

Draft Consolidated Annual Performance and Evaluation Report

FY2020-21

CR-05 - Goals and Outcomes

Progress the jurisdiction has made in carrying out its strategic plan and its action plan. 91.520(a)

This could be an overview that includes major initiatives and highlights that were proposed and executed throughout the program year.

The program year 2020-21 County of Orange Consolidated Annual Performance and Evaluation Report (CAPER) reports on the County's performance and accomplishments relative to achieving its goals and objectives in the first year of its Five-Year 2020-2024 Consolidated Plan (CP). The CAPER describes and evaluates how Community Development Block Grant (CDBG), HOME Investment Partnerships (HOME), and Emergency Solutions Grant (ESG) funds, received from the U.S. Department of Housing and Urban Development (HUD), were expended to meet the CP five-year strategic goals for the reporting period July 1, 2020 to June 30, 2021.

Below is a summary of accomplishments made in FY 2020-21:

CDBG Funds:-

- A total of (17) public facilities & improvements projects were underway in FY 2020-21, of those, (9) were completed including extended project from FY 2019-20 and (8) are still underway. These projects included ADA accessibility improvements, alleys, curbs/gutters, sidewalks, recreational facilities, senior center and community center(s). A total of \$801,920 was expended for these projects in this program year.
- (10)- housing rehabilitations projects were underway, of those, (6) were completed in FY 2020-21 and (4) are still underway. The (6) were completed expending a total \$502,101 in this project year.
- A total of (7) economic development were underway in FY 2020-21, and all (7) are underway.
- A total of seven (17) public service projects were undertaken 6 were completed in program year 2020-21 and 11 CDBG-CV are in process. Public services included senior services, health/ mental health services, employment and educational services, homeless shelters and programs, childcare services, youth services and CDBG-CV activities to prepare for, respond to and recover from the COVID-19 pandemic. A total of \$483,115 was expended.
- One (1) project, administration was undertaken to affirmatively further fair housing; a total of \$52,000 was expended.

The County of Orange administers the HOME Program throughout the unincorporated areas of the County, in Urban County Participating Cities,

Goal	Category	Source / Amount	Indicator	Unit of Measure	Expected – Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected – Program Year	Actual – Program Year	Percent Complete
Enhance Quality of Life	Affordable Housing Non-Housing Community Development	CDBG: \$757,838 / HOME: \$ / ESG: \$ / CDBG-CV: \$	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	359,251	424,926	119%	55,006	66,007	120%
Enhance Quality of Life	Affordable Housing Non-Housing Community Development	CDBG: \$ / HOME: \$ / ESG: \$ / CDBG-CV: \$	Facade treatment/business building rehabilitation	Business	0	0		0	0	
Enhance Quality of Life	Affordable Housing Non-Housing Community Development	CDBG: \$ / HOME: \$ / ESG: \$ / CDBG-CV: \$	Rental units rehabilitated	Household Housing Unit	0	0		0	0	
Enhance Quality of Life	Affordable Housing Non-Housing Community Development	CDBG: \$ / HOME: \$ / ESG: \$ / CDBG-CV: \$	Homeowner Housing Rehabilitated	Household Housing Unit	0	0		0	0	
Enhance Quality of Life	Affordable Housing Non-Housing Community Development	CDBG: \$ / HOME: \$ / ESG: \$ / CDBG-CV: \$	Homeless Person Overnight Shelter	Persons Assisted	0	0		0	0	
Enhance Quality of Life	Affordable Housing Non-Housing Community Development	CDBG: \$140,326 / HOME: \$ / ESG: \$ / CDBG-CV: \$	Overnight/Emergency Shelter/Transitional Housing Beds added	Beds	180	2937	1,632%	45	458	1,001%

Enhance Quality of Life	Affordable Housing Non-Housing Community Development	CDBG: \$ / HOME: \$ / ESG: \$ / CDBG-CV: \$	Jobs created/retained	Jobs	0	0		0	0	
Enhance Quality of Life	Affordable Housing Non-Housing Community Development	CDBG: \$ / HOME: \$ / ESG: \$ / CDBG-CV: \$	Businesses assisted	Businesses Assisted	0	0		0	0	
Enhance Quality of Life	Affordable Housing Non-Housing Community Development	CDBG: \$ / HOME: \$ / ESG: \$ / CDBG-CV: \$	Housing for Homeless added	Household Housing Unit	0	0		0	0	
Enhance Quality of Life	Affordable Housing Non-Housing Community Development	CDBG: \$ / HOME: \$ / ESG: \$ / CDBG-CV: \$	Housing for People with HIV/AIDS added	Household Housing Unit	0	0		0	0	
Expand Affordable Housing Opportunities	Affordable Housing	CDBG: \$50,000 / HOME: \$ / ESG: \$	Facade treatment/business building rehabilitation	Business	5	0	0%	5	0	0.00%
Expand Affordable Housing Opportunities	Affordable Housing	CDBG: \$ / HOME: \$ / ESG: \$	Rental units constructed	Household Housing Unit	125	0	0.00%	125	0	0.00%
Expand Affordable	Affordable Housing	CDBG: \$502,101 / HOME: \$ / ESG: \$	Homeowner Housing Rehabilitated	Household Housing Unit	901	622	69%	101	164	163%

Housing Opportunities											
Expand Affordable Housing Opportunities	Affordable Housing	CDBG: \$ / HOME: \$54,771 / ESG: \$	Tenant-based rental assistance / Rapid Rehousing	Households Assisted	80	74	93%	80	74	93%	
Public Services	Homeless Non-Homeless Special Needs	CDBG: \$ 670,603 / HOME: \$ / ESG: \$207,184 / CDBG-CV: / ESG-CV1 & 2: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	26000	53684	206.48%	4,279	9,152	214%	
Public Services	Homeless Non-Homeless Special Needs	CDBG: \$ / HOME: \$ / ESG: \$ / CDBG-CV: \$ / ESG-CV1 & 2: \$	Tenant-based rental assistance / Rapid Rehousing	Households Assisted	8	0	0%	8	0	0%	
Public Services	Homeless Non-Homeless Special Needs	CDBG: \$219,427 / HOME: \$ / ESG: \$129,910 / CDBG-CV: \$ / ESG-CV1 & 2: \$	Homeless Person Overnight Shelter	Persons Assisted	972	9,159	314%	972	9,159	943%	
Public Services	Homeless Non-Homeless Special Needs	CDBG: \$ / HOME: \$ / ESG: \$ / CDBG-CV: \$ / ESG-CV1 & 2: \$	Overnight/Emergency Shelter/Transitional Housing Beds added	Beds	0	0		0	0		

and in entitlement cities. HOME funding is typically utilized to:

- Expand the affordable rental housing stock for homeless, low-income, and special needs households; and
- Provide shelter to homeless and low-income households through tenant-based rental assistance

In FY 2020-21, the County allocated ESG funding to the County's Health Care Agency through an MOU to fund City Net to operate the emergency shelter, rapid re-housing program and HMIS for persons either at-risk of, or experiencing homelessness. A total of \$133,998 was expended in

Federal ESG funds.

Comparison of the proposed versus actual outcomes for each outcome measure submitted with the consolidated plan and explain, if applicable, why progress was not made toward meeting goals and objectives. 91.520(g)

Categories, priority levels, funding sources and amounts, outcomes/objectives, goal outcome indicators, units of measure, targets, actual outcomes/outputs, and percentage completed for each of the grantee’s program year goals.

Table 1 - Accomplishments – Program Year & Strategic Plan to Date

Assess how the jurisdiction’s use of funds, particularly CDBG, addresses the priorities and specific objectives identified in the plan, giving special attention to the highest priority activities identified.

The CAPER provides a detailed description of how the County provided new or improved availability/accessibility, affordability, sustainability of the following goals for which funding was allocated:

- Expand and preserve the supply of affordable housing to create housing opportunities for low- and moderate-income households and homeless individuals and families
- Strengthen, preserve, and enhance the physical character and quality of life in Orange County’s low- and moderate-income neighborhoods, including the housing stock and public infrastructure and facilities.
- Continue to build the capacity of residents to empower themselves and help strengthen their community, through the funding of needed public services for seniors, the homeless, and those at risk of homelessness.
- Planning and administration.

The Accomplishments Table above provides a summary of these priority goals and the County’s success in meeting the established objectives set forth in the FY 2020-24 Consolidated Plan and Annual Action Plan. Unfortunately, as with most of the priority goals, the needs far outweigh the County’s available resources which are not sufficient to address all of the needs of low- and moderate-income persons or special needs residents

in the County's CPD program area.

During the FY 2020-21, CDBG funding focused primarily on the highest plan priorities to address specific objectives including the improvements public facilities, public services, ADA accessibility improvements, housing rehabilitation and activities furthering fair housing.

HOME funds were used to address housing priorities established in the FY 2020-24 Consolidated Plan.

ESG activities were directed at increasing services to homeless families and individuals by providing overnight shelter and rapid re-housing services for persons experiencing homelessness.

