



2019/20
Annual Action Plan
for the
U.S. Department of Housing and
Urban Development
Grant Programs

CDBG | HOME | ESG

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Executive Summary

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

1. Introduction

The City Chula Vista 2015-2019 Consolidated Plan outlines the community's strategies for meeting its identified housing and community development needs, developed through a citizen participation process as detailed in the 2015-2019 Citizen Participation Plan (Exhibit "E"). The five-year Consolidated Plan includes a needs assessment, market analysis, and identification of priority needs and long-term strategies. An Annual Action Plan implements the strategies and provides a basis for allocating Community Development Block Grant (CDBG), Home Investment Partnerships Act (HOME), and Emergency Solutions Grant (ESG) resources. This document represents the City of Chula Vista's program year 2019-20 CDBG Action Plan. It identifies the goals and programming of funds for activities to be undertaken in the first year of the five-year Consolidated Plan.

2. Summarize the objectives and outcomes identified in the Plan

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

During the formulation of the Consolidated Plan, the City of Chula Vista conducted a needs assessment and market analysis to inform the process on the community's needs. Community input obtained through public hearings, public meetings and consultation with local stakeholders helped establish Chula Vista's priority needs and develop long-term goals and strategies. Through the process, an overall focus for CDBG activities will be assistance to the most vulnerable population, households with incomes below 50% of median income and persons with disabilities.

3. Evaluation of past performance

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

Each program year of the Consolidated Plan period, the City must submit to HUD, a Consolidated Annual Performance and Review Report (CAPER) with detailed information on progress towards the priorities, goals and objectives outlined in the Consolidated Plan. HUD conducts an annual program assessment and provides feedback on the City's use of CDBG, HOME and ESG funds.

For the past program years, HUD has determined that the overall performance of the City's CDBG program was satisfactory. HUD stated, "the City has addressed the strategic program goals and

objectives which give context and meaning to annual and cumulative accomplishments. All major program requirements are in compliance with regulatory requirements. “

The City has consistently complied with the CDBG regulation regarding timeliness. 24 CFR 570.902 (a) states, a grantee may not have more than 1.5 times the entitlement grant amount for the current year remaining undisbursed from the U.S. Treasury 60 days prior to the end of the grantee’s current program year.

4. Summary of Citizen Participation Process and consultation process

Summary from citizen participation section of plan.

During the consolidated planning process, the City implemented a process for obtaining input from citizens through public hearings, public meetings, and an on-line survey to identify the needs and long-term goals and strategies for use of the federal funds. In drafting the 2019/20 Annual Action Plan, contact was made with representatives of local social service agencies which serve LMI clients to see what types of activities they considered a priority for the community they served. In addition, an advertisement was placed in the local newspaper of general circulation which solicited proposals for 2019/20 CDBG, HOME and ESG projects. Once activities were selected for programming, another advertisement was published to announce the public hearing date and solicited comments during the 30-day public comment period on the proposed projects to be funded. A public hearing was held before the Chula Vista City Council at its regularly televised meeting in April 2019.

5. Summary of public comments

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

The City did not receive any comments during the two City Council Public Hearings or during the 30-day public review comment period. In the event that comments would have been received, they would have been incorporated into the Plan.

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

Not applicable as no comments or view were rejected.

7. Summary

As discussed above, the City maximizes on the amount of public input in can receive. This can be in the form of social media, public hearings, public notices and community meetings/events.

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

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

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

Agency Role		Name	Department/Agency
CDBG Administrator			Development Services Department - Housing Division
HOME Administrator			Development Services Department - Housing Division
ESG Administrator			Development Services Department - Housing Division

Table 1 – Responsible Agencies

Narrative (optional)

Under the direction of the Development Services Department Director, the grant administrators oversee the three federal grant entitlement programs (CDBG, HOME and ESG). Oversight and management include preparation of the required planning documents, regulatory compliance, contract oversight of the partnering agencies, environmental reviews and fiscal management.

Consolidated Plan Public Contact Information

Information on the Consolidated Plan and Annual Action may be obtained through contacting either of the federal grant administrators.

Angelica Davis, Senior Management Analyst: (619) 691-5036; adavis@chulavistaca.gov and/or Jose Dorado, Senior Management Analyst: (619) 476-5375; jdorado@chulavistaca.gov.

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

1. Introduction

In the process of developing the 2015-2019 Consolidated Plan and Annual Action Plan, the City consulted with community members and representatives from a number of local organizations providing housing and services to low and moderate income households. In addition to public meetings, a survey containing the City's funding goals and objectives was distributed. Many of the social service providers noted a continued need for funding sources for additional social services and public service programs; however, no more than 15% of a CDBG award may be used for funding public services.

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))

Throughout the year, Chula Vista staff meets with other representatives of various non-profit, public, and private agencies that serve the needs of the homeless, persons at risk of homelessness, persons with mental health conditions, the disabled, and other low- to moderate-income persons.

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 Regional Continuum of Care Council (RCCC) is a community-based association focused on ending homelessness in San Diego and charged with overseeing millions of dollars in federal funding under the Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act through the U.S. Department of Housing and Urban Development's (HUD) Continuum of Care (CoC) program.

