DRAFT

City of Long Beach

FY 2020-21 Annual Action Plan

(October 1, 2020-September 30, 2021)

LONGBEACH DEVELOPMENT SERVICES

CITY OF LONGBEACH

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Executive Summary

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

1. Introduction

This Annual Action Plan for FY 2020-2021 represents the fourth year of implementing the City's five-year Consolidated Plan. It serves as the City's official application to HUD for Community Development Block Grant (CDBG), HOME Investment Partnership Act (HOME), and Emergency Solutions Grant (ESG) funds. This Action Plan covers the planning period of October 1, 2020 through September 30, 2021.

The Consolidated Plan and Action Plans represent a comprehensive planning effort mainly led by the Long Beach City Council and the Long Beach Community Investment Company (LBCIC), with involvement of local government experts, the social service community, residents, and consultation with other local HUD entitlement communities.

This Action Plan was prepared using the eCon Planning Suite system developed and mandated by HUD. The system prescribes the structure and contents of this document, following the Federal Consolidated Planning regulations.

2. Summarize the objectives and outcomes identified in the Plan

The City's goals and priorities for the five-year Consolidated Plan are identified below:

Goal: Assist in the Creation and Preservation of Affordable Housing for Lower-Income and Special Needs Households

Priority: New Affordable Housing Opportunities

Priority: Preservation of Existing Affordable Housing

Priority: Housing Assistance

Goal: Support Activities to End Homelessness

Priority: Emergency Shelters and Essential Services

Priority: Rapid Re-Housing

Priority: Homeless Prevention

Priority: Street Outreach

Goal: Support Activities that Assist with Basic Needs, Eliminate Blight, and/or Strengthen Neighborhoods

Priority: Public Facility and Infrastructure Improvements

Priority: Neighborhood Improvement Programs

Priority: Improved Quality of Aging Housing Stock

Priority: Public and Supportive Services

Priority: Interim Assistance

Goal: Expand Economic Opportunities for Low-Income Households

Priority: Business Technical Assistance and Other Programs

Priority: Improved Business Corridors

Goal: Promote Fair Housing Choice

Priority: Fair Housing Services, Outreach, and Education

Goal: Planning and Program Administration

Priority: Management of Grant Funds and Program Delivery

3. Evaluation of Past Performance

During FY 2018-2019, the City of Long Beach undertook a range of housing and community development activities to benefit primarily the extremely low, very low/low, and moderate-income residents and those with special needs. This section only highlights some of the key accomplishments. For more detailed information, please refer to the Consolidated Annual Performance and Evaluation Reports (CAPERs) available at City Hall and on City website. Overall, the City is on track to meeting the objectives established in its Consolidated Plan.

Affordable Housing

The City utilized both CDBG and HOME funds to preserve and improve the City's affordable housing stock:

- Single-Family Residential Rehabilitation Loan Program: 2 units rehabilitated
- Home Improvement Rebate: 133 units
- Multi-Family Residential New Construction/Acquisition/Rehabilitated: 1,352 affordable units preserved
- Security/Utility Deposit Assistance: 21 households assisted
- Code Enforcement: 4,688 code violations inspected and provided assistance for correction

In addition, the City is also leveraging HOME funds with CDBG funds to rehab single family residential properties resided by very low-income and elderly persons.

Public Services

The City utilized CDBG funds and ESG funds to provide supportive services for the City's extremely low, very low/low, and moderate-income households, especially those with special needs:

- Youth Services: 38,815 youths assisted with after-school and weekend recreation programs
- Homeless Services: 380 persons assisted with emergency shelters; 10,835 persons assisted at the Multi-Service Center; 75 persons assisted with homeless street outreach; and 45 households assisted with homeless prevention activities.
- Graffiti Removal: graffiti removed from 70,477 tags removed from 70,621 sites
- Neighborhood Resource Center: 37,114 persons assisted
- Fair Housing Services: 1,330 persons assisted

Public Facility and Infrastructure Improvements

Through its Neighborhood Improvement Strategy (NIS), the City utilized CDBG and other local and private funds to provide an array of programs and services to improve our neighborhoods:

- Urban Forestry: 497 trees planted in CDBG areas and a total of 728 trees planted citywide.

Economic Development

The City assisted 572 local neighborhood businesses with technical assistance services, resulting in 436 jobs created/retained in Long Beach. A total of 7 loans were also provided to commercial and industrial businesses that provide jobs or services to low- and moderate-income persons.

4. Summary of Citizen Participation Process and consultation process

Neighborhood Meetings: The City had originally planned to conduct neighborhood meetings with various neighborhood organizations. However, with COVID-19 and the Shelter in Place Order, the City was not able to conduct any in-person meetings.

Public Review of Draft Documents: A 30-day public review was held from August 14, 2020 through September 15, 2020. Copies of the Draft Consolidated Plan were made available for the public at the City website. Due to COVID-19, City Hall and City libraries have been closed.

The final CP, amendments, annual Action Plans and performance reports will be available for five years at Long Beach Development Services Department.

Public Hearings: After a notice was published in three local newspapers, the Long Beach Community Investment Company (LBCIC) conducted a Public Hearing on September 16, 2020 to solicit public comments on the draft FY 2020 Action Plan. In addition to published notices in English, Spanish, and Khmer (Cambodian), fliers announcing the Public Hearing were e-mailed to over 1,000 individuals and organizations. The Action Plan included all public comments received at the Public Hearing and written responses from staff. At the conclusion of the Public Hearing, the LBCIC recommended approval of the FY 2020 Action Plan to the City Council.

At the public hearing, the Long Beach City Council reviewed the Action Plan recommended by the LBCIC along with the citizen comments and solicited public comments.

5. Summary of public comments

Public comments are summarized in the appendix.

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

Not applicable. All comments received were accepted.

7. Summary

The City of Long Beach has undertaken diligent and good faith efforts in outreaching to all segments of the community that may benefit from the City's CDBG, HOME, and ESG programs.

The Process

PR-05 Lead & Responsible Agencies 24 CFR 91.200(b)

1. Describe agency/entity responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source

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

Agency Role	Name	Department/Agency
Lead Agency	Long Beach	Development Services/Grants Administration
CDBG Administrator	Long Beach	Development Services/Grants Administration
HOME Administrator	Long Beach	Development Services/Grants Administration
ESG Administrator	Long Beach	Development Services/Grants Administration

Table 1 – Responsible Agencies

Narrative

The City's CDBG, HOME, and ESG programs are administered by the Development Services Department, Grants Administration.

Consolidated Plan Public Contact Information

For matters concerning the City of Long Beach's CDBG, HOME and ESG programs, please contact: Alem Hagos, Grants Administration Officer, City of Long Beach Development Services Department, 411 West Ocean Blvd., 3rd Floor, Long Beach, CA 90802, (562) 570-7403.

Annual Action Plan - Expected Resources

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

1. Introduction

As part of the development of this Action Plan, the City undertook an outreach program to consult and coordinate with non-profit agencies, affordable housing providers, and government agencies regarding the needs of the low- and moderate-income community. The outreach program has been summarized in the Executive Summary and Citizen Participation sections of this Plan and provided in detail in the appendix.

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

The City compiled an outreach list consisting of various agencies and organizations, including:

- Non-profit service providers that cater to the needs of low- and moderate-income households and persons with special needs;
- Local churches and religious groups;
- Schools;
- Affordable housing providers;
- Housing advocates;
- Housing professionals;
- Public agencies (such as neighboring jurisdictions, school districts, health services, public works);
- Economic development and employment organizations; and
- Community and neighborhood groups.

On an ongoing basis, Long Beach staff interacts with various non-profit agencies and public service groups in the delivery of programs through its federal entitlement and other resources. These agencies are assisted by City staff in planning programs and projects, ensuring activity eligibility and costs, complying with federal regulations and requirements, and monitoring the timely expenditure of annually allocated program funds. The City requires agencies to submit quarterly and annual reports to meet federal requirements, and periodically conducts on-site monitoring reviews.

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 Long Beach Continuum of Care (CoC) sets forth the City's strategies for ending homelessness. The City of Long Beach Department of Health and Human Services is the lead agency for the Long Beach CoC. The Long Beach Continuum of Care has strategic partnerships with local agencies to provide a comprehensive system of care to reduce homelessness for chronically homeless individuals and families, families with children, veterans, and unaccompanied youth. The CoC recognizes the local needs of people experiencing homelessness, and bridges HUD's priorities with local priorities to allocate resources to address the needs of homeless persons and persons at risk of homelessness in the Long Beach jurisdiction. The CoC includes the fundamental program components identified by HUD and also provides a system of linkages and referral mechanisms across these components to provide comprehensive services to move individuals and families from being homeless or at risk of being homeless to permanent housing and self-sufficiency.

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

The Department of Health and Human Services Homeless Services Division (HSD) is the lead for the local CoC jurisdiction and draws upon the Homeless Services Advisory Committee, CoC Board, and CoC General Membership for policy, program, and funding recommendations. The Homeless Services Division releases a Request for Proposals (RFP) for the federal ESG biennially for these component types: Homelessness Prevention, Emergency Shelter, HMIS, Outreach Services, and Rapid Rehousing.

All ESG funded providers are required to enter data into the Long Beach HMIS (or comparable database). HSD developed a performance matrix for the CoC and ESG using HMIS data and fiscal performance data. This performance data is shared with the CoC Board and General Membership to evaluate ESG funded projects on their programs' effectiveness and compares the performance data to the last period to score and rank each project by component type to allocate ESG funds.

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

The outreach list includes the County and neighboring cities to invite them to participate in the public hearings or provide comments on the City's Action Plan. Agencies and organizations that attended the neighborhood meetings include:

- AOC 7 Neighborhood Association
- Century Villages at Cabrillo
- College Square Neighborhood Association
- Housing Authority of the City of Long Beach
- Latinos in Action
- Long Beach Job Corps Center
- Mental Health America of Los Angeles

- Starr King Neighborhood Association
- Washington Neighborhood Association

Table 2 – Agencies, Groups, Organizations Who Participated

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

All applicable agencies and agency types were consulted.

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 (CoC)	Long Beach Health and Human Services Department	Potential funding allocations to address homeless needs will complement the CoC Strategy.
Housing Action Plan (HAP)	Long Beach Development Services Department	The HAP outlines the uses of Housing Asset Funds to address affordable housing needs.

Table 3 – Other Local / Regional / Federal Planning Efforts

AP-12 Participation

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

Summarize citizen participation process and how it impacted goal-setting

Neighborhood Meetings

Due to COVID-19, no neighborhood meetings were conducted as part of the FY 2020-21 Action Plan.

Publicity

Multi-lingual (English, Spanish, Khmer, and Tagalog) information about the meetings was distributed through: City website; flyers; email blasts; press releases; Public Service Announcements; display advertisements in Long Beach Press Telegram (English), Impacto USA (Spanish), and Angkor Borei (Khmer); and posted on City's Facebook/Twitter pages.

Public Review of Draft Documents

A 30-day public review was held from August 14, 2020 through September 15, 2020. Copies of the Draft Action Plan were made available for the public on the City Website or by contacting Alem Hagos, Operations Officer in the Department of Development Services.

The final CP, amendments, annual Action Plans and performance reports will be available for five years at Long Beach Development Services Department.

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	Neighborhood and Stakeholder Consultation	Minorities Non-English Speaking: Spanish, Khmer, Tagalog Non-Targeted/ Broad Community	Due to COVID-19, no neighborhood meetings were conducted as part of the FY 2020-21 Action Plan.	Comments are summarized in the appendix.	All comments were accepted	
2	Public Hearings	Non-Targeted/ Broad Community	The City conducted public hearings before the Long Beach Community Investment Company (LBCIC) on September 16, 2020 and ____, 2020. The Action Plan was presented before the City Council on _____, 2020.	Comments are summarized in the appendix.	All comments were accepted	

Table 4 – Citizen Participation Outreach

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

Introduction

The City of Long Beach is an entitlement jurisdiction for CDBG, HOME, and ESG funds, and is receiving $6,151,677 in CDBG funds, $2,901,396 in HOME funds, and $535,591 in ESG funds for FY 2020-2021. In addition, a program income of $60,000 from CDBG activities and $1,500,000 from HOME activities is anticipated. Program income anticipated is incorporated into the City's annual budgeting process.

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Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 4				Expected Amount Available Remainder 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	$6,151,677	$60,000	---	$6,211,677	$5,400,000	For planning purposes, the City estimates the availability of approximately $27 million in CDBG annual allocations over the five-year Consolidated Plan period. This estimate assumes stable allocations over the planning period. In addition, the City anticipates a total program income of $400,000 over five years. Specifically, a program income of $60,000 is expected for FY 2019-2020.
HOME	Public-Federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	$2,901,396	$1,500,000	---	$4,401,396	$2,200,000	For planning purposes, the City estimates the availability of approximately $11 million in HOME funds over the five-year Consolidated Plan period. This estimate assumes stable allocations over the planning period. In addition, the City anticipates $1,500,000 in program income in FY 2019-2020.
ESG	Public-Federal	Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Street Outreach	$535,591	---	---	$535,591	$500,000	For planning purposes, the City estimates the availability of approximately $2.5 million in ESG funds over the five-year Consolidated Plan period. This estimate assumes stable allocations over the planning period.

Table 5 - Expected Resources – Priority Table

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

Leveraging

Long Beach has access to a variety of federal, state, local and private resources to achieve its housing and community development goals. These funds include the following key programs in FY 2020-2021 and total over $123 million:

- CDBG: $6,211,677
- HOME: $4,401,396
- ESG: $535,591
- Section 8/Housing Choice Vouchers: $101,311,518.98
- Continuum of Care: $ $9,330,143
- HOPWA: $1.25 million
- Housing Assets Funds: $27.5 million
- General Fund: Public Facilities Improvement ($3 million) and Code Enforcement Activities ($4 million)
- Health Fund: Code Enforcement Activities ($1.9 million)

Specific funding sources will be utilized based on the opportunities and constraints of each program.

Match Requirements

Home Match Requirements: Pursuant to HUD regulations, all participating jurisdictions (PJs) must contribute or match 25 cents for each dollar of HOME funds spent on affordable housing. The HOME statute allows for a reduction of the matching contribution requirement under three conditions: 1) fiscal distress, 2) severe fiscal distress, and 3) for Presidentially-declared major disasters. When a local jurisdiction meets one of these distress conditions, it is determined to be in fiscal distress and receives a 50 percent reduction of match. If a local jurisdiction satisfies both of the distress criteria, it is determined to be in severe fiscal distress and receives a 100 percent reduction of match. For FY 2020-2021, the City of Long Beach was considered to be in “financial distress,” with a 50 percent reduction in match requirements. This determination was made because per capita income ($27,750) and poverty level percentages (20.26 percent) for Long Beach exceeded the HUD criteria for financial distress. The City has an accumulated excess match for over $10 million when redevelopment funds were available to provide affordable housing. This excess match will be adequate to fulfill the City future match requirements for an extended period of time.

ESG Match Requirements: The City of Long Beach contracts with non-profit agencies to provide emergency housing, rapid rehousing, and street outreach. The funded agencies must provide at least 100 percent match as stated in the Request for Proposals. The match source can be either in-kind or cash match and must be from sources other than ESG program or McKinney-Vento funding. Funds used to match a previous ESG/CDBG grant may not be used to match a subsequent grant. Also, detailed match documentation must be submitted during the invoice process.

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

The LBCIC owns two sites with potential for residential development. These sites were previously purchased with redevelopment housing set-aside funds and therefore are subject to the income and household target requirements per SB 341. LBCIC plans to release Requests for Proposals (RFP) for these Housing Opportunity Sites:

- 4151 E. Fountain - Units TBD
- Fifteenth Street/Long Beach Boulevard - Units TBD

The City is working on various affordable housing projects:

- The construction of Las Ventanas Apartments, a 102-unit affordable apartment complex that will provide quality housing for extremely low-, very low-, and low-income individuals and families, 15 of which are homeless or at risk of homelessness;
- The construction of Vistas del Puerto Apartments, a 48-unit affordable apartment complex that will provide quality housing for extremely low-, very low-, and low-income individuals and families, 20 of which have experienced homelessness.
- The construction of The Spark at Midtown, a 95-unit affordable apartment complex that will provide quality housing for extremely low-, very low-, and low-income individuals and families, 47 of which have experienced homelessness.
- The construction of Bloom at Magnolia, a 40-unit affordable apartment complex that will provide quality housing for extremely low-income individuals that have experienced homelessness.
- The construction of Habitat for Humanity townhomes at Pacific Avenue, a 10-unit affordable ownership development that will provide ownership opportunities to six low-income and four moderate-income first-time homebuyers.

Discussion

See discussions above.

AP-20 Annual Goals and Objectives

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Create and Preserve Affordable Housing	2017	2021	Affordable Housing	Citywide Place-Based Neighborhood Improvement Strategy Areas	New Affordable Housing Opportunities Preservation of Existing Affordable Housing Housing Assistance	**HOME:** $4,111,257	**Rental units constructed:** 40 Housing Units **Rental units rehabilitated:** 15 Housing Units **Tenant-Based Rental Assistance/Rapid Re-Housing:** 115 Households Assisted
2	Support Activities to End Homelessness	2017	2021	Homeless	Citywide	Emergency Shelters and Essential Services Rapid Re-Housing Homeless Prevention Street Outreach	**CDBG:** $100,000 **ESG:** $495,422	**Homeless Person Overnight Shelter:** 375 Persons Assisted **Public service activities other than Low/Moderate Income Housing Benefit:** 15,000 persons assisted **Homeless Prevention:** 25 Persons Assisted. **Street Outreach:** 1,500 persons assisted

3	Eliminate Blight and Strengthen Neighborhoods	2017	2021	Non-Homeless Special Needs Non-Housing Community Development	Place-Based Neighborhood Improvement Strategy Areas CDBG Low and Moderate Income (LMA) Target Areas Code Enforcement Target Areas	Public Facility and Infrastructure Improvements Neighborhood Improvement Programs Improved Quality of Aging Housing Stock Public and Supportive Services	**CDBG:** $4,326,582	**Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit:** 50,000 Persons Assisted **Homeowner Housing Rehabilitated:** 95 Housing Units **Public Service Activities other than Low/Moderate Income Housing Benefit:** 42,030 Persons Assisted **Housing Code Enforcement:** 8,050 Housing Units
4	Expand Economic Opportunities	2017	2021	Non-Housing Community Development	Place-Based Neighborhood Improvement Strategy Areas	Business Technical Assistance and Other Programs Improved Business Corridors	**CDBG:** $672,000	**Businesses assisted:** 578 Businesses Assisted
5	Promote Fair Housing Choice	2017	2021	Affordable Housing	Citywide	Fair Housing Services, Outreach, and Education	**CDBG:** $85,000	**Public Service Activities other than Low/Moderate Income Housing Benefit:** 2,000 Persons Assisted
6	Planning and Program Administration	2017	2021	Planning and Administration	Citywide	Management of Grant Funds and Program Delivery	**CDBG:** $1,128,095 **HOME:** $290,139 **ESG:** $40,169	

Table 6 – Goals Summary

Goal Descriptions

1	**Goal Name**	Create and Preserve Affordable Housing
	Goal Description	The City will pursue a range of activities to expand affordable housing opportunities for low and moderate income households, including those with special needs (seniors, large households, disabled, homeless, etc.) Emphasis will be on affordable rental housing due to funding limitations and urgency of needs. The City will actively pursue opportunities through new construction, rehabilitation, acquisition/rehabilitation, and preservation.
2	**Goal Name**	Support Activities to End Homelessness
	Goal Description	The City will utilize both ESG and CDBG funds to coordinate services and facilities for the homeless. The City's strategy for addressing homeless needs is four-pronged: 1) street outreach; 2) rapid re-housing; 3) homeless prevention; and 4) homeless facilities and essential services. The intent is to address the needs of those rendered homeless and at-risk of homelessness using a continuum of care approach by supporting services and facilities that complement the existing Continuum of Care system.
3	**Goal Name**	Eliminate Blight and Strengthen Neighborhoods
	Goal Description	The City has developed a new Place-Based Neighborhood Improvement Strategy where resources are targeted to address issues at the neighborhood level. To address key Assessment of Fair Housing (AFH) goals, improve neighborhood conditions, and eliminate disparities in access to opportunity between residents in Long Beach and reduce segregation, the Consolidated Plan will focus place-based efforts and investments in segregated, high poverty, low opportunity neighborhoods.
4	**Goal Name**	Expand Economic Opportunities
	Goal Description	The City will work to expand economic development opportunities in low income neighborhoods to advance social equity. Assistance may include technical assistance and other programs with the goal of retaining and attracting businesses to these neighborhoods and improving the business corridors that serve low income neighborhoods.
5	**Goal Name**	Promote Fair Housing Choice
	Goal Description	The City will promote fair housing, outreach, and education services to promote the awareness and compliance with fair housing laws.
6	**Goal Name**	Planning and Program Administration
	Goal Description	The City will continue to implement the CDBG, HOME, and ESG programs in compliance with all applicable regulations and requirements. The caps for program administration costs are 20 percent for CDBG, 10 percent for HOME, and 7.5 percent for ESG.