Several public facility/ infrastructure projects that are experiencing delays which is mostly due to the need to secure additional funding, increase in the cost of materials and/or labor, and in some instances, a lack of dedicated staff resources. These projects are currently underway and will report accomplishments in upcoming CAPER's.

In addition, several of the activities have not met their proposed goals anticipated in this last year due to COVID-19 pandemic.

For additional information please refer to the following Integrated Disbursement and Information System (IDIS) reports in the appendix:

- Summary of CDBG Activities (PR03)
- Status of HOME/TCAP Activities (PR 22)
- Financial Summary (PR26)
- HOME Matching Liability Report (PR33)
- ESG Financial Summary (PR91)

CR-10 - Racial and Ethnic composition of families assisted

Describe the families assisted (including the racial and ethnic status of families assisted).

91.520(a)

	CDBG	HOME	ESG
White	64,206	53	338
Black or African American	2,993	15	55
Asian	19,620	1	22
American Indian or American Native	438	1	38
Native Hawaiian or Other Pacific Islander	638	1	3
Total	87,895	74	490
Hispanic	9,811	0	185
Not Hispanic	78,084	74	305

Table 2 – Table of assistance to racial and ethnic populations by source of funds

Narrative

According to the 2018 Census, 76.6% of County residents are White, 18.1% Hispanic, 13.4% Black/African American, 5.8% Asian, .2% Native Hawaiian/other Pacific Islander and 2.7% other races.

Recipients in the above/below tables represent the diversity within the County that were assisted with HUD funded programs during the FY 2020-21.

In the County, funds are utilized throughout all of the unincorporated areas as well as all participating cities/metro city under the County's CPD programs. When evaluating the ethnic/racial composition of families assisted in the table, White's appear to be represented at the highest level with regard to the CDBG programs (73% of the total population). Hispanics were assisted at a rate of 11% of the total population.

When comparing the ethnic/racial mix of HOME program beneficiaries with the make-up of the population as a whole, White's appear to be over represented to the HOME program (100% of families assisted).

The County is committed to allocating CDBG, HOME, and ESG funds to address community development needs of the lowest-income and most disadvantaged residents based upon the individual eligibility requirements of the specific CPD program. Assistance was targeted to populations residing in areas of low-income and minority concentrations. However, while projects and programs will target low-income and minority populations, they will not necessarily be limited geographically to areas where these populations are concentrated. Some service providers are not located in low/moderate-income census

tracts; however, their services are designed and intended for low/moderated income clients.

CR-15 - Resources and Investments 91.520(a)

Identify the resources made available

Source of Funds	Source	Resources Made Available	Amount Expended During Program Year
CDBG	public - federal	4,570,941	4,543,442
HOME	public - federal	8,117,421	186,347
ESG	public - federal	223,982	133,988
Other	public - federal		0

Table 3 - Resources Made Available

Narrative

The table above illustrates the amount of funding “estimated” to be available for CDBG, HOME, and ESG for the 2020-21 program year, but does not account for all unspent prior year funds. The County had \$3,925,197 in CDBG resources (\$3,273,896 entitlement funds/\$200,000 PI/\$451,301 prior year), \$1,714,125 in HOME resources (\$1,038,528 entitlement funds/\$621,326 PI/\$54,271 prior year), and \$223,982 in ESG resources (\$223,982 entitlement funds) to allocate to projects to carry out the goals outlined in the County’s CP and Annual Action Plan.

Program Income (PI) is generated from repayments or other funding accrued and collected from previously funded CDBG and HOME projects and is allocated based on HUD’s program income requirements. During the 2020-21 program year, the County received \$160,510 CDBG PI and \$621,346 HOME PI.

Per IDIS Report PR26 – CDBG Financial Summary Report (2019-20 program year) are as follows:

Low/Mod Benefit for program year: 100%

Planning and Administration (Cap 20%): 17.9%

Public Service (Cap 15%): 15

The CDBG Expenditure Report, IDIS Report PR03, shows that the County’s CDBG program disbursed \$4,543,552 in program year 2020-21. The ESG Financial Summary Report, IDIS Report PR91 shows that \$133,998 was disbursed in program year 2020-21.

Identify the geographic distribution and location of investments

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description

Table 4 – Identify the geographic distribution and location of investments

Narrative

The “Urban County” of Orange is comprised of 11 cities with populations under 50,000 (participating cities), two “Metro” cities –Placentia and Yorba Linda – with populations over 50,000, and the unincorporated areas of Orange County. The 11 participating cities include Brea, Cypress, Dana Point, Laguna Beach, Laguna Hills, Laguna Woods, La Palma, Los Alamitos, Seal Beach, Stanton, and Villa Park. With populations over 50,000, Placentia and Yorba Linda are eligible to participate in the CPD programs as entitlement jurisdictions and receive funding directly from HUD. However, these cities have elected to join the Urban County for the overall implementation of these programs.

Currently, the County is using a competitive funding application process to distribute CDBG funds. The Funding Allocation Policy & Process (FAPP) is a planning document that is to utilize priorities listed in the Consolidated Plan to address local housing and Community development needs with Federal and local resources in preparing the Annual Action Plan (APP). Individual participating cities, County departments, are required to submit applications for funding. Housing & Community Development works with an Evaluation Committee to rank each application according to the Consolidated Plan priorities, urgency of needs, readiness of projects, experience of program/project administrators, and cost-effectiveness. Many factors, such as the administrative burden of the program, the number of eligible census block groups, annexations, and population growth in the participating cities, weigh into the analysis of the most efficient and effective way to distribute CPD funds to meet the high-priority activities outlined in this Consolidated Plan. The competitive basis for funding distribution has the advantage of flexibly dealing with the changing needs and geographic disparities in terms of needs and resources.

CDBG program funds will be distributed and expended based on program criteria. Housing rehabilitation programs will be provided on a citywide basis in each participating city and in the unincorporated County areas based on low and moderate income qualified residents. Supportive services will be available throughout the Urban County to low and moderate-income residents and persons with special needs. Public and infrastructure improvements will be located primarily in the Urban County’s low- and moderate-income areas. HOME funds will be distributed to those projects that meet priority needs, are timely and meet other evaluation factors that indicate a strong probability the project will come to fruition. ESG funds and CDBG funds for Public Services will be awarded to projects using a noncompetitive process that will best serve the priority needs of homeless individuals, families, those at risk of becoming homeless and Public Services that serve the community operating County owned facilities. HCD did not use any publically owned land to address needs identified in the Consolidated or Action Plans.

Leveraging

Explain how federal funds leveraged additional resources (private, state and local funds), including a description of how matching requirements were satisfied, as well as how any publicly owned land or property located within the jurisdiction that were used to address the needs identified in the plan.

The County leverages its CDBG, HOME, and ESG funds with other resources to increase the impact upon housing, community development, and homelessness issues. Given the extent and level of housing and other community and economic development needs in Orange County, it becomes essential that the limited resources made available through the CPD programs be leveraged with other resources. Many of the most successful affordable housing projects, community facilities, and public service programs were leveraged with other funds.

The CDBG regulations do not require a funding match for the program; however, the County strongly encourages leveraging of CDBG funds and gives priority consideration in the evaluation of proposed activities that leverage CDBG with other funding. Applicants requesting funds to support its programs and projects are asked to provide documentation of other funding sources they will use as leveraging to meet their needs. In the participating cities, CDBG funds are matched with city general funds and other local resources. For CDBG PFI Projects, Subrecipients are required to match funds if the project funding amount requested is over \$150,000, with a maximum request of \$350,000, the Subrecipient is required to match 20% of the total amount requested. For those project up to \$150,000, no match funding is required. Two of the CPD-funded programs, HOME and ESG (Federal and State), have matching fund requirements – HOME 25%, ESG 100%. ESG funds are matched dollar for dollar by sub-recipients. These regulatory matching requirements ensure the efficient use of the Federal funds through leveraging. HOME funds are leveraged with other gap financing sources. Developers identify and secure primary funding sources prior to HOME allocations being awarded. HOME funds are typically leveraged and matched with one or more of the following sources: low income housing tax credits, tax-exempt bond financing, housing successor agency funds, Federal Home Loan Bank Affordable Housing Program (AHP) funds, California Housing Finance Agency (CalHFA) funds, California Department of Housing and Community Development Multifamily Housing Program (MHP) funds, and Mental Health Services Act (MHSA) funds such as the Special Needs Housing Program and No Place Like Home. County HOME funds are also leveraged with other local funds including City and local land and housing trust funds.

In 2016 Oakcrest Heights (IDIS 2174) had match amounts of \$6,254,664 in State and local funds and \$2,912,000 in private loans.