This coordinating body consists of representatives from the 18 cities within San Diego County, nonprofit service providers and other interested parties who seek to identify gaps in homeless services, establish funding priorities and pursue an overall systemic approach to addressing homelessness. The mission of the RCCC is three-fold: End homelessness for all individuals and families throughout the region; address the underlying causes of homelessness; and lessen the negative impact of homelessness on individuals, families and communities.

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

The RCCC has been working together with stakeholders on strategic planning and coordination of resources to overcome homelessness in our region for over 15 years. In 2013, the RCCC began a transformation to formalize the structures needed for the regional CoC, including seating an inaugural Governance Board to make funding and policy decisions and establish regional best practices. The board is made up of members, including SDWP CEO Peter Callstrom, who show a vested interest in helping to relieve homelessness in San Diego. Its first order of business was to create a transparent local scoring process to allocate over 18 million dollars in program funding.

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

Table 2 – Agencies, groups, organizations who participated

1	Agency/Group/Organization	SOUTH BAY COMMUNITY SERVICES
	Agency/Group/Organization Type	Services - Housing Services-Children Services-Victims of Domestic Violence Neighborhood Organization
	What section of the Plan was addressed by Consultation?	Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Unaccompanied youth
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The City partners with this organization to provide services to the most vulnerable of our community. The City consulted with the organization by distributing a survey containing the proposed Housing and Community Development funding priorities. In addition, the City receives quarterly updates on the services provided by the organization to meet the needs with the resources available.
2	Agency/Group/Organization	FAMILY HEALTH CENTERS OF SAN DIEGO
	Agency/Group/Organization Type	Services-Children Services-Education Neighborhood Organization
	What section of the Plan was addressed by Consultation?	Homeless Needs - Families with children
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The City partners with this organization to provide services to the most vulnerable of our community. The City consulted with the organization by distributing a survey containing the proposed Housing and Community Development funding priorities. In addition, the City receives quarterly updates on the services provided by the organization to meet the needs with the resources available.

3	Agency/Group/Organization	Meals on Wheels of Greater San Diego
	Agency/Group/Organization Type	Services-Elderly Persons Neighborhood Organization
	What section of the Plan was addressed by Consultation?	Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The City partners with this organization to provide services to the most vulnerable of our community. The City consulted with the organization by distributing a survey containing the proposed Housing and Community Development funding priorities. In addition, the City receives quarterly updates on the services provided by the organization to meet the needs with the resources available.
4	Agency/Group/Organization	CHULA VISTA
	Agency/Group/Organization Type	Services-Elderly Persons Services-Persons with Disabilities
	What section of the Plan was addressed by Consultation?	Homeless Needs - Chronically homeless Homeless Needs - Families with children Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The Chula Vista Recreation Department provides services to the most vulnerable of our community. Housing staff consulted with the organization by distributing a survey containing the proposed Housing and Community Development funding priorities. In addition, the City receives quarterly updates on the services provided by the organization to meet the needs with the resources available.

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

Not applicable. No major agencies involved in housing or community development were intentionally excluded from consultation.

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	The Regional Continuum of Care Council	* Increase progress towards ending chronic homelessness-Increase housing stability * Increase project participants income-* Increase number of participants receiving main stream benefits-Rapid rehousing* Coordination with ESG Entitlement Jurisdictions * Coordinated Assessment efforts

Table 3 – Other local / regional / federal planning efforts

Narrative (optional)

AP-12 Participation – 91.105, 91.200(c)

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

The City acknowledges the value of public participation in the management of the federal grant funds it receives. For this reason, the City utilizes all available methods to reach as many residents, community members, stakeholders and partners. This includes utilizing social media outlets, local newspapers, televised City Council Public Hearings/Meetings. This ensures that each year, the City is allocating funds to activities meeting the needs of the community.

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Public Hearing	Non-targeted/broad community	Public Hearing held to present the 2017/18 Consolidated Annual Performance Evaluation Report and to solicit public input on the 2018/2019 program year needs.	No comments received.	Not applicable.	
2	Newspaper Ad	Non-targeted/broad community	No response received.	No comments received.	Not applicable.	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
3	Public Hearing	Non-targeted/broad community	Public Hearing held to present the proposed 2018/2019 Action Plan Spending Plan.	No comments received.	Not applicable.	
4	Newspaper Ad	Non-targeted/broad community	No response received.	No comments received.	Not applicable.	

Table 4 – Citizen Participation Outreach

Expected Resources

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

Introduction

The City is anticipating receiving a total of \$3,416,521 in combined funds from the Community Development Block Grant, the Home Investment Partnerships Act Grant and the Emergency Solutions Grant. Additionally, prior year resources from CDBG and HOME will be utilized.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	2,289,117	0	168,362	2,457,479	0	Funding includes prior year unencumbered CDBG funds.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	850,160	0	1,514,100	2,364,260	0	Funding includes prior year unencumbered funds.
ESG	public - federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing	194,238	0	0	194,238	0	

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

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

In 2013, the U.S. Department of Housing and Urban Development updated the HOME Investment Partnerships Program (HOME) regulations. This may severely impact the ability to complete certain types of affordable housing development projects within the City of Chula Vista. The new funding regulations state that before the City can commit its HOME funds, the project Sponsor or Developer must obtain funding commitments from all of the other funding sources before the City is allow to count those funding commitments in meet HUD's timeliness deadline.