Projects

AP-35 Projects – 91.220(d)

Introduction

During FY 2020-2021, the City of Long Beach will pursue a range of housing and community development activities using CDBG, HOME, and ESG funds. These activities will implement the City's Consolidated Plan and Priorities:

Goal: Assist in the Creation and Preservation of Affordable Housing for Lower-Income and Special Needs Households

Priority: New Affordable Housing Opportunities

Priority: Preservation of Existing Affordable Housing

Priority: Housing Assistance

Goal: Support Activities to End Homelessness

Priority: Emergency Shelters and Essential Services

Priority: Rapid Re-Housing

Priority: Homeless Prevention

Priority: Street Outreach

Goal: Support Activities that Assist with Basic Needs, Eliminate Blight, and/or Strengthen Neighborhoods

Priority: Public Facility and Infrastructure Improvements

Priority: Neighborhood Improvement Programs

Priority: Improved Quality of Aging Housing Stock

Priority: Public and Supportive Services

Priority: Interim Assistance

Goal: Expand Economic Opportunities for Low-Income Households

Priority: Business Technical Assistance and Other Programs

Priority: Improved Business Corridors

Goal: Promote Fair Housing Choice

Priority: Fair Housing Services, Outreach, and Education

Goal: Planning and Program Administration

Priority: Management of Grant Funds and Program Delivery

For FY 2020-2021, the City of Long Beach is receiving $6,151,677 in CDBG funds, $2,901,396 in HOME funds, and $535,591 in ESG funds. In addition, the City anticipates generating $60,000 in program income from CDBG activities and $1,500,000 in program income from HOME activities.

Projects

#	Project Name
1	Home Improvement Rebate Program ($2,000)
2	Home Improvement Loan Program ($10,000)
3	Home Improvement - Program Delivery
4	Graffiti Removal Program
5	Graffiti Prevention Program (Mural Restoration)
6	Neighborhood Resource Center
7	Neighborhood Leadership Program
8	Homeless Multi-Service Center
9	Senior Service (Ex. Home Sharing, Tax Assistance)
10	After School & Weekend Recreation
11	Code Enforcement
12	Code Enforcement (City Attorney)
13	Sidewalk Improvement Projects (PW-CIP)
14	Urban Forestry Program
15	Targeted Place-Making (Facilities/Outdoor Alleys/NPP)
16	Technical Business Assistance/SBDC Support
17	Business Revitalization Program (Corridor)
18	Line of Credit Loan Program
19	Fair Housing Services
20	Program Administration
21	Multi-Family Residential Rehabilitation Loan (CHDO)
22	New Construction/Acquisition and Rehabilitation (Housing Development)
23	Rental Security Deposit Assistance
24	Security Deposit Assistance (Very Low Income Seniors)
25	Emergency Shelter
26	Homeless Prevention
27	Street Outreach

Table 7 – Project Information

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

Long Beach has allocated approximately 46 percent of its CDBG allocation to public facilities and infrastructure improvements, and code enforcement within target low- and moderate-income areas. About 20 percent of the City's allocation is reserved for administration costs (including fair housing) and 13 percent is set aside for public services (including the Multi-Services Center).

One of the greatest challenges in meeting the underserved needs of low- and moderate-income persons is having limited financial resources. The City of Long Beach will continue to use its CDBG, HOME, and ESG funding to support: the development of affordable housing and public service agencies that address the special needs of the underserved, including the homeless, those at risk of homelessness, youth, seniors, female-headed households, victims of domestic

violence, and the disabled. The City also proactively seeks additional resources to better meet the underserved needs.

Amendment

Adjustments to the FY 2019-2020 project budgets are necessary. The unspent funds ($950,000) from two programs would be available to one project:

Façade Improvement Program - $950,000

Façade Improvement will be an economic development project involving neighborhood infrastructure and strategic façade improvements. This program provides infrastructure improvements, community facility improvements/expansion, and neighborhood hardscape and major façade improvements to storefront businesses at key intersections surrounded by CDBG-eligible neighborhoods.

Program	Carryover Amount	Program	Amount
Code Enforcement	($496,706)	Façade Improvement Program	$950,000
Planning Administration	($453,294)		
Total	($950,000)		$950,000

AP-38 Project Summary

Project Summary Information

1	**Project Name**	**Home Improvement Rebate Program ($2,000)**
	Target Area	Place-Based Neighborhood Improvement Strategy Areas
	Goals Supported	Eliminate Blight and Strengthen Neighborhoods
	Needs Addressed	Improved Quality of Aging Housing Stock
	Funding	CDBG: $260,000
	Description	This program provides rebates of up to $2,000 for exterior improvements to residential properties (some restrictions apply). This program is offered primarily to households in the Place-Based Neighborhood Improvement Strategy (Place-Based NIS) areas.
	Target Date	9/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	85 Households
	Location Description	This program is available citywide to income-eligible households, with an emphasis on households in the Place-Based NIS areas.
	Planned Activities	Provide assistance with improvement of residential properties for occupancy by low and moderate income households.
2	**Project Name**	**Home Improvement Loan Program ($10,000)**
	Target Area	Place-Based Neighborhood Improvement Strategy Areas
	Goals Supported	Eliminate Blight and Strengthen Neighborhoods
	Needs Addressed	Improved Quality of Aging Housing Stock
	Funding	CDBG: $150,000
	Description	Improve existing aging housing stock by providing a long-term deferred exterior rehabilitation loan of up to $10,000, for seniors, and less than 50% AMI households.
	Target Date	9/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	10 Households
	Location Description	This program is available primarily to income-eligible households in the Place-Based NIS areas.
	Planned Activities	Provide loans with a focus on Place-Based Neighborhood Improvement Strategy (Place-Based NIS) areas. a.) Deferred, No Interest Loan - for seniors, people on fixed income, and less than 50% AMI households; b.) Low-Interest Loan (0-3%) for 50-80% AMI households.

3	**Project Name**	**Home Improvement – Program Delivery**
	Target Area	Place-Based Neighborhood Improvement Strategy Areas
	Goals Supported	Eliminate Blight and Strengthen Neighborhoods
	Needs Addressed	Improved Quality of Aging Housing Stock
	Funding	CDBG: $235,295
	Description	The City will utilize CDBG funding to deliver a range of residential rehabilitation programs to income-qualified households.
	Target Date	9/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	Beneficiaries are already accounted for under individual programs.
	Location Description	Not Applicable.
	Planned Activities	Deliver residential rehabilitation programs to income-qualified households.
4	**Project Name**	**Graffiti Removal Program**
	Target Area	Place-Based Neighborhood Improvement Strategy Areas
	Goals Supported	Eliminate Blight and Strengthen Neighborhoods
	Needs Addressed	Public and Supportive Services
	Funding	CDBG: $150,000
	Description	This program is used to remove graffiti from private and public properties to improve neighborhoods and discourage further graffiti. The program is offered citywide at no cost to property owners or tenants.
	Target Date	9/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	20,000 Sites
	Location Description	This program is available in the CDBG Low and Moderate Income (LMA) Target Areas, with an emphasis in the Place-Based NIS areas.
	Planned Activities	Remove graffiti from private and public properties.
5	**Project Name**	**Graffiti Prevention Program (Mural Restoration)**
	Target Area	CDBG Low and Moderate Income (LMA) Target Areas
	Goals Supported	Eliminate Blight and Strengthen Neighborhoods
	Needs Addressed	Public and Supportive Services
	Funding	CDBG: $10,000

	Description	The Mural Arts Program provides mural restoration at various public facilities such as schools and parks to discourage vandalism and improve the physical exterior of facilities.
	Target Date	9/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	10 Projects
	Location Description	This program is available in the CDBG Low and Moderate Income (LMA) Target Areas.
	Planned Activities	Mural restoration at various public facilities.
6	**Project Name**	**Neighborhood Resource Center**
	Target Area	CDBG Low and Moderate Income (LMA) Target Areas
	Goals Supported	Eliminate Blight and Strengthen Neighborhoods
	Needs Addressed	Public and Supportive Services
	Funding	CDBG: $125,000
	Description	The Neighborhood Resource Center provides administrative and technical training for organizations located within the target zone. A community room and meeting space is also available for organizations.
	Target Date	9/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	10,000 Persons Assisted
	Location Description	This program is available in the CDBG Low and Moderate Income (LMA) Target Areas. Neighborhood Resource Center located at 100 W. Broadway, Suite 550, Long Beach, CA 90802.
	Planned Activities	Funds will be used for the operation of the Neighborhood Resource Center, a key neighborhood and community resource and referral point.
7	**Project Name**	**Neighborhood Leadership Program**
	Target Area	CDBG Low and Moderate Income (LMA) Target Areas
	Goals Supported	Eliminate Blight and Strengthen Neighborhoods
	Needs Addressed	Public and Supportive Services
	Funding	CDBG: $5,000
	Description	The Neighborhood Leadership Program is a six-month training program teaching Target Areas residents the principles of effective leadership and provides examples of how to solve neighborhood problems. Each student must complete a community project.
	Target Date	9/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	30 Persons Assisted

	Location Description	This program is available in the CDBG Low and Moderate Income (LMA) Target Areas.
	Planned Activities	Funds will be used for the program to provide training to students for completing the community projects.
8	**Project Name**	**Multi-Services Center**
	Target Area	Citywide
	Goals Supported	Support Activities to End Homelessness
	Needs Addressed	Emergency Shelters and Essential Services
	Funding	CDBG: $100,000
	Description	The Multi-Service Center (MSC) is one of the Coordinated Entry System hubs used for intake, screening, assessment, and provision of essential services.
	Target Date	9/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	15,000 Persons Assisted
	Location Description	Multi-Service Center located at 1301 West 12th Street, Long Beach, CA 90813
	Planned Activities	Funds will be used for the provision of essential services to individuals and families that are homeless through comprehensive screenings as well as shelter diversion and placement services.
9	**Project Name**	**Senior Services**
	Target Area	Citywide
	Goals Supported	Eliminate Blight and Strengthen Neighborhoods
	Needs Addressed	Public and Supportive Services
	Funding	CDBG: $20,000
	Description	Provide services for seniors to complement current senior programming at various City facilities. New services include tax assistance, and home sharing for seniors.
	Target Date	9/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	2,000 Persons Assisted
	Location Description	Citywide
	Planned Activities	Tax Assistance for Seniors: Tax assistance to complement current senior programming at various City facilities. Home Sharing for Seniors: By partnering with a senior service organization(s), senior homeowners will be matched with low-income students to cohabitate. Students can provide maintenance and other services to property. Benefits: blight removal, affordability, supplemental income for seniors and mental health. Thorough applicant screening required by senior services organization.

10	**Project Name**	**After School & Weekend Recreation**
	Target Area	CDBG Low and Moderate Income (LMA) Target Areas
	Goals Supported	Eliminate Blight and Strengthen Neighborhoods
	Needs Addressed	Public and Supportive Services
	Funding	CDBG: $390,000
	Description	After School, Weekend, and/or Summer Recreation for youth programs in schools and parks located in designated low/moderate income neighborhoods.
	Target Date	9/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	30,000 Persons Assisted
	Location Description	This program is available to youth and children in the CDBG Low and Moderate Income Target Areas.
	Planned Activities	Funds will be used for after school, weekend and/or summer recreation youth programs.
11	**Project Name**	**Code Enforcement**
	Target Area	Place-Based Neighborhood Improvement Strategy Areas
	Goals Supported	Eliminate Blight and Strengthen Neighborhoods
	Needs Addressed	Public and Supportive Services
	Funding	CDBG: $1,159,551
	Description	The ICE program is a comprehensive code enforcement program to eliminate blight in the Target Areas in conjunction with the Home Improvement Rebate and Commercial Façade Improvement Programs.
	Target Date	9/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	8,000 Housing Units
	Location Description	This program is available in the CDBG Code Enforcement Target Areas, with an emphasis on housing units in the Place-Based NIS areas.
	Planned Activities	The program focuses on bringing all structures within a specific geographic area into compliance with City building, health and safety requirements.
12	**Project Name**	**Code Enforcement (City Attorney)**
	Target Area	Place-Based Neighborhood Improvement Strategy Areas
	Goals Supported	Eliminate Blight and Strengthen Neighborhoods
	Needs Addressed	Public and Supportive Services
	Funding	CDBG: $150,000

	Description	Provides funds for work performed by the City Attorney and City Prosecutor on Code Enforcement cases.
	Target Date	9/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	50 Housing Units
	Location Description	This program is available in the CDBG Code Enforcement Target Areas, with an emphasis on housing units in the Place-Based NIS areas.
	Planned Activities	Provides funds for work performed by the City Attorney and City Prosecutor on Code Enforcement cases.
13	**Project Name**	**Sidewalk Improvement Projects (PW-CIP)**
	Target Area	Place-Based Neighborhood Improvement Strategy Areas
	Goals Supported	Eliminate Blight and Strengthen Neighborhoods
	Needs Addressed	Public Facility and Infrastructure Improvements
	Funding	CDBG: $768,000
	Description	Replaces deteriorated sidewalks to improve and enhance low and moderate income neighborhoods.
	Target Date	9/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	60,000 Square Feet
	Location Description	This program is available in the CDBG Low and Moderate Income (LMA) Target Areas, with an emphasis in the Place-Based NIS areas.
	Planned Activities	Replaces deteriorated sidewalks to improve and enhance low and moderate income neighborhoods.
14	**Project Name**	**Urban Forestry Program**
	Target Area	Place-Based Neighborhood Improvement Strategy Areas
	Goals Supported	Eliminate Blight and Strengthen Neighborhoods
	Needs Addressed	Public Facility and Infrastructure Improvements
	Funding	CDBG: $70,000
	Description	Utilizing neighborhood volunteers, the City will plant and maintain trees along public parkways in target areas. Other grant funds will be leveraged to increase the project accomplishments.
	Target Date	9/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	350 Trees
	Location Description	This program is available in the CDBG Low and Moderate Income (LMA) Target Areas, with an emphasis in the Place-Based NIS areas.

	Planned Activities	Funding will be made available to plant and maintain trees along public parkways in target areas.
15	**Project Name**	**Targeted Place-Making**
	Target Area	Place-Based Neighborhood Improvement Strategy Areas
	Goals Supported	Eliminate Blight and Strengthen Neighborhoods
	Needs Addressed	Public Facility and Infrastructure Improvements
	Funding	CDBG: $733,736
	Description	Projects will create a space for residents to transform areas of liability to places of opportunity for programming and activating neighborhoods. In order to address visual blight and reduce disparities in access to quality public facilities, open space and parks, and infrastructure, priority for projects will be given to spaces in R/ECAPs and Place-Based NIS areas.
	Target Date	9/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	5 Public Facilities
	Location Description	This program is available primarily in Place-Based NIS areas
	Planned Activities	Funding provided will support potential projects prepared by staff and voted by R/ECAP/Place-Based NIS residents through a community-led process. The City will work with Public Works to design alley and other public infrastructure improvements. Projects will be coordinated and complimented by Light, Quick and Cheap (LQC). LQC focus can be on environment & nature, art installations, street furniture, etc.
16	**Project Name**	**Technical Business Assistance / SBDC Support**
	Target Area	CDBG Low and Moderate Income (LMA) Target Areas
	Goals Supported	Expand Economic Opportunities
	Needs Addressed	Business Technical Assistance and Other Programs
	Funding	CDBG: $110,000
	Description	To provide for the attraction, creation, and expansion of businesses, concentration on low-moderate income areas, especially the creation of low-moderate income jobs. Focus services on small businesses, utilizing bilingual workers to outreach and furnish information about business development and loan programs.
	Target Date	9/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	20 Jobs/500 Businesses
	Location Description	This program is available in the CDBG Low and Moderate Income (LMA) Target Areas

	Planned Activities	CDBG funds are used to assist private for-profit businesses with counseling, development, and expansion. The Small Business Development Center (SBDC) provides services to small and large businesses by supporting new start-ups and promoting growth of existing businesses to provide services and jobs to low and moderate income neighborhoods.
17	**Project Name**	**Business Revitalization Program (Corridor)**
	Target Area	Place-Based Neighborhood Improvement Strategy Areas
	Goals Supported	Expand Economic Opportunities
	Needs Addressed	Improved Business Corridors
	Funding	CDBG: $405,000
	Description	Provides assistance to business along designated corridors within the Place-Based Neighborhood Improvement Strategy Areas to make façade improvements. Improved businesses will enhance services for residents of the areas.
	Target Date	9/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	75 Businesses Assisted
	Location Description	This program is available in the CDBG Low and Moderate Income (LMA) Target Areas, with an emphasis in the Place-Based NIS areas.
	Planned Activities	Provide loans/grants to businesses to make façade improvements.
18	**Project Name**	**Line of Credit Loan Program**
	Target Area	Place-Based Neighborhood Improvement Strategy Areas
	Goals Supported	Expand Economic Opportunities
	Needs Addressed	Business Technical Assistance and Other Programs
	Funding	CDBG: $157,000
	Description	Line of Credit Loan Program specifically designed for small businesses in Place-Based NIS areas that provide direct goods and services to residents. Line of Credit can be used as working-capital to improve stock of high-quality goods.
	Target Date	9/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	3 Businesses
	Location Description	This program is primarily available in the Place-Based NIS areas.
	Planned Activities	Provide up to three loans for small businesses in Place-Based Neighborhood Improvement Strategy areas.

19	**Project Name**	**Fair Housing Services**
	Target Area	Citywide
	Goals Supported	Promote Fair Housing Choice
	Needs Addressed	Fair Housing Services, Outreach, and Education
	Funding	CDBG: $85,000
	Description	The Fair Housing Program for the City includes the following programs: Discrimination Complaints – Investigations and disposition; Landlord/Tenant Program – Counseling and dispute resolution; and Education and Outreach Program – Outreach to residents, landlords, apartment managers, and other housing professionals.
	Target Date	9/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	2,000 Persons Assisted
	Location Description	This program is available to all residents, housing providers, and housing professionals citywide.
	Planned Activities	Funds will be used to provide fair housing services to tenants, landlords, and housing professionals.
20	**Project Name**	**Program Administration**
	Target Area	Citywide
	Goals Supported	Planning and Program Administration
	Needs Addressed	Management of Grant Funds and Program Delivery
	Funding	CDBG: $1,128,095 HOME: $290,139 ESG: $40,169
	Description	To provide for the general oversight and management of various grant programs. Work with the Mayor, City Council, Long Beach Community Investment Company, and the community to conceive, develop and administer activities aimed at the improvement of low/moderate income areas and persons.
	Target Date	9/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	Not Applicable.
	Location Description	333 West Ocean Blvd., Long Beach, CA 90802
	Planned Activities	Funding administration and planning activities.