Fiscal Year Summary – HOME Match	
1. Excess match from prior Federal fiscal year	37,450
2. Match contributed during current Federal fiscal year	
3. Total match available for current Federal fiscal year (Line 1 plus Line 2)	266,333
4. Match liability for current Federal fiscal year	
5. Excess match carried over to next Federal fiscal year (Line 3 minus Line 4)	37,450

Table 5 – Fiscal Year Summary - HOME Match Report

Match Contribution for the Federal Fiscal Year								
Project No. or Other ID	Date of Contribution	Cash (non-Federal sources)	Foregone Taxes, Fees, Charges	Appraised Land/Real Property	Required Infrastructure	Site Preparation, Construction Materials, Donated labor	Bond Financing	Total Match
0000	0	0	0	0	0	0	0	0

Table 6 – Match Contribution for the Federal Fiscal Year

HOME MBE/WBE report

Program Income – Enter the program amounts for the reporting period				
Balance on hand at begin-ning of reporting period \$	Amount received during reporting period \$	Total amount expended during reporting period \$	Amount expended for TBRA \$	Balance on hand at end of reporting period \$
7,496,095	621,326	186,347	54,771	7,876,304

Table 7 – Program Income

Minority Business Enterprises and Women Business Enterprises – Indicate the number and dollar value of contracts for HOME projects completed during the reporting period						
	Total	Minority Business Enterprises				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
Contracts						
Dollar Amount	0	0	0	0	0	0
Number	0	0	5	0	4	128
Sub-Contracts						
Number	0	0	0	0	0	0
Dollar Amount	0	0	0	0	0	0
	Total	Women Business Enterprises	Male			
Contracts						
Dollar Amount	0	0	0			
Number	0	1	0			
Sub-Contracts						
Number	0	0	0			
Dollar Amount	0	0	0			

Table 8 - Minority Business and Women Business Enterprises

Minority Owners of Rental Property – Indicate the number of HOME assisted rental property owners and the total amount of HOME funds in these rental properties assisted						
	Total	Minority Property Owners				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
Number	0	0	0	0	0	0
Dollar Amount	0	0	0	0	0	0

Table 9 – Minority Owners of Rental Property

Relocation and Real Property Acquisition – Indicate the number of persons displaced, the cost of relocation payments, the number of parcels acquired, and the cost of acquisition						
Parcels Acquired		0		0		
Businesses Displaced		0		0		
Nonprofit Organizations Displaced		0		0		
Households Temporarily Relocated, not Displaced		0		0		
Households Displaced	Total	Minority Property Enterprises				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
Number	0	0	0	0	0	0
Cost	0	0	0	0	0	0

Table 10 – Relocation and Real Property Acquisition

CR-20 - Affordable Housing 91.520(b)

Evaluation of the jurisdiction's progress in providing affordable housing, including the number and types of families served, the number of extremely low-income, low-income, moderate-income, and middle-income persons served.

	One-Year Goal	Actual
Number of Homeless households to be provided affordable housing units	120	0
Number of Non-Homeless households to be provided affordable housing units	0	0
Number of Special-Needs households to be provided affordable housing units	0	0
Total	120	0

Table 11 – Number of Households

	One-Year Goal	Actual
Number of households supported through Rental Assistance	100	74
Number of households supported through The Production of New Units	20	0
Number of households supported through Rehab of Existing Units	0	0
Number of households supported through Acquisition of Existing Units	0	0
Total	120	74

Table 12 – Number of Households Supported

Discuss the difference between goals and outcomes and problems encountered in meeting these goals.

The County was challenged in meeting the goals/outcomes set out in the 2020-21 AAP. Activity is difficult to predict given the typical fluctuations in the housing market. In July 2016, the Orange County Housing Authority (OCHA) entered into an agreement with the County providing that the County would supply OCHA HOME funds to administer the Tenant Based Rental Assistance (TBRA) program. OCHA would administer the TBRA program by providing move-in costs to homeless households participating in

a special purpose housing assistance program administered by OCHA. Assistance is provided on an as needed basis and in FY 2020-21 OCHA assisted 74 households.

Eligible activities for OCHA’s administration of the TBRA program include grants for security deposit assistance. Preference is given to homeless low-income individuals, families, seniors, and special needs populations with extenuating circumstances, including those at risk of being displaced from their primary residence. Currently, the grants for security deposit assistance are marketed for use for OCHA’s homeless programs, which include HUD-VASH, Homeless Set Aside, Project Based, and Continuum of Care.

HOME funds are currently set-aside to fund Permanent Supportive Housing activities under the County’s 2020 Supportive Housing Notice of Funding Availability (NOFA) . On December 17, 2019, the Orange County Board of Supervisors authorized the OC Community Resources Director, or designee, to issue a 2020 Supportive Housing Notice of Funding Availability (2020 NOFA) with an emphasis on developing extremely low-income housing in a combination of up to \$13 million in Orange County Housing Successor Agency (HSA) funds, Federal HOME Investment Partnerships Program (HOME) funds and Mental Health Services Act (MHSA) funds and utilize up to 200 Housing Choice Project-Based Vouchers and return to the Board for funding commitments to individual projects. Additional funding and vouchers were subsequently approved by the Board to be added to the 2020 NOFA. The 2020 NOFA is an open process and applications are accepted on a first-come, first-served basis.

As of the end of August 2021, Staff had received 15 applications requesting \$18.2 million in funds and 307 Housing Choice Project-Based Vouchers through the 2020 NOFA.

Discuss how these outcomes will impact future annual action plans.

In FY 2019-20, the County entered into a Housing Assistance Payment Contract for eleven (11) Housing Choice project based vouchers for new units of affordable rental housing for low-income households in Orange County. HOME funds are currently set-aside to fund Permanent Supportive Housing activities under the County’s 2016 Permanent Supportive Housing Notice of Funding Availability (NOFA) and the 2020 Supportive Housing NOFA. In FY 2019-20, the County approved HOME funds for the development of 64 permanent supportive housing units in the City of Placentia and continues to process funding requests for the use of HOME funds for development in other Orange County cities.

Include the number of extremely low-income, low-income, and moderate-income persons served by each activity where information on income by family size is required to determine the eligibility of the activity.

Number of Households Served	CDBG Actual	HOME Actual
Extremely Low-income	13	71
Low-income	26	3
Moderate-income	23	0
Total	62	75

Table 13 – Number of Households Served

Narrative Information

See above.

CR-25 - Homeless and Other Special Needs 91.220(d, e); 91.320(d, e); 91.520(c)

Evaluate the jurisdiction's progress in meeting its specific objectives for reducing and ending homelessness through:

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

The County of Orange (County) is focused on building a System of Care that is integrated and coordinated regionally to address the needs of persons experiencing homelessness and provides a safety net for persons at risk of homelessness. The System of Care is comprised of five components – healthcare, behavioral health, housing, community corrections and benefits and support services – that provide critical resources and support to the community. The County's effort in building a System of Care includes facilitating access through ongoing outreach and engagement to persons experiencing homelessness, especially those living on the streets or in place not mean for human habitation. Through outreach and engagement, the individual needs of persons experiencing homelessness are assessed and incorporated in to action plans to support individuals in securing housing and other supportive services to ensure housing stability. The County has implemented outreach, engagement and assessment to occur in multiple settings, including the year-round emergency shelters and service centers where people experiencing homelessness typically access resources.

Since 1998, the County has had a comprehensive, coordinated, and regional Continuum of Care strategy that includes participation of all 34 cities in Orange County, County Agencies, the County's homeless housing and service providers, and other community groups, including non-profits, local governmental agencies, faith-based organizations, those currently experiencing homelessness and those who previously experienced homelessness, interested business leaders, schools and other stakeholders to identify the gaps and unmet needs of the County's System of Care. The needs of the homeless population and service priorities continue to be identified through the County's Continuum of Care. The Continuum of Care provides an opportunity for the public to engage on matters and issues related to homelessness and provide feedback or recommendations on its going development and coordination of homeless services. The inclusive practices of the Continuum of Care allow for participation of all stakeholders including those with current or past experience of homelessness in planning processes such as the Point In Time Count and survey and most recently through the establishment of a Lived Experience Advisory Committee.

The County also established the Commission to End Homelessness to serve as an advisory body to the Board of Supervisors in policy matters related to promote an effective response to homelessness Orange County. The Commission to End Homelessness works in collaboration with the County government, 34 city governments, business sector, philanthropic organizations, community organizations, faith-based organizations, healthcare, public sector and other interested stakeholders to focus on regional policy, implementation strategies, affordable housing development, data and gaps analysis, best practice research, social policy and systemic change.

Addressing the emergency shelter and transitional housing needs of homeless persons

The County of Orange has supported in the development of an emergency shelter system in the Orange County that serves individuals (adults age 18 and older) experiencing homelessness improving the availability of needed beds. The County has been able to leverage funding from the federal, state and local government to support the development of navigation centers that incorporate emergency shelter beds along with wrap around supportive services that promote housing placements. These wrap around services co-locate the Social Services Agency for assistance in mainstream benefit applications, behavioral health support, community clinics for access to healthcare, homeless service agency for connecting to housing resources and more.

In January 2021, the Housing Inventory Chart was completed, there were a total of 2,567 emergency shelter beds at 57 emergency shelter program locations. Since January, the County of Orange has supported the creation of 375 emergency shelter beds, bringing the total beds to over 2,900 beds.