The City of Chula Vista will continue to work with Sponsors and Developers to ensure that the City's ability to provide funding to support the development of affordable rental housing is not impacted by this new rule. The new rule does not affect the City's ability to fund smaller projects that do not rely on substantial private and State funding sources such as Low Income Housing Tax Credits and Tax Exempt Bond financing projects. The new rule also does not impact the City's ability to fund a Tenant Based Rental Assistance Program.

The City of Chula Vista has successfully leveraged funds from federal, state, local and private resources to complete several Capital Improvement Projects (CIP) and affordable housing developments in the City's low income communities. The most recent CIP project with leveraged funds is the Palomar and Orange infrastructure project. The most recently completed affordable housing development project which included leveraged funds was Duetta and Volta. This development also used a 4% LIHTC along with private financing to construct the family and senior units.

Discussion

Reference above section for discussion.

Annual Goals and Objectives

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	Provide Community and Supportive Services	2015	2016	Homeless Non-Homeless Special Needs Non-Housing Community Development	City Wide (Low/Mod Census Tracts)	Community Development Priorities	CDBG: \$704,785 ESG: \$0	Public service activities other than Low/Moderate Income Housing Benefit: 1945 Persons Assisted Other: 1 Other
2	Provide Community Facilities and Infrastructure	2015	2016	Non-Housing Community Development	City Wide (Low/Mod Census Tracts)	Community Development Priorities	CDBG: \$1,401,500 HOME: \$0 ESG: \$0	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 4900 Persons Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
3	Provide decent, affordable housing.	2015	2016	Affordable Housing	City Wide (Low/Mod Census Tracts)	Housing Priority	CDBG: \$351,194 HOME: \$2,436,736 ESG: \$194,238	Rental units constructed: 10 Household Housing Unit Homeowner Housing Rehabilitated: 10 Household Housing Unit Direct Financial Assistance to Homebuyers: 0 Households Assisted Tenant-based rental assistance / Rapid Rehousing: 15 Households Assisted Homeless Person Overnight Shelter: 15 Persons Assisted Overnight/Emergency Shelter/Transitional Housing Beds added: 120 Beds Other: 1 Other

Table 6 – Goals Summary

Goal Descriptions

1	Goal Name	Provide Community and Supportive Services
	Goal Description	<i>Provide essential services to the most vulnerable of the population including the elderly, disabled, youth, victims of domestic violence, homeless and low income.</i>

2	Goal Name	Provide Community Facilities and Infrastructure
	Goal Description	Under this goal, the City plans to address the need for infrastructure improvements in the northwest area of the City. There are a number of streets that lack in the basic infrastructure such as streets, sidewalks and ADA curb cuts. In addition, there are a number of parks and public facilities which need improvements.
3	Goal Name	Provide decent, affordable housing.
	Goal Description	The City established the goal of providing decent, affordable housing to those most vulnerable of the community. The City has created housing opportunities through new construction projects and rental assistance programs to minimize the growing affordable housing need. In addition, rehabilitation loans/grants are available to those homeowners in need of health and safety repairs as well as energy efficiency improvements.

Projects

AP-35 Projects – 91.220(d)

Introduction

For FY 2019/20, the City will receive \$2,289,117 in CDBG entitlement funds. Additionally, \$168,362 of unencumbered prior year funds will be utilized during the program year. The City will also receive \$850,160 in HOME funds and \$194,238 in Emergency Solutions Grant funds. The City has categorized the proposed activities into five distinct categories. The HOME program requires that a minimum of 15 percent of the HOME entitlement be set aside for specific activities to be undertaken by a special type of nonprofit called a Community Housing Development Organization (CHDO). To meet the requirement, the City issued a Notice of Funding Availability for its 2019/20 CHDO funds for certified CHDOs in the region. Several qualified CHDOs have expressed interested in partnering with the City to develop new affordable rental units.

Projects

#	Project Name
1	CDBG Planning and Administration Activities
2	CDBG Public Services
3	CDBG Capital Improvement and Community Development
4	HOME Projects
5	ESG Projects

Table 7 - Project Information

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

The City has a detailed list of approved Capital Improvement Projects that demonstrate a general public need but, due to the loss of redevelopment, funding is scarce. Federal funds are used to serve the target community, meet the established goals for these funds, and to serve the greatest number of members of the community. The City will use its existing HOME Investment Partnership funds to provide First Time Homebuyer assistance, Acquisition and Rehabilitation of existing housing stock for affordable housing, preservation of affordable housing, and new construction of affordable housing.

For public services, the City utilizes CDBG funds. CDBG regulations, limit the amount the City can spend on public services and is capped at 15% of the City's annual entitlement . The City provides funding to non-profit organizations that demonstrate an ability to provide needed services that directly benefit the residents of the Chula Vista. The use of the City of Chula Vista CDBG funds for public services enables non-profit organization and City Departments to leverage these funds with other funding sources for projects and activities that serve the greatest number of residents with the limited amount of funding.