21	**Project Name**	**Single/Multi-Family Residential Rehabilitation Loan (CHDO)**
	Target Area	Citywide
	Goals Supported	Create and Preserve Affordable Housing
	Needs Addressed	Improved Quality of Aging Housing Stock
	Funding	HOME: $435,210
	Description	The City works in cooperation with the LBCIC to administer a rehabilitation loan program for multi-family housing. This satisfies the City's 15 percent CHDO requirement for HOME funds.
	Target Date	9/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	3 Housing Units
	Location Description	This program is available to multi-family housing developments citywide.
	Planned Activities	Provide rehabilitation assistance to multi-family housing via a Request for Proposal/Notice of Funding Availability process.
22	**Project Name**	**New Construction/Acquisition and Rehabilitation Program (Housing Development)**
	Target Area	Citywide
	Goals Supported	Create and Preserve Affordable Housing
	Needs Addressed	New Affordable Housing Opportunities
	Funding	HOME: $3,181,047
	Description	Provide assistance for the new construction/acquisition/rehabilitation of affordable multi-family housing units.
	Target Date	9/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	40 Housing Units
	Location Description	This program is available citywide
	Planned Activities	Provide funding for the new construction and acquisition/rehabilitation of affordable housing via a Request for Proposal/Notice of Funding Availability process.
23	**Project Name**	**Security/Utility Deposit Assistance**
	Target Area	Citywide
	Goals Supported	Create and Preserve Affordable Housing
	Needs Addressed	Housing Assistance
	Funding	HOME: $195,000

	Description	Security deposit assistance/utility deposit assistance for homeless families seeking permanent shelter. Clients who will be served under this program are usually those that earn below 50% Area Median Family Income (AMI).
	Target Date	9/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	65 Households
	Location Description	This program is available citywide
	Planned Activities	Provide short-term assistance for homeless families to secure permanent housing.
24	**Project Name**	**Security Deposit Assistance (Very Low-Income Seniors)**
	Target Area	Citywide
	Goals Supported	Create and Preserve Affordable Housing
	Needs Addressed	Housing Assistance
	Funding	HOME: $150,000
	Description	Security deposit assistance for very low income seniors seeking permanent shelter. Clients who will be served under this program are usually those that earn below 50% Area Median Family Income (AMI).
	Target Date	9/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	50 Households
	Location Description	This program is available citywide
	Planned Activities	Provide short-term assistance for very low income seniors to secure permanent housing.
25	**Project Name**	**Emergency Shelter**
	Target Area	Citywide
	Goals Supported	Support Activities to End Homelessness
	Needs Addressed	Emergency Shelters and Essential Services
	Funding	ESG: $221,355
	Description	Activities to maintain operate emergency shelter activities (payment for shelter maintenance, operation, rent, security, fuel, equipment, insurance, utilities, food and furnishings).
	Target Date	9/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	375 Persons
	Location Description	This program is available citywide

	Planned Activities	Several agencies in Long Beach provide temporary shelter for homeless families, individuals, and for specific sub-populations of the homeless with an average length of stay of less than 90 days. Homeless households requiring longer than a 90-day stay will be prioritized for direct entry to a transitional shelter. MSC intake staff coordinated discharges from emergency shelters for alternative placement to housing resources.
27	**Project Name**	**Homeless Prevention**
	Target Area	Citywide
	Goals Supported	Support Activities to End Homelessness
	Needs Addressed	Emergency Shelters and Essential Services
	Funding	ESG: $174,067
	Description	Assistance to non-profit agencies providing services to individuals and families that provide prevention services tailored to Long Beach's individuals and families to prevent homelessness.
	Target Date	9/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	25 Persons
	Location Description	This program is available citywide
	Planned Activities	A range of homeless prevention services.
28	**Project Name**	**Street Outreach**
	Target Area	Citywide
	Goals Supported	Support Activities to End Homelessness
	Needs Addressed	Emergency Shelters and Essential Services
	Funding	ESG: $100,000
	Description	Street outreach activities to assess the needs of the homeless and make appropriate referrals for assistance.
	Target Date	9/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	1,500 Persons
	Location Description	This program is available citywide
	Planned Activities	Street Outreach provides the critical link between people living on the streets and supportive services. The Continuum of Care has developed a comprehensive approach that is coordinated and integrated to address the varying needs of homeless unsheltered persons.

AP-50 Geographic Distribution – 91.220(f)

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

The City's strategy is to focus its investment in a most impactful manner by providing significant investments in several older, low income neighborhoods in the City that have been designated as the Place-Based Neighborhood Improvement Strategy (NIS) areas. Five neighborhoods experiencing severe social, physical and economic distress have been designated Place-Based NIS areas by the City Council. The funding for services is principally derived from the Consolidated Plan/Action Plan programs.

Geographic Distribution

Target Area	Percentage of Funds
Place-Based Neighborhood Improvement Strategy Areas	26.3%
CDBG Low and Moderate Income (LMA) Target Areas	5.7%
Code Enforcement Target Areas	11.8%

Table 8 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

Criteria for designating as a Place-Based NIS area include, but are not limited to, poverty, income, overcrowding, age of housing stock, unemployment, and education attainment. The Place-Based NIS refocuses City resources to Racial/Ethnic Concentrated Areas of Poverty (R/ECAPs). This strategy provides a coordinated improvement of aging housing units and public improvements. The new approach empowers active Neighborhood Associations in R/ECAPs and adjacent areas and emphasizes a balanced approach that includes place-based and mobility strategies – making investments in the City's R/ECAPs that improve conditions and eliminate disparities in access to opportunity between residents of these neighborhoods and the rest of the Long Beach jurisdiction.

Discussion

In addition to programs that focus on the various target areas, programs that are offered based on income eligibility or other special needs status could also benefit residents in these target areas.

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

The City of Long Beach plans to utilize CDBG and HOME funds to support a number of authorized housing activities, including various residential rehabilitation programs and an affordable housing development program:

- Home Improvement Rebate: 85 households
- Home Improvement Loan: 10 households
- Multi-Family Residential Rehabilitation: 3 units
- New Construction/Acquisition/Rehabilitation: 40 units
- Security Deposit: 65 households
- Security Deposit for Seniors: 50 households

One Year Goals for the Number of Households to be Supported	
Homeless	115
Non-Homeless	150
Special-Needs	0
Total	265

Table 9 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through	
Rental Assistance	115
The Production of New Units	20
Rehab of Existing Units	110
Acquisition of Existing Units	20
Total	265

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

Discussion

See discussion above.

AP-60 Public Housing – 91.220(h)

Introduction

The Housing Authority of the County of Los Angeles (HACoLA) owns and operates the only public housing project in Long Beach - the 743-unit Carmelitos Housing Development located in North Long Beach.

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

HACoLA receives modernization funds annually from HUD to maintain its public housing stock. The 2018-2022 Public Housing Agency Plan (PHAP) identifies revitalization of the Carmelitos Senior Rose Garden to make the space usable to residents with the addition of trash receptacles, bike racks, picnic tables, and drought tolerant plants. Carmelitos is identified as a development that has set aside three units for disadvantaged Transitional Age Youth. Support services and workforce development programs are offered to youth at Carmelitos to assist them in gaining financial independence. The City will continue to inform Carmelitos residents about available City programs and will continue to coordinate with HACoLA to increase activities and improve the living conditions of residents.

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

The Resident Council at Carmelitos meets with HACoLA staff regularly. The residents, through the Resident Council, are encouraged to take part in determining the needs of their neighborhood by completing various surveys and attending meetings with HACoLA's Resident Initiatives staff. An on-site Service Learning Program provides residents a range of learning opportunities. The Carmelitos Community Garden represents another community partnership to improve the quality of life for public housing residents.

Residents of the Carmelitos public housing development have access to several programs aimed at lifting residents up out of poverty. The Housing Authority of the County of Los Angeles (HACoLA) offers public housing CalWORKS recipients career development and work experience opportunities. A Service Learning Program on-site at Carmelitos provided in conjunction with local universities and colleges offers a range of educational opportunities for residents, with a focus on family literacy, workforce development, and family issues.

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

Not applicable. HACoLA is not identified as a "troubled" agency.

Discussion

See discussion above.

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

Introduction

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

For the FY 2020-2021, the City will continue to implement its ESG program to address the needs of the homeless in the community. Specifically, the City is proposing to allocate ESG funding to the following program components: Emergency shelter, street outreach for reaching out to unsheltered homeless persons, and homeless prevention services.

Addressing the emergency shelter and transitional housing needs of homeless persons

For the FY 2020-2021, the ESG program includes funding for Emergency Shelter to address the emergency shelter needs of homeless persons.

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

For the FY 2020-2021, the City will allocate funding for Homeless Prevention and Emergency Shelter programs. In addition, HOME funds will be used to support the Utility/Security Deposit Assistance program to help the homeless or at risk homeless attain permanent housing.

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

Several programs and services to be offered by the City will help low income families and individuals avoid becoming homeless. These include:

- Multi-Service Center
- Fair Housing Services
- Utility/Security Deposit Assistance
- Utility/Security Deposit Assistance for Seniors

The City and the Long Beach CoC are continuing to collaborate on the refinement of the policies and procedures for admission, diversion, referral, and discharge by emergency shelters assisted under ESG. ESG-funded emergency shelter programs serve households that meet the definition of “homeless” as defined by HUD at 24 CFR §576.2. Households served by ESG-funded emergency shelters lack a fixed, regular, and adequate nighttime residence; cannot be served by other programs or resources; and have no other options for overnight shelter. Households are referred to ESG- funded emergency shelters after exhausting all available options for diversion.

Projects funded under the Emergency Shelter component work directly with the CES to target open shelter beds. Households are screened using a standardized assessment tool to evaluate program eligibility and identify the appropriate intervention(s) to meet the households' needs. Households are assessed to determine the lowest level of assistance needed to maintain or obtain sustainable housing. Households needing immediate shelter will be prioritized and placed based on availability.

CES intake staff prioritize emergency shelter placement for homeless households requiring short-term shelter with the outcome target to secure permanent housing such as:

- Households that are able to afford fair market rent but lack the supports or resources to stabilize into housing on their own.
- Households that recently lost income, but have the work history to secure employment and stabilize in a short amount of time.
- Households that recently secured a housing voucher and are in the process of securing long-term permanent housing.
- Households that need to be stabilized due to long term street homelessness

Diversion from emergency shelter is one of the strategies the Long Beach CoC utilizes to reduce homelessness within the local community. During intake assessment, households are assessed for existing support systems and resources to prevent them from entering the shelter system. Intake staff provide linkages to mainstream resources such as childcare, employment services, and food resources to stabilize households. HMIS is used to increase coordination and avoid duplication of services.

Emergency shelter placement is prioritized for homeless households requiring short-term shelter (less than 90-days) with the outcome target to secure permanent housing. Homeless households requiring longer than a 90-day stay will be prioritized for direct entry to transitional shelter. Discharges from the emergency shelter will be coordinated at the CES hubs by the ESG funded eligibility screening staff member for alternative placement to housing stabilization resources. Emergency shelters will ensure vacancies will be filled within 72 hours.

Discussion

See discussions above.

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

Introduction

The most critical barrier to affordable housing in Long Beach is that the need for decent and affordable housing far exceeds the City's available resources. With the elimination of redevelopment funds, the City's ability to address its affordable housing needs is seriously compromised. The City values its partnership with nonprofit housing developers in pursuing innovative strategies to addressing the City affordable housing needs, including providing more permanent housing options for the homeless and persons with special needs.

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

To encourage the development and conservation of affordable housing, the City has adopted several ordinances – a density bonus ordinance, State coastal zone law, as well as various other incentives. These ordinances encourage higher density housing that is affordable to special needs populations and remove potential constraints to development, while preserving affordable units in the coastal zone.

- **Density Incentives** – Long Beach has adopted the State density law to provide up to 35 percent of density bonus to facilitate the development of lower income housing, moderate-income condominiums, and housing for seniors.

- **Exemption of Fees** – In addition to the density bonus, parks and recreation and transportation development fees are exempt for affordable housing if the criteria on length of affordability and income/affordability level are met.

- **Relaxed Standards** – In conjunction with the density bonus ordinance, certain development standards may be relaxed if increased density cannot be physically accommodated on the site. This provision follows a priority order specified in the Zoning Code and the applicant must show that the density bonus cannot be achieved with each sequential waiver before the next waiver is allowed. The priority order is:

    1. Percentage of compact parking
    2. Tandem parking design limitations;
    3. Privacy standards;
    4. Private open space;
    5. Common open space;
    6. Height;
    7. Distance between buildings;
    8. Side yard setbacks;
    9. Rear yard setbacks;
    10. Number of parking spaces; and
    11. Front setbacks.

If the developer believes that with the density bonus and the additional incentives, the provision of lower income housing, moderate income condominiums, or senior citizen housing units is not

financially feasible, then the developer may submit a project pro forma demonstrating the deficiency.

Discussion

See discussions above.

AP-85 Other Actions – 91.220(k)

Introduction:

Actions planned to address obstacles to meeting underserved needs

The extent of housing and community development needs in Long Beach exceeds the City's funding capacity. To utilize its limited funding in the most cost-effective manner, the City targets its investments in the most distressed neighborhoods in the community. Specifically, the City instituted a new Place-Based Neighborhood Improvement Strategy (Place-Based NIS) to coordinate resources for the improvement of targeted areas. The City was also awarded additional funding for affordable housing opportunities, including Permanent Local Housing Allocation and CalHome funding from the California Department of Housing and Community Development.

Additionally, on July 14th, 2020, the City Council approved a citywide Inclusionary Housing Policy that would require 11 percent of all new rental units in the Downtown and Midtown areas to be affordable to very-low income households, and would require 10 percent of all new for-sale housing to be affordable to moderate-income households. The policy will take effect once the implementing Ordinance is adopted in summer 2020 and the affordability requirements will be phased in over a 3-year period, with full requirements applied by 2023.

Actions planned to foster and maintain affordable housing

The City fosters relationships with for-profit and non-profit housing developers for the new construction of both market rate and affordable housing projects. The City also leverages its resources with private capital in order to develop quality affordable homes for Long Beach residents. For FY 2020-2021, the City has allocated CDBG and HOME funds for the rehabilitation and preservation of its aging housing stock.

Actions planned to reduce lead-based paint hazards

The City's lead-based paint (LBP) hazard reduction strategy involves several components.

Housing Programs

All CDBG, HOME, and NSP-funded housing programs and projects have incorporated lead-based paint hazard reduction efforts. In addition, the City has complied with federal lead safety requirements, including pre-rehabilitation lead inspections and post-rehabilitation lead clearances. These practices will continue for the federally funded rehabilitation projects under this five-year Consolidated Plan, which estimates lead inspection and/or clearances for approximately 1,400 housing units.

Code Enforcement

Code Enforcement uses the Lead Safe Work Practice (LSWP) standards to correct code enforcement violations. Five Code Enforcement employees have obtained the State of California Department of Public Health Lead Inspection Assessor certification.

Childhood Lead Poisoning Prevention Program (CLPPP):

The Department of Health and Human Services also manages the CLPPP focusing on case management of children with elevated blood lead levels as defined by the State. This program provides community outreach regarding lead poisoning prevention and the hazards of lead poisoning, as well as information on identifying sources of lead. Health education presentations and materials are provided at community events and meetings. Public Health Nurses (PHNs) provide case management services to children who are referred to the program. Case management services include an interview and lead prevention and nutrition education by PHNs with the parents. The PHNs encourage parents to conduct medical follow-up for children who have lead poisoning. A Registered Environmental Health Specialist (REHS) provides an environmental inspection including on-site testing and specimen collection for possible sources of lead for testing by the Health Department Public Health Laboratory. The PHNs also provide outreach and education to parents of children with lower lead levels and to adults who have elevated lead levels.

Lead Hazard Control (LHC) Strategy

In FY 2019, the City of Long Beach received $4,100,000 from HUD for its Lead-Based Paint Hazard Control Program (LHC) for a forty-two month period from May 1, 2019 through October 30, 2022. The LHC Program identifies low income residences (with a focus on families with children under six years old), and addresses lead poisoning hazards created by lead-based paint. The total award is $3.5 million for Lead Hazard Control, and an additional $600,000 for home-based health and safety improvements in units where the City conducts lead work.

The LHC program performs the following work:

- Provides lead-based paint hazard control services for pre-1978 constructed affordable housing throughout the City, focusing on areas of highest need, specifically ZIP Codes 90802, 90804, 90805, 90806, 90810, and 90813.
- Health Education Specialist educates residents, advises residents of relocation and other responsibilities associated with LHC activities. Inspector/Assessors perform inspections, create reports.
- After LHC work is performed by contractor, Inspector/Assessors follow HUD and State of California clearance protocols. Submit samples to certified lab.
- Program manager solicits educational outreach opportunities from city and community groups. Program manager and health educator attend events, provide materials and education, with a focus on pregnant women and children under six. Provide instruction in lead-safe work practices at CLPPP events.
- Program Assistant coordinates with Center for Working Families, City Section 3 coordinator, and local media to recruit low-income residents interested in becoming lead-based paint certified workers. Contract with local certified training company to provide education, certification.

Actions planned to reduce the number of poverty-level families

The challenges associated with poverty–stress, strained family relationships, substandard housing, lower educational attainment, limited employment skills, unaffordable childcare, and transportation difficulties – make it hard for low-income families to obtain and maintain

employment, and therefore housing and basic needs. Economic stability can have lasting and measurable benefits for both parents and children.

The City seeks to reduce the number of people living in poverty (extremely low-income households earning less than 30 percent of the AMI) by providing a number of programs including housing assistance, supportive services, economic development assistance, and job training opportunities. The City will continue to leverage opportunities to support funding for Community Based Development Organizations (CBDOs), and other groups to provide training and employment opportunities to extremely low-income persons.

In collaboration with the Pacific-Gateway Workforce Investment Board (PGWIB), the City will continue to offer outreach and training to poverty level families and individuals. Through the CoC system, the City will work with the PGWIB job-training providers to ensure that low- and moderate-income persons are trained with employable skills with the potential to earn higher wages. The City will also support youth programs that focus on providing youth a positive direction and outlook in life, assisting them in achieving educational and career goals.

In addition, the City's funding (through CDBG and ESG funds) of human service programs for basic needs, food distribution, and case management for homeless and those at risk of homelessness support the goals and strategies of reducing poverty.

Actions planned to develop institutional structure

The central responsibility for the administration of the Action Plan is assigned to Grants Administration. This agency will coordinate activities among the public and private organizations to realize the prioritized goals of the Annual Action Plan. Extensive public-private partnerships have been established and organized to address the City's housing, homeless, and community development needs. Grants Administration will access, facilitate, and coordinate resource linkages and draw from the immediate sources of expertise in the community to strengthen existing partnerships and develop new collaboratives.

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

The City conducts extensive outreach to engage a wide range of non-profit agencies, groups and organizations to assist in the process of developing the Action Plan. The process includes:

1. Press releases and notices circulated in the City inviting residents to participate in the process.
2. E-mail notification to existing non-profit partners inviting them to participate in the plan process.
3. Public notices advertising the Plan public comment and review period, non-profit application period, and plan adoption hearing.
4. Public application process for non-profit organizations based in the community.
5. Internal application process for City departments.
6. Discussions with departments to identify funding priorities.
7. Discussions of funding and public meetings, including Council meeting.

Program Specific Requirements

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

Introduction

This section addresses the regulatory requirements of the CDBG, HOME, and ESG programs not covered in the previous sections. The City of Long Beach allocates 100 percent of its non-Admin CDBG dollars to benefit low and moderate income persons on an annual basis. The minimum overall benefit is determined on a one-year basis.

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.	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:

No other forms of HOME investments beyond those previously described.

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:

While the City has not allocated FY 2019-2020 HOME funds for homebuyer assistance, households assisted with HOME-funded homebuyer assistance in the past are subject to the following recapture provisions.

Homebuyer Activities – Recapture Option

To ensure long-term affordability, the City will impose a recapture provision, which will allow the City to recycle funds to assist future homebuyers. The City may require additional restrictions, including first-time homebuyer qualifications and affordability requirements, which may be more restrictive than current HOME Program regulations. Examples of current requirements include the following: a) Total household income cannot exceed low-income limits; b) Must occupy property as the principal residence; and c) Required to comply with recapture/resale provisions during the affordability period. Additional City Restrictions: a) Must purchase a home within the City of Long Beach; b) Required to be a first-time homebuyer; and c) Complete an approved pre-purchase Homebuyer Workshop

Recapture Option

The City of Long Beach will recapture the entire direct HOME if the HOME Program recipient decides to sell the house within the affordability period.

Enforcement of the Recapture Option

To enforce the recapture restrictions, the City will record a Deed of Trust against the property. This Agreement will ensure that the full HOME subsidy will be recaptured from the net proceeds of the sale. Where the net proceeds are insufficient to repay both the HOME subsidy plus the homeowner's investment, the City will forgive a prorated share of the HOME subsidy based on occupancy during the affordable period. In such case, the homeowner will not be permitted to recover more than the homeowner's investment.