The County of Orange has allocated \$223,985 in ESG funds and \$219,427 in CDBG funds during FY 2020-21 for essential services, operations, emergency shelter, showers, and meals for homeless clients. The County operates the “Armory Emergency Shelter Program,” which allows for emergency shelter for approximately five months out of the year, serving a maximum capacity of 400 individuals nightly, divided between two locations. Given the COVID-19 pandemic, the operations of the Armory Emergency Shelter Program transitioned in to a COVID-19 Response Shelter that operated 24-hours a day and allowed participants to practice Safer At Home guidelines as provided by the State and physical distancing as recommended by public health.

Additionally, in response to the COVID-19 pandemic, the County has implemented Project Roomkey, a state initiative to operate non-congregate shelters to ensure the safety of individuals experiencing homelessness who are high risk for severe COVID-19 illness and/or COVID-19 positive or symptomatic. To date, the County has assisted approximately 2,900 individuals with non-congregate shelter thus limiting the exposure to COVID-19. The County has plans to continue

operating project Roomkey through December 2021 and is looking at all available funding resources to support funding this needed program during the pandemic.

Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: likely to become homeless after 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); and, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs

The goal of the County's System of Care is to provide a safety net of services to individuals and families at risk of experiencing homelessness as they engage with the various components. The County is focused on providing housing focused case management to support individuals and families in maintaining their current housing and providing supportive services to assist in stabilization. This often includes evaluating the appropriateness of current housing, developing a sustainable budget and identifying ways to increase income through employment or connection to mainstream benefits. This current system model works well when partnered with a variety of supportive services that address other needs the household may have and support in addressing risk factors that may contribute to housing insecurity. In Orange County, a variety of private, federal, state and county-funded programs offer job training courses, child care, work-appropriate clothing, food bags and/or meals, among other services. Many of these services follow clients through their homeless service program stay(s), and sometimes even after they have found permanent housing. The variety of non-profit service providers that have formed in Orange County over the last 30 years has meant that many different types of clients can be served simultaneously. Each provider tends to specialize in a particular subpopulation in order to tailor services effectively. Currently served populations include, but are not limited to: families (households with at least one minor child), victims of domestic violence, veterans, individuals experiencing chronic homelessness, individuals with mental health issues and their families, and individuals with physical and developmental disabilities and their families.

The Continuum of Care Board has representation in expertise and knowledge of different subpopulations and their unique challenges, and components of the System of Care and the available resources. This provides the Continuum of Care Board an opportunity to ensure that available programs and approaches are comprehensive and appropriate to meet the needs of the community. Additionally, the Continuum of Care has focused on developing targeted resources and strategies for the subpopulations such as veteran, families, transitional aged youth, etc. With the implementation of the Coordinated Entry System, there is an additional focus on creating a responsive System of Care that promotes regional collaboration and coordination and is responsive to the diverse needs of the individuals and families at risk of

homelessness and/or experiencing homelessness. The Coordinated Entry System was launched in 2015 focusing initially on Permanent Supportive Housing then incorporating Rapid Rehousing. Today, the Coordinated Entry System is lead and managed by the County of Orange and has developed to incorporate additional housing programs and funding sources thus streamlining the access to available housing resources. There are over 40 access points throughout the county doing housing assessments and then working the participants through their housing and stabilization process. Some of the access points target specific subpopulations within the county, providing an opportunity to address their unique needs and challenges.

Historically, the most difficult individuals to house are those experiencing chronic homelessness. People experiencing chronic homelessness have a disability that is a long-lasting duration that requires ongoing support. The County has utilized Mental Health Services Act (MHSA) to establish a Housing Program that supports the development of permanent housing units with wrap around supportive services. Although the MHSA program concluded in May 2016, funding programs such as the Special Needs Housing Program and No Place Like Home were released to continue those efforts. The County previously allocated \$33 million in MHSA funding to provide additional housing for the homeless mentally ill and in June 2018, allocated an additional \$70.5 million for the development of additional supportive housing units for MHSA eligible individuals and households. In addition to the MHSA Housing Program, other housing and supportive services are provided through the MHSA Community Services and Supports component of the MHSA for clients enrolled in a Full Service Partnership Program. Participants of these programs must be seriously mentally ill adults or older adults or seriously mentally ill/seriously emotionally disturbed children and youth. The programs are participant-driven and provide flexible resources that are tailored to each client's specific needs. Additionally, the County adopted an Affordable Housing Strategic Plan and allocated \$8 million in Federal HOME and local funds for the development of Permanent Supportive Housing for the homeless through a Notice of Funding Availability. Additionally, all CoC Permanent Supportive Housing (PSH) projects are dedicated for households that are experiencing chronic homelessness.

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

Traditionally, the most fundamental risk factor for becoming homeless is acute poverty, however given the impact of the COVID-19 pandemic there is a growing population that is facing financial instability at this time. Orange County has dozens of organizations, both private and public,

providing resources to those at risk of homelessness and is looking for ways to streamline access to services. The solutions to developing a system capable of ensuring that people have the right resources to remain housed generally involve a continued high level of supportive services once an individual or family has been placed in permanent housing.

The Continuum of Care has developed action plans and is reviewing its structure to ensure it is more effectively creating Systems of Care that are formally linked and coordinated with the various existing systems such as those listed in the prompt. The Coordinated Entry System (CES) is being developed to meet the needs of the various subpopulation, including re-entry, LGBTQ, Transitional Aged Youth, Domestic Violence, medically fragile, etc.. Implementation of the Mental Health Services Act in Orange County has provided a large array of supportive services for those who are experiencing homelessness or at high-risk of homelessness as well as having a serious mental illness. Supportive services include, but are not limited to, employment services, mentoring, in-home crisis stabilization, education and training, centralized assessment team services, recovery centers, residential treatment, a wellness center, and a transitional age youth discovery program.

Actions taken to develop institutional structure. 91.220(k); 91.320(j)

The institutional structure, through which the Consolidated Plan will be implemented, includes various agencies of County government, participating cities, nonprofit organizations, and private industry. OC Housing & Community Development has oversight responsibility for the Consolidated Plan/Annual Plan processes. OC Housing & Community Development is a component of OC Community Resources, which consists of OC Housing & Community Development OC Animal Care, OC Community Services, OC Parks, and OC Public Libraries, which are part of the County of Orange. Additionally, the OC Housing & Community Development has worked with the OC Health Care Agency Office of Care Coordination to integrate components of the homeless system of care into the process and provide additional details for jurisdictions to include into their planning processes.

In addition, the County has developed a comprehensive, coordinated, and regional Continuum of Care (CoC) strategy that includes the participation of all thirty-four cities in the County, County Agencies, the County's homeless housing and service providers, and other community groups (including non-profits, local governmental agencies, faith-based organizations, the homeless and formerly homeless, interested business leaders, schools, and many other stakeholders) to identify the gaps and unmet needs of the County's homeless.

Orange County's CoC planning process is continually sustained with regular community wide efforts. Throughout the year the Commission to End Homelessness, and other interested parties,

continue the process of identifying gaps and priority needs, and examining new strategies to strengthen the current system of care. This planning process includes identification of the greatest needs facing the homeless of Orange County and assessing the funding priorities to address these needs.

Since 1996, this public/private planning process has resulted in the allocation of over \$298 million in federal homeless assistance funds for Orange County. HUD CoC funds are leveraged with federal, state, and local resources allocated to Orange County's CoC System. Although Orange County's CoC System has dramatically improved since 1996, there are still huge gaps at all levels of the system. While the dollar amount that the County received is a notable amount, it does not provide enough to service all those that are in need.

CR-30 - Public Housing 91.220(h); 91.320(j)

Actions taken to address the needs of public housing

The public housing needs of Urban Orange County residents are met by the Orange County Housing Authority (OCHA), a division within Orange County Community Resources and the OC Housing and Homeless Services. There are no public housing projects in the Urban County program, however OCHA provides tenant-based and project-based housing assistance to residents in the Urban County.

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

OCHA has established a Resident Advisory Board with the membership representing the residents assisted by OCHA. The Board was consulted in the development of OCHA's Five-Year and Annual Public Housing Agency Plans. In addition, OCHA provides homeownership opportunities to eligible participants in the Housing Choice Voucher Program and there are currently six households receiving assistance in paying their mortgage in this program.

Actions taken to provide assistance to troubled PHAs

Not Applicable

CR-35 - Other Actions 91.220(j)-(k); 91.320(i)-(j)

Actions taken 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. 91.220 (j); 91.320 (i)

In January 2009, the Orange County Board of Supervisors amended the Housing Opportunities Overlay Regulations to expand the Overlay to high density multi-family residential districts located along arterial highways. Originally adopted in 2006, the Housing Opportunities Overlay Regulations permit the “by-right” development of affordable housing units on commercial, industrial and certain high density residential zoned sites through an administrative approval process. The County and participating cities have also worked to address the issues surrounding barriers to affordable housing development through the Housing Element process required by the State of California. The California Department of Housing and Community Development (HCD) must review the Housing Element for compliance with State law. Among other things, each jurisdiction’s Housing Element is required to identify opportunity sites with land use controls that facilitate affordable housing development. Another key component of HCD review is the extent of government policies that act as barriers to housing development, especially affordable housing development, and the jurisdiction’s commitment to eliminating or mitigating the barriers. Each jurisdiction in California (including all participating cities and the County of Orange) adopts a housing element as a required component of the general plan. The County of Orange 2014-2021 Housing Element was adopted in December 2013. The document includes specific actions to facilitate affordable housing. The County has also approved a Zoning Code amendment that allows emergency shelters “by-right” (with no public hearing requirement) in commercial and industrial zoned areas. To address neighborhood on affordable housing, Housing & Community Development encourages all developers to work closely with local residents and community groups. The County’s 2014-21 Housing Element establishes an action that the County’s Affordable Housing Project Manager and Housing & Community Development staff will work cooperatively with other governmental agencies, business groups, universities, environmental organizations, housing advocates and the development community to increase public awareness of the importance of affordable housing to the County’s long-term viability.