AP-38 Project Summary
Project Summary Information

1	Project Name	CDBG Planning and Administration Activities
	Target Area	City Wide (Low/Mod Census Tracts)
	Goals Supported	Provide decent, affordable housing. Provide Community and Supportive Services Provide Community Facilities and Infrastructure
	Needs Addressed	Housing Priority Community Development Priorities
	Funding	CDBG: \$457,827
	Description	Activities under this project include planning and administration activities as well as fair housing.
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	<ul style="list-style-type: none"> • <i>CDBG Administration and Planning</i> • <i>Fair Housing Services</i>
2	Project Name	CDBG Public Services
	Target Area	City Wide (Low/Mod Census Tracts)
	Goals Supported	Provide Community and Supportive Services
	Needs Addressed	Community Development Priorities
	Funding	CDBG: \$307,962
	Description	Activities funded this category include all public services offered to low/moderate income persons. This includes those with special needs, homeless, elderly, and youth.
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	An estimated 1,945 families will benefit from the proposed activities.
	Location Description	

	Planned Activities	<ul style="list-style-type: none"> • <i>Short-term Housing Voucher Program: \$50,000</i> • <i>Interfaith Shelter Network - Rotational Shelter Network: \$11,000</i> • <i>SBCS - Homeless Services: \$39,550</i> • <i>San Diego Food Bank - Food-4-Kids Backpack Program: \$15,000</i> • <i>Meals-on-Wheels - Senior Care Program: \$12,000</i> • <i>South Bay Food Program: \$10,000</i> • <i>Family Violence Treatment Program: \$39,312</i> • <i>Therapeutic Program: \$20,100</i> • <i>Family Resource Center Emergency and Basic Services: \$39,312</i> • <i>KidCare Express Mobile Medical Unit: \$27,000</i> • <i>Norman Park Senior Services: \$30,000</i> • <i>Community Through Hope: \$15,000</i>
3	Project Name	CDBG Capital Improvement and Community Development
	Target Area	City Wide (Low/Mod Census Tracts)
	Goals Supported	Provide Community Facilities and Infrastructure
	Needs Addressed	Community Development Priorities
	Funding	CDBG: \$1,401,500
	Description	Activities under this project will be capital improvement projects and other community development-related projects.
	Target Date	6/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	A total of 4,900 residents will benefit from the proposed capital improvement project.
	Location Description	The proposed project is located on Alpine Avenue (Naples to Emerson).
	Planned Activities	<ul style="list-style-type: none"> • <i>Section 108 Loan Payment: \$764,000</i> • <i>Alpine Avenue: \$637,500</i>
4	Project Name	HOME Projects
	Target Area	City Wide (Low/Mod Census Tracts)

	Goals Supported	Provide decent, affordable housing.
	Needs Addressed	Housing Priority
	Funding	HOME: \$1,431,814
	Description	
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	1110: HOME Administration and Planning: \$91,814 1114: Wakeland Anita Affordable Housing: \$1,040,000 Release of Notice of Funding Availability: \$300,000
5	Project Name	ESG Projects
	Target Area	City Wide (Low/Mod Census Tracts)
	Goals Supported	Provide Community and Supportive Services
	Needs Addressed	Housing Priority Community Development Priorities
	Funding	ESG: \$179,761
	Description	Activities under this project will be ESG-funded and directed towards homeless services such as transitional housing services, rapid re-housing, and HMIS.
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	<ul style="list-style-type: none"> 1106: ESG Administration and Planning: \$13,482 1107: Homeless Management Information Systems: \$8,988 1108: Casa Nueva Vida Transitional Shelter: \$63,777 1109: Rapid ReHousing: \$93,514

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 infrastructure and park improvement projects are located in low/moderate income census tracts in the northwest area of the city. Combined, the three census tracts where the improvements will be completed, consist of approximately 65% low/moderate income.

Geographic Distribution

Target Area	Percentage of Funds
City Wide (Low/Mod Census Tracts)	65

Table 8 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

The projects located in specific geographical areas consist of capital improvement projects. The rationale for priority given to these projects and the specific area is due to the high number of low/moderate income persons and the lack of basic infrastructure such as sidewalks.

Discussion

Investments in parks, capital improvement projects, and services serving special needs populations and low/moderate income persons can be made throughout the City so long as the activity meets a HUD National objective and there is demonstrated significant benefit to low and moderate income persons. The general basis used for prioritizing investments includes the total number of residents benefited, the urgent need of a given community within the City, environment issues that threaten life or property, the need for improved access, and other important needs of the community as a whole.

For public services, the City utilizes 15 percent of its Community Development Block Grant (CDBG) allocation to provide small grants to non-profit organizations that demonstrate an ability to provide needed services that directly benefit the low and moderate income residents of the City of Chula Vista. By directing public service funds as grants to these non-profits, the City is able to leverage its CDBG funds for projects and activities that serve the greatest number of residents with this limited amount of funding.

Housing assistance will be available to income-qualified households. Due to aging housing stock in Northwest and Southwest Chula Vista, priority will be given to those households who wish to participate in owner occupied residential rehabilitation programs to maintain safe housing and for revitalization of neighborhoods. New construction of affordable housing will likely occur in East Chula Vista with its available undeveloped land and to provide for a more diverse and varied housing stock in the area.

CDBG funds may also be used to address HUD's Decent Housing objective (servicing clients who earn less than 80% of the Area Median Income) by providing rehabilitation loans or grants to assist owner occupants of single family homes or mobile homes that are built prior to 1980 that are primarily in Western Chula Vista.

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

The loss of the Chula Vista Redevelopment Agency has significantly impaired the production of affordable housing in the City of Chula Vista. For FY 2019-2020, the City of Chula Vista's Successor Housing Agency (CV-SHA) plans to contribute funding available towards the Production of Affordable Housing. For rehabilitation of existing housing units, the City expects to fund ten residential rehabilitation loans to low-and moderate-income homeowners with CDBG funds. In addition, the city plans to acquire and rehabilitate one unit for the purpose of providing rental opportunities to very low income households. The City will also utilize prior year funds generated from Inclusionary Housing obligations to assist First-time homebuyers.