Fair Return on Investment

The City will administer its resale/recapture provisions by ensuring that the owner receives a fair return on his/her investment out of the net proceeds and that the home will continue to be affordable to low-income buyers or grantees share of proceeds are used to assist or develop in the creation of affordable housing. Fair return on investment means the total homeowner investment which includes the total cash contribution plus any qualified capital improvements as well as prorated or shared equity appreciation. Qualified improvements are those documented amounts expended by the borrower for major capital improvements to the property which are determined by the City, acting in its sole discretion, to constitute qualifying improvement expenditures. Borrower must provide satisfactory and customary evidence of the cost of such improvements (such as paid invoices) to the City. In no event will the City approve normal maintenance or repair expenditures as part of the Qualified Improvements, nor will the City grant credit for a Qualified Improvement for any expenditure, no matter how substantial, to the extent it has not, in City's judgment, added value to the Property.

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

While the City has not allocated FY 2019-2020 HOME funds for homebuyer assistance, households assisted with HOME-funded homebuyer assistance in the past are subject to the following recapture provisions.

Homebuyer Activities – Recapture Option

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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:

See Appendix D.

Emergency Solutions Grant (ESG)

Reference 91.220(l)(4)

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

See Appendix C.

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

The Long Beach CoC Coordinated Entry System (CES) is intended to increase and streamline access to housing and services for households experiencing homelessness, to match appropriate

levels of housing and services based on their needs, and to prioritize persons with severe service needs for the most intensive interventions. The Long Beach CES has two designated CES hubs, the Multi-Service Center (MSC) and the Homeless Assistance Program (HAP) Project. The MSC is a unique facility that co-locates social service agencies that provide integrated, centralized assessment and comprehensive services for at-risk and homeless individuals and families in one location. The HAP serves as a satellite CES for the CoC system of care. The HAP provides integrated, centralized assessment and comprehensive services for homeless people, with expertise in working with homeless people with a mental illness and those with a dual diagnosis of mental illness and substance abuse.

The Long Beach CES hubs provide preliminary triage and assessment to determine program eligibility and level of assistance needed. Households are assessed to determine the least level of assistance needed in order to maintain or obtain sustainable housing. CES also prioritizes assistance based on vulnerability and severity of service needs to ensure that people who need assistance the most can receive it in a timely manner.

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).

As the lead agency of the Long Beach CoC, the City competitively funds private nonprofit agencies that provide a broad array of services to address the needs of the men, women, and children experiencing homelessness in Long Beach. A Request for Proposals (RFP) is issued in compliance with procurement requirements and City Council authorization. The City allocates and administers ESG funds to private nonprofit agencies via executed contracts, as recommended by the Homeless Services Advisory Committee, and as approved by the Mayor and City Council of Long Beach.

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

The City has a homeless or formerly homeless person serving as a voting member on the Homeless Services Advisory Committee (HSAC). HSAC is an advisory body that was established by City Ordinance in 1988 to commence strategic planning activities to address homelessness in the City. HSAC is comprised of representatives from each of 9 council districts along with two representatives appointed by the Mayor.

***5.* Describe performance standards for evaluating ESG.**

The City's ESG allocation complements and contributes to the Long Beach CoC program by providing resources to increase permanent housing placements, reduce the length of homelessness, increase housing retention, and maintain/increase household income.

DHHS developed a performance matrix for evaluation of ESG funds using HMIS data and fiscal performance. HMIS data is used to monitor progress on a monthly basis to ensure compliance with eligibility requirements and effective distribution of the CoC service and housing resources. HMIS will be utilized to track client data and report on outputs and outcomes as required by HUD.

Discussion

<u>Consultation with CoC</u>

The City of Long Beach Department of Development Services, Grants Administration manages the Consolidated Planning process for the City and collaborates with the Department of Health and Human Services (DHHS), Bureau of Human Services, Homeless Services Division, which is the City lead for the local Continuum of Care (CoC) jurisdiction. As lead CoC agency since 1995, DHHS competitively funds nonprofit agencies that provide a broad array of services located at the Multi-Service Center (MSC), the Villages at Cabrillo, the Village Integrated Service Agency, and other scattered site programs to address the needs of those experiencing homelessness in Long Beach. The Homeless Services Division administers the following components within the City's Consolidated Plan: Emergency Solutions Grant (ESG) and HOME Move-in Deposit Program. In addition, the Homeless Services Division collaborates directly with the City's Housing Authority to coordinate the CoC Shelter Plus Care projects, Section 8 set aside, and the Veterans Affairs Supportive Housing (VASH) programs for the City.

The Homeless Services Division works closely with the Long Beach CoC stakeholders on a variety of levels, including the development and implementation of funding priorities, performance standards, system-wide policies and procedures, program implementation, and the HMIS. The Homeless Services Officer and MSC Coordinator participate in several advisory boards, including the HSAC, an advisory body appointed by the Long Beach City Council; the Multi-Service Center Advisory Board; and the Villages at Cabrillo Advisory Board. The Homeless Services Officer also hosts regular CoC General Membership and CoC Board meetings to review system-wide coordination. The CoC membership has met in subcommittees to address the following:

- Educational Assurances
- Chronic Homelessness
- Veteran Homelessness
- Discharge Planning
- Homeless Management Information System (HMIS), Data and Performance
- Centralized/Coordinated Intake and Assessment

Requirements for Recipients who plan to use the risk factor under paragraph (1)(iii)(G) of the "at risk of homelessness" definition

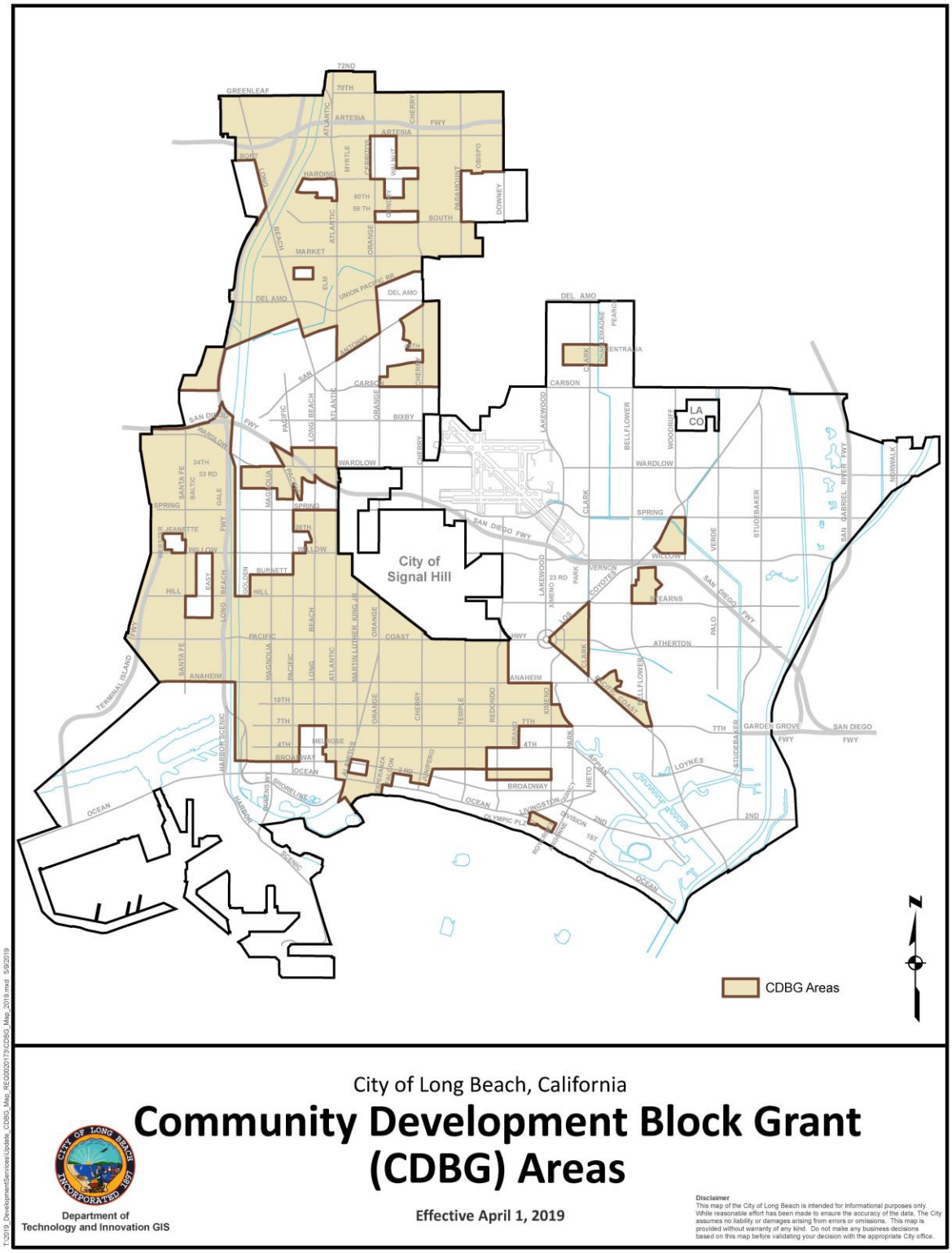
The City does not intend to use the risk factor under Paragraph (1)(iii)(G) of the "at risk of homelessness" definition.

Appendix A: Public Participation

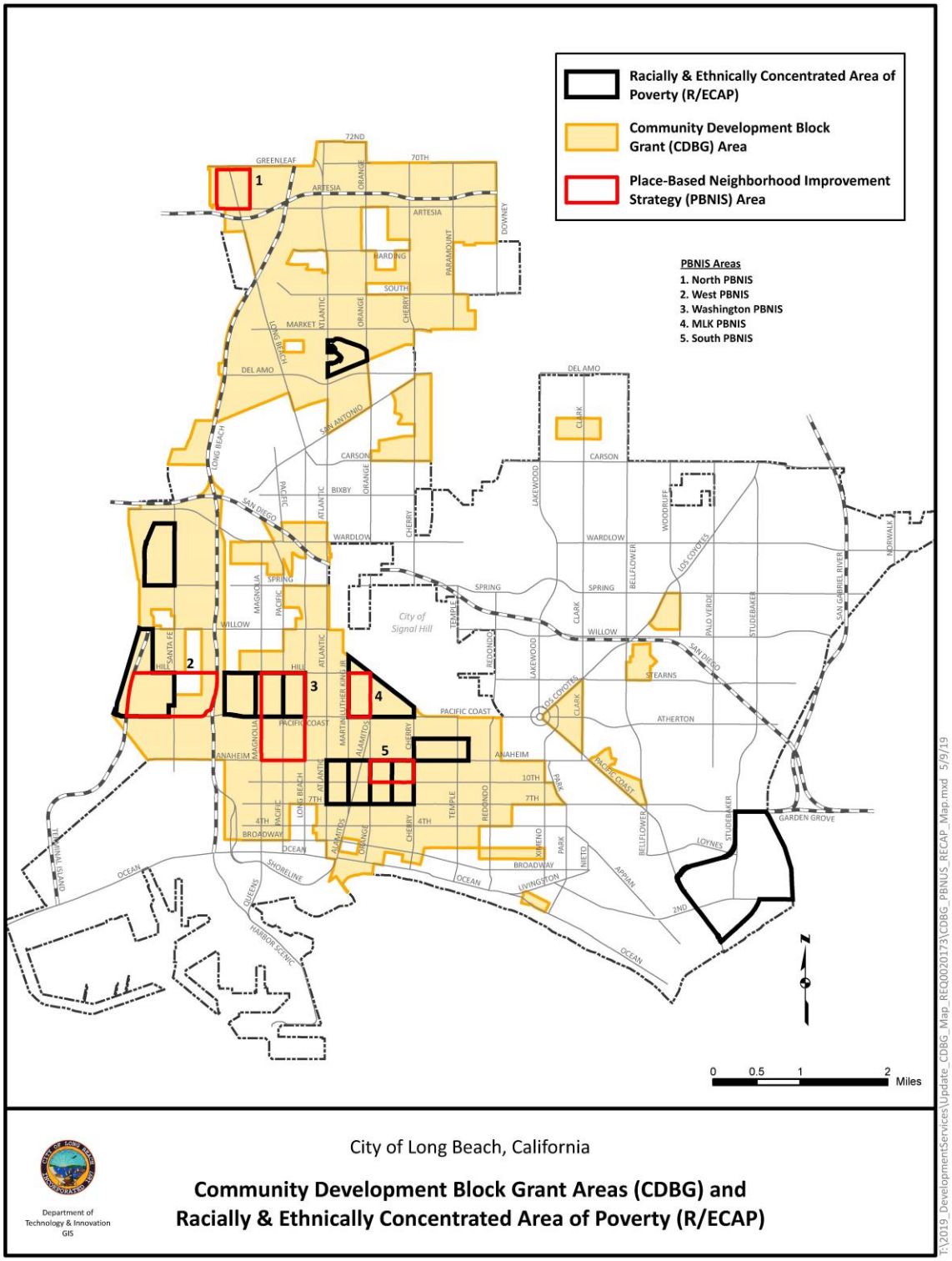
Appendix B: Relevant Maps

The following maps illustrate the various target areas in implementing the City's Consolidated Plan strategies and programs.

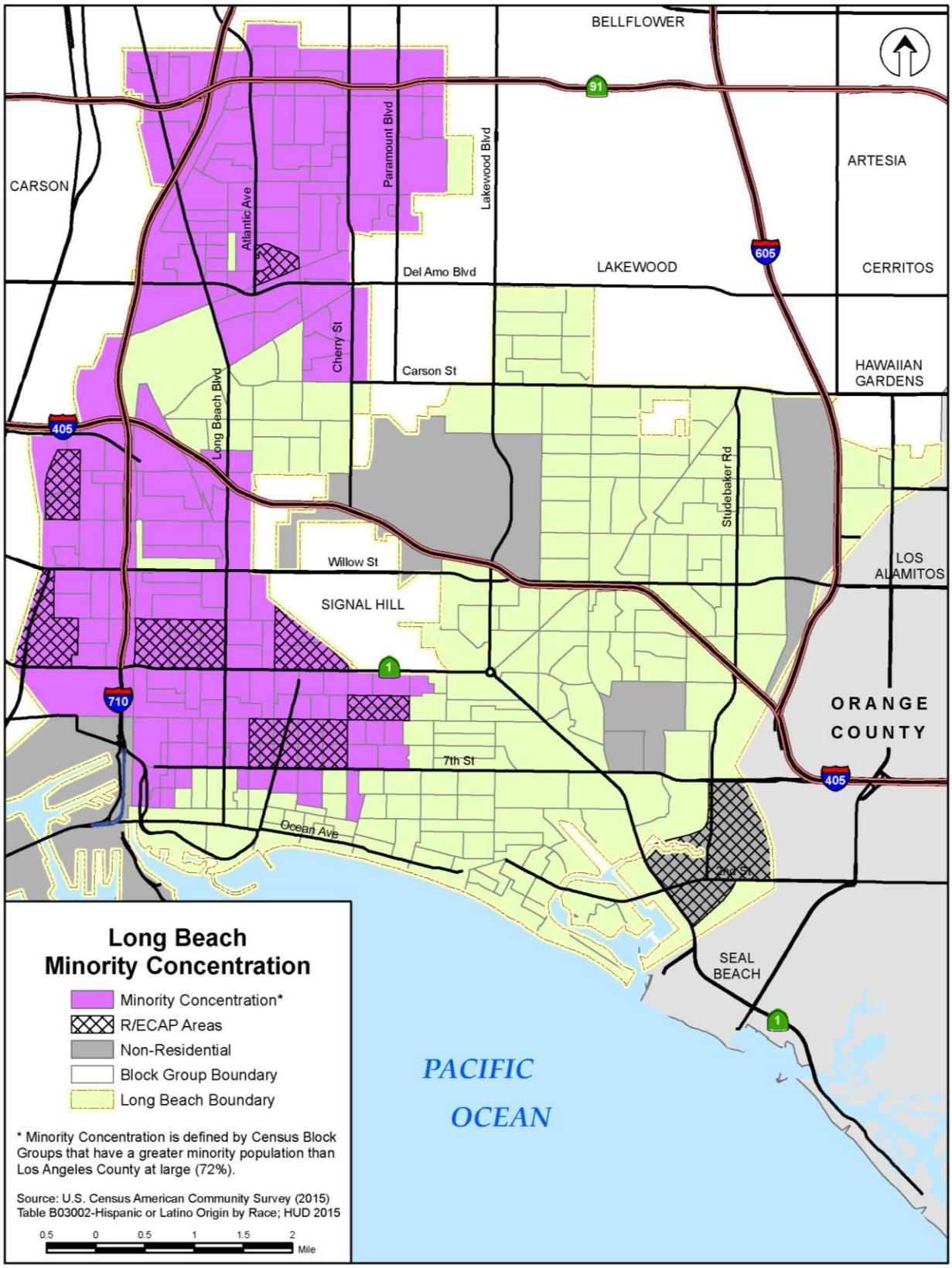
Low and Moderate Income CDBG Target Areas



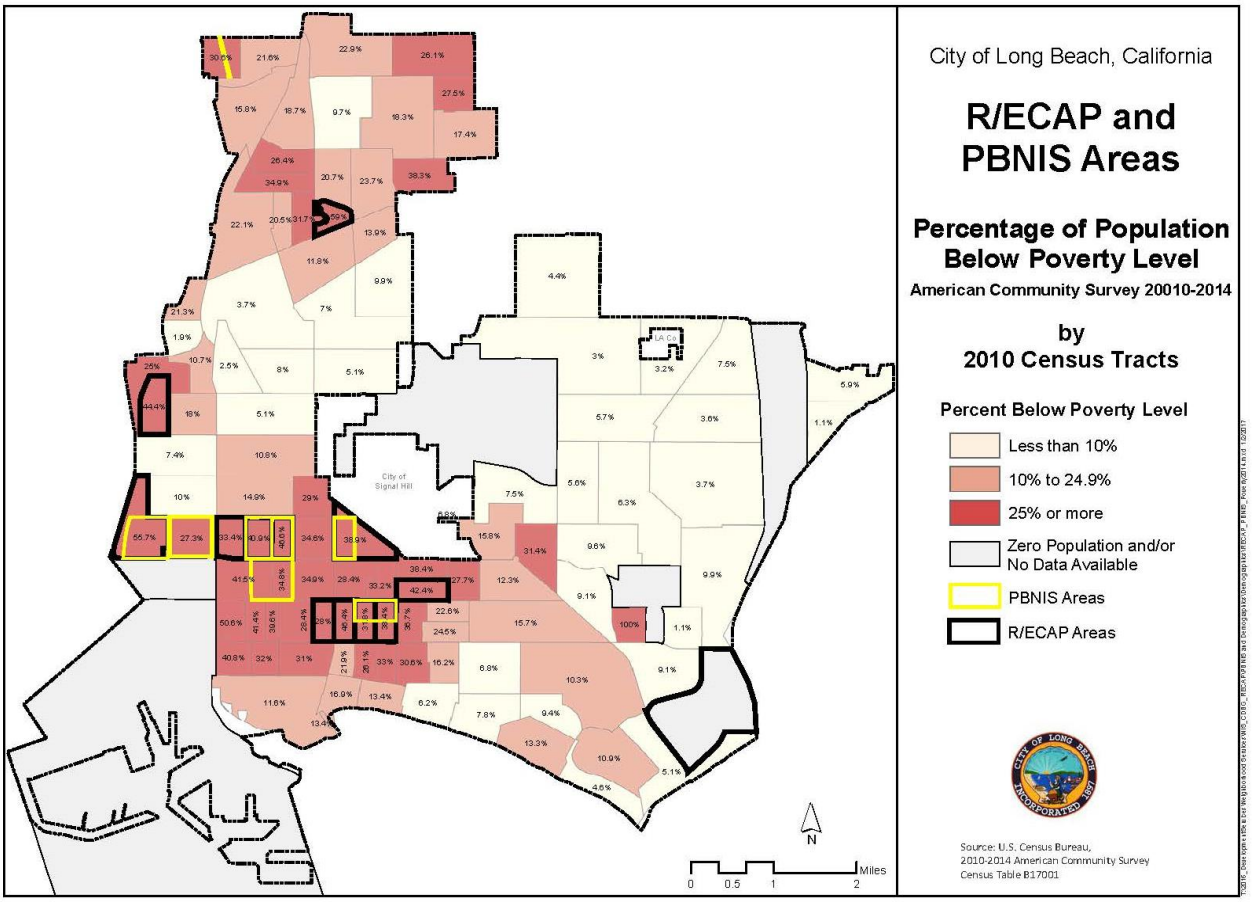
Low and Moderate Income CDBG Target Areas and R/ECAPs



