

### **ANNUAL ACTION PLAN**

**FISCAL YEAR 2024 - 2025** 

COMMUNITY DEVELOPMENT BLOCK GRANT (CDBG)

HOME INVESTMENT PARTNERSHIPS PROGRAM (HOME)

EMERGENCY SOLUTIONS GRANTS (ESG)

City of Moreno Valley Grants Division 14177 Frederick St. Moreno Valley, CA 92552

**ADOPTED** 

MAY 21,2024

### **Executive Summary**

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

#### 1. Introduction

Every year the Department of Housing and Urban Development (HUD) allocates federal grant monies to Entitlement Cities (eligible, selected cities with a population exceeding 50,000). The city of Moreno Valley is considered an entitlement city and receives federal funding on an annual basis from HUD for three federal grant programs: Community Development Block Grant (CDBG), HOME Investment Partnerships (HOME), and Emergency Solutions Grants (ESG). The City of Moreno Valley utilizes these federal grant monies to support programs that provide decent housing, build infrastructure, create economic development opportunities, and provide a variety of social services for low to moderate-income residents. The City's Five-Year Consolidated Plan is a comprehensive planning document that provides the framework for the use of CDBG, HOME, and ESG funds to provide community development, housing, and homeless activities. The current Consolidated Plan cycle runs from July 2023 through June 2028. The FY 2024-2025 Annual