Actions taken to address obstacles to meeting underserved needs. 91.220(k); 91.320(j)

One of the greatest challenges in meeting the underserved needs of low- and moderate-income persons is having limited financial resources. The County must weigh and balance the input from different groups and assign funding priorities that best bridge the gaps in the County’s service delivery system. While other goals the County has set are also important, for the purposes of the Consolidated Plan, only those which are anticipated to be funded with CPD funding programs (CDBG, HOME, and ESG) during the five-year planning cycle are indicated to be high priorities. The County utilizes other funding sources to meet goals that are not considered high priority in the Consolidated Plan. The County established priorities for allocating CPD funds based on a number of criteria, including:

- Urgency of needs
- Cost efficiency
- Eligibility of activities/programs
- Availability of other funding sources to address specific

needs • Funding program limitations • Capacity and authority for implementing actions • Consistency with countywide goals, policies, and efforts

Actions taken to reduce lead-based paint hazards. 91.220(k); 91.320(j)

Estimates show that approximately 93,077 housing units within the County's jurisdiction were constructed prior 1978. Although the level of hazardous incidents involving lead-based paint is relatively low compared to other urban areas, the County still takes a proactive approach in lead-based paint removal. Under the guidance of HUD's Lead Safe Housing Regulations, Housing & Community Development works closely with state certified service providers and homeowners participating in housing rehabilitation programs to safely and effectively identify, evaluate, and remove lead-based paint hazards.

Actions taken to reduce the number of poverty-level families. 91.220(k); 91.320(j)

In the Urban County, 159,265 households (or 16 percent of all households) earned less than 30 percent of the Area Median Income (AMI), according to CHAS. Of these, 57 percent experienced housing problems such as cost burden or overcrowding. The challenges associated with poverty – stress, strained family relationships, substandard housing, lower educational attainment, limited employment skills, unaffordable child care, 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 County 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 County will continue to leverage opportunities to support funding for Community Based Development Organizations, cities, and other groups to provide training and employment opportunities to extremely low-income persons. In collaboration with the County's Workforce Investment Board (OCWIB), the County will continue to offer outreach and training to poverty level families and individuals. Through the CoC system, the County will work with the OCWIB job-training providers to ensure that low- and moderate-income persons are trained with employable skills with the potential to earn higher wages. In addition, the County Section 8 Housing Choice Voucher Program provides assisted families an incentive for employment opportunities through its Family Self Sufficiency (FSS) Program: The FSS Program participants receive resources and are taught job skills that enable them to gain employment and become self-sufficient. The County of Orange has several departments that are involved in some aspect of providing economic development opportunities (e.g., job training, provision of jobs, adding value to communities) to their clientele. In addition, the Orange County Business Council and the County Executive Office have completed an inventory of county resources and coordinate the provision of funds and services. The goals and strategies contained in this Consolidated Plan for funding for housing and human services programs often directly address poverty issues. The County's funding (CDBG and ESG) 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. In addition, housing costs often consume a large

portion of lower-income households' monthly income. This creates a housing cost burden, leaving less money accessible for other necessities. As such, the County's efforts to create new affordable housing, both permanent and transitional, and rehabilitate existing housing contribute to curbing poverty in the County. In the area of housing, the County, in partnership with other governmental agencies, private non-profit, and for profit agencies, has been successful in addressing the areas of affordable housing needs.

Actions taken to develop institutional structure. 91.220(k); 91.320(j)

As the lead agency for the County's Consolidated Plan, the Housing & Community Development Department (HCD) coordinates with State agencies, local governments, all cities in Orange County particularly its 13 participating cities, over 300 community based organizations, 5 County Departments, and various businesses and financial institutions to assist in implementing its formula grant programs. HCD's focus on the institutional structure is a broad strategy of coordination, and communication among the public, private and nonprofit sectors. HCD continues to foster greater cooperation and coordination of efforts with other local governmental agencies and has identified a variety of programs, services and strategies suitable for collaboration with other County Departments. Strengths and gaps regarding the institutional structure emerge from , meetings and other coordinated communication. HCD also provided technical assistance and capacity building to agencies to increase their effectiveness in implementing programs to address the County's housing and community development needs. As the Urban County administrator, HCD coordinates with the Continuum of Care through MOU's and collaboration on allocating Federal funding to target the gaps in the homeless system of care. In the past year, the County increased the amount of funding dedicated to the coordination of services and shelters in Orange County and developed a coordinated system that works to ensure the most effective and efficient utilization of resources and ensure consistency of practices in Orange County. HCD also coordinated with the Orange County Housing Authority through continued support of a Tenant Based Rental Assistance program and the commitment of Project Based Vouchers to developments utilizing Federal HOME funds for the development of permanent supportive housing.

On an annual basis HCD convenes a CDBG Sub Committee made up of participating city representatives from the local City Manager's association. As part of these meetings the County works with the participating cities to recommend and confirm policies for the allocation of funding in the Urban County

Additionally, the County collaborated with the non-profit and private sector in the past year through informational sessions to the development community on available funding for the development of affordable housing and permanent supportive housing. The County is also a member of the Orange County Housing Finance Trust which includes membership from 23 other Orange County cities all focused on the development of affordable housing throughout Orange County.

How many shelters are there now?

- 59 emergency shelter programs in HMIS

- 2,269 year-round emergency shelter beds (as of 2021 HIC)
- 71 seasonal emergency shelter beds (as of 2021 HIC)
- 517 emergency shelter beds created in response to COVID-19 (as of 2021 HIC) 2,857 total emergency shelter beds (as of 2021 HIC)

Actions taken to enhance coordination between public and private housing and social service agencies. 91.220(k); 91.320(j)

Housing & Community Development (HCD) is responsible for the administration and compliance of programs and grant management. HCD performs audits, compliance, and legal notification procedures required by HUD for both the Housing and Neighborhood Preservation and Housing Assistance functions. It also conducts the Annual Application Review process that is the competitive evaluation process by which Federal funding is allocated to special projects. HCD oversees housing community development, such as public infrastructure, housing rehabilitation, community development, preservation and improvement activities, affordable rental housing and homeownership activities through the administration of subrecipient contracts and loans funded through the CDBG, HOME, ESG, and Supportive Housing Grants programs. The cities of Brea, Cypress, Dana Point, Laguna Beach, Laguna Hills, Laguna Woods, La Palma, Los Alamitos, Seal Beach, Stanton, Villa Park participate in the County program and are responsible for delivering specific programs and activities in their communities. The cities of Placentia and Yorba Linda are participating as Metro cities and are responsible for delivering specific programs and activities in their communities. Nonprofits form a network of resources that address a wide variety of housing and community development needs. These organizations provide a valuable link between the population in need of assistance and the pool of resources available. These organizations are awarded entitlement funds through a competitive evaluation process. The County works with numerous nonprofit organizations annually. The Office of Care Coordination, a department within HCA, provides Homeless Services and homeless activities, homeless prevention support of CoC activities ESG, and Supportive Housing Grants programs. As a result of an agency reorganization they will provide oversight of all homeless activities under the CDBG, ESG and HOME grant funding. In addition, having these activities now under the Health Care Agency will allow for staff to be more aware of additional funding available through mental health avenues that were previously not pursued within the previous structure. Private sector participants may include lending institutions and for-profit development entities. Lending institutions may be the source of low-cost loans for affordable housing and rehabilitation projects. Developers are the primary providers of the housing stock and are encouraged to participate in low-income housing in a variety of ways, including through density bonuses and participation in the Low-Income Housing Tax Credit (LIHTC) program. With the formation of the

OCHFT joint powers authority the County of Orange and 24 cities throughout the county have joined forces to apply for funding for housing specifically assisting the homeless population and persons and families of extremely low, very low, and low income within the County of Orange. The benefit of this trust has allowed the OCHFT to apply for funding that is only available to housing trusts, that the County or the member cities would not have been eligible to apply for as a local government. In addition, OCHFT has secured \$1 million in State General Fund, \$1 million in County General Fund and \$25.5 million in County MHSAs funds to be provided as matching funds over the next five years for the State Local Housing Trust Fund Program.