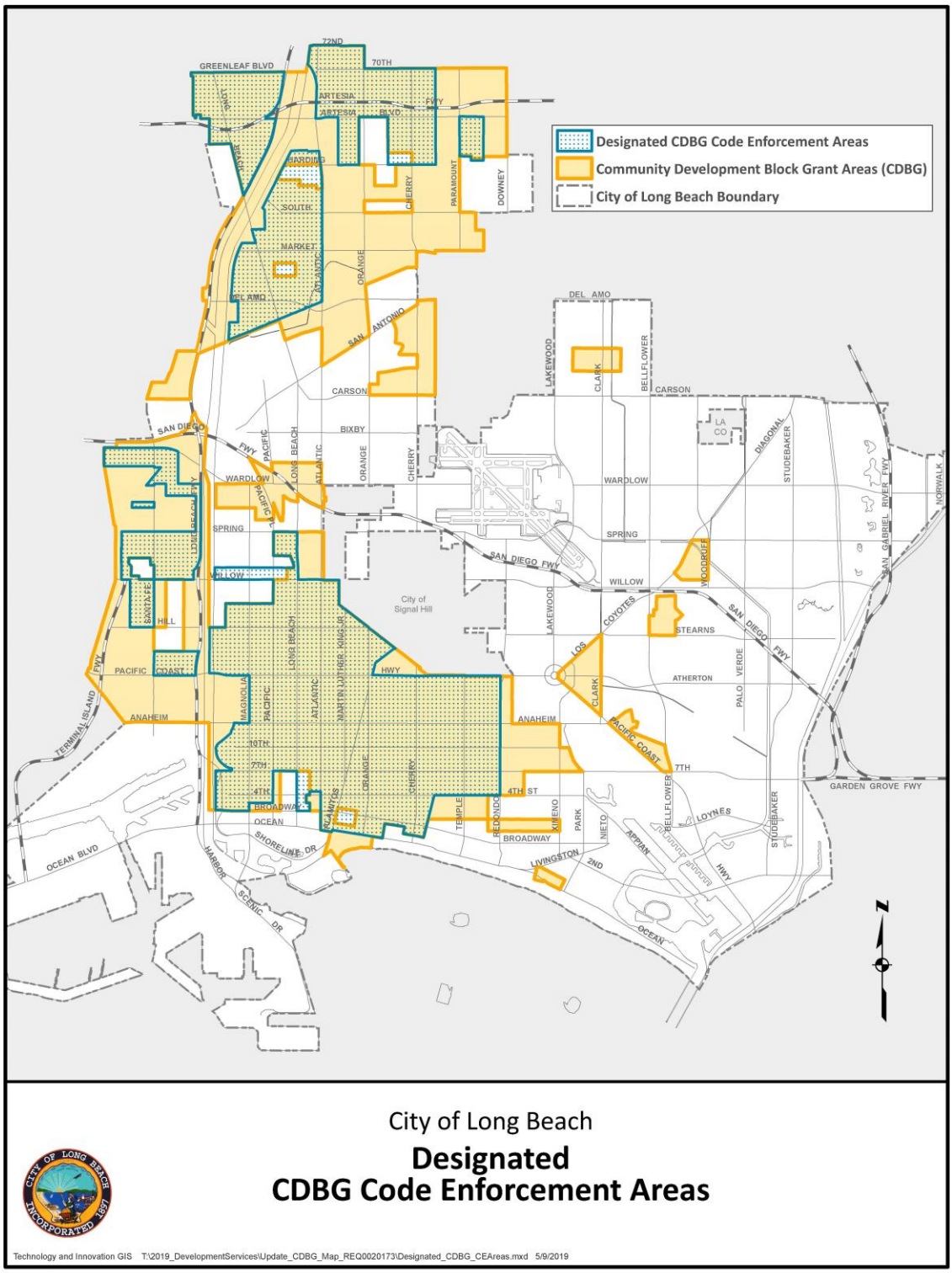
Minority Concentration Areas



Place-Based Neighborhood Improvement Strategy Areas



Designated CDBG Code Enforcement Areas



Appendix C: ESG Written Standards

Long Beach Continuum of Care

Written Standards

Department of Health and Human Service

Homeless Services Division

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REVIEW RELEASE DATES AND BOARD APPROVAL DATES

Continuum of Care Grant Written Standards	
Review Release Date	CoC Board of Directors Approval Date
April 30, 2015	-
May 27, 2016	September 8, 2016

Emergency Solutions Grant Written Standards	
Review Release Date	CoC Board of Directors Approval Date
April 30, 2015	June 24, 2015
May 27, 2016	September 8, 2016

Merged CoC & ESG Written Standards	
Review Release Date	CoC Board of Directors Approval Date
April 11, 2017	May 11, 2017

LONG BEACH CONTINUUM OF CARE WRITTEN STANDARDS

INTRODUCTION

The City of Long Beach is committed to fostering a system of care that responds to the diverse needs of homeless individuals and families and those at-risk of homelessness. A comprehensive and coordinated approach with city leaders, local agencies and community groups proactively addresses the needs in the Long Beach community. Together these partners provide services and programming that transition homeless households from housing crisis to self-sufficiency and stable permanent housing.

PURPOSE

The Continuum of Care (CoC) and Emergency Solutions Grant (ESG) Program interim rules require recipients and CoCs to consult to develop written standards for administering assistance. This is necessary to establish community-wide expectations on the operations of projects within the community, to ensure the system is transparent to users and operators, to establish a minimum set of standards and expectations in terms of the quality expected of projects, to make the local priorities transparent to recipients and subrecipient of funds, and to create consistency and coordination between projects.

The Written Standards establish a uniform criteria for eligibility determination, system delivery, prioritization, and performance measures throughout the CoC. These standards will ensure that at-risk and homeless households experiencing homelessness, who enter projects throughout the CoC, will be given similar information and support to access and maintain permanent housing. All projects that receive CoC and/or ESG funding, or co-located at the Coordinated Entry System hubs are required to abide by the Written Standards.

It is expected that the standards will be refined as programs evolve, members gain more experience, and Homeless Management Information System (HMIS) data from projects are analyzed. The Written Standards serve as the guiding principles for the Long Beach CoC system of care. These policies may only be changed by the approval of the CoC Board based on feedback from the CoC membership.

The Written Standards may be adapted to consider feedback from service providers, program participants, the effectiveness and appropriateness of housing and services for current program participants, the CoC's success at meeting the performance standards in Section 427 of the McKinney-Vento Act, changes in the characteristics of the homeless population within the CoC, or changes in the housing and service resources available.

SECTION I: GENERAL REQUIREMENTS

COORDINATED ENTRY SYSTEM

Overview of Coordinated Entry and Assessment

The Long Beach CoC Coordinated Entry System (CES) is intended to increase and streamline access to housing and services for households experiencing homelessness, to match appropriate levels of housing and services based on their needs, and to prioritize persons with severe service needs for the most intensive interventions. CES also prioritizes assistance based on vulnerability and severity of service needs to ensure that people who need assistance the most can receive it in a timely manner.

The Long Beach CES has two designated CES hubs, the Multi-Service Center (MSC) and the Homeless Assistance Program (HAP) Project. The MSC is a unique facility that co-locates social service agencies that provide integrated, centralized assessment and comprehensive services for at-risk and homeless individuals and families in one location. Services include: showers, mail, outreach and prevention services, case management, crisis counseling, educational assurances, life skills training, employment assistance, financial literacy, expungement workshops, fair housing workshops, housing coordination and deposit assistance, health screenings, HIV/AIDs related services, substance abuse and mental health treatment referrals, veterans services, mainstream benefits, and referrals to other community resources.

The HAP serves as a satellite CES for the CoC system of care. The HAP provides integrated, centralized assessment and comprehensive services for homeless people, with expertise in working with homeless people with a mental illness and those with a dual diagnosis of mental illness and substance abuse. These individuals, especially those with co-occurring disorders, are among those described as chronically homeless. Mental illnesses, like schizophrenia or bi-polar disorder, coupled with very low or no income, are major factors that perpetuate long-term homelessness. HAP streamlines service delivery, minimizes barriers to obtaining and maintaining permanent housing, and ultimately reduces the length of homelessness experienced by individuals.

The Department of Housing and Urban Development's (HUD) primary goals for coordinated entry processes are that assistance be allocated as effectively as possible and that assistance be easily accessible no matter where or how people present. Key elements of coordinated assessment include:

- A coordinated assessment location and staff
- The use of standardized assessment tools to assess consumer needs
- Referrals to programs based on the results of the assessment tools
- Capturing and managing data related to assessment and referrals in a Homeless Management Information System (HMIS)
- Prioritization of consumers with the most barriers to return to housing for the most cost- and service-intensive interventions.

Funded agencies will participate in the CES, ensuring that any point of entry in the CoC provides participants with access to stabilization and housing. Agencies will participate in the CoC's CES intake process. Participation includes direct service for and referrals to: homeless programs, prevention and diversion, mainstream resources, and housing. Projects will prioritize referrals from the CES hubs, to fill project vacancies within five (5) business days.

Goals of Coordinated Entry System

CES is intended to increase and streamline access to housing and services for households experiencing homelessness, to match appropriate levels of housing and services based on their needs, and to prioritize persons with severe service needs for the most intensive interventions. CES will help the Long Beach CoC prioritize assistance based on vulnerability and severity of service needs to ensure that people who need assistance the most can receive it in a timely manner. The Long Beach CoC identified the following common goals for the CES:

- Assistance will be allocated as effectively as possible
- Assistance is easily accessible no matter where or how people present
- The process will be easy on the program participant, and will provide quick and seamless entry into homelessness services
- Individuals and families will be referred to the most appropriate resource(s) for their individual situation
- The process will prevent duplication of services
- The process will reduce length of homelessness
- The process will insure full occupancy across programs
- The process will improve performance outcomes across funded projects

Assessment

The Long Beach CoC has adopted the Vulnerability Index and Service Prioritization Decision Assistance Tool (VI-SPDAT) as its primary assessment tool. The tool is a combination of the Vulnerability Index, which measures the chronicity and vulnerability of a person and the Service Prioritization Decision Assistance Tool, which is an intake and case management tool that helps allocate resources in a logical, targeted way that focuses on individual needs. The combination of the two tools allows providers to assess a person beyond the general population categories like vulnerable and chronically homeless and to understand the person on multi-dimensions to better meet their needs. The tool provides for an unbiased assessment of a household's overall housing and service needs. The VI-SPDAT is not meant to replace any other programmatic assessment, but rather is a universal assessment tool that is used in combination with other appropriate program tools. The VI-SPDAT is centralized in the HMIS and shared across CoC/ESG partners in an effort to increase coordination of care and to de-duplicate assessment efforts. Assessment may occur over time and there may also be instances where a participant should be reassessed or reprioritized, particularly if s/he remains homeless for a long period of time or if there has been a significant change in the household that may impact service need. The VI-SPDAT assessment in conjunction with other screening tools will assist in:

- Screening for diversion or prevention
- Assessing shelter and other emergency needs
- Identifying housing resources and barriers
- Evaluating vulnerability to prioritize for assistance
- Screening for program eligibility
- Facilitating connections to mainstream resources

The Long Beach CES hubs provide preliminary triage and assessment to determine program eligibility and level of assistance needed. Households are assessed to determine the least level of assistance needed in order to maintain or obtain sustainable housing.

Housing status and annual income, where required, are verified by program staff prior to program enrollment. Additionally, the evidence relied upon to establish and verify homeless status and annual income are included in the Homeless Management Information System

(HMIS) record to demonstrate compliance with program regulations, to establish history of homelessness, and to prevent duplication of services within the CoC.

Households that are screened and determined to meet preliminary criteria will have a VI-SPDAT completed in order to identify the household's housing and service needs. The agency will follow the Written Standards guiding the use of the VI-SPDAT.

Outreach and Engagement

Funded agencies will participate in outreach and engagement of the street homeless population including participation in the Long Beach CoC Street Outreach Network. The agency will utilize the HMIS to enter, document and update data on outreach and engagement of the street homeless population and follow protocol for adding participants to the Chronic Homeless Registry.

Prioritization for Permanent Supportive Housing (PSH) Placement

Funded agencies will participate in the Long Beach CoC PSH Placement Prioritization Process. All PSH placements will be prioritized according to the CoC's written prioritization process and aligned with HUD priorities. PSH placements will come from the Housing Prioritization List established by the Chronic Homeless Registry.

Housing First Certification

Housing First is an evidence-based practice that has shown to be an effective model for chronically homeless populations to access, obtain and maintain permanent housing. Funded agencies will utilize a Housing First approach per the awarded project application. Housing First is a housing approach that offers permanent, affordable housing as quickly as possible for individuals and families experiencing homelessness, and then provides the supportive services and connections to community-based supports people need to keep their housing and avoid returning to homelessness. Housing First does not have service participation requirements or precondition requirements for program enrollment.

Housing First Certification components include:

- Quickly and successfully connecting homeless individuals and families to permanent housing;
- No service participation requirements or preconditions including, but not limited to:
    - Demonstration of sobriety
    - Completion of alcohol or drug treatment
    - Agreeing to comply with a treatment regimen upon program entry
    - Placement into Transitional Housing prior to permanent housing
    - Minimum income threshold
    - Participation in services as a condition of tenancy
    - Related preconditions during program participation that might lead to the program participant's termination from the project
    - Program participants are not required to participate in services as a condition of tenancy
- Supportive services that are offered to maximize housing stability and prevent returns to homelessness;
- Participation in supportive services based on the needs and desires of program participants;
- Tenants have full rights, responsibilities, and legal protections; and
- Practices and policies to prevent lease violations and evictions.

STANDARDS FOR DETERMINING TERMINATION OF ASSISTANCE

CoC and ESG funded projects may terminate assistance to project participants who violate program requirements or conditions of occupancy. Termination under this section does not bar the subrecipient from providing further assistance at a later date to the same individual or family. The subrecipient may terminate assistance in accordance with a formal process established by the subrecipient that recognizes the rights of individuals affected This process, at a minimum, must consist of:

- Written notice to the program participant containing a clear statement of the reasons for termination;
- 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 decision to terminate; and
- Prompt written notice of the final decision to the program participant.

STANDARDS FOR PROJECT PARTICIPANT CONFIDENTIALITY

To ensure the safety and security of program participants, subrecipients are required to develop and implement written policies and procedures to guarantee the confidentiality of records concerning program participation. Confidentiality must be protected at all times. This includes all written information, any release of information, program participant records and adequate confidential space for services. To comply with these requirements, the subrecipient should, for example, keep written records or files under lock and key with only particular personnel granted access to those files. Confidentiality statements must be signed by every employee and kept on file. Standardized forms must be used to show program participant consent when program participant information is exchanged from agency to agency and kept in the program participant chart or file. The policy regarding program participant confidentiality and the completion of required forms must be in place.

STANDARDS FOR FAIR AND EQUAL ACCESS AND INCLUSIVITY

The Long Beach CoC ensures fair and equal access to programs and services for all program participants regardless of actual or perceived race, color, religion, national origin, age, gender identity, pregnancy, citizenship, familial status, household composition, disability, Veteran status, or sexual orientation. If an individual's self-identified gender or household composition creates challenging dynamics among residents within a facility, the host program should make every effort to accommodate the individual or assist in locating alternative accommodation that is appropriate and responsive to the individual's needs.

The Long Beach CES includes provisions for all priority subpopulations including households experiencing chronic homelessness, veterans, families, youth, seniors, disabled and specialized provisions for those fleeing domestic violence.

CoC/ESG providers will enroll homeless households based on needs regardless of limiting barriers to housing. Households will not be turned away from emergency response services or homeless designated housing due to lack of income, lack of employment, disability status, or substance use. Subrecipients who leverage alternate funding which restricts access to partner projects based on specific program participant attributes or characteristics, shall disclose this additional restrictions to the CoC in writing.

SAFETY PLANNING

Special provisions are set in place when dealing with domestic violence households seeking services through the coordinated entry hubs. CES staff and the broader CoC shall utilize the local domestic violence hotline to coordinate intakes for households fleeing domestic violence and seeking shelter. Intake staff shall coordinate additional services via telephone directly with shelter staff, as domestic violence shelters do not track program participants in the local HMIS. Households seeking entry into domestic violence shelters are not required to access services through the CES hubs so that households can access the system of care in the most seamless and safest manner possible.

PROCESS FOR MAKING SUBAWARDS

As the lead agency of the Long Beach CoC, the City of Long Beach Department of Health and Human Services (DHHS) competitively funds nonprofit agencies that provide a broad array of services to address the needs of the men, women, and children experiencing homelessness or at-risk of homelessness in Long Beach. A Request For Proposals (RFP) will be issued, in compliance with procurement requirements and City Council authorization. The City will allocate and administer CoC and ESG State and Federal funds via executed subcontracts, as recommended by the Homeless Services Advisory Committee (HSAC) to the CoC Board and approved by the Mayor and City Council of Long Beach.

HOMELESS PARTICIPATION REQUIREMENT

The DHHS has a homeless or formerly homeless person serving as a voting member on the Homeless Services Advisory Committee (HSAC). HSAC is an advisory body that was established by City Ordinance in 1988 to commence strategic planning activities to address homelessness in the City. HSAC is comprised of representatives from each of 9 council districts along with two representatives appointed by the Mayor. The Continuum of Care Board also has a homeless or formerly homeless person serving as a voting member.

FULL COVERAGE

The Long Beach CES services the entire Long Beach jurisdiction. The CES provides linkages to services that are funded by the CoC, as well as non-CoC funded projects, such as those funded through the State/Federal Emergency Solutions Grant, County funded projects, faith based partners, businesses, and philanthropic groups. The Long Beach CES works collaboratively with regional CES partners to ensure that all households accessing the Long Beach CES are effectively linked to their corresponding CES where appropriate.

PERFORMANCE STANDARDS

The CoC's ESG State and Federal allocations will complement and contribute to the Long Beach CoC system performance measures by providing resources to increase permanent housing placements, reduce the length of homelessness, increase housing retention, and maintain/increase household income.

DHHS will utilize the local HMIS to regularly monitor progress, ensure compliance with eligibility requirements and effectively coordinate CoC services and housing resources. HMIS will be utilized to track program participant data and report on outputs and outcomes as required by funders.

SYSTEM EVALUATION

The CES process will be evaluated on a regular basis to ensure that it is operating at maximum efficiency. The CES Advisory Board will be the lead entity that evaluates system delivery and will partner with the HMIS subcommittee to review data on system performance. Performance evaluation will include:

- A monthly review of metrics from the coordinated assessment process including occupancy reports, length of stay, and turn over beds coordination.
- A program participant focus group with people experiencing homelessness that have accessed the coordinated assessment process.
- An annual performance report with a section devoted to coordinated assessment and homelessness assistance system outcomes. The report may include assessment data, as well as the total number of assessments and referrals made, successes to be shared. Major findings from this report will be presented to the CoC Board.

TRAINING AND PARTICIPATION REQUIREMENT

Subrecipients will participate in the CoC General Membership meetings, webinars, and any relevant subcommittees that support quality service delivery within the system of care.

CONSULTATION WITH CONTINUUM OF CARE MEMBERSHIP

The City of Long Beach Department of Development Services, Neighborhood Services Bureau manages the Consolidated Planning process for the City and collaborates with the Department of Health and Human Services (DHHS), Bureau of Human Services, Homeless Services Division, which is the City lead for the local Continuum of Care (CoC) jurisdiction. As lead CoC agency since 1995, DHHS competitively funds nonprofit agencies that provide a broad array of services located at the Multi-Service Center (MSC), the Villages at Cabrillo, The Village – Mental Health America of Los Angeles, and other scattered site programs to address the needs of those experiencing homelessness in Long Beach. The Homeless Services Division administers the following components within the City's Consolidated Plan: Emergency Solutions Grant (ESG) and HOME Move-in Deposit Program. In addition, the Homeless Services Division collaborates directly with the City's Housing Authority to coordinate the CoC Rental Assistance projects (formerly known as Shelter Plus Care projects), Housing Choice Voucher (Section 8) set aside, and the Veterans Affairs Supportive Housing (VASH) programs for the City.