The tables below indicate the number and type of Households (Table 6) to be supported by affordable housing projects and/or programs (Table 7) implemented by the City during 2019/20.

One Year Goals for the Number of Households to be Supported	
Homeless	150
Non-Homeless	30
Special-Needs	0
Total	180

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

One Year Goals for the Number of Households Supported Through	
Rental Assistance	150
The Production of New Units	10
Rehab of Existing Units	20
Acquisition of Existing Units	0
Total	180

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

Discussion

The City's affordable housing goals for 2019/20 are:

- *The release a Notice of Funding Availability for use of HOME funds and Succesor Housing Agency Funds for the creation of new affordable rental units.*
- *Provide homeowner rehabilitation loans (Existing CDBG funds). For mobile-homes the forgivable loan may not exceed \$8,500 and for single family homes the assistance may not exceed \$24,999;*
- *Provide shelter for homeless clients (ESG & CDBG funds);*
- *Provide case management and rental assistance funds to homeless persons or at risk of becoming homeless;*
- *Assist at risk populations, including displaced households, with up to 12-months tenant based rental assistance.*

AP-60 Public Housing – 91.220(h)

Introduction

The City of Chula Vista does not operate a public housing agency. The Housing Authority of the County of San Diego (HACSD) serves as the City's public housing agency for the four Public Housing projects located in the City of Chula Vista. Please refer to the County of San Diego's 2015-2019 Consolidated Plan and 2019-2020 Annual Action Plan and 2019 Public Housing Plan that describes the planned actions during the next year to address the needs of public housing residents, to encourage participation, and to increase homeownership. Please visit www.sandiegocounty.gov/sdhcd for more information.

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

Refer to introduction above.

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

Refer to introduction above.

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

Not applicable, agency is not a PHA.

Discussion

Refer to section above.

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

Introduction

The City of Chula Vista participates in the regional approach to end chronic homelessness and homeless prevention efforts. This is accomplished through membership of the Regional Continuum of Care Council (CoC). This organization includes representation from the County of San Diego, the City of Chula Vista, the Chula Vista Elementary School District and various social service agencies. The CoC's continues to implement the Strategic Planning Objectives, which serve as the Homeless Strategic Plan for the region. A copy of the Strategic Planning Objectives can be found at the RCCCs website at <http://www.sandiegococ.org/>.

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

The City will utilize Emergency Solutions Grant funds in accordance with guidelines established by the RCCC Steering Committee:

- *Leverage existing resources to achieve the program's match and case management requirements (non-federal, private, donated, state/local contributions);*
- *Coordinate across regional entitlement jurisdictions by utilizing standardized eligibility and assessment tools;*
- *Support federal and local goals for priority populations, including but not limited to veterans, families and other special needs populations;*
- *Allow for variations in the program design that responds to the needs and resources of the jurisdiction;*
- *Comply with new eligibility and verification requirements (HMIS, housing status, habitability standards, homeless definitions, etc.); and*
- *Allow each program to take responsibility for arranging intake, assessment, case management, reporting, and meeting public notice requirements.*

Addressing the emergency shelter and transitional housing needs of homeless persons

The City will continue to assist homeless service providers proposing to construct transitional housing or homeless shelters in Chula Vista and find appropriate sites for development. Developers are encouraged to review the 2013-2020 Housing Element, which includes potential sites or zones for development or to schedule a consultation meeting with Planning and Housing staff.

The City will also continue to participate in sub-regional efforts to provide these facilities and may assist in the development of these types of projects using the following funding sources:

- *City's affordable housing in-lieu fund.*
- *Community Development Block Grant*
- *Home Investment Partnership Act funds (note these funds cannot be used to build emergency shelters)*
- *Low Moderate Income Housing fund*

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

Funding for on-going operational costs may include the following funding sources:

- *Emergency Solutions Grant (note: cannot be used for transitional housing)*
- *Community Development Block Grant (note: public service funds are limited)*
- *Supportive Housing Program*
- *State Funding*
- *Charitable foundations*
- *Fund raising*

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.

Other Objectives to address these needs includes funding Public Services up to the maximum cap of 15 percent of the annual CDBG entitlement as an available funding source:

The following inventory lists some of the homeless resources located in the South Bay area of the region.

- **Emergency Solutions Grant Program:** HUD-funded Emergency Solutions Grant Program provides funding for shelter outreach, emergency shelter, HMIS services, and Homeless

Prevention and Rapid Re-Housing.