Identify actions taken to overcome the effects of any impediments identified in the jurisdictions analysis of impediments to fair housing choice. 91.520(a)

During the 2020-2021 report period the County of Orange Urban County jurisdiction took the following actions (on its own or in cooperation with regional partners and the Fair Housing Council of Orange County (FHCOC)) to overcome impediments to fair housing choice identified in the regional AI:

Please see attachment A

CR-40 - Monitoring 91.220 and 91.230

Describe the standards and procedures used to monitor activities carried out in furtherance of the plan and used to ensure long-term compliance with requirements of the programs involved, including minority business outreach and the comprehensive planning requirements

In accordance with HUD CPD program regulations, the County continually monitors all CPD-funded sub-recipients and their activities. The County has identified two components of effective Program monitoring: internal desk monitoring and external (Sub-recipients). Internal monitoring encompasses the actions, procedures, and performance of County staff along with subrecipient invoice processing monitoring. Monitoring activities of sub-recipients are carried out through by ensuring the CPD funded activities comply with applicable federal regulations including environmental clearance, labor compliance, procurement procedures, affirmative action, equal opportunity, and fair housing, monitors contracts and funded activities on a consistent basis for compliance, financial management systems and programmatic activity, project reporting through Grant Performance Report (GPR), on-site visits and monitoring minority business outreach and Davis Bacon and Section 3 requirements for public facilities and HOME activities. ESG funds are monitored to ensure the funds are being used effectively to assist homeless individuals and families and that the basic ESG program goals are met, ensure compliance with ESG regulations and program requirements in the usage of funds and in carrying out program activities, ensure complete and accurate client demographics are entered in HMIS and enhance and develop the management capacity of grantees or recipients. Monitoring visits on HOME funded Affordable Housing Projects are done in compliance with 92.504 (d) schedule. Site visits include, but are not limited to: On site visits which consist of conducting Housing Quality Standards unit inspections, exterior common area inspections, and tenant file review for compliance with tenant affordability requirements. Certificate of Continuing Program Compliance forms are required from the Developer including Income Restricted Unit reports which contain a list of tenant occupancy information and current rent schedules. Monitoring visits also are conducted to assure that the Property Management is complying with the Property's Regulatory Agreements for each project. If a property is found in violation, a written notification of findings is sent and a follow-up monitoring visit(s) is conducted, if necessary.

Citizen Participation Plan 91.105(d); 91.115(d)

Describe the efforts to provide citizens with reasonable notice and an opportunity to comment on performance reports.

The Citizen Participation Plan provides a framework and process by which the County's consolidated planning efforts comply with the citizen participation requirements published by the U.S. Department of Housing and Urban Development (HUD). The Citizen Participation Plan is prepared and implemented in accordance with the guidance provided in HUD Regulations 24CFR Part 91.105. The requirements for citizen participation do not restrict the responsibility or authority of the County of Orange from the development or execution of its Consolidated Plan. The County of Orange is entitled to receive annual grant funding from the Community Development Block Grant (CDBG), Home Investment Partnership (HOME), and the Emergency Shelter Grant (ESG) programs. It is the policy of Orange County to ensure adequate citizen involvement, with particular emphasis on participation by low- and moderate-income persons, in the planning, implementation, and evaluation of its housing and community development programs. This plan covers the Urban County of Orange comprised of Participating cities with populations under 50,000 (participating cities), cities with a population over 50,000 that elect to participate in the urban county (metropolitan city) and the unincorporated areas of Orange County. The County of Orange is the lead agency in developing the Citizen Participation Plan. It is the policy of the County to follow its Citizen Participation Plan and to encourage and facilitate a participation (residents, service providers, government agencies, and others) in the development of all Community Planning and Development (CPD) required consolidated planning documents including the Five-Year Consolidated Plan, Annual Action Plans, Substantial Amendments, and the Consolidated Annual Performance and Evaluation Report (CAPER). The primary purpose of the participation will be in needs identification, priority setting, funding allocations, and program recommendations related to the consolidated planning process. The County shall provide for and encourage citizen participation with particular emphasis on low- and moderate-income persons; persons residing in predominantly low -and moderate-income neighborhoods or slum and blighted areas; and persons residing in areas where the use of CDBG funds is being proposed. Prior to the CAPER submission, the County published a public notice in English, Vietnamese and Spanish in a newspaper of general distribution advising residents of the availability of the CAPER for public review and comment. The CAPER is available upon request at Housing & Community Development office and available on the the Housing & Community Development' website at <https://www.ochcd.org/community-development> for the required 15 days beginning September 10, 2021 in English and Spanish and beginning September 14 in Vietnamese prior to submission to HUD. Interested persons could submit written, oral, or electronically sent comments until September 28, 2021. All residents are given reasonable access to information and records regarding the CAPER. Copies of the final CAPER are available upon request, made in person or by mail. The County accepting comments on FY 2020-21 CAPER during the 15 day comment period and to date no comments have been received.

CR-45 - CDBG 91.520(c)

Specify the nature of, and reasons for, any changes in the jurisdiction's program objectives and indications of how the jurisdiction would change its programs as a result of its experiences.

The County strongly supports and encourages community-wide participation, input, cooperation, and feedback from all residents of the County in the administration of its CPD-funded programs. The County continues its commitment to meeting priority goals outlined in the FY2020-2024 Five Year Consolidated Plan. The County's Citizen Participation Plan allows for minor and technical amendments. Substantial amendments require approval by the County Board of Supervisors through a public notice and public hearing. Five substantial amendments occurred during the FY2020-21 to add CDBG_CV1, CDBG-CV3, ESG-CV1 and ESG-CV2 funding to FY2015-19, FY2020-21 consolidated plans to funding to prepare, respond to and recover from the COVID-19 pandemic through various activities and one to change the City of Yorba Linda budget to move unspent regular CDBG funds from two projects to the city's Small Business Relief program. The following minor actions were taken: Funding Changes City of Placentia moved funds from their unspent Façade Improvement project to their ADA improvements to the Old City Hall Building project. Other amendments include contract extensions for the city of Brea, Cypress, Los Alamitos, Placentia, Yorba Linda and Colett;s Childrens Home.

Does this Jurisdiction have any open Brownfields Economic Development Initiative (BEDI) grants?

No

[BEDI grantees] Describe accomplishments and program outcomes during the last year.

CR-50 - HOME 91.520(d)

Include the results of on-site inspections of affordable rental housing assisted under the program to determine compliance with housing codes and other applicable regulations

Please list those projects that should have been inspected on-site this program year based upon the schedule in §92.504(d). Indicate which of these were inspected and a summary of issues that were detected during the inspection. For those that were not inspected, please indicate the reason and how you will remedy the situation.

Every year, the County of Orange performs approximately 400 on-site inspections of affordable housing units and on-site audit tenant files to ensure compliance with Property Standards 24 CFR 92.251; Qualification as affordable housing: Rental Housing 24 CFR 92.252; Participating jurisdiction responsibilities; written agreement; and on-site inspection 24 CFR 92.504. The on-site inspections must occur within 12 months after project completion and at least once every 3 years thereafter during the period of affordability. The HOME-assisted multi-family housing project portfolio consists of 28 completed projects. The total number of restricted units ranged from 4 to 131 HOME-assisted units for all HOME projects; or approximately 600 HOME-assisted restricted units available for cursory and full inspections.

In FY 2019-2020, the County of Orange was on schedule to inspect and audit the following properties listed below; however, due to COVID-19 and per HUD's HOME COVID-19 Regulatory Waivers and Statutory Suspensions, all inspections have been placed on hold until the end of the waiver period but continues to perform desk monitoring reviews remotely. The County of Orange is set to resume all inspections of units that would have been subject to HQS inspections during the waiver period within 120 days of the September 30, 2021 expiration of the waiver.

List of HOME funded Housing Developments that should have received On-site Visits:

Ability First, Avenida Villas Families, Birch Hills, Bishop Apartments, Bonterra Apartment Homes, Buena Vista Apartments, California Villas (Sterling Court), Camden Place Senior Apartments, Canada & Marquita Apartments, Casa Alegre, Casa de la Esperanza, Cornerstone Apartments, Cotton's Point, Dorado Senior Apts. HOME, Doria I & II, Granite Court, Heritage Villas, Linbrook Court Senior, Mendocino at Talega I, Midway City SRO, Montecito Vista Apartments, Oakcrest Heights, Solara Court Senior

Apartments, Stonegate I & II, Vintage Canyon Senior Apartments, Vintage Shores, Walnut Village Apartments and Woodbury Walk Apartments.

**Provide an assessment of the jurisdiction's affirmative marketing actions for HOME units.
92.351(b)**

As discussed in the 2020-24 ConPlan, obstacles to meeting the under-served needs of households within the low and moderate-income levels are generally based on available financial resources, construction costs, and citizen support of the concept of affordable housing. The County has taken affirmative measures to improve on the availability and use of resources by allocating funds to a variety of activities and organizations. The County continues to inform the public at-large of the Program's many opportunities through its policy of advertising through the use of County Notices and Public Notices published in local newspapers, including Spanish and Vietnamese publications. Enhancing Coordination - The County continues to expand its relationships with a variety of groups and agencies in order to better meet the needs of the community. Beyond maintaining its current role in funding and coordinating with local cities, non-profits, developers, lenders, and property owners, the County has taken the initiative to develop more opportunities for these entities to collaborate to discuss issues and work in partnership on possible actions and/or solutions. HOME funded Permanent Supportive Housing units receive referrals from the Coordinated Entry System. The Coordinated Entry System lead agency, Orange County Community Resources (OCCR), is empowered by the Continuum of Care (CoC) to manage the process of determining and updating the prioritization for all CoC funded permanent supportive housing (PSH) and CoC and ESG funded rapid rehousing (RRH) as well as any other housing resources that voluntarily participate in the Coordinated Entry System.