The Homeless Services Division works closely with the Long Beach CoC stakeholders for input and guidance on the development and implementation of funding priorities, performance standards, system-wide policies and procedures, program implementation, and the HMIS. The Homeless Services Officer, MSC Coordinator, and Homeless Impacts Coordinator participate in several advisory boards, including the HSAC, an advisory body appointed by the Long Beach City Council; the Coordinated Entry System Advisory Board; and the Villages at Cabrillo Advisory Board. The Homeless Services Officer also hosts regular CoC Membership meetings to review system wide coordination. The CoC Membership has subcommittees in the following topic areas:

- Educational Assurances Policy
- Chronic Homelessness Initiative
- Veteran Homelessness Initiative

- Discharge Planning Consortium
- Homeless Management Information System (HMIS)
- HEARTH Act system transformation

REQUIREMENTS FOR RECIPIENTS WHO PLAN TO USE THE RISK FACTOR UNDER PARAGRAPH (1)(iii)(G) OF THE "AT RISK OF HOMELESSNESS" DEFINITION

The City does not intend to use the risk factor under Paragraph (1)(iii)(G) of the "at risk of homelessness" definition.

SECTION II: CONTINUUM OF CARE (COC) PROGRAM BACKGROUND, POLICIES, PROCEDURES, AND STANDARDS

BACKGROUND

Beginning in 1987, the City of Long Beach has committed to shaping a comprehensive and coordinated system of care that responds to the diverse needs of individuals and families experiencing homelessness and those at-risk of becoming homeless. The City continues to expand services to these populations and facilitates a seamless delivery system using an active collaboration of local agencies, city leaders, community groups, and other public and private resources. Through the Long Beach Continuum of Care, the City and its community partners strive to create a balance of emergency, transitional, and permanent housing and supportive services to assist families and individuals experiencing homelessness. Through this balance of services, the Long Beach CoC empowers families and individuals to make the critical transition from housing crisis to self-sufficiency and stable permanent housing.

POLICIES AND PROCEDURES FOR EVALUATING INDIVIDUALS' AND FAMILIES' ELIGIBILITY FOR ASSISTANCE UNDER 24 CFR 578

Households are triaged at time of initial intake for program eligibility and level of assistance needed. Households are assessed to determine the least level of assistance needed to maintain or obtain sustainable housing by utilizing the Vulnerability Index and Service Prioritization Decision Assistance Tool (VI-SPDAT) as the primary assessment tool. The household must meet the requirements of an applicable AND eligible category under the definition of "At Risk of Homelessness" OR definition of "Homeless" as established by HUD at 24 CFR §578.3, in addition to all applicable requirements for each project.

For homeless assistance programs:

- The household has not identified any subsequent housing options.
- The household lacks the financial resources and support networks needed to obtain immediate housing.

Housing status and annual income, where required, are verified by program staff prior to program enrollment. Additionally, the evidence relied upon to establish and verify homeless status and annual income are included in the Homeless Management Information System (HMIS) record in order to demonstrate compliance with program regulations, prevent duplication of services and enhance interagency coordination within the CoC.

POLICIES AND PROCEDURES FOR DETERMINING AND PRIORITIZING WHICH ELIGIBLE INDIVIDUALS AND FAMILIES WILL RECEIVE TRANSITIONAL HOUSING ASSISTANCE

Transitional housing addresses the needs of several homeless subpopulations including unaccompanied youth, veterans, single women and men, families, substance users, and dually diagnosed persons. The CES prioritizes transitional housing placement for homeless households requiring long-term shelter (more than 90-days) with the outcome target to secure permanent housing. Projects awarded for transitional housing under the Long Beach COC must utilize a Housing First approach.
Eligible households for transitional housing placement include, but are not limited to:

- Households with no income or limited income
- Recent history of substance abuse, or actively using drugs or alcohol

- Sporadic employment history
- No high school diploma/GED
- Survivors of domestic violence
- Head of household has a significant disability impeding them from working
- Head of household has a significant disability requiring supportive housing services
- Household is employed but total household income cannot sustain fair market rent
- Criminal background

POLICIES AND PROCEDURES FOR DETERMINING AND PRIORITIZING WHICH ELIGIBLE INDIVIDUALS AND FAMILIES WILL RECEIVE RAPID RE-HOUSING ASSISTANCE.

Rapid Re-housing (RRH) is an intervention, informed by a Housing First approach, which is a critical part of a community's effective homeless crisis response system. RRH projects are designed to support households living on the streets or in emergency shelters so that these households can achieve long-term housing stability. The RRH projects assists households to address practical and immediate challenges to obtaining permanent housing by linking them to community resources, reducing the amount of time they experience homelessness, and avoiding a near-term return to homelessness.

Households prioritized for Rapid Re-housing are those that lack financial resources and support networks needed to obtain immediate housing, but have the ability to maintain housing with sufficient income and social supports with the assistance of Rapid Re-housing.

Households prioritized for rapid re-housing services include:

- Household recently lost its employment and is receiving unemployment benefits
- Household has a part-time job
- Household has a full time job
- Household recently lost its job and has exhausted its unemployment benefits; or
- Household has a history of steady, gainful employment for at least 6 months within the previous 24 months, if not currently employed
- Lower acuity (1-7) VI-SPDAT
- Households that can demonstrate the ability to be self-sufficient within a short time frame

Rapid Re-housing projects may establish an income requirement for continued eligibility at re-evaluation, a maximum amount or percentage of rental assistance that a program participant may need, a maximum number of months that a program participant may receive rental assistance, and a maximum number of times that a program participant may receive rental assistance.

Projects receiving Rapid Re-Housing funds are required to determine that units meet HUD's Housing Quality Standards, rent reasonableness standards (which is the applicable rent standard), and comply with the Lead Based Paint Poisoning Prevention Act. Program participants receiving Tenant Based Rental Assistance (TBRA) must sign a lease of at least one year that is renewable (for a minimum term of one month) and terminable only for cause.

Supportive services include a wide range of services outlined in 24 CFR part 578.53. Supportive services may be provided until 6 months after rental assistance stops. At a minimum, program participants must attend monthly case management meetings; however, if the project is operating

under the Housing First approach, service participation may be refused, but must be documented as such.

STANDARDS FOR DETERMINING WHAT PERCENTAGE OR AMOUNT OF RENT EACH PROGRAM PARTICIPANT MUST PAY WHILE RECEIVING RAPID RE-HOUSING ASSISTANCE.

Determination of the share of rent and utilities cost will be determined at time of household's intake assessment and will be approved as the smallest amount needed in order to maintain or obtain housing. CoC-funded rental assistance 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 is being provided with replacement housing payments under the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (URA) at the same time. Units assisted with rental assistance must also meet rent reasonableness standards, and have both a rental assistance agreement and written lease agreement before financial assistance payments are approved. CoC-funded rental assistance will be paid directly to the appropriate third-party (e.g. property owner).

POLICIES AND PROCEDURES FOR DETERMINING AND PRIORITIZING WHICH ELIGIBLE INDIVIDUALS AND FAMILIES WILL RECEIVE PERMANENT SUPPORTIVE HOUSING ASSISTANCE.

The Long Beach CoC maintains a wide portfolio of permanent housing resources ranging from deposit assistance to permanent supportive housing. All households are assessed by the CES for eligibility and overall needs to ensure that the household is being linked to the most appropriate housing resource. Order of priority for Permanent Supportive Housing (PSH) beds will be determined in accordance with Exhibit A, *Notice CPD-16-011: Prioritizing Persons Experiencing Chronic Homelessness and other Vulnerable Homeless Persons in Permanent Supportive Housing.*

CoC funded PSH agencies will follow an order of priority that targets persons who need housing the most. This will ensure that persons who are Chronically Homeless (CH) are prioritized for housing with an appropriate level of care. The CoC dedicates and prioritizes PSH beds in order to increase the number available to persons who are CH. Agencies are encouraged to increase the number of CH PSH beds dedicated to persons experiencing chronic homelessness by designating formerly non-CH beds as CH beds. All PSH projects are encouraged to prioritize the designation of CH beds that become vacant to the maximum extent possible.

Priority Levels: An order of priority is used to prioritize chronically homeless individuals and families for housing. The order of priority is based upon the severity of needs, and not upon diagnosis or disability type. PSH projects are required to follow the order of priority when selecting participants for housing in accordance with the CoC's written standards and current grant agreement. Order of priority for occupancy in PSH 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.

Other Considerations and Requirements for PSH Projects

- Compliance of CoC funded PSH agencies with 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.
- Compliance of CoC funded PSH agencies with recordkeeping requirements that document a program participant's status as chronically homeless.
- Recipients must maintain and follow written intake procedures to comply with the definition of CH status. The order of priority for obtaining evidence is: (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.
- PSH projects that include beds dedicated to, or prioritized for, CH must maintain records verifying individuals or families in those beds meet the definition for CH status.

SECTION III: EMERGENCY SOLUTIONS GRANT (ESG) PROGRAM BACKGROUND, POLICIES, PROCEDURES, AND STANDARDS

BACKGROUND

In accordance with Title 24 of the Code of Federal Regulations (24 CFR) 91.220(l)(4)(i) and 567.400(e)(1), the City of Long Beach (City) and the Long Beach Continuum of Care (CoC) have developed the following written standards for the provision and prioritization of Emergency Solutions Grant (ESG) funding. The following standards are intended as basic, minimum standards to which individual ESG applicants and/or subrecipients can add additional and more stringent standards applicable only to their own projects. These required standards help to ensure that the ESG program is administered fairly and methodically. The City and the Long Beach CoC will continue to build upon and refine this document.

The Homeless Emergency Assistance and Rapid Transition to Housing Act of 2009 (HEARTH Act) significantly amended the McKinney-Vento Homeless Assistance Act, including major revisions to the Emergency Shelter Grants program, which was renamed the Emergency Solutions Grants program. The HEARTH Act, and implementation of the applicable federal regulations by HUD, incorporated many of the lessons learned from the implementation of the Homelessness Prevention and Rapid Re-Housing Recovery Act Program (HPRP) into the new ESG program, including placing a greater emphasis on rapid re-housing assistance.

The City of Long Beach is awarded Federal ESG funds annually from the Department of Housing and Urban Development (HUD) as part of the Annual Action Plan Process. These funds are designed to identify sheltered and unsheltered homeless persons, as well as those at risk of homelessness, and provide the services necessary to help those persons quickly regain stability in permanent housing after experiencing a housing crisis and/or homelessness.

The City of Long Beach was recently designated by the California State Department of Housing and Community Development (HCD) as an Administrative Entity (AE) of State ESG funds in furtherance of these goals. As an AE, the City's responsibility is to award and administer State ESG funds to eligible service providers for ESG eligible activities in the CoC service area. State ESG regulation section 8403(g) requires that AEs select qualified service providers through a process that meets HCD requirements. All CA ESG funds shall be utilized in a manner consistent with the Core Practices set forth in 25 CCR 8409. The State ESG program is subject to change by the State.

The State ESG Program, funded by the State's General Fund, funds activities eligible under the Federal ESG Program, including rapidly re-housing individuals and families, preventing families and individuals from becoming homeless, engaging homeless individuals and families living on the street, and operating homeless shelters and providing essential services to shelter residents. Funds awarded by an AE shall be used for eligible activities as permitted by 25 CCR 8408. State ESG funds shall not be used for Renovation, Conversion, or Major Rehabilitation activities pursuant to 24 CFR §576.102.

The ESG program allows the City to set priorities based on the needs of the community. These standards outline the specific guidelines and priorities that will be used by the City in awarding and administering ESG funding. Currently, eligible program components that are prioritized under the City's ESG program are Emergency Shelter, Street Outreach, Rapid Re-Housing, Administrative Costs, Homeless Management Information System (HMIS), and Homelessness Prevention. Applications

for projects in other components will not be considered at this time. The City and Long Beach Continuum of Care may revise ESG component priority in subsequent years.

POLICIES AND PROCEDURES FOR EVALUATING INDIVIDUALS' AND FAMILIES' ELIGIBILITY FOR ASSISTANCE UNDER EMERGENCY SOLUTIONS GRANT (ESG)

All subrecipients receiving ESG funds will ensure that all program participants meet the applicable eligibility requirements for the project. At a minimum, this includes:

- An initial evaluation, conducted in accordance with the centralized assessment, these written standards, and Long Beach CoC Standards of Care, to determine:
    - Eligibility of each individual or family for ESG assistance; AND
    - The amount and types of assistance needed to (re)gain stability in permanent housing; AND
- The household must meet the requirements of an applicable AND eligible category under the definition of "At Risk of Homelessness" OR definition "Homeless" as established by HUD at 24 CFR§576.2; AND
- For Homelessness Prevention assistance:
    - The household income must be below 30% area median income (AMI).
    - The household has not identified any subsequent housing options.
    - The household lacks the financial resources and support networks necessary to retain immediate housing or remain in their existing housing without ESG assistance.
- For Rapid Re-housing assistance:
    - The household has not identified any subsequent housing options.
    - The household lacks the financial resources and support networks needed to obtain immediate housing.

Housing status and annual income must be verified through recordkeeping and documentation procedures outlined by HUD in 24 CFR part 576. Additionally, the evidence relied upon to establish and verify homeless or at risk for homelessness status and annual income must be included in the program HMIS participant record sufficient to demonstrate compliance with the program regulations.

STANDARDS FOR TARGETING AND PROVIDING ESSENTIAL SERVICES RELATED TO STREET OUTREACH

Funded projects under the street outreach component provide outreach and engagement to all people experiencing homelessness regardless of subpopulation. Outreach efforts are targeted to those individuals/families who are least likely to access services on their own and are determined to be vulnerable. Projects can use funds for costs providing essential services necessary to reach out to unsheltered homeless people to 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 ESG-funded street outreach projects, the term “unsheltered homeless people” means individuals and families who qualify as homeless under paragraph (1)(i) of the “homeless” definition under the § 576.2.

POLICIES AND PROCEDURES FOR ADMISSION, DIVERSION, REFERRAL, AND DISCHARGE BY EMERGENCY SHELTERS ASSISTED UNDER ESG, INCLUDING STANDARDS REGARDING LENGTH OF STAY, IF ANY, AND SAFEGUARDS TO MEET THE SAFETY AND SHELTER NEEDS OF SPECIAL POPULATION.

The City and the Long Beach CoC are continuing to collaborate on the refinement of the policies and procedures for admission, diversion, referral, and discharge by emergency shelters assisted under ESG. ESG-funded emergency shelter programs serve households that meet the definition of “homeless” as defined by HUD at 24 CFR §576.2. Households served by ESG-funded emergency shelters lack a fixed, regular, and adequate nighttime residence; cannot be served by other programs or resources; and have no other options for overnight shelter. Households are referred to ESG- funded emergency shelters after exhausting all available options for diversion.

Projects funded under the Emergency Shelter component work directly with the CES to target open shelter beds. Households are screened using a standardized assessment tool to evaluate program eligibility and identify the appropriate intervention(s) to meet the households’ needs. Households are assessed to determine the lowest level of assistance needed to maintain or obtain sustainable housing. Households needing immediate shelter will be prioritized and placed based on availability.

CES intake staff prioritize emergency shelter placement for homeless households requiring short-term shelter with the outcome target to secure permanent housing such as:

- Households that are able to afford fair market rent but lack the supports or resources to stabilize into housing on their own.
- Households that recently lost income, but have the work history to secure employment and stabilize in a short amount of time.
- Households that recently secured a housing voucher and are in the process of securing long-term permanent housing.
- Households that need to be stabilized due to long term street homelessness

Diversion from emergency shelter is one of the strategies the Long Beach CoC utilizes to reduce homelessness within the local community. During intake assessment, households are assessed for existing support systems and resources to prevent them from entering the shelter system. Intake staff provide linkages to mainstream resources such as childcare, employment services, and food resources to stabilize households. HMIS is used to increase coordination and avoid duplication of services.

Emergency shelter placement is prioritized for homeless households requiring short-term shelter (less than 90-days) with the outcome target to secure permanent housing. Homeless households requiring longer than a 90-day stay will be prioritized for direct entry to transitional shelter. Discharges from the emergency shelter will be coordinated at the CES hubs by the ESG funded eligibility screening staff member for alternative placement to housing stabilization resources. Emergency shelters will ensure vacancies will be filled within 72 hours.

POLICIES AND PROCEDURES FOR ASSESSING, PRIORITIZING, AND REASSESSING INDIVIDUALS' AND FAMILIES' NEEDS FOR ESSENTIAL SERVICES RELATED TO EMERGENCY SHELTER

Due to limited length of stay in emergency shelter, households will be assessed, prioritized, and reassessed for essential services on a regular basis; they will also be regularly assessed to determine progress on goals pertaining to increasing income, linkages to mainstream and homeless services resources, and housing placement. Emergency shelter staff will work with the CoC partners to ensure linkages to mainstream services, employment, and housing resources are expedited in an effort to reduce length of time that a household experiences homelessness. Eligible Essential Services include case management; child care; educational services; employment assistance and job training; outpatient health services, but only to the extent that other appropriate health services are unavailable in the community; legal services, but only to the extent that other appropriate legal services are unavailable or inaccessible in the community; life skills training; mental health services, but only to the extent that other appropriate mental health services are unavailable or inaccessible in the community; substance abuse treatment services, but only to the extent that other appropriate substance abuse treatment services are unavailable or inaccessible within the community; and transportation.

POLICIES AND PROCEDURES FOR COORDINATION AMONG EMERGENCY SHELTER PROVIDERS, ESSENTIAL SERVICES PROVIDERS, HOMELESSNESS PREVENTION, AND RAPID RE- HOUSING ASSISTANCE PROVIDERS; OTHER HOMELESS ASSISTANCE PROVIDERS; AND MAINSTREAM SERVICE AND HOUSING PROVIDERS

The system coordination among the emergency shelters, homelessness prevention, rapid re-housing, homeless assistance and mainstream service providers will be completed via the CES hubs. At both CES hubs, representatives from mainstream benefits and employment services are located onsite to increase income and earning capacity for those served by the Long Beach CoC. There is regular, open, and ongoing communication between the ESG partners, the Long Beach CoC, and the City via meetings and trainings. Furthermore, ESG subrecipients are required to participate in the local HMIS, which coordinates care, reduces duplication, and better serves program participants across the CoC system of care.

POLICIES AND PROCEDURES FOR DETERMINING AND PRIORITIZING WHICH ELIGIBLE FAMILIES AND INDIVIDUALS WILL RECEIVE HOMELESSNESS PREVENTION ASSISTANCE AND WHICH ELIGIBLE FAMILIES AND INDIVIDUALS WILL RECEIVE RAPID RE- HOUSING ASSISTANCE

Homelessness prevention and shelter diversion can reduce the number of people entering the homeless assistance system and the demand for shelter and other programmatic housing beds. While prevention is the least proven strategy, linking homelessness prevention and diversion efforts with the centralized assessment process can create an integrated, system-wide "front door" to the homeless assistance system. Homelessness prevention will be prioritized for individuals and families who would spend the night in an emergency shelter or on the streets without ESG assistance. To be eligible for homeless prevention services under ESG, the household must:

- Meet the requirements of an category under either the definition of "At Risk of Homelessness" OR categories 2 or 4 under the definition of definition "Homeless" as established by HUD at 24 CFR§576.2;
- Have an annual household income below 30% of area median income;

- Have not identified any subsequent housing options;
- Lack the financial resources and support networks necessary to retain immediate housing or remain in their existing housing without ESG assistance;
- Meet one of the following prevention targets:
  - Severe housing cost burden (55% to 75% rent to gross monthly income ratio);
  - Fixed income is TANF, Pension, SSI, VA benefits;
  - Sudden and significant loss of source of income; or
  - Had a onetime financial incident and a onetime gap payment will end the housing crisis; AND
- Demonstrate at least one of the following risk factors:
  - Household unit left primary residence in Long Beach within past 3 months and is currently staying with family/friends;
  - Household is living in a motel, using own resources;
  - Residency in housing that has been condemned by housing officials and is no longer meant for human habitation;
  - Eviction within 2 weeks from a private dwelling;
  - Imminent foreclosure of rental housing can be confirmed;
  - Discharge within 2 weeks from an institution in which person has been a resident for more than 180 days;
  - Credit problems or history of eviction that preclude obtaining of housing;
  - Physical disabilities and other chronic health issues which are barriers to employment;
  - Recent traumatic life event that has prevented the household from meeting its financial responsibilities;
  - Homeless in last 12 months;
  - Incidence of domestic violence; and/or
  - Program participant has exhausted all other sources of public benefits.