- **South Bay Food Program:** This program provides meals to homeless families and low income individuals.
- **Interfaith Shelter Network:** Provide rotational winter night time shelter at nine congregations in the South Bay for approximately 18 weeks. Services include meals, overnight supervision, showers, and case management.
- **Regional Task Force on the Homeless – Regional Task Force on the Homeless:** The RTFH provides information and referral services to homeless service agencies, individuals and local government jurisdictions and publishes for the public homeless information reports that address homeless services, the homeless population profile and homeless funding. The RTFH also operates a HUD mandated Homeless Management Information System that allows service agencies to track homeless client information through a central database and conducts the homeless count needed to pursue HUD's Supportive Housing Program funding for the region.
- **South Bay Homeless Services:** The Homeless Services Program will build upon the housing and supportive services available for those individuals and families experiencing homelessness within the City. It will include assessment utilizing the VI-SPDAT, entry into the Coordinate Assessment and Housing Placement System, screening for SBCS (and partner) housing availability, and connection to resources and supportive services which may include: emergency food and clothing, benefits screening, healthcare enrollment, employment assistance and hotel/motel vouchers.
- **Short-term Voucher Program:** As the number of homeless in the region increase, the number of shelters continue to have limited space and are often at capacity. This program offers a temporary solution to this problem by providing hotel/motel vouchers to homeless individuals and families. The participants must be willing to participate in case management with one of the City's service providers during the transitional phase into permanent, stable housing.

Discussion

The City will utilize Emergency Solutions Grant funds in accordance with guidelines established by the RCCC Steering Committee:

- *Leverage existing resources to achieve the program's match and case management requirements;*
- *Coordinate across regional entitlement jurisdictions by utilizing standardized eligibility and assessment tools;*
- *Support federal and local goals for priority populations, including but not limited to veterans, families and other special needs populations;*
- *Allow for variations in the program design that responds to the needs and resources of the jurisdiction;*
- *Comply with new eligibility and verification requirements (HMIS, housing status, habitability standards, homeless definitions, etc.); and*

- *Allow each program to take responsibility for arranging intake, assessment, case management, reporting, and meeting public notice requirements.*

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

Introduction:

The City will utilize Emergency Solutions Grant funds in accordance with guidelines established by the RCCC Steering Committee:

- *Leverage existing resources to achieve the program's match and case management requirements;*
- *Coordinate across regional entitlement jurisdictions by utilizing standardized eligibility and assessment tools;*
- *Support federal and local goals for priority populations, including but not limited to veterans, families and other special needs populations;*
- *Allow for variations in the program design that responds to the needs and resources of the jurisdiction;*
- *Comply with new eligibility and verification requirements (HMIS, housing status, habitability standards, homeless definitions, etc.); and*
- *Allow each program to take responsibility for arranging intake, assessment, case management, reporting, and meeting public notice requirements.*

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

For FY 2018-19, the City plans to set-aside approximately \$XXX for the production of affordable housing activities including new rental housing and programs. In the past, the City has used HOME funds for the production of affordable housing, first time homebuyer program and tenant based rental assistance.

The City will support developers for the creation of affordable rental housing, and residents who seek funding opportunities to become first time homebuyers. The following measures may be taken to alleviate the barriers to affordable housing:

- *Apply for State and federal funding to gap finance affordable housing production and rehabilitation of existing affordable housing stock.*
- *Continue to support applications for Tax Exempt Bond financing from the California Debt Limit Allocation Committee.*
- *Continue to support applications for Low-Income Housing Tax Credits from the California Tax Credit Allocation Committee.*

- *Continue to streamline the environmental review process for housing developments, using available state categorical exemptions and federal categorical exclusions, when applicable. Also, send staff to CEQA and NEPA trainings as needed to gain expertise in the preparation of environmental review documents.*
- *Continue to apply for State funding to assist First Time Homebuyers.*
- *Continue to improve the permit processing and planning approval processes to minimize delay in housing development in general and affordable housing development in particular.*
- *Continue providing rehabilitation assistance and homeownership assistance, and to assist in the construction and preservation of affordable housing.*
- *Encourage public participation when a proposed project is being considered for approval.*

Implement policies and strategies identified in the 2013-2020 Housing Element.

Discussion:

No further discussion necessary.

AP-85 Other Actions – 91.220(k)

Introduction:

This section describes the action the City plans to address the following:

- *Obstacles meeting underserved needs;*
- *Maintenance of affordable housing;*
- *Lead-based paint hazards;*
- *Number of poverty-level families;*
- *Institutional structure;*
- *Coordination between public and private housing and social service agencies.*

Actions planned to address obstacles to meeting underserved needs

Refer to explanation provided above.

Actions planned to foster and maintain affordable housing

Chula Vista has very actively addressed housing needs by increasing (with required voter approval) participation in future affordable rental developments, approving a mobile home overlay district to address mobile home redevelopment and loss of affordable units, passing its Affordable Housing Policy which requires developers to contribute to the affordable housing stock, increasing allowable residential density in the city's general plan and by not placing strong limits on residential growth. However, local and state sources of revenue for affordable housing and community development are inadequate to address housing and community development needs in the city. The current economic climate is particularly challenging. On the plus side, home prices have fallen, enabling more moderate income renters to afford to buy homes-if they are able to get financing. The city will also benefit from new federal funds to address many of its most acute and community development needs.

Actions planned to reduce lead-based paint hazards

The City of Chula Vista has a two-tiered approach to the evaluation and elimination of lead-²based paint hazards where the problem has been determined to be most prevalent. The County of San Diego's lead-²based paint hazard Program (CLPPP), involves outreach, screening, case management, and public education.

The overall lead poisoning program is administered through the County of San Diego, Department of Health Services (DHS). The City of Chula Vista also has in place a loan/grant program to assist homeowners alleviate lead-based paint hazards through the Community Housing Improvement Program (CHIP); however, the City utilizes Community Development Block Grant funds for this purpose.