Refer to IDIS reports to describe the amount and use of program income for projects, including the number of projects and owner and tenant characteristics

For FY 2020-21, \$54,274 in program income was expended on a HOME funded projects.

**Describe other actions taken to foster and maintain affordable housing. 91.220(k) (STATES ONLY: Including the coordination of LIHTC with the development of affordable housing).
91.320(j)**

On April 30, 2020, the California HCD announced the release of a Notice of Funding Availability (NOFA) for approximately \$57 million in funds for the Local Housing Trust Fund (LHTF) Program. As a requirement of the program, Local Housing Trust Funds established by cities and counties, Native American Tribes and incorporated 501(c)(3) nonprofit organizations could be awarded Matching Grants to Eligible activities including construction loans and/or permanent financing loans to pay for predevelopment costs, acquisition costs, and other costs associated with the development or rehabilitation of Affordable rental housing projects, or Emergency Shelters, Transitional Housing, Permanent Supportive Housing, and Affordable homebuyer/homeowner projects, including assistance to income-eligible households to purchase for-sale housing units or to rehabilitate. Funds may also be

used for the construction, conversion, repair, and rehabilitation of Accessory Dwelling Units (ADUs) or Junior Accessory Dwelling Units (JADUs). In order to comply with the matching fund requirements, On May 19, 2020, the Board of Supervisors approved a redistribution of \$25.5 million in MHSA funds to the OCHFT to be distributed over a five year period to be used as matching funds for the Local Housing Trust Program. These funds will be used for the development of permanent supportive housing to serve persons with serious mental illness who are homeless, at risk of homelessness, and who otherwise meet the MHSA Housing Program target population description.

CR-60 - ESG 91.520(g) (ESG Recipients only)

ESG Supplement to the CAPER in *e-snaps*

For Paperwork Reduction Act

1. Recipient Information—All Recipients Complete

Basic Grant Information

Recipient Name	ORANGE COUNTY
Organizational DUNS Number	009657602
EIN/TIN Number	956000928
Identify the Field Office	LOS ANGELES
Identify CoC(s) in which the recipient or subrecipient(s) will provide ESG assistance	Santa Ana/Anaheim/Orange County CoC

ESG Contact Name

Prefix	Ms
First Name	Julia
Middle Name	0
Last Name	Bidwell
Suffix	0
Title	Director, Housing & Community Development

ESG Contact Address

Street Address 1	1501 E. St. Andrews Place
Street Address 2	0
City	Santa Ana
State	CA
ZIP Code	-
Phone Number	7144802991

CAPER

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Extension 0
Fax Number 0
Email Address julia.bidwell@occr.ocgov.com

ESG Secondary Contact

Prefix Mr
First Name Craig
Last Name Fee
Suffix 0
Title Community Development Manager
Phone Number 7144802996
Extension 0
Email Address craig.fee@occr.ocgov.com

2. Reporting Period—All Recipients Complete

Program Year Start Date 07/01/2020
Program Year End Date 06/30/2021

3a. Subrecipient Form – Complete one form for each subrecipient

Subrecipient or Contractor Name: Health Care Agency
City: Santa Ana
State: CA
Zip Code: 92701
DUNS Number: 079483415 _____
Is subrecipient a victim services provider: N
Subrecipient Organization Type: County of Orange
ESG & ESG-CV Subgrant or Contract Award Amount: \$5,683,869

CR-65 - Persons Assisted

4. Persons Served

4a. Complete for Homelessness Prevention Activities

Number of Persons in Households	Total
Adults	0
Children	0
Don't Know/Refused/Other	0
Missing Information	0
Total	0

Table 16 – Household Information for Homeless Prevention Activities

4b. Complete for Rapid Re-Housing Activities

Number of Persons in Households	Total
Adults	0
Children	0
Don't Know/Refused/Other	0
Missing Information	0
Total	0

Table 17 – Household Information for Rapid Re-Housing Activities

4c. Complete for Shelter

Number of Persons in Households	Total
Adults	0
Children	0
Don't Know/Refused/Other	0
Missing Information	0
Total	0

Table 18 – Shelter Information

4d. Street Outreach

Number of Persons in Households	Total
Adults	0
Children	0
Don't Know/Refused/Other	0
Missing Information	0
Total	0

Table 19 – Household Information for Street Outreach

4e. Totals for all Persons Served with ESG

Number of Persons in Households	Total
Adults	0
Children	0
Don't Know/Refused/Other	0
Missing Information	0
Total	0

Table 20 – Household Information for Persons Served with ESG

5. Gender—Complete for All Activities

	Total
Male	0
Female	0
Transgender	0
Don't Know/Refused/Other	0
Missing Information	0
Total	0

Table 21 – Gender Information

6. Age—Complete for All Activities

	Total
Under 18	0
18-24	0
25 and over	0
Don't Know/Refused/Other	0
Missing Information	0
Total	0

Table 22 – Age Information

7. Special Populations Served—Complete for All Activities

Number of Persons in Households

Subpopulation	Total	Total Persons Served – Prevention	Total Persons Served – RRH	Total Persons Served in Emergency Shelters
Veterans	0	0	0	0
Victims of Domestic Violence	0	0	0	0
Elderly	0	0	0	0
HIV/AIDS	0	0	0	0
Chronically Homeless	0	0	0	0
Persons with Disabilities:				
Severely Mentally Ill	0	0	0	0
Chronic Substance Abuse	0	0	0	0
Other Disability	0	0	0	0
Total (Unduplicated if possible)	0	0	0	0

Table 23 – Special Population Served

CR-70 – ESG 91.520(g) - Assistance Provided and Outcomes

10. Shelter Utilization

Number of New Units - Rehabbed	0
Number of New Units - Conversion	0
Total Number of bed-nights available	999,330
Total Number of bed-nights provided	745,980
Capacity Utilization	74.65%

Table 24 – Shelter Capacity

11. Project Outcomes Data measured under the performance standards developed in consultation with the CoC(s)

County staff has developed an MOU with the Orange County Health Care Agency which has a collaborative of ESG recipient jurisdictions in geographic CoC area. County staff with all other ESG jurisdictions in the County, meet on an ongoing basis to discuss policies and procedures for Homeless Management Information System (HMIS) and best practices to allocate ESG funds for the program year. In order to inform funding decisions, ESG recipients participate in CoC meetings, committees, and have representation on the CoC Board. Additionally, County staff, along with other ESG recipients' jurisdictions, continue to use a set of mutually agreed upon forms: intake forms, client participation agreements, checklists for monitoring and evaluating project and agency performance, and reimbursement forms for purposes of consistency and streamlining the process for all applicable parties. The policies, procedures and forms are regularly reviewed by staff and updated as needed. Staff also consult with the CoC and attends their meetings to discuss issues/concerns, development of area-wide intake assessment, written standards and best practices for meeting the needs of the homeless population.

CR-75 – Expenditures

11. Expenditures

11a. ESG Expenditures for Homelessness Prevention

	Dollar Amount of Expenditures in Program Year		
	2017	2018	2019
Expenditures for Rental Assistance	0	0	0
Expenditures for Housing Relocation and Stabilization Services - Financial Assistance	0	0	0
Expenditures for Housing Relocation & Stabilization Services - Services	0	0	0
Expenditures for Homeless Prevention under Emergency Shelter Grants Program	0	0	0
Subtotal Homelessness Prevention	0	0	0

Table 25 – ESG Expenditures for Homelessness Prevention

11b. ESG Expenditures for Rapid Re-Housing

	Dollar Amount of Expenditures in Program Year		
	2018	2019	2020
Expenditures for Rental Assistance	47,833	64,622	67,195
Expenditures for Housing Relocation and Stabilization Services - Financial Assistance	0	0	0
Expenditures for Housing Relocation & Stabilization Services - Services	0	0	0
Expenditures for Homeless Assistance under Emergency Shelter Grants Program	0	0	0
Subtotal Rapid Re-Housing	47,833	64,622	67,195

Table 26 – ESG Expenditures for Rapid Re-Housing

11c. ESG Expenditures for Emergency Shelter

	Dollar Amount of Expenditures in Program Year		
	2018	2019	2020
Essential Services	0	0	0

Operations	124,937	129,948	6,006,070
Renovation	0	0	0
Major Rehab	0	0	0
Conversion	0	0	0
Subtotal	124,937	129,948	6,006,070

Table 27 – ESG Expenditures for Emergency Shelter

11d. Other Grant Expenditures

	Dollar Amount of Expenditures in Program Year		
	2018	2019	20120
Street Outreach	0	0	0
HMIS	9,693	9,693	10,079
Administration	16,156	16,561	16,798