The Rapid Re-housing component under the Federal ESG will target households residing in emergency and transitional shelter programs, to promote reduced length of time experiencing homelessness and to decrease average length of stay in shelter programs system wide. Rapid re-housing resources will be targeted to individuals and families who meet the following guidelines:

- Household must be literally homeless, as defined by HUD; AND
- No appropriate subsequent housing options have been identified; AND
- Household lacks the financial resources and support networks needed to obtain immediate housing.

Families and individuals with lower barriers to housing and less service needs who are expected to stabilize in permanent housing with no additional assistance will receive priority for Rapid Rehousing assistance for the Federal ESG Program.

Additionally, the Rapid Re-housing and Homelessness Prevention components funded under the State ESG Program must follow the Core Practices preserved in 25 CCR 8409.

Core Practices under the State ESG Program include:

- Comprehensive and coordinated access to the funded activity throughout the Service Area of the CoC;
- Prioritized access to funded services for people with the most severe needs;
- Low barrier access to services and services operated consistent with housing first practices; and
- A progressive engagement approach to services and financial assistance.

Rapid Re-housing (RRH) projects must ensure that at re-evaluation, household's income must be less than or equal to 30% of AMI. However, RRH projects may establish a maximum amount or percentage of rental assistance that a program participant may need, maximum number of months that a program participant may receive rental assistance, and maximum number of times that a program participant may receive rental assistance.

Projects receiving Rapid Re-Housing funds are required to determine that units pass HUD's Habitability Standards, rent reasonableness (rental assistance may cover up to the FMR for a unit), and comply with the Lead Based Paint Poisoning Prevention Act. Program participants receiving Tenant Based Rental Assistance (TBRA) must have a written lease between the owner and the program participant.

Supportive services are limited to housing relocation and stabilization services. Housing stability case management may not exceed 30 days during the period in which the program participant is seeking permanent housing and may not exceed 24 months during the period in which the program participant is living in permanent housing. At a minimum, program participants must attend monthly case management meetings; however, if the project is operating under the Housing First approach, service participation may be refused, but must documented as such. The Core Practices prescribed in 25 CCR 8409 establish that all California State ESG funded programs will utilize Housing First and Progressive Engagement practices.

State regulations prohibit subpopulation targeting with State ESG funds in Homelessness Prevention and Rapid Re-housing program unless documentation of all of the following is provided to HCD prior to award of funds for these activities: (1) that there is an unmet need for these activities for the subpopulation proposed for targeting, and (2) that there is existing funding in the Continuum of Care Service Area for programs that address the needs of all of the excluded populations for these activities (25 CCR Section 8408).

STANDARDS FOR DETERMINING WHAT PERCENTAGE OR AMOUNT OF RENT AND UTILITIES COSTS EACH PROGRAM PARTICIPANT MUST PAY WHILE RECEIVING HOMELESSNESS PREVENTION OR RAPID RE-HOUSING ASSISTANCE

Determination of the share of rent and utilities cost will be determined at time of household's intake assessment and will be approved as the smallest amount needed in order to maintain or obtain housing. ESG-funded financial assistance, including rental assistance, 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 Assistance and Real Property Acquisition Policies Act of 1970 (URA), during the period of time covered by the URA payments. Units assisted with rental assistance must also meet rent reasonableness standards, be at or below Fair Market Rent (FMR), and have both a rental assistance agreement and written lease agreement before financial assistance payments are approved. ESG-funded financial assistance, including rental assistance, will be paid directly to the appropriate third-party (e.g. utility company, property owner). Any late fees incurred while receiving ESG assistance will be the responsibility of the subrecipient or tenant; such fees must be paid by non-CoC/ESG funds.

STANDARDS FOR DETERMINING HOW LONG A PARTICULAR PROGRAM PARTICIPANT WILL BE PROVIDED WITH RENTAL ASSISTANCE AND WHETHER AND HOW THE AMOUNT OF THAT ASSISTANCE WILL BE ADJUSTED OVER TIME

The City and Long Beach CoC are committed to ensuring the most efficient and effective use of ESG resources. All approvals of rental assistance will be based on the assessment of the eligible household's needs. Households receiving rapid re-housing assistance or homelessness prevention will be re-evaluated every three months to determine if the household maintains program eligibility (i.e., an annual income below 30% AMI, a lack of sufficient resources and support networks necessary to retain housing without ESG assistance, and a demonstrated continued need for financial assistance). Furthermore, ESG subrecipients will be responsible for follow up evaluations with households for tracking housing retention. Per household rental assistance should not exceed twelve months in a three-year period.

STANDARDS FOR DETERMINING THE TYPE, AMOUNT, AND DURATION OF HOUSING STABILIZATION AND/OR RELOCATION SERVICES

The type of housing stabilization and/or relocation services a household receives will be determined at the time of initial evaluation, via the VI-SPDAT assessment, and at each re-evaluation. Households will be assessed for the lowest amount of need for housing stabilization. The subrecipients will retain flexibility to promote improved outcomes among a population with diverse and individualized needs. In accordance with the interim rule, no household will receive more than 24 months housing stabilization and/or relocation services in a 3-year period.

DETERMINATIONS OF INELIGIBILITY

For each household determined ineligible to receive Emergency Solutions Grant (ESG) assistance, the household's record must include documentation of the reason for that determination.

APPENDIX A *Notice CPD-16-011: Prioritizing Persons Experiencing Chronic Homelessness and Other Vulnerable Homeless Persons in Permanent Supportive Housing*

U.S. Department of Housing and Urban Development
Office of Community Planning and Development

1

Special Attention of:
All Secretary's Representatives

Issued:
All Regional Directors for CPD

Expires:
All CPD Division Directors
Continuums of Care (CoC)
Recipients of the Continuum of Care (CoC) Program

Notice: CPD-16-11
Issued: July 25, 2016
Expires: This Notice is effective until it is amended, superseded, or rescinded

Cross Reference: 24 CFR Parts 578 and 42 U.S.C. 11381, *et seq.*

Subject: Notice on Prioritizing Persons Experiencing Chronic Homelessness and Other Vulnerable Homeless Persons in Permanent Supportive Housing

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I. Purpose

This Notice supersedes Notice CPD-14-012 and provides guidance to Continuums of Care (CoC) and recipients of Continuum of Care (CoC) Program (24 CFR part 578) funding for permanent supportive housing (PSH) regarding the order in which eligible households should be served in **all** CoC Program-funded PSH. This Notice reflects the new definition of chronically homeless as defined in CoC Program interim rule as amended by the Final Rule on Defining "Chronically Homeless" (herein referred to as the Definition of Chronically Homeless final rule) and updates the orders of priority that were established under the prior Notice. CoCs that previously adopted the orders of priority established in Notice CPD-14-012, which this Notice supersedes, and who received points for having done so in the FY2015 CoC Program Competition are encouraged to update their written standards to reflect the updates to the orders of priority as established in this Notice. CoCs that have not previously adopted the orders of priority established in Notice CPD-14-012 are also encouraged to incorporate the orders of priority included in this Notice into their written standards

A. Background

In June 2010, the Obama Administration released *Opening Doors: Federal Strategic Plan to Prevent and End Homelessness* (*Opening Doors*), in which HUD and its federal partners set goals to end Veteran and chronic homelessness by 2015, and end family and youth homelessness by 2020. Although progress has been made there is still a long way to go. In 2015, the United States Interagency Council on Homelessness extended the goal timeline for achieving the goal of ending chronic homelessness nationally from 2015 to 2017. In 2015, there were still 83,170 individuals and 13,105 persons in families with children that were identified as chronically homeless in the United States. To end chronic homelessness, it is critical that CoCs ensure that limited resources awarded through the CoC Program Competition are being used in the most effective manner and that households that are most in need of assistance are being prioritized.

Since 2005, HUD has encouraged CoCs to create new PSH dedicated for use by persons experiencing chronic homelessness (herein referred to as dedicated PSH). As a result, the number of dedicated PSH beds funded through the CoC Program for persons experiencing chronic homelessness has increased from 24,760 in 2007 to 59,329 in 2015. This increase has contributed to a 30.6 percent decrease in the number of chronically homeless persons reported in the Point-in-Time Count between 2007 and 2015. Despite the overall increase in the number of dedicated PSH beds, this only represents 31.6 percent of all CoC Program-funded PSH beds.

To ensure that all PSH beds funded through the CoC Program are used as strategically and effectively as possible, PSH needs to be targeted to serve persons with the highest needs and greatest barriers towards obtaining and maintaining housing on their own–persons experiencing chronic homelessness. HUD's experience has shown that many communities and recipients of CoC Program-funded PSH continue to serve persons on a "first-come, first-serve" basis or based on tenant selection processes that screen-in those who are most likely to succeed while screening out those with the highest level of need. These approaches to tenant

selection have not been effective in reducing chronic homelessness, despite the increase in the number of PSH beds nationally.

B. Goals of this Notice

The overarching goal of this Notice is to ensure that those individuals and families who have spent the longest time in places not meant for human habitation, in emergency shelters, or in safe havens and who have the most severe service needs within a community are prioritized for PSH. By ensuring that persons with the longest histories of homelessness and most severe service needs are prioritized for PSH, progress towards the Obama Administration's goal of ending chronic homelessness will increase. In order to guide CoCs in ensuring that all CoC Program-funded PSH beds are used most effectively, this Notice revises the orders of priority related to how persons should be selected for PSH as previously established in Notice CPD-14-012 to reflect the changes to the definition of chronically homeless as defined in the Definition of Chronically Homeless final rule. CoCs are strongly encouraged to adopt and incorporate them into the CoC's written standards and coordinated entry process.

HUD seeks to achieve two goals through this Notice:

1. Establish a recommended order of priority for dedicated and prioritized PSH which CoCs are encouraged to adopt in order to ensure that those persons with the longest histories residing in places not meant for human habitation, in emergency shelters, and in safe havens and with the most severe service needs are given first priority.

2. Establish a recommended order of priority for PSH that is not dedicated or prioritized for chronic homelessness in order to ensure that those persons who do not yet meet the definition of chronic homelessness but have the longest histories of homelessness and the most severe service needs, and are therefore the most at risk of becoming chronically homeless, are prioritized.

C. Applicability

The guidance in this Notice is provided to all CoCs and all recipients and subrecipients of CoC Program funds–the latter two groups referred to collectively as recipients of CoC Program-funded PSH. CoCs are strongly encouraged to incorporate the order of priority described in this Notice into their written standards, which CoCs are required to develop per 24 CFR 578.7(a)(9), for their CoC Program-funded PSH. Recipients of CoC Program funds are required to follow the written standards for prioritizing assistance established by the CoC (see 24 CFR 578.23(c)(10)); therefore, if the CoC adopts these recommended orders of priority for their PSH, all recipients of CoC Program-funded PSH will be required to follow them as required by their grant agreement. CoCs that adopted the orders of priority established in Notice CPD-14-012, which this Notice supersedes, and who received points for having done so in the most recent CoC Program Competition are strongly encouraged to update their written standards to reflect the updates to the orders of priority as established in this Notice. Lastly, where a CoC has chosen to not adopt HUD's recommended orders of priority into their written standards, recipients of CoC Program-funded PSH are encouraged to follow these standards for selecting participants into their programs as long as it is not inconsistent with the CoC's written standards.

D. Key Terms

1. **Housing First.** A model of housing assistance that prioritizes rapid placement and stabilization in permanent housing that does not have service participation requirements or preconditions for entry (such as sobriety or a minimum income threshold). HUD encourages all recipients of CoC Program-funded PSH to follow a Housing First approach to the maximum extent practicable.

2. **Chronically Homeless.** The definition of "chronically homeless", as stated in Definition of Chronically Homeless final rule is:

   (a) A "homeless individual with a disability," as defined in section 401(9) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11360(9)), who:

   i. lives in a place not meant for human habitation, a safe haven, or in an emergency shelter; and

   ii. Has been homeless and living as described in paragraph (a)(i) continuously for at least 12 months or on at least four separate occasions in the last 3 years, as long as the combined occasions equal at least 12 months and each break in homelessness separating the occasions included at least 7 consecutive nights of not living as described in paragraph (a)(i). Stays in institutional care facilities for fewer than 90 days will not constitute as a break in homelessness, but rather such stays are included in the 12-month total, as long as the individual was living or residing in a place not meant for human habitation, a safe haven, or an emergency shelter immediately before entering an institutional care facility;

   (b) 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 (a) of this definition, before entering the facility;

   (c) 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 (a) or (b) of this definition (as described in Section I.D.2.(a) of this Notice), including a family whose composition has fluctuated while the head of household has been homeless.

3. **Severity of Service Needs.** This Notice refers to persons who have been identified as having the most severe service needs.

   (a) For the purposes of this Notice, this means an individual for whom at least one of the following is true:

   i. History of high utilization of crisis services, which include but are not limited to, emergency rooms, jails, and psychiatric facilities; and/or

ii. Significant health or behavioral health challenges, substance use disorders, or functional impairments which require a significant level of support in order to maintain permanent housing.

iii. For youth and victims of domestic violence, high risk of continued trauma or high risk of harm or exposure to very dangerous living situations.

iv. When applicable CoCs and recipients of CoC Program-funded PSH may use an alternate criteria used by Medicaid departments to identify high-need, high cost beneficiaries.

(b) Severe service needs as defined in paragraphs i.-iv. above should be identified and verified through data-driven methods such as an administrative data match or through the use of a standardized assessment tool and process and should be documented in a program participant's case file. The determination must not be based on a specific diagnosis or disability type, but only on the severity of needs of the individual. The determination cannot be made based on any factors that would result in a violation of any nondiscrimination and equal opportunity requirements, see 24 C.F.R. § 5.105(a).

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

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

Dedicated PSH beds are those which are required through the project's grant agreement to only be used to house persons experiencing chronic homelessness unless there are no persons within the CoC that meet that criteria. If there are no persons within the CoC's geographic area that meet the definition of chronically homeless at a point in which a dedicated PSH bed is vacant, the recipient may then follow the order of priority for non-dedicated PSH established in this Notice, if it has been adopted into the CoC's 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 CoC's geographic area at that time. These PSH beds are also reported as "CH Beds" on a CoC's Housing Inventory Count (HIC).

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. During the CoC Program competition project applicants for CoC Program-funded PSH indicate the number of non-dedicated beds that will be prioritized for use by persons experiencing chronic homelessness during the operating year of that grant, when awarded. These projects are then required to prioritize chronically homeless persons in their non-dedicated CoC Program-funded PSH beds for the applicable operating year as the project application is incorporated into the

grant agreement. All recipients of non-dedicated CoC Program-funded PSH are encouraged to change the designation of their PSH to dedicated, however, at a minimum are encouraged to prioritize the chronically homeless as beds become vacant to the maximum extent practicable, until there are no persons within the CoC's geographic area who meet that criteria. Projects located in CoCs where a sub-CoC approach to housing and service delivery has been implemented, which may also be reflected in a sub-CoC coordinated entry process, need only to prioritize assistance within their specified area. For example, if a Balance of State CoC has chosen to divide the CoC into six distinct regions for purposes of planning and housing and service delivery, each region would only be expected to prioritize assistance within its specified geographic area.[1]

The number of non-dedicated beds designated as being prioritized for the chronically homeless may be increased at any time during the operating year and may occur without an amendment to the grant agreement.

III. Order of Priority in CoC Program-funded Permanent Supportive Housing

The definition of chronically homeless included in the final rule on "Defining Chronically Homeless", which was published on December 4, 2015 and went into effect on January 15, 2016, requires an individual or head of household to have a disability and to have been living in a place not meant for human habitation, in an emergency shelter, or in a safe haven for at least 12 months either continuously or cumulatively over a period of at least 4 occasions in the last 3 years. HUD encourages all CoCs adopt into their written standards the following orders of priority for all CoC Program-funded PSH. CoCs that adopted the orders of priority established in Notice CPD-14-012, which this Notice supersedes, and who received points for having done so in the most recent CoC Program Competition are strongly encouraged to update their written standards to reflect the updates to the orders of priority as established in this Notice. Where a CoC has chosen to not incorporate HUD's recommended orders of priority into their written standards, recipients of CoC Program-funded PSH are encouraged to follow these standards for selecting participants into their programs as long as it is not inconsistent with the CoC's written standards.

As a reminder, recipients of CoC Program-funded PSH are required to prioritize otherwise eligible households in a nondiscriminatory manner. Program implementation, including any prioritization policies, must be implemented consistent with the nondiscrimination provisions of the 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 Title II or III of the Americans with Disabilities Act, as applicable. For example, while it is acceptable to prioritize based on level of need for the type of assistance being offered, prioritizing based on specific disabilities would not be consistent with fair housing requirements or program regulations.

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[1] For the State of Louisiana grant originally awarded pursuant to ''Department of Housing and Urban Development—Permanent Supportive Housing'' in chapter 6 of title III of the Supplemental Appropriations Act, 2008 (Public Law 110–252; 122 Stat. 2351), projects located within the geographic area of a CoC that is not the CoC through which the State is awarded the grant may prioritize assistance within that geographic area instead of within the geographic area of the CoC through which the State is awarded the grant.

A. Prioritizing Chronically Homeless Persons in CoC Program-funded Permanent Supportive Housing Beds Dedicated or Prioritized for Occupancy by Persons Experiencing Chronic Homelessness

1. CoCs are strongly encouraged to revise their written standards to include an order of priority, determined by the CoC, for CoC Program-funded PSH that is dedicated or prioritized for persons experiencing chronic homelessness that is based on the length of time in which an individual or family has resided in a place not meant for human habitation, a safe haven, or an emergency shelter and the severity of the individual's or family's service needs. Recipients of CoC Program-funded PSH that is dedicated or prioritized for persons experiencing chronic homelessness would be required to follow that order of priority when selecting participants for housing, in a manner consistent with their current grant agreement.

2. Where there are no chronically homeless individuals and families within the CoC's geographic area, CoCs and recipients of CoC Program-funded PSH are encouraged to follow the order of priority in Section III.B. of this Notice. For projects located in CoC's where a sub-CoC approach to housing and service delivery has been implemented, which may also be reflected in a sub-CoC coordinated entry process, need only to prioritize assistance within their specified sub-CoC area. [2]

3. 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 should follow the order of priority under Section III.A.1. of this Notice to the extent in which persons with serious mental illness meet the criteria. In this example, if there were no persons with a serious mental illness that also met the criteria of chronically homeless within the CoC's geographic area, the recipient should follow the order of priority under Section III.B for persons with a serious mental illness.

4. Recipients must exercise due diligence when conducting outreach and assessment to ensure that chronically homeless individuals and families are prioritized for assistance based on their total length of time homeless and/or the severity of their needs. 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 of CoC Program-funded PSH are not required to allow units to remain vacant indefinitely while waiting for an identified chronically homeless person to accept an offer of PSH. CoC Program-funded PSH providers are encouraged to follow a Housing First approach to the maximum extent practicable. Therefore, a person experiencing chronic homelessness should not be forced to refuse an offer of PSH if they do not want to participate in the project's services, nor should a PSH

[2] For the State of Louisiana grant originally awarded pursuant to ''Department of Housing and Urban Development—Permanent Supportive Housing'' in chapter 6 of title III of the Supplemental Appropriations Act, 2008 (Public Law 110–252; 122 Stat. 2351), projects located within the geographic area of a CoC that is not the CoC through which the State is awarded the grant may prioritize assistance within that geographic area instead of within the geographic area of the CoC through which the State is awarded the grant.

project have eligibility criteria or preconditions to entry that systematically exclude those with severe service needs. Street outreach providers should continue to make attempts to engage those persons that have been resistant to accepting an offer of PSH and where the CoC has adopted these orders of priority into their written standards, these chronically homeless persons must continue to be prioritized for PSH until they are housed.