As part of the City's HOME First-~~Â~~

~~Time~~ Homebuyers Prog

Assistance Program, and CDBG Residential Rehabilitation Program, lead-~~Â~~

~~based~~ paint hazard

evaluation and remediation is incorporated into these programs as follows: Owners are provided with information regarding: 1) Sources of LBP, 2) Hazards and Symptoms, 3) Blood Lead Level Screening, 4) Precautions, 5) Maintenance and Treatment of LBP Hazards, 6) Tenant and Homebuyer responsibilities prior to rehabilitation loan/grant approval, the homeowner read and sign a copy of information received. In addition, the City's Building and Safety Department, City of Chula Vista Housing staff or the City's First Time Homebuyer administrator checks for signs of LBP for properties being assisted, and abatement should occur based on federal guidelines pertaining to the amount of assistance given.

The City will also pursue a Lead Hazard Protection grant funds that are available. The Environmental Health Coalition is supportive of the City's interest in obtaining grant funds.

Actions planned to reduce the number of poverty-level families

It is the City of Chula Vista's goal is to utilize 100% of its entitlement grants to assist low/moderate income residents break the cycle of poverty through supporting social service programs. Many of the programs include multi-service programs to assist low income families back into the main stream. They include help with job readiness, educational training, counseling, child care, food clothing, housing assistance and a host of other service to help families and individuals escape the cycle of poverty.

Following is a sample of the organizations the City partnered with for the 2019/2020 program year:

- Chula Vista Community Collaborative to provide case management and referral services;
- Family Health Centers of San Diego to provide mobile medical services at various elementary schools located in low income census tracts;
- Interfaith Shelter Network to provide rotational shelter and case management during the cold winter months;
- Meals-on-Wheels to provide daily hot meal delivery to seniors in need;
- San Diego Food Bank which delivers weekly backpack with food to children who are at risk of experiencing hunger through the weekend.
- South Bay Community Services (SBCS) is made up of three distinct departments and has a staff of over 250 that serve more than 50,000 individuals and families annually in South San Diego County.

Actions planned to develop institutional structure

Developing institutional and enhancing coordination between public and private agencies:

The City of Chula Vista is a member an organization which relies heavily on public and private coordination in the region to address the needs of the low income community members. The **Chula Vista**

Community Collaborative is collaboration among partners and stakeholders in Chula Vista which include; Residents and Parents; Schools and School District Staff; Social Service/Non-profit Agencies; Local Government; Faith-based Community; Health Professionals; and, Business Owners. Together, the Collaborative works to develop coordinated strategies and systems that protect the health, safety, and wellness of its residents as well as share information and resources that strengthen families and communities. Regular meetings are held with the goal of obtaining and sharing information about services, resources, employment and training opportunities, as well as any events accessible to the Chula Vista community. The meetings are a useful venue to network and efficiently coordinate activities with partnering agencies.

Although the City of Chula Vista administers the CDBG, ESG, and HOME programs, the City does engage in contracts with outside agencies for the delivery of services to the public, other than the required fair housing services and funding requests received from City Departments. Non-profits apply for public service funds, capital improvement, and creation of affordable housing. The City monitors the affordable housing programs for all properties in its portfolio including those owned by private parties, under a deed restriction between the City and the respective party. The City has developed a strong relationship with both affordable and for-profit housing developers in not only the creation of affordable units but the ongoing maintenance of the developments as well.

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

Non-profit social service agencies continue to play an important role in serving the needs of low-and moderate-income residents in Chula Vista, There is a 15% cap on the amount of public service funds to be used from its CDBG Allocation.

The City surveyed social service providers who serve Chula Vista during the needs assessment process and will continue to attend the Chula Vista Community Collaborative meetings to foster networking among the providers.

Discussion:

No further discussion necessary.

Program Specific Requirements

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

Introduction:

The City of Chula Vista, as an entitlement jurisdiction, receives Community Development Block Grant, Home Investment Partnership Act, and Emergency Solutions Grant from the U.S Department of Housing and Urban Development. Described below are the Program Specific Requirements for each of these programs.

Community Development Block Grant Program (CDBG)

Reference 24 CFR 91.220(I)(1)

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

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

Other CDBG Requirements

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

HOME Investment Partnership Program (HOME)

Reference 24 CFR 91.220(I)(2)

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

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as follows:

Other forms of investment being used by the City is the match provided for HOME-funded housing activities. The City is required to provide a 25 percent match for HOME funds used for rental assistance, housing rehabilitation, and acquisition and rehabilitation of housing. Some examples include, land value (donated), on and off-site improvements, waiver of local and state taxes or fees, low-interest loans below market, inclusionary housing obligations. Most commonly, the City's match funds are generally generated through housing developer contributions, prior Low/Moderate Income Set-Aside funds from the State, and individual first-time homebuyer private funds. Specific match dollar amounts are reported to HUD in the CAPER through its submittal of the HUD forms 40107-A HOME Match Log.

In 2019/20 the City will be releasing a Notice Funding Availability to all Certified Community Housing Developer Organizations to leverage with the available HOME funds.

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:

For 2019/2020 the City of Chula Vista will not use HOME funds to carry out the First Time Homebuyer Program.

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:

The guidelines for resale and recapture still apply to the previously HOME-funded loans. Borrower shall pay principal and all accrued interest (either simple interest or default interest, as the case may be) on the HOME Note, in one lump sum, to Lender upon the earliest of: (1) a Sale (as defined in Section 2(b), below); (2) a default after completion of the applicable acceleration procedures set forth in Section 3, below; or (3) thirty (30) years from the date first written above. Borrower shall make any payments at the City of Chula Vista Finance Department's office located at 276 Fourth Avenue, Chula Vista, California 91910, or such other place as designated by Lender. Notwithstanding the foregoing, in the event of a Sale, where the net proceeds available from the sale are less than the amount that would otherwise be due hereunder, then the Lender shall be entitled to recapture the net proceeds available from the Sale. Net proceeds are defined as the sales price minus repayment of all senior loans and any closing costs. "Senior loans" means loans that are superior to the Deed of Trust. In the event of any Sale which is not a foreclosure or an arm's-length transaction, the "sales price" shall be determined by an appraiser holding a MAI designation from the Appraisal Institute that has at least five (5) years of experience in the geographic area in which the Property is located, selected by the Lender in its sole discretion.

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

The following are conditions under which the City may refinance existing debt secured by multifamily housing that is being rehabilitated:

- *Complete a City of Chula Vista affordable housing application and meet City funding guidelines. Application must describe whether activity consists of maintenance of existing affordable housing units, creation of new affordable housing units or both.*
- *Agree to a minimum affordable period of 55 Years*
- *The property has not previously received HOME funds (exception may be made for trouble projects, with HUD approval).*
- *The project must be located in the City of Chula Vista.*
- *Subsidy amount must not exceed HUD limits.*
- *Subject to approval by local governing bodies*
- *May be subject to HUD approval.*
- *Rehabilitation will be the primary HUD eligible activity with an established minimum level of rehabilitation per unit or a required ratio between rehabilitation and refinancing.*
- *Disinvestment in the property will not occur as a result of activity.*
- *Demonstration that long-term needs of the project will be met*
- *HOME funds will not be used to refinance multifamily loans made or insured by any federal program, including the CDBG program.*

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

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

Written standards attached.

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 San Diego City and County Continuum of Care (hereinafter referred to as the "CoC") includes all of the geography within the County of San Diego, including the City of Chula Vista. The City of Chula Vista is required to consult with the CoC on funding priorities using ESG funds. The U.S. Department of Housing and Urban Development (HUD) charges communities that receive funds under the Homeless Continuum of Care Program (hereinafter referred to as "CoC Program") of the Homeless Emergency Assistance and Rapid Transition to Housing Act (HEARTH Act) with specific responsibilities. Section 578.5 of the HEARTH Interim Rule published in July 2012 (Interim Rule), defines

a Continuum of Care (CoC) as “the group organized to carry out the responsibilities required under this part and that is composed of representatives of organizations, including nonprofit homeless providers, victim service providers, faith-based organizations, governments, businesses, advocates, public housing agencies, school districts, social service providers, mental health agencies, hospitals, universities, affordable housing developers, law enforcement, organizations that serve homeless and formerly homeless veterans, and homeless and formerly homeless persons to the extent these groups are represented within the geographic and are available to participate.” Relevant organizations in the San Diego CoC Region established the Regional Continuum of Care Council (RCCC) in 1998, which has served as the CoC coordinating body acknowledged by HUD. Planning and operations of the San Diego CoC have historically been facilitated through the RCCC, an unincorporated association as defined under Section 18035 of the California Corporations Code. As a result, the general operations of the CoC have been guided through the By Laws, structure, and action of the RCCC. The CoC have adopted the following Governance Charter (Article XI) that describes the oversight of ESG Entitlements within its jurisdiction.

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

The City of Chula Vista releases a funding of Notice Availability inviting all non-profit organizations who serve eligible ESG clients to submit a proposal. The process is included in The City’s Federal Grants Administrative Manual (Attachment X).

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

Not applicable.

5. Describe performance standards for evaluating ESG.

The ESG entitlement areas and the RCCC have established the following cross-jurisdictional strategies for use of the ESG funds in ways that that set performance standards for each subrecipient:

- *Further the accomplishment of actions identified in the Consolidated Plan of each jurisdiction.*
- *Foster greater access to permanent housing, especially helping people access housing that is affordable at 30% area median income.*
- *Leverage existing resources to achieve the case management requirements and to avoid duplication of services.*
- *Leverage alternate funding sources to meet the funding match requirement . On a typical year, approximately 85% of the funds utilized for Emergency Solutions Grant programs consist of non-federal funding. This consist of local general fund, state grants and private contributions.*

- *Coordinate across jurisdictions for development of standardized eligibility and assessment standards and by convening semiannual regional planning meetings.*
- *Support federal and local goals for priority populations, including but not limited to veterans, persons with disabilities, families and others.*
- *Allow for variations in ESG entitlement programs that respond to the needs and resources of the individual jurisdictions.*
- *Comply with eligibility and verification requirements and locally established standards (HMIS, housing status, habitability standards, homeless definitions, etc.).*
- *Allows each program to take responsibility for program administration including compliance with public notice requirements and timely reporting.*
- *Encourages all subrecipients to participate in collaborative assessment, coordinated entry, data management, and reporting systems established by the RCCC in accordance with HEARTH regulations.*
- *Supports timely and accurate data collection and reporting through contractual obligations with subrecipients, and through establishing common standards for vendor relationships with the HMIS Lead.*