Table 28 - Other Grant Expenditures

11e. Total ESG Grant Funds

Total ESG Funds Expended	2018	2019	2020
	198,619	220,824	5,416,646

Table 29 - Total ESG Funds Expended

11f. Match Source

	2018	2019	2020
Other Non-ESG HUD Funds	0	0	0
Other Federal Funds	0	0	0
State Government	99,252	0	0
Local Government	100,000	900,000	150,000
Private Funds	0	0	0
Other	0	0	0
Fees	0	0	0
Program Income	0	0	0
Total Match Amount	199,252	900,000	150,000

Table 30 - Other Funds Expended on Eligible ESG Activities

11g. Total

Total Amount of Funds Expended on ESG Activities	2018	2019	2020
	397,871	1,120,824	5,416,646

Table 31 - Total Amount of Funds Expended on ESG Activities

Attachment A

During the 2020-2021 report period the County of Orange Urban County jurisdiction took the following actions (on its own or in cooperation with regional partners and the Fair Housing Council of Orange County (FHCOC)) to overcome impediments to fair housing choice identified in the regional AI:

- Fair Housing Community Education – During 2020-21, the FHCOC regionally conducted or participated in 188 virtual education and/or outreach activities, reaching a culturally and ethnically diverse audience, in which they made participants aware of fair housing laws and counseling services (including services to help households improve their readiness for a home purchase). Because of the COVID-19 pandemic-driven need to engage with participants only virtually, these activities were not specific to residents of the Urban County jurisdiction, but they were all available to those residents. Regionally, 763 people were served by these activities. Through its various regional outreach efforts FHCOC distributed over 18,700 information pieces on fair housing, its services and other housing-related topics, in either English, Spanish or Vietnamese. Overwhelmingly, these items were distributed electronically, although some were distributed via mail or bulk delivery. Additionally, throughout Orange County FHCOC held 10 virtual training sessions for rental property owners/managers. FHCOC presented 2 virtual fair housing seminars for housing providers in cooperation with the Apartment Association of Orange County (AAOC). Twenty-one general fair housing workshops intended for participation by both/either housing consumers and providers throughout Orange County were provided. Due to the virtual nature of these workshops none were specific to residents of the Urban County jurisdiction, but they were all available to those residents.
- Fair Housing Enforcement – On a regional basis, FHCOC staff received 96 allegations of housing discrimination and opened 48 cases where the allegations seemed sufficiently meritorious to warrant further investigation and/or action. We also counseled or informed another 54 clients regarding fair housing law and/or rights. Nine allegations arose from the Urban County jurisdiction and 7 cases (6 disability, & 1 national origin) involved housing in the Urban County. On a regional basis, FHCOC also conducted 99 paired telephonic, systemic tests for discriminatory rental housing practices. An additional 8 paired systemic tests of real estate agents and 8 paired systemic pre-application tests of lenders were conducted telephonically. While all such systemic testing would normally be conducted in person, COVID-19 pandemic restrictions necessitated they be conducted via telephone only. Fifteen systemic tests involved locations in the Urban County.
- Housing Dispute Evaluation & Resolution – On a regional basis, activities provided by FHCOC included assisting 2,942 unduplicated households addressing 9,173 issues, disputes and/or inquires. Of these, 616 unduplicated households, involving 1,864 issues, disputes and/or inquires, were from the Urban County jurisdiction. The occupancy of the households served totaled 1,976 people.
- Reasonable Accommodations – On a regional basis, 9 inquiries regarding reasonable accommodations and modifications were received by FHCOC that resulted in casework beyond basic counseling. Three of the inquiries arose from the Urban County jurisdiction. Overall, 7 of the 9 clients requested and received a reasonable accommodation, while the 2 other requests were effectively and improperly denied, resulting in an administrative complaints filed with the Fair Housing and Equal Opportunity (FHEO) Office of the U.S. Department of Housing and Urban Development.

Attachment A

- Web-based Outreach – FHCOC’s website currently has an on-line housing discrimination complaint-reporting tool that generates an email to FHCOC. It is also used for other, non-discrimination, housing-related issues.
- Monitoring On-line Advertising – Orange County rentals listed on Craigslist were monitored by FHCOC for discriminatory content (as permitted by staffing limitations). Any discriminatory advertisements were flagged as prohibited and FHCOC responded to these ads through Craigslist’s reply mechanism in order to inform the poster of possible discriminatory content. In most instances it was not possible to identify the property address and the identity of the individual making the posting. When possible FHCOC also brought these ads to the attention of Craigslist to hasten their removal, although Craigslist reporting mechanism is no longer simple. When investigation was found to be feasible, the ad was referred to FHCOC’s investigators for possible enforcement action. Other on-line rental advertising sites (e.g., *OC Register*, *LA Times*, *Westside Rentals*, etc.) were sporadically monitored; however, the lack of an efficient text search function on these sites made monitoring them less practical. Without exception, among the ‘apt / housing’ Craigslist rental listings, the identified problematic postings indicated restrictions with regard to children under the age of 18 or improper preference for seniors or ‘older adults’ for housing opportunities that did not appear to qualify as housing for older persons (age 55 and over) Overt racial or national origin discrimination was not observed. Advertising in the ‘rooms / shared’ area of Craigslist were observed to have a higher incidence of stated preferences that violated fair housing law. However due to the practical aspects of resource limitations and case law considerations of shared housing situations, most were not acted upon. With the change in California law effective January 1, 2020 that expanded ‘source of income’ protections to individuals who use forms of housing rent assistance, such as the Housing Choice Voucher (often called ‘Section 8’), FHCOC identified numerous Craigslist postings that contained discriminatory language regarding the use of housing rental assistance. FHCOC has successfully filed 3 complaints with the California Department of Fair Employment and Housing regarding these discriminatory ads. FHCOC has also successfully caused dozens of these postings to be changed to remove the discriminatory content.
- Monitor Home Mortgage Disclosure Act Data - Ongoing monitoring of Home Mortgage Disclosure Act (HMDA) data continues to be infeasible due to limited resources at FHCOC. FHCOC last was able to conduct such analysis using 2008 data (then the latest available) in conjunction with the preparation of the 2010-2015 *Regional AI*. Analysis of updated HMDA data from 2013, as well as other mortgage lending practices, was included as part of the County of Orange’s FY 2015-2020 Regional Analysis of Impediments to Fair Housing Choice (AI), which was submitted as part of its Five Year Consolidated Plan FY 2015 - 2020. Similarly, the recently completed Regional Orange County Analysis of Impediments to Fair Housing Choice for the 2020-2024 Consolidated Plan cycle, contained some basic analysis of regional HMDA data for the period of 2014-2017. That analysis showed disparities in the access to loans on the basis of race, with minority applicants having less access than white applicants.
- During 2020-21, FHCOC continued efforts to promote housing affordability within Orange County. It provided services and outreach to organizations involved in the creation and preservation of affordable housing. These groups included the Kennedy Commission, Mental Health Association of Orange County, Radiant Health (formerly Aids Services Foundation), Affordable Housing

Attachment A

Clearinghouse, Jamboree Housing Corporation, Mercy House, South County Outreach, Families Forward, Orange County Congregations Community Organizations, and Orange County Community Housing Corporation.

- During the 2020-21 report period, FHCOC continued to offer fair housing training sessions, and these were open to all local government staff. Due to COVID-19 imposed restrictions all trainings were conducted virtually. Training activity included providing training to staff of the Orange County Housing Authority, which serves Laguna Niguel. Any City staff attending training could receive certification of their attendance.
- The FHCOC produced and provided written fair housing related materials in English, Spanish and Vietnamese to the persons in the Urban County jurisdiction. Due to limitations necessitated by the COVID-19 pandemic our ability to distribute physical materials was severely limited, as public meetings and events were essentially nonexistent. Some materials were distributed by mail or email to persons contacting our agency or participating in virtual outreach activities. FHCOC also undertook specific virtual outreach efforts to immigrant populations in low-income neighborhoods. On a regional basis, an estimated 850 limited English proficiency households were served during the 12 month program period, through a combination of telephonic contact and virtual education and outreach activities. FHCOC also continued to implement activities under HUD Fair Housing Initiatives Program grants, for both education and outreach and fair housing enforcement. These efforts were also limited to virtual activities. These program efforts specifically targeted fair housing services to persons with disabilities, minority groups and immigrant communities, especially immigrants with limited English proficiency. Program efforts included a fair housing testing program that sought to involve members of immigrant populations with limited English proficiency, both for purposes of enforcing fair housing laws as testers and as a vehicle to increase outreach to these populations.
- Through its status as a HUD-approved Housing Counseling agency, FHCOC assisted individuals, including those with limited English proficiency (LEP), with various housing related problems. This included being available to counsel and assist those who had received loans with documents, all prepared in English, which had terms that were different from what they believed or were informed they were obtaining, or of which they had less than a full understanding. Many of the other counseling activities under its HUD-approved Housing Counseling also assisted individuals with LEP.