B. Prioritizing Chronically Homeless Persons in CoC Program-funded Permanent Supportive Housing Beds Not Dedicated or Not Prioritized for Occupancy by Persons Experiencing Chronic Homelessness

1. CoCs are strongly encouraged to revise their written standards to include the following order of priority for non-dedicated and non-prioritized PSH beds. If adopted into the CoCs written standards, recipients of CoC Program-funded PSH that is not dedicated or prioritized for the chronically homeless would be required to follow this order of priority when selecting participants for housing, in a manner consistent with their current grant agreement.

(a) First Priority–Homeless Individuals and Families with a Disability with Long Periods of Episodic Homelessness and Severe Service Needs

An individual or family that is eligible for CoC Program-funded PSH who has experienced fewer than four occasions where they have been living or residing in a place not meant for human habitation, a safe haven, or in an emergency shelter but where the cumulative time homeless is at least 12 months **and** has been identified as having severe service needs.

(b) Second Priority–Homeless Individuals and Families with a Disability with Severe Service Needs.

An individual or family that is eligible for CoC Program-funded PSH who is residing in a place not meant for human habitation, a safe haven, or in an emergency shelter and has been identified as having severe service needs. The length of time in which households have been homeless should also be considered when prioritizing households that meet this order of priority, but there is not a minimum length of time required.

(c) Third Priority—Homeless Individuals and Families with a Disability Coming from Places Not Meant for Human Habitation, Safe Haven, or Emergency Shelter Without Severe Service Needs.

An individual or family that is eligible for CoC Program-funded PSH who is residing in a place not meant for human habitation, a safe haven, or an emergency shelter where the individual or family has not been identified as having severe service needs. The length of time in which households have been homeless should be considered when prioritizing households that meet this order of priority, but there is not a minimum length of time required.

(d) Fourth Priority–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 currently residing in a transitional housing project, where prior to residing in the transitional housing had lived in a place not meant for human habitation, in an emergency shelter, or safe haven. This priority also includes individuals and families residing in transitional housing who were fleeing or attempting to flee domestic violence, dating violence, sexual assault, or stalking and prior to residing in that transitional housing project even if they did not live in a place not meant for human habitation, an emergency shelter, or a safe haven prior to entry in the transitional housing.

2. Recipients of CoC Program-funded PSH should follow the order of priority above, as adopted by the CoC, while also considering the goals and any identified target populations served by the project. For example, non-dedicated or non-prioritized CoC Program-funded PSH that is permitted to target youth experiencing homelessness should follow the order of priority under Section III.B.1. of this Notice, as adopted by the CoC, to the extent in which youth meet the stated criteria.

3. Recipients must exercise due diligence when conducting outreach and assessment to ensure that persons are prioritized for assistance based on their length of time homeless and the severity of their needs following the order of priority described in this Notice, 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 indefinitely while waiting for an identified eligible individual or family to accept an offer of PSH (see FAQ 1895). Recipients of CoC Program-funded PSH are encouraged to follow a Housing First approach to the maximum extent practicable. Street outreach providers should continue to make attempts to engage those persons that have been resistant to accepting an offer of PSH and where the CoC has adopted these orders of priority into their written standards, these individuals and families must continue to be prioritized until they are housed.

IV. Using Coordinated Entry and a Standardized Assessment Process to Determine Eligibility and Establish a Prioritized Waiting List

A. Coordinated Entry Requirement

Provisions at 24 CFR 578.7(a)(8) requires that each CoC, in consultation with recipients of Emergency Solutions Grants (ESG) program funds within the CoC's geographic area, establish and operate either a centralized or coordinated assessment system (referred to in this Notice as coordinated entry or coordinated entry process) that provides an initial, comprehensive assessment of the needs of individuals and families for housing and services. CoCs that adopt the order of priority in Section III of this Notice into the CoC's written standards are strongly encouraged to use a coordinated entry process to ensure that there is a single prioritized list for all CoC Program-funded PSH within the CoC. The Coordinated Entry Policy Brief, provides recommended criteria for a quality coordinated entry process and standardized assessment tool and process. Under no circumstances shall the order of priority be based upon diagnosis or disability type,

but instead on the length of time an individual or family has been experiencing homelessness and the severity of needs of an individual or family.

B. Written Standards for Creation of a Single Prioritized List for PSH

CoCs are also encouraged to include in their policies and procedures governing their coordinated entry system a requirement that all CoC Program-funded PSH accept referrals only through a single prioritized list that is created through the CoCs coordinated entry process, which should also be informed by the CoCs street outreach. Adopting this into the CoC's policies and procedures for coordinated entry would further ensure that CoC Program-funded PSH is being used most effectively, which is one of the goals in this Notice. The single prioritized list should be updated frequently to reflect the most up-to-date and real-time data as possible.

C. Standardized Assessment Tool Requirement

CoCs must utilize a standardized assessment tool, in accordance with 24 CFR 578.3, or process. The Coordinated Entry Policy Brief, provides recommended criteria for a quality coordinated entry process and standardized assessment tool.

D. 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. See 24 C.F.R. § 5.105(a).

V. Recordkeeping Recommendations for CoCs that have Adopted the Orders of Priority in this Notice

24 CFR 578.103(a)(4) outlines documentation requirements for all recipients of dedicated and non-dedicated CoC Program-funded PSH associated with determining whether or not an individual or family is chronically homeless for the purposes of eligibility. In addition to those requirements, HUD expects that where CoCs have adopted the orders of priority in Section III. of this Notice into their written standards. The CoC, as well as recipients of CoC Program-funded PSH, will maintain evidence of implementing these priorities. Evidence of following these orders of priority may be demonstrated by:

A. Evidence of Severe Service Needs. Evidence of severe service needs is that by which the recipient is able to determine the severity of needs as defined in Section I.D.3. of this Notice using data-driven methods such as an administrative data match or through the use of a standardized assessment. The documentation should include any information pertinent to how the determination was made, such as notes associated with case-conferencing decisions.

B. 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.

C. Evidence that there are no Households Meeting Higher Order of Priority within CoC's Geographic Area.

(a) When dedicated and prioritized PSH is used to serve non-chronically homeless households, the recipient of CoC Program-funded PSH should document how it was determined that there were no chronically homeless households identified for assistance within the CoC's geographic area – or for those CoCs that implement a sub-CoC [3]planning and housing and service delivery approach, the smaller defined geographic area within the CoC's geographic area – at the point in which a vacancy became available. This documentation should include evidence of the outreach efforts that had been undertaken to locate eligible chronically homeless households within the defined geographic area and, where chronically homeless households have been identified but have not yet accepted assistance, the documentation should specify the number of persons that are chronically homeless that meet this condition and the attempts that have been made to engage the individual or family. Where a CoC is using a single prioritized list, the recipient of PSH may refer to that list as evidence.

(b) When non-dedicated and non-prioritized PSH is used to serve an eligible individual or family that meets a lower order of priority, the recipient of CoC Program-funded PSH should document how the determination was made that there were no eligible individuals or families within the CoC's geographic area - or for those CoCs that implement a sub-CoC planning and housing and service delivery approach, the smaller defined geographic area within the CoC's geographic area - that met a higher priority. Where a CoC is using a single prioritized list, the recipient of PSH may refer to that list as evidence that there were no households identified within the CoC's geographic area that meet a higher order of priority.

VI. Questions Regarding this Notice

Questions regarding this notice should be submitted to HUD Exchange Ask A Question (AAQ) Portal at: https://www.hudexchange.info/get-assistance/my-question/.

[3] For the State of Louisiana grant originally awarded pursuant to ''Department of Housing and Urban Development—Permanent Supportive Housing'' in chapter 6 of title III of the Supplemental Appropriations Act, 2008 (Public Law 110–252; 122 Stat. 2351), projects located within the geographic area of a CoC that is not the CoC through which the State is awarded the grant may prioritize assistance within that geographic area instead of within the geographic area of the CoC through which the State is awarded the grant.

APPENDIX B

Department of Housing and Community Development, Emergency Solutions Grants Program, State Regulations, California Code of Regulations Title 25,Division 1, Chapter 7, Subchapter 20, § 8409. Core Practices

Authority cited: Section 50406(n), Health and Safety Code. Reference: 24 C.F.R. 92.320 and 24 C.F.R. Part 576.

§ 8409. Core Practices

(a) Unless exempted by federal rules, all ESG-funded activities shall utilize a Coordinated Entry system established by and consistent with the protocols of the Continuum of Care for the Service Area in which that program operates. Participation in Coordinated Entry shall occur in a manner that promotes the following, as reflected in the Continuum of Care Written Standards:

(1) Comprehensive and coordinated access to assistance regardless of where an individual or family is located in the Continuum of Care Service Area. Local systems should be easy to navigate and have protocols in place to ensure immediate access to assistance for people who are homeless or most at-risk;

(2) Prioritized access to assistance for people with the most urgent and severe needs, including, but not limited to, survivors of domestic violence. ESG-funded activities shall seek to prioritize people who:

(A) Are unsheltered and living in places not designed for human habitation, such as cars, parks, bus stations, and abandoned buildings;

(B) Have experienced the longest amount of time homeless;

(C) Have multiple and severe service needs that inhibit their ability to quickly identify and secure housing on their own; and

(D) For Homelessness prevention activities, people who are at greatest risk of becoming literally homeless without an intervention and are at greatest risk of experiencing a longer time in shelter or on the street should they become homeless.

(b) All ESG-assisted projects shall operate in a manner consistent with housing first practices as reflected in the Continuum of Care Written Standards, (consistent with subsections (1) through (5) below), and progressive engagement and assistance practices, including the following:

(1) Ensuring low-barrier, easily accessible assistance to all people, including, but not limited to, people with no income or income history, and people with active substance abuse or mental health issues;

(2) Helping participants quickly identify and resolve barriers to obtaining and maintaining housing;

(3) Seeking to quickly resolve the housing crisis before focusing on other non-housing related services;
(4) Allowing participants to choose the services and housing that meets their needs, within practical and funding limitations;

(5) Connecting participants to appropriate support and services available in the community that foster long-term housing stability;

(6) Offering financial assistance and supportive services in a manner which offers a minimum amount of assistance initially, adding more assistance over time if needed to quickly resolve the housing crisis by either ending homelessness, or avoiding an immediate return to literal homelessness or the imminent risk of literal homelessness. The type, duration, and amount of assistance offered shall be based on an individual assessment of the household, and the availability of other resources or support systems to resolve their housing crisis and stabilize them in housing; and

(7) Notwithstanding subdivision (6) above:

(A) Rapid Rehousing activities funded within the same Continuum of Care Service Area shall follow the same program requirements for type, duration, and amount of assistance provided, unless sufficient written justification for any differences is provided by the Continuum of Care and approved by the Department; and

(B) Homeless prevention activities funded within the same Continuum of Care Service Area shall follow the same program requirements for type, duration, and amount of assistance provided, unless sufficient written justification for any differences is provided by the Continuum of Care and approved by the Department.

(8) Any other practices promoted or required by HUD.

Authority cited: Section 50406(n), Health and Safety Code. Reference: 24 C.F.R. Sections 576.400 and 576.401.

§ 8410. Match Requirements.

(a) Pursuant to 24 CFR 576.201, the Department will provide HUD with annual documentation of the sources and amounts of matching funds required of the Department as a recipient of ESG funds.

Appendix D: AP-90 (HOME Refinancing Guidelines)

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:

Refinancing with Rehabilitation Guidelines

Under certain circumstances, the HOME Investment Partnership Program allows the use of HOME funds for refinancing; however, HUD regulations at 24 CFR 92.206(b) require that “Refinancing Guidelines" be included in the local participating jurisdiction's Consolidated Plan. Subject to certain HUD requirements, the local participating jurisdiction designs its own "Refinancing Guidelines" and includes these guidelines in the Consolidated Plan for public input and HUD review/approval.

The HOME regulations at 24 CFR 92.206(b) allow HOME funds to pay the cost to refinance existing debt secured by housing that is being rehabilitated with HOME funds:

1. For single-family (1 to 4 unit) owner-occupied housing when lending HOME funds to rehabilitate the housing, if the refinancing is necessary to reduce the overall housing costs to the borrower and make the housing more affordable; and
2. For multi-family projects when lending HOME funds to rehabilitate the units, if refinancing is necessary to permit or continue affordability under 24 CFR 92252. The Participating Jurisdiction (PJ) must establish refinancing guidelines and state them in its Consolidated Plan.

It is the City's understanding, via oral confirmation from HUD Los Angeles Area Office staff, that HUD's intent in the above-stated 24 CFR 92.206 (b) reference to "the cost to refinance existing debt" is not simply to use HOME funds to pay for the lender's costs and fees associated with a refinancing, but also to pay for the refunding in replacing the existing debt with new debt. The following adopted "Refinancing Guidelines" describe the conditions under which the City of Long Beach will use HOME funds in any project proposing to refinance existing debt on a multifamily housing property.

1. May not be used for single-family housing. Although HUD HOME regulations allow HOME funds for refinancing in connection with "single family (one to four units) housing", the City of Long Beach Refinancing Guidelines stipulate that HOME funds to refinance may only be allowed in connection with multi-family housing projects; refinancing may not be allowed with single-family housing. HUD defines "single-family housing" as one to four units, including one owner-occupied unit.

2. HOME funds cannot be used to refinance multifamily loans made or insured by any federal program, including CDBG. This is a HOME regulations requirement at 24 CFR 92.206(b)(2)(vi).

3. HOME funds may not be used to refinance properties that previously received home funding unless the affordability period has expired. This is a HOME regulations requirement. 92 CFR 92.214(a)(7) states that HOME funds may not be used to provide

HOME assistance (beyond one year after project completion) to a project previously assisted with HOME funds during the period of affordability established in the original written agreement.

4. Use of HOME funds for refinancing will only be allowed in multi-family projects, which are proposed to be rehabilitated with HOME funds. This is a HOME regulations requirement. 24 CFR 92.206(b) states that HOME funds may be used to pay "the cost to refinance existing debt secured by housing that is being rehabilitated with HOME funds" (emphasis added).

5. The refinancing must be necessary to permit or continue affordability under HOME regulations at 24 CFR 92.252 ("Qualification As Affordable Housing: Rental Housing"). The purpose of the refinancing must be to maintain current affordability and/or create additional affordable units. This is a HOME regulations requirement at24 CFR 92.206(b)(2).

6. The new investment of HOME funds for refinancing can be made either to maintain current affordable units or to create additional affordable units. Levels of affordability will be, at a minimum, those required by the HOME Program regulations. This guideline is a HOME regulations requirement at 24 CFR 92.206(b)(2)(iii). The Guidelines must "state whether the new investment is being made to maintain current affordable units, create additional affordable units, or both."

7. For those projects which currently have affordable (non-HOME-funded) deed restricted units and which may seek to use HOME Program "Refinancing With Rehabilitation," the requirement to "maintain current affordable units or create additional affordable units" may also be met by increasing the project's current affordability level. For example, an increased affordability level may be achieved by:
   - lowering the existing rent restrictions;
   - increasing the number of affordable/restricted units;
   - extending the term of existing affordability restrictions; or
   - a combination thereof.

The level of additional affordability (if any) will be determined in the context of overall financial feasibility of each financing.

1. Regardless of the amount of HOME funds invested, the minimum affordability period shall be at least 15 years. This is a HOME regulations requirement at 24 CFR 92.206(b)(2) and 24 CFR 92.206(b)(2)(iv). The actual affordability period will be the subject of negotiation on each project.

2. The investment of HOME funds for refinancing will be allowed jurisdiction-wide. Eligible properties must be located in the City of Long Beach. This is a HOME regulations requirement at 24 CFR 92.206(b)(2)(v), which requires the guidelines to specify whether the investment of HOME funds, for refinancing, will be jurisdiction wide or limited to a specific geographic area, such as a neighborhood identified in a neighborhood revitalization strategy.

3. Whenever HOME funds are used for refinancing, the City of Long Beach staff will require a review of management practices to determine that:

- "Disinvestment" in the property has not occurred. HUD regulations do not define "disinvestment." Within these Guidelines, the term "disinvestment" shall mean an intentional and avoidable reduction in capital investment, which results in a failure to either construct, maintain or replace capital assets [i.e., buildings, equipment, furnishings, fixtures, property infrastructure, etc] in accordance with the HUD minimum property standards enumerated at 24 CFR 92.251, and as determined by the City of Long Beach staff;
- The long-term needs of the project can be met; and
- The feasibility of serving the targeted population over an extended affordability period can be demonstrated.

This is a HOME regulations requirement at 24 CFR 92.206(b)(2)(ii). The City of Long Beach staff will either conduct this review of management practices, or select a consultant (costs to be borne by the owner) to conduct such a review.

4. In any project using HOME funds for "Refinancing With Rehabilitation" the owner(s) would not be allowed to take cash out of the refinancing. However, a reasonable developer fee (which shall be subject to negotiation) for a project would be considered a project expense and would not be considered to be taking cash out of the refinancing. HOME regulations do not allow owners to withdraw cash from the refinancing; 24 CFR 92.205(d) states that only the actual HOME eligible development costs (i.e. costs eligible under 92.206(a), (b), or (c)) of the assisted units may be charged to the HOME program. Neither Sections 92.206(a) or (b) or (c) authorize the retention of refinanced HOME funds by the owner.

5. The minimum amount of HOME funds that can be invested in a project is $1,000 times the number of HOME-assisted units in the project. This is a HOME regulations requirement.

6. Projects seeking to use HOME funds for "Refinancing With Rehabilitation" _must be in compliance with all regulations for the HOME Investment Partnership Program at 24 CFR 92.

7. There will be a minimum "required ratio" between rehabilitation and refinancing as follows: within a proposed project up to 85% of the project's HOME funds may be used for refinancing and at least 15% of the project's HOME funds must be used for rehabilitation. The HOME regulations require, at 24 CFR 92.206(b)(2)(i), that whenever HOME funds are used for refinancing, the rehabilitation must be the "primary eligible activity" and that this "primary eligible activity" requirement is met either by establishing a minimum level of rehabilitation per unit or by establishing a "required ratio" _between rehabilitation and refinancing. HUD HOME regulations do not specify the amount of this "required ratio" and allow the participating jurisdiction to propose the "required ratio." Staff will determine the ratio based on the amount of HOME funds invested, leverage of HOME funds, and financial feasibility.

8. Under these Guidelines, the property proposing to use HOME for refinancing may only be owned by non-profit owners or by public entities including the Long Beach Housing Development Company. However, there is a prohibition on ownership interests, which are contrary to the HUD conflict of interest prohibitions at 24 CFR 92.356 [HOME "Conflict of Interest"], or 24 CFR 8536 ["Procurement"], or 24 CFR 8442 ["Codes of Conduct"].

9. HUD HOME regulations do not limit property ownership in connection with refinancing. However, under these Guidelines, in order to encourage housing activity by nonprofits, the City of Long Beach has decided to exclude for-profit owners from using HOME funds for "Refinancing With Rehabilitation" and give priority to non-profits which are designated as Community Housing Development Organizations (CHDOs).

10. Loan Terms: These "Refinancing With Rehabilitation Guidelines" are intended to be used in conjunction with other existing HOME-funded programs previously approved by the City of Long Beach ("other City of Long Beach existing HOME programs"). City of Long Beach staff will superimpose these Guidelines onto the "other City of Long Beach existing HOME programs." To the extent that these Guidelines may be inconsistent with the requirements of the "other City of Long Beach existing HOME programs," the more restrictive requirements will apply.

11. These "Refinancing with Rehabilitation Guidelines" are minimum guidelines for conformance with HUD minimum requirements, and they may be subject to further additional restrictions or limitations (including but not limited to funding availability) as determined by the City of Long Beach. These Guidelines serve to obtain HUD's approval of a general framework and create a potential alternative for the City of Long Beach. However, approval of these Guidelines does not create an obligation or requirement that the City of Long Beach will make loans utilizing Refinancing With Rehabilitation. The City of Long Beach is authorized to modify (after notification to HUD) these "Refinancing With Rehabilitation Guidelines" to the extent that any provisions in these "Refinancing With Rehabilitation Guidelines" may be inconsistent with the City of Long Beach current (or future) adopted policies.

Appendix E: Certifications

Appendix F: Standard Forms (SF 424)