: Lease Agreement

- The program participant must be the tenant on a lease for a term of at least one year that is renewable and is terminable only for cause. The lease must be renewable for terms that are a minimum of one month long. § 578.77

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Written Standard #3: Housing Quality Standards

- The unit must pass HUD Habitability Standards for ESG (24 CFR part 576.104) and HUD Housing Quality Standards for CoC (24 CFR part 578.37)

Written Standard #4: Restricted Assistance and Disabilities

- Permanent supportive housing can only provide assistance to individuals with disabilities (including substance abuse) and families in which one adult or child has a disability. § 578.37

-

Written Standard #5: Supportive Services

- Supportive services designed to meet the needs of program participants must be made available to the program participants. § 578.37

Written Standard #6: Duration of Supportive Services Assistance

- Supportive services to enable program participants to live as independently as possible must be provided throughout the duration of their residence § 578.53

Written Standard #7: One Person per Bedroom

- Two individuals in a shared housing situation must have their own lease and their own bedroom unless the two individuals are presented together as a household (Housing Quality Standards (HQS) under 24 CFR 982.401)

For more information about Housing Quality Standards, please refer to Chapter 10 of the HCVP Guidebook:

www.hud.gov/offices/adm/hudclips/guidebooks/7420.10G/7420g10GUID.pdf."

Written Standard #8: Program Income

- Program income generated from rent and occupancy charges may be collected from program participants and added to funds committed to the project by HUD and used for eligible program activities § 578.97, § 578.49

Written Standard #9: Calculating Occupancy Charges and Rent

- if occupancy charges are imposed, they may not exceed the highest of: 1) 30 percent of the family's monthly adjusted income (adjustment factors include the number of people in the family, age of family members, medical expenses, and child-care expenses); 2) 10

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percent of the family's monthly income; or 3) If the family is receiving payments for welfare assistance from a public agency and a part of the payments (adjusted in accordance with the family's actual housing costs) is specifically designated by the agency to meet the family's housing costs, the portion of the payments that is designated for housing costs. § 578.77

Written Standard #10: Examining Program Participant's Initial Income

- A program participant's initial income must be examined at least annually to determine the amount of the contribution toward rent payable by the program participant and adjustments to a program participant's contribution toward the rental payment must be made as changes in income are identified. §578.77

Written Standard #11: Verifying Program Participant's Initial Income

- Each program participant must agree to supply the information or documentation necessary to verify the program participant's income. §578.77

Written Standard #12: Recalculating Occupancy Charges and Rent

- If there is a change in family composition (e.g., birth of a child) or a decrease in the resident's income during the year, the resident may request an interim reexamination, and the occupancy charge will be adjusted accordingly. § 578.77

Written Standard #13: Supportive Services Agreement

- Supportive services must be offered to program participants based on individual needs. Required participation can be part of a specific program model, however, HUD tends to believe that these kind of requirements can be barriers and should be rare and minimal if used as all. § 578.75.

"Supportive services are voluntary, but can and should be used to persistently engage tenants to ensure housing stability - Supportive services are proactively offered to help tenants achieve and maintain housing stability, but tenants are not required to participate in services as a condition of tenancy. Techniques such as harm reduction and motivational interviewing may be useful. Harm reduction techniques can confront and mitigate the harms of drug and alcohol use through non-judgmental communication while motivational interviewing may be useful in helping households acquire and utilize new skills and information."

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Written Standard #14: Termination of Assistance

- Assistance may be terminated to a program participant who violates conditions of occupancy by providing a formal process that recognizes the due process of law.
- Continued violation of program requirements may result in termination of services.
- Terminating housing services should be a last resort.

II. Written Standards for Rapid Rehousing § 578.7

Types of rapid rehousing assistance include:

- Rental assistance;
- Case management;
- Supportive services;
- Security deposits.

A. Eligible Clients

Eligible clients must meet HUD's Category 1 definition of homelessness which is:

Individuals and families who lack a fixed, regular, and adequate nighttime residence:

- An individual or family with a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, including a car, park, abandoned building, bus or train station, etc.
- An individual or family living in a supervised publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state, or local government programs for low income individuals); or
- An individual who is exiting an institution where he or she resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution.

Eligible clients must also meet eligibility criteria as defined in the NOFA under which the program was funded.

B. Prioritizing Rapid Rehousing

Recently, HUD provided guidance for rapid rehousing in terms of prioritizing subpopulations. HUD noted in a SNAPS In Focus: Rapid Re-Housing As a Model and Best Practice, August 6, 2014, that:

“Rapid re-housing can be effective for many populations, such as families with children, youth aging out of foster care, domestic violence survivors, single adults, and veterans, but should be targeted to those households that would not be able to get out of homelessness without the assistance. It is particularly a key strategy for achieving the Opening Doors goal of ending family, youth, and child homelessness by 2020.

Rapid re-housing should prioritize people with more challenges, including those with no income, poor employment prospects, troubled rental histories, and criminal records. Providers should link participants with community resources that will help them achieve longer-term stability and well-being. Now is the time for communities to be working together to establish written standards for administering rapid re-housing and thinking strategically about how this type of assistance will be used most effectively within the CoC.”

Thus, the Ventura CoC has prioritized the following subpopulations:

- families with children;
- youth aging out of foster care;
- domestic violence survivors;
- single adults;
- and veterans

Written Standard #1: Lease Agreement

- The program participant must be the tenant on a lease for a term of at least one year that is renewable and is terminable only for cause. The lease must be renewable for terms that are a minimum of one month long.

Written Standard #2: Housing Quality Standards

- The unit must pass HUD Habitability Standards for ESG (24 CFR part 576.104) and HUD Housing Quality Standards for CoC (24 CFR part 578.37)

Written Standard #3: Rental Assistance

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- Program participants may receive short-term (up to 3 months) and/or medium-term (for 3 to 24 months) tenant-based rental assistance § 578.37

Written Standard #4: Amount of Rental Assistance § 578.37

- Standards for determining the share of rent and utilities costs that each program participant must pay, if any, will be based on the following guidelines:
 - The maximum amount of rent that a participant will pay can be up to 100% of the rental amount;
 - The maximum percentage of income paid by participants towards rent should generally be no more than 50%. However, in certain circumstances, on a case-by-case basis, there may be participants whose rental share may exceed 50% of the rent based on their financial circumstances. The CoC also recognizes that this can be challenging in a high cost housing market. In general, the goal will be that participants generally pay no more than 50% of their income in rent;
 - 100% of the cost of rent in rental assistance may be provided to program participants. However to maximize the number of households that can be served with rapid re-housing resources, it is expected that the level of subsidy will be based on the goal of providing only what is necessary for each household to be stably housed for the long term;
 - Rental assistance cannot be provided for a unit unless the rent for that unit is at or below the Fair Market Rent limit, established by HUD;
 - The rent charged for a unit must be reasonable in relation to rents currently being charged for comparable units in the private unassisted market and must not be in excess of rents currently being charged by the owner for comparable unassisted units.

Written Standard #5: Duration of Assistance § 578.37

- Program participants may receive up to 24 months of rental assistance. However, it is expected that program participants will only receive the level of assistance necessary to be stably housed for the long-term.

Written Standard #6: Security Deposits including Last Month's Rent

- Program participants may receive funds for security deposits in an amount not to exceed 2 months of rent. § 578.51

Written Standard #7: Receiving Rental Assistance through Other Sources

- Rental assistance cannot be provided to a program participant who is already receiving rental assistance, or living in a housing unit receiving rental assistance or operating assistance through other federal, State, or local sources. § 578.51

Written Standard #8: Case Management

- Program participants must meet with a case manager not less than once per month to assist the program participant in ensuring long-term housing stability. These encounters should be documented in HMIS. § 578.37

Written Standard #9: Supportive Services

- Program participants may receive supportive services as set forth in § 578.53 (see Appendix A)

§ 578.37 Program components and uses of assistance (a) (1) (ii) states that

“Continuum of Care funds may provide **supportive services**, as set forth in § 578.53, and/or short-term (up to 3 months) and/or medium-term (for 3 to 24 months) tenant-based rental assistance, as set forth in § 578.51(c), as necessary to help a homeless individual or family, with or without disabilities, move as quickly as possible into permanent housing and achieve stability in that housing.”

Written Standard #10: Duration of Supportive Services § 578.37

- Program participants may receive supportive services for no longer than 6 months after rental assistance stops

Written Standard #11: Re-evaluation § 578.37

- Program participants must be re-evaluated, not less than once annually, in order to determine whether program participants lack sufficient resources and support networks necessary to retain housing without CoC assistance. The types and amounts of assistance that the program participant needs to retain housing will be documented in the participant’s case file.

III. Determining Written Standards for Transitional Housing

A. Eligible Clients

Eligible clients must meet HUD's Category 1 definition of homelessness which is:

Individuals and families who lack a fixed, regular, and adequate nighttime residence:

- An individual or family with a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, including a car, park, abandoned building, bus or train station, etc.
- An individual or family living in a supervised publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state, or local government programs for low income individuals); or
- An individual who is exiting an institution where he or she resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution.

Eligible clients must also meet eligibility criteria as defined in the NOFA under which the program was funded.

- Chronically homeless individuals should not be served with transitional housing unless there is a clear plan to exit them to permanent housing that is not a CoC funded PSH project requiring chronically homeless individuals to fill those beds.

B. Prioritizing Transitional Housing

Domestic violence survivors and youth ages 18 – 24 will be prioritized for transitional housing if they are not assessed as chronically homeless.¹ Chronically homeless individuals and families will

¹ In the HEARTH Act, chronically homeless is defined as (1) An individual who: (i) Is homeless and lives in a place not meant for human habitation, a safe haven, or in an emergency shelter; and (ii) Has been homeless and living or residing in a place not meant for human habitation, a safe haven, or in an emergency shelter continuously for at least one year or on at least four separate occasions in the last 3 years; and (iii) Can be diagnosed with one or more of the following conditions: substance use disorder, serious mental illness, developmental disability (as defined in section 102 of the Developmental Disabilities Assistance Bill of Rights Act of 2000 (42 U.S.C. 15002)), post-traumatic stress disorder, cognitive impairments resulting from brain injury, or chronic physical illness or disability; (2) An

not be served through transitional housing.² Such households will be served by permanent supportive housing through a Housing First approach. Also, eligible single veterans and veterans with families, will be served by permanent supportive housing through the HUD VASH voucher program or the Supportive Services for Veteran Families (SSVF) program.

C. Written Standards

Written Standard #1: Duration of Assistance and Lease agreement

The program participant must have a lease or occupancy agreement for a term of at least one month that ends in 24 months and cannot be extended” unless a “homeless individual or family may remain in transitional housing for a period longer than 24 months, if permanent housing for the individual or family has not been located or if the individual or family requires additional time to prepare for independent living” as noted in § 578.79

Written Standard #2: Renewal of Lease Agreement

The lease with program participant “must be automatically renewable upon expiration, except on prior notice by either party, up to a maximum term of 24 months.” § 578.37

Written Standard #3: Eligible costs

In order to facilitate the movement of program participants to PH within 24 months of entering TH, grant funds may be used for all of the following activities: acquisition, rehabilitation, new construction, leasing, rental assistance, operating costs, and supportive services. § 578.53

Written Standard #4: Supportive Services

Supportive services must be made available to program participants “throughout the duration of their residence” and such services “may also be provided to former residents of transitional

individual who has been residing in an institutional care facility, including a jail, substance abuse or mental health treatment facility, hospital, or other similar facility, for fewer than 90 days and met all of the criteria in paragraph (1) of this definition, before entering that facility; or (3) A family with an adult head of household (or if there is no adult in the family, a minor head of household) who meets all of the criteria in paragraph (1) of this definition, including a family whose composition has fluctuated while the head of household has been homeless.

² Chronically homeless households are no longer considered chronically homeless once they become residents of transitional housing programs. As a result, such households are no longer eligible for permanent supportive housing programs that are restricted to serve only chronically homeless households. In addition, HUD strongly encourages permanent supportive housing providers to fill vacant beds with chronically homeless households.

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housing and current residents of permanent housing who were homeless in the prior 6 months, for no more than 6 months after leaving transitional housing or homelessness, respectively, to assist their adjustment to independent living.”

Written Standard #5: Occupancy Charges

Recipients and subrecipients of funding for transitional housing “are not required to impose occupancy charges on program participants as a condition of residing” in transitional housing. “However, if occupancy charges are imposed, they may not exceed the highest of:

- (1) 30 percent of the family’s monthly adjusted income (adjustment factors include the number of people in the family, age of family members, medical expenses, and child-care expenses);
- (2) 10 percent of the family’s monthly income; or
- (3) If the family is receiving payments for welfare assistance from a public agency and a part of the payments (adjusted in accordance with the family’s actual housing costs) is specifically designated by the agency to meet the family’s housing costs, the portion of the payments that is designated for housing costs.
- (4) Income. Income must be calculated in accordance with 24 CFR 5.609 and 24 CFR 5.611(a). Recipients and subrecipients must examine a program participant’s income initially, and if there is a change in family composition (e.g., birth of a child) or a decrease in the resident’s income during the year, the resident may request an interim reexamination, and the occupancy charge will be adjusted accordingly.

Written Standard #6: Discontinuation of Services

Assistance for a transitional housing project may be discontinued “if more than half of the homeless individuals or families remain in that project longer than 24 months.”

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Appendix A: Supportive Services

§ 578.53 Supportive services.

(a) In general. Grant funds may be used to pay the eligible costs of supportive services that address the special needs of the program participants. If the supportive services are provided in a supportive service facility not contained in a housing structure, the costs of day-to-day operation of the supportive service facility, including maintenance, repair, building security, furniture, utilities, and equipment are eligible as a supportive service.

(1) Supportive services must be necessary to assist program participants obtain and maintain housing.

(2) Recipients and subrecipients shall conduct an annual assessment of the service needs of the program participants and should adjust services accordingly.

(b) Duration.

(1) For a transitional housing project, supportive services must be made available to residents throughout the duration of their residence in the project.

(2) Permanent supportive housing projects must provide supportive services for the residents to enable them to live as independently as is practicable throughout the duration of their residence in the project.

(3) Services may also be provided to former residents of transitional housing and current residents of permanent housing who were homeless in the prior 6 months, for no more than 6 months after leaving transitional housing or homelessness, respectively, to assist their adjustment to independent living.

(4) Rapid rehousing projects must require the program participant to meet with a case manager not less than once per month as set forth in § 578.37(a)(1)(ii)(F), to assist the program participant in maintaining long-term housing stability.

(c) Special populations. All eligible costs are eligible to the same extent for program participants who are unaccompanied homeless youth; persons living with HIV/AIDS; and victims of domestic violence, dating violence, sexual assault, or stalking.

(d) Ineligible costs. Any cost that is not described as an eligible cost under this section is not an eligible cost of providing supportive services using Continuum of Care program funds. Staff training and the costs of obtaining professional licenses or certifications needed to provide supportive services are not eligible costs.

(e) Eligible costs.

(1) Annual Assessment of Service Needs. The costs of the assessment required by § 578.53(a)(2) are eligible costs.

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(2) Assistance with moving costs. Reasonable one-time moving costs are eligible and include truck rental and hiring a moving company.

(3) Case management. The costs of assessing, arranging, coordinating, and monitoring the delivery of individualized services to meet the needs of the program participant(s) are eligible costs. Component services and activities consist of:

(i) Counseling;

(ii) Developing, securing, and coordinating services;

(iii) Using the centralized or coordinated assessment system as required under § 578.23(c)(9).

(iv) Obtaining federal, State, and local benefits;

(v) Monitoring and evaluating program participant progress;

(vi) Providing information and referrals to other providers;

(vii) Providing ongoing risk assessment and safety planning with victims of domestic violence, dating violence, sexual assault, and stalking; and

(viii) Developing an individualized housing and service plan, including planning a path to permanent housing stability.

(4) Child care. The costs of establishing and operating child care, and providing child-care vouchers, for children from families experiencing homelessness, including providing meals and snacks, and comprehensive and coordinated developmental activities, are eligible.

(i) The children must be under the age of 13, unless they are disabled children.

(ii) Disabled children must be under the age of 18.

(iii) The child-care center must be licensed by the jurisdiction in which it operates in order for its costs to be eligible.

(5) Education services. The costs of improving knowledge and basic educational skills are eligible.

(i) Services include instruction or training in consumer education, health education, substance abuse prevention, literacy, English as a Second Language, and General Educational Development (GED).

(ii) Component services or activities are screening, assessment and testing; individual or group instruction; tutoring; provision of books, supplies, and instructional material; counseling; and referral to community resources.

(6) Employment assistance and job training. The costs of establishing and operating employment assistance and job training programs are eligible, including classroom, online and/or computer

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instruction, on-the-job instruction, services that assist individuals in securing employment, acquiring learning skills, and/or increasing earning potential. The cost of providing reasonable stipends to program participants in employment assistance and job training programs is also an eligible cost.

(i) Learning skills include those skills that can be used to secure and retain a job, including the acquisition of vocational licenses and/or certificates.

(ii) Services that assist individuals in securing employment consist of:

(A) Employment screening, assessment, or testing;

(B) Structured job skills and job-seeking skills;

(C) Special training and tutoring, including literacy training and pre-vocational training;

(D) Books and instructional material;

(E) Counseling or job coaching; and

(F) Referral to community resources.

(7) Food. The cost of providing meals or groceries to program participants is eligible.

(8) Housing search and counseling services. Costs of assisting eligible program participants to locate, obtain, and retain suitable housing are eligible.

(i) Component services or activities are tenant counseling; assisting individuals and families to understand leases; securing utilities; and making moving arrangements.

(ii) Other eligible costs are:

(A) Mediation with property owners and landlords on behalf of eligible program participants;

(B) Credit counseling, accessing a free personal credit report, and resolving personal credit issues; and

(C) The payment of rental application fees.

(9) Legal services. Eligible costs are the fees charged by licensed attorneys and by person(s) under the supervision of licensed attorneys, for advice and representation in matters that interfere with the homeless individual or family's ability to obtain and retain housing.

(i) Eligible subject matters are child support; guardianship; paternity; emancipation; legal separation; orders of protection and other civil remedies for victims of domestic violence, dating violence, sexual assault, and stalking; appeal of veterans and public benefit claim denials; landlord tenant disputes; and the resolution of outstanding criminal warrants.

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(ii) Component services or activities may include receiving and preparing cases for trial, provision of legal advice, representation at hearings, and counseling.

(iii) Fees based on the actual service performed (i.e., fee for service) are also eligible, but only if the cost would be less than the cost of hourly fees. Filing fees and other necessary court costs are also eligible. If the subrecipient is a legal services provider and performs the services itself, the eligible costs are the subrecipient's employees' salaries and other costs necessary to perform the services.

(iv) Legal services for immigration and citizenship matters and issues related to mortgages and homeownership are ineligible. Retainer fee arrangements and contingency fee arrangements are ineligible.

(10) Life skills training. The costs of teaching critical life management skills that may never have been learned or have been lost during the course of physical or mental illness, domestic violence, substance abuse, and homelessness are eligible. These services must be necessary to assist the program participant to function independently in the community. Component life skills training are the budgeting of resources and money management, household management, conflict management, shopping for food and other needed items, nutrition, the use of public transportation, and parent training.

(11) Mental health services. Eligible costs are the direct outpatient treatment of mental health conditions that are provided by licensed professionals. Component services are crisis interventions; counseling; individual, family, or group therapy sessions; the prescription of psychotropic medications or explanations about the use and management of medications; and combinations of therapeutic approaches to address multiple problems.

(12) Outpatient health services. Eligible costs are the direct outpatient treatment of medical conditions when provided by licensed medical professionals including:

(i) Providing an analysis or assessment of an individual's health problems and the development of a treatment plan;

(ii) Assisting individuals to understand their health needs;

(iii) Providing directly or assisting individuals to obtain and utilize appropriate medical treatment;

(iv) Preventive medical care and health maintenance services, including in-home health services and emergency medical services;

(v) Provision of appropriate medication;

(vi) Providing follow-up services; and

(vii) Preventive and non-cosmetic dental care.

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(13) Outreach services. The costs of activities to engage persons for the purpose of providing immediate support and intervention, as well as identifying potential program participants, are eligible.

(i) Eligible costs include the outreach worker's transportation costs and a cell phone to be used by the individual performing the outreach.

(ii) Component activities and services consist of: initial assessment; crisis counseling; addressing urgent physical needs, such as providing meals, blankets, clothes, or toiletries; actively connecting and providing people with information and referrals to homeless and mainstream programs; and publicizing the availability of the housing and/or services provided within the geographic area covered by the Continuum of Care.

(14) Substance abuse treatment services. The costs of program participant intake and assessment, outpatient treatment, group and individual counseling, and drug testing are eligible. Inpatient detoxification and other inpatient drug or alcohol treatment are ineligible.

(15) Transportation. Eligible costs are:

(i) the costs of program participant's travel on public transportation or in a vehicle provided by the recipient or subrecipient to and from medical care, employment, child care, or other services eligible under this section.

(ii) Mileage allowance for service workers to visit program participants and to carry out housing quality inspections;

(iii) The cost of purchasing or leasing a vehicle in which staff transports program participants and/or staff serving program participants;

(iv) The cost of gas, insurance, taxes, and maintenance for the vehicle;

(v) The costs of recipient or subrecipient staff to accompany or assist program participants to utilize public transportation; and

(vi) If public transportation options are not sufficient within the area, the recipient may make a one-time payment on behalf of a program participant needing car repairs or maintenance required to operate a personal vehicle, subject to the following:

(A) Payments for car repairs or maintenance on behalf of the program participant may not exceed 10 percent of the Blue Book value of the vehicle (Blue Book refers to the guidebook that compiles and quotes prices for new and used automobiles and other vehicles of all makes, models, and types);

(B) Payments for car repairs or maintenance must be paid by the recipient or subrecipient directly to the third party that repairs or maintains the car; and

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(C) The recipients or subrecipients may require program participants to share in the cost of car repairs or maintenance as a condition of receiving assistance with car repairs or maintenance.

(16) Utility deposits. This form of assistance consists of paying for utility deposits. Utility deposits must be a one-time fee, paid to utility companies.

(17) Direct provision of services. If the a service described in paragraphs (e)(1) through (e)(16) of this section is being directly delivered by the recipient or subrecipient, eligible costs for those services also include:

(i) The costs of labor or supplies, and materials incurred by the recipient or subrecipient in directly providing supportive services to program participants; and

(ii) The salary and benefit packages of the recipient and subrecipient staff who directly deliver the services.

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Appendix B
Grantee's Proof of Publication

B-1

Certificate of Publication

Ad #752093

In Matter of Publication of:

Public Notice

State of California)

)§

County of Ventura)

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

Oct. 23, 2015

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

Dated this Oct. 23, 2015; in Camarillo, California, County of Ventura.



Maria Rodriguez
(Signature)

COUNTY OF VENTURA CONSOLIDATED ANNUAL ACTION PLAN - FY 2016-17

**NOTICE OF MANDATORY
PUBLIC HEARING**
Wednesday, November 4,
2015, 9:00 a.m.
County Government Center,
Administration Building
Lower Plaza Assembly Room,
800 S. Victoria Avenue, Ven-
tura

The County of Ventura Entitlement Area will conduct the first FY 2016-17 Consolidated Annual Action Plan Public Hearing on Wednesday, November 4. It is mandatory for potential applicants to attend the hearing in order to submit an application in December. Sign-ins and speaker cards will not be accepted after 9:15 a.m.

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

The input received at the public hearing will be considered in preparing the County's Consolidated Annual Action Plan for FY 2016-17. The Action Plan will outline projects to be funded through three U.S. Department of Housing and Urban Development (HUD) grant programs: the Community Development Block Grant (CDBG) program, the HOME Investment Partnerships Program (HOME), and the Emergency Solutions Grant Program (ESG).

The County received \$1,490,000 in CDBG funds for the current cycle, but anticipates a reduction in allocation. CDBG funds may be utilized for affordable housing, public facilities, economic development, and public service (limited to 15% of the grant amount).

The County received \$427,000 in HOME funds for the current cycle, but anticipates a reduction in allocation. Funds may be used to increase the supply of affordable housing for low-income persons for the acquisition, new construction, reconstruction or substantial rehabilitation of housing, and tenant-based rental assistance.

The County received \$136,000 in ESG funds for the current cycle, but anticipates a reduction in allocation. Funds may be used to provide services for persons who are homeless or at risk of homelessness.

CDBG, HOME, and ESG applications, instructions, program summaries and the calendar of key dates for the FY 2016-17 funding process will be available on-line on November 5th at the County Executive Office's website at <http://www.ventura.org/divisions/community-development> (click on HUD Grants).

If you require language trans-

lation, physical assistance or other assistance to attend or participate in the hearing, please contact Gia Allen at (805) 654-5027 by October 28, 2015.
10/23/15
CNS-2807262#
VENTURA COUNTY STAR
Ad No.752093



Certificate of Publication

Ad #942459

In Matter of Publication of:

Public Notice

State of California)

))§

County of Ventura)

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

Feb. 19, 2016

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

Dated this February 19, 2016; in Camarillo, California, County of Ventura.


Wendy Worman



**NOTICE OF
PUBLIC HEARING
VENTURA COUNTY
ENTITLEMENT AREA
FY 2016-17 ANNUAL ACTION
PLAN DEVELOPMENT
MARCH 2, 2016, 9:00 A.M.
Lower Plaza Assembly Room
Government Center, Hall of
Administration
800 S. Victoria Avenue,
Ventura, CA 93009**

The County of Ventura will conduct the second public hearing for development of the FY 2016-17 Annual Action Plan. This hearing will be held jointly with the cities of Fillmore, Moorpark, Ojai, Port Hueneme and Santa Paula that, along with the County unincorporated area, comprise the Entitlement Area. The purpose of this public hearing is to discuss specific recommended projects to be funded by HUD Community Development Block Grant (CDBG), Emergency Solutions Grant (ESG), and Home Investment Partnerships (HOME) funds. Attendance is mandatory for applicants with projects recommended for funding.

The County anticipates similar funding to FY 2015-16 for the Entitlement Area, across all entitlement grant programs. Funding amounts for FY 2015-16 are \$1,488,904 in CDBG funding, which may be utilized for activities for persons of low-income that fall into the categories of housing, public facilities, economic development, and public service; \$136,542 in ESG funding, which may be utilized to address the needs of homeless people in emergency or transitional shelters and to assist people to quickly regain stability in permanent housing after experiencing a housing crisis and/or homelessness; and \$427,452 in HOME funding to increase the supply of affordable housing for low-income persons.

This also serves as notice for a possible third public hearing to be conducted on March 17, 2016, at 9:00 a.m. in the Atlantic Conference Room of the Government Center, Hall of Administration. For further notification whether the third meeting will be held or additional information on the HUD funding process, please visit <http://www.ventura.org/community-development/hud-grants>.

Provisions to accommodate handicapped, hearing

Impaired, and non-English speaking individuals at the public hearing will be made available upon request by calling (805) 654-2251 at least 48 hours prior to the hearing.
2/19/16
CNS-2846795#
VENTURA COUNTY STAR
Ad No. 942459

B-3

Certificate of Publication

Ad #1013418

In Matter of Publication of:

Public Notice

State of California)

))§

County of Ventura)

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

March 30, 2016

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

Dated this March 30, 2016; in Camarillo, California, County of Ventura.


Wendy Worman



NOTICE OF DOCUMENT AVAILABILITY AND PUBLIC HEARING COUNTY OF VENTURA FY 2016-17 ANNUAL ACTION PLAN AND SUBSTANTIAL AMENDMENT TO FY 2015-16 ANNUAL ACTION PLAN MAY 3, 2016, 10:30 A.M.

Board of Supervisors
Hearing Room
Government Center,
Hall of Administration
800 S. Victoria Ave.,
Ventura, CA 93009

The County of Ventura will conduct the third public hearing for the draft FY 2016-17 Annual Action Plan and a Substantial Amendment to the FY 2015-16 Annual Action Plan. The purpose of this public hearing is to receive comments and seek Board of Supervisor's approval before transmitting the Plans to the Department of Housing and Urban Development.

The draft 2016-17 Action Plan identifies specific projects to meet those goals in the second year of the five-year period covered by the Regional Consolidated Plan, which addresses the unmet needs

of low and moderate-income persons and persons with special needs who reside in the Ventura County Entitlement Area (comprised of the unincorporated areas and the cities of Fillmore, Moorpark, Ojai, Port Hueneme, and Santa Paula). The Entitlement Area will receive about \$2,026,175 from two HUD grant programs for FY 2015-17 - the Community Development Block Grant (CDBG), and Home Investment Partnership (HOME). Funding is proposed to be used for affordable housing (\$418,424), public service programs including programs for elderly and homeless (\$234,189), community and economic development projects (\$1,014,819) and administration and other programmatic considerations (\$358,743).

The Substantial Amendment to the 2015-16 Annual Action Plan proposes to cancel funding of \$318,971 for a delayed project, which is instead recommended for funding in the 2016-17 Action Plan. The canceled funds will be allocated to two existing public infrastructure projects.

The documents are available at the following City Halls: Fillmore, Moorpark, Ojai, Port Hueneme, and Santa Paula. They are also available at the Ventura County Executive Office and on the County Executive Office's website at <http://ceo.countyofventura.org> (click on Quick Links, HUD Programs).

Provisions to accommodate handicapped, hearing impaired and non-English speaking individuals will be made available at the public hearing upon 48-hour advance notice.

Written comments should be directed to Christy Madden, County Executive Office, County of Ventura, 800 S. Victoria Avenue, L#1940, Ventura, CA 93009, or to christy.madden@ventura.org.

For additional information on the process or documents, contact Mary Ann Guariento at 654-2852.
3/30/16
CNS-2862365#
VENTURA COUNTY STAR
Ad No.1013418


B-4

Grantee SF-424's and Certification(s)

OMB Number: 4040-0004
Expiration Date: 3/31/2016


| Application for Federal Assistance SF-424 | | |
|--|--|--|
| * 1. Type of Submission: <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application | | |
| * 2. Type of Application: <input type="checkbox"/> New <input checked="" type="checkbox"/> Continuation <input type="checkbox"/> Revision | | |
| * 3. Revision: select appropriate letter(s). <input type="text"/> | | |
| * 4. Other (Specify): <input type="text"/> | | |
| * 3. Date Received: <input type="text"/> | | |
| 4. Applicant Identifier: <input type="text" value="B-16-JC-C6-0507"/> | | |
| 5a. Federal Entity Identifier: <input type="text"/> | | |
| 5b. Federal Award Identifier: <input type="text"/> | | |
| State Use Only: | | |
| 6. Date Received by State: <input type="text"/> | | |
| 7. State Application Identifier: <input type="text"/> | | |
| 8. APPLICANT INFORMATION: | | |
| * a. Legal Name: <input type="text" value="County of Ventura"/> | | |
| * b. Employer/ taxpayer identification Number (EIN/TIN): <input type="text" value="95-6000944"/> | | |
| * c. Organizational DUNS: <input type="text" value="066691220000"/> | | |
| d. Address: | | |
| * Street1: <input type="text" value="Hall of Administration"/> | | |
| * Street2: <input type="text" value="800 S. Victoria Avenue, Bldg 1040"/> | | |
| * City: <input type="text" value="Ventura"/> | | |
| * County/Parish: <input type="text" value="Ventura"/> | | |
| * State: <input type="text" value="CA: California"/> | | |
| * Province: <input type="text"/> | | |
| * Country: <input type="text" value="USA: UNITED STATES"/> | | |
| * Zip / Postal Code: <input type="text" value="93009-0001"/> | | |
| e. Organizational Unit: | | |
| Department Name: <input type="text" value="County Executive Office"/> | | |
| Division Name: <input type="text" value="Regional Development Division"/> | | |
| f. Name and contact information of person to be contacted on matters involving this application: | | |
| Prefix: <input type="text" value="Ms."/> * First Name: <input type="text" value="Christy"/> | | |
| Middle Name: <input type="text"/> | | |
| * Last Name: <input type="text" value="Madden"/> | | |
| Suffix: <input type="text"/> | | |
| Title: <input type="text" value="Senior Deputy Executive Officer"/> | | |
| Organizational Affiliation: <input type="text"/> | | |
| * Telephone Number: <input type="text" value="805-654-2675"/> Fax Number: <input type="text" value="805-654-5106"/> | | |
| * Email: <input type="text" value="Christy.Madden@ventura.org"/> | | |

| Application for Federal Assistance SF-424 | |
|--|--|
| * 9. Type of Applicant 1: Select Applicant Type: <input type="text" value="B: County Government"/> | |
| Type of Applicant 2: Select Applicant Type: <input type="text"/> | |
| Type of Applicant 3: Select Applicant Type: <input type="text"/> | |
| * Other (specify): <input type="text"/> | |
| * 10. Name of Federal Agency: <input type="text" value="U.S. Department of Housing and Urban Development"/> | |
| 11. Catalog of Federal Domestic Assistance Number: <input type="text" value="14.018"/> | |
| CFDA Title: <input type="text" value="Community Development Block Grants/Entitlement Grants"/> | |
| * 12. Funding Opportunity Number: <input type="text"/> | |
| Title: <input type="text"/> | |
| 13. Competition Identification Number: <input type="text"/> | |
| Title: <input type="text"/> | |
| 14. Areas Affected by Project (Cities, Counties, States, etc.): <input type="text"/> <div> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/> </div> | |
| * 15. Descriptive Title of Applicant's Project: <input type="text" value="Ventura County FY 2016-17 Annual Action Plan-Community Development Block Grant Program, benefiting the cities of Fillmore, Moorpark, Ojai, Santa Paula, and Port Pineda, and the County unincorporated areas."/> | |
| Attach supporting documents as specified in agency instructions. <div> <input type="button" value="Add Attachments"/> <input type="button" value="Delete Attachments"/> <input type="button" value="View Attachments"/> </div> | |

| Application for Federal Assistance SF-424 | |
|--|--|
| 16. Congressional Districts Of: | |
| * a. Applicant: <input type="text" value="23424"/> | * b. Program/Project: <input type="text" value="23424"/> |
| Attach an additional list of Program/Project Congressional Districts if needed. <input type="text"/> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/> | |
| 17. Proposed Project: | |
| * a. Start Date: <input type="text" value="07/01/2016"/> | * b. End Date: <input type="text" value="06/30/2017"/> |
| 18. Estimated Funding (\$): | |
| * a. Federal | <input type="text" value="1,561,260.00"/> |
| * b. Applicant | <input type="text" value="0.00"/> |
| * c. State | <input type="text" value="0.00"/> |
| * d. Local | <input type="text" value="0.00"/> |
| * e. Other | <input type="text" value="0.00"/> |
| * f. Program Income | <input type="text" value="0.00"/> |
| * g. TOTAL | <input type="text" value="1,561,260.00"/> |
| * 19. Is Application Subject to Review By State Under Executive Order 12372 Process? <input type="checkbox"/> a. This application was made available to the State under the Executive Order 12372 Process for review on <input type="text"/> . <input checked="" type="checkbox"/> b. Program is subject to E.O. 12372 but has not been selected by the State for review. <input type="checkbox"/> c. Program is not covered by E.O. 12372. | |
| * 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.) <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes", provide explanation and attach <input type="text"/> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/> | |
| 21. *By signing this application, I certify (1) to the statements contained in the list of certifications** and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 21B, Section 1001) <input checked="" type="checkbox"/> ** I AGREE ** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions. | |
| Authorized Representative: | |
| Prefix: <input type="text" value="Mr."/> | * First Name: <input type="text" value="Michael"/> |
| Middle Name: <input type="text"/> | |
| * Last Name: <input type="text" value="Powers"/> | |
| Suffix: <input type="text"/> | |
| * Title: <input type="text" value="County Executive Officer"/> | |
| * Telephone Number: <input type="text" value="885-654-2881"/> | Fax Number: <input type="text" value="885-654-3100"/> |
| * Email: <input type="text" value="Michael.Powers@kentons.org"/> | |
| * Signature of Authorized Representative:  | * Date Signed: <input type="text" value="5/8/16"/> |

| Application for Federal Assistance SF-424 | | |
|---|--|--|
| <p>* 1. Type of Submission:</p> <p><input type="checkbox"/> Preapplication</p> <p><input checked="" type="checkbox"/> Application</p> <p><input type="checkbox"/> Changed/Corrected Application</p> | | |
| <p>* 2. Type of Application:</p> <p><input type="checkbox"/> New</p> <p><input checked="" type="checkbox"/> Continuation</p> <p><input type="checkbox"/> Revision</p> | | |
| <p>* If Revision, select appropriate letter(s):</p> <p>Other (Specify):</p> | | |
| <p>* 3. Date Received:</p> | | <p>4. Applicant Identifier:</p> <p>M-1,6-02-06-n540</p> |
| <p>5a. Federal Entity Identifier:</p> | | <p>5b. Federal Award Identifier:</p> |
| <p>State Use Only:</p> | | |
| <p>6. Date Received by State:</p> | | <p>7. State Application Identifier:</p> |
| <p>8. APPLICANT INFORMATION:</p> | | |
| <p>* a. Legal Name: County of Ventura</p> | | |
| <p>* b. Employer/Taxpayer Identification Number (EIN/TIN):</p> <p>33-000944</p> | | <p>* c. Organizational DUNS:</p> <p>0650911220000</p> |
| <p>d. Address:</p> | | |
| <p>* Street1: Hall of Administration</p> | | |
| <p>* Street2: 800 S. Victoria Avenue, T81440</p> | | |
| <p>* City: Ventura</p> | | |
| <p>* County/Parish: Ventura</p> | | |
| <p>* State: CA: California</p> | | |
| <p>* Province:</p> | | |
| <p>* Country: USA: UNITED STATES</p> | | |
| <p>* Zip / Postal Code: 93005-0800</p> | | |
| <p>e. Organizational Unit:</p> | | |
| <p>Department Name:</p> <p>County Executive Office</p> | | <p>Division Name:</p> <p>Regional Development Division</p> |
| <p>f. Name and contact information of person to be contacted on matters involving this application:</p> | | |
| <p>Prefix: Ms. * First Name: Christy</p> | | |
| <p>Middle Name:</p> | | |
| <p>* Last Name: Hedder</p> | | |
| <p>Suffix:</p> | | |
| <p>Title: Senior Deputy Executive Officer</p> | | |
| <p>Organizational Affiliation:</p> | | |
| <p>* Telephone Number: 805-654-2615 Fax Number: 805-654-2106</p> | | |
| <p>* Email: Christy.Hedder@ventura.org</p> | | |

| | | |
|---|---|--|
| Application for Federal Assistance SF-424 | | |
| * 9. Type of Applicant 1: Select Applicant Type: | | |
| <input type="text" value="9: County Government"/> | | |
| Type of Applicant 2: Select Applicant Type | | |
| <input type="text"/> | | |
| Type of Applicant 3: Select Applicant Type: | | |
| <input type="text"/> | | |
| * Other (specify): | | |
| <input type="text"/> | | |
| * 10. Name of Federal Agency: | | |
| <input type="text" value="U.S. Department of Housing and Urban Development"/> | | |
| 11. Catalog of Federal Domestic Assistance Number: | | |
| <input type="text" value="14.229"/> | | |
| CFDA Title | | |
| <input type="text" value="HOME Investment Partnership Program"/> | | |
| * 12. Funding Opportunity Number: | | |
| <input type="text"/> | | |
| * Title: | | |
| <input type="text"/> | | |
| 13. Competition Identification Number: | | |
| <input type="text"/> | | |
| Title: | | |
| <input type="text"/> | | |
| 14. Areas Affected by Project (Cities, Counties, States, etc.): | | |
| <input type="text"/> | <input type="button" value="Add Attachment"/> | <input type="button" value="Delete Attachment"/> |
| <input type="button" value="View Attachment"/> | | |
| * 16. Descriptive Title of Applicant's Project: | | |
| <input type="text" value="Ventura County FY 2015-16 Annual Action Plan HOME Investment Partnership Program, benefiting the cities of Eureka, Moorpark, Ojai, Santa Paula, and Port Hueneme, and the County unincorporated areas."/> | | |
| Attach supporting documents as specified in agency instructions. | | |
| <input type="button" value="Add Attachments"/> | <input type="button" value="Delete Attachments"/> | <input type="button" value="View Attachments"/> |

| Application for Federal Assistance SF-424 | |
|---|---|
| 16. Congressional Districts Of: | |
| * a. Applicant | 23624 |
| * b. Program/Project | 23624 |
| Attach an additional list of Program/Project Congressional Districts if needed. | |
| <input type="text"/> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/> | |
| 17. Proposed Project: | |
| * a. Start Date: | 07/01/2015 |
| * b. End Date: | 06/30/2017 |
| 18. Estimated Funding (\$): | |
| * a. Federal | 464,915.00 |
| * b. Applicant | 0.00 |
| * c. State | 0.00 |
| * d. Local | 0.00 |
| * e. Other | 0.00 |
| * f. Program Income | 0.00 |
| * g. TOTAL | 464,915.00 |
| * 19. Is Application Subject to Review By State Under Executive Order 12372 Process? | |
| <input type="checkbox"/> a. This application was made available to the State under the Executive Order 12372 Process for review on <input type="text"/> . | |
| <input checked="" type="checkbox"/> b. Program is subject to E.O. 12372 but has not been selected by the State for review. | |
| <input type="checkbox"/> c. Program is not covered by E.O. 12372. | |
| * 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.) | |
| <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | |
| If "Yes", provide explanation and attach | |
| <input type="text"/> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/> | |
| 21. "By signing this application, I certify (1) to the statements contained in the list of certifications** and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 28, Section 1001) | |
| <input checked="" type="checkbox"/> ** I AGREE | |
| ** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions. | |
| Authorized Representative: | |
| Prefix: | Mr. |
| * First Name: | Michael |
| Middle Name: | |
| * Last Name: | Powers |
| Suffix: | |
| * Title: | County Executive Officer |
| * Telephone Number: | 800-656-2600 |
| Fax Number: | 805-554-5000 |
| * Email: | Michael.Powers@ventura.org |
| * Signature of Authorized Representative: |  |
| * Date Signed: | 5/3/16 |

CERTIFICATIONS

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

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

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


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

1. No Federal appropriated funds have been paid or will be paid, by or on behalf of it, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement;
2. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, it will complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions; and
3. It will require that the language of paragraph 1 and 2 of this anti-lobbying certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

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

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

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



Signature/Authorized Official

Date 05/03/16

Michael Powers, County Executive Officer

Specific CDBG Certifications

The Entitlement Community certifies that:

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

Community Development Plan -- Its consolidated housing and community development plan identifies community development and housing needs and specifies both short-term and long-term community development objectives that provide decent housing, expand economic opportunities primarily for persons of low and moderate income. (See CFR 24 570.2 and CFR 24 part 570)

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

Use of Funds -- It has complied with the following criteria:

1. Maximum Feasible Priority. With respect to activities expected to be assisted with CDBG funds, it certifies that it has developed its Action Plan so as to give maximum feasible priority to activities which benefit low and moderate income families or aid in the prevention or elimination of slums or blight. The Action Plan may also include activities which the grantee certifies are designed to meet other community development needs having a particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community, and other financial resources are not available);
2. Overall Benefit. The aggregate use of CDBG funds including section 108 guaranteed loans during program year(s) 2016-17, _____ (a period specified by the grantee consisting of one, two, or three specific consecutive program years), shall principally benefit persons of low and moderate income in a manner that ensures that at least 70 percent of the amount is expended for activities that benefit such persons during the designated period;
3. Special Assessments. It will not attempt to recover any capital costs of public improvements assisted with CDBG funds including Section 108 loan guaranteed funds by assessing any amount against properties owned and occupied by persons of low and moderate income, including any fee charged or assessment made as a condition of obtaining access to such public improvements.

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

The jurisdiction will not attempt to recover any capital costs of public improvements assisted with CDBG funds, including Section 108, unless CDBG funds are used to pay the proportion of fee or assessment attributable to the capital costs of public improvements financed from other revenue sources. In this case, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds. Also, in the case of properties owned and occupied by moderate-income (not low-income) families, an assessment or charge may be made against the property for public improvements financed by a source other than CDBG funds if the jurisdiction certifies that it lacks CDBG funds to cover the assessment.

Excessive Force -- It has adopted and is enforcing:

1. A policy prohibiting the use of excessive force by law enforcement agencies within its

jurisdiction against any individuals engaged in non-violent civil rights demonstrations; and

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

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

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

Compliance with Laws – It will comply with applicable laws.


Signature/Authorized Official

05/03/16
Date

Michael Powers, County Executive Officer
Title

OPTIONAL CERTIFICATION
CDBG

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

The grantee hereby certifies that the Annual Plan includes one or more specifically identified CDBG-assisted activities which are designed to meet other community development needs having a particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community and other financial resources are not available to meet such needs.


Signature/Authorized Official

05/03/16
Date

Michael Powers, County Executive Officer
Title

Specific HOME Certifications

The HOME participating jurisdiction certifies that:

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

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

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

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



05/03/16

Signature/Authorized Official

Date

Michael Powers, County Executive Officer
Title

ESG Certifications

The Emergency Solutions Grants Program Recipient certifies that:

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

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

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

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

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

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

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

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

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

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



Signature/Authorized Official

05/03/16

Date

Michael Powers, County Executive Officer

Title

HOPWA Certifications

The HOPWA grantee certifies that:

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

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

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


Signature/Authorized Official

05/03/16
Date

Michael Powers, County Executive Officer
Title

APPENDIX TO CERTIFICATIONS

INSTRUCTIONS CONCERNING LOBBYING:

A. Lobbying Certification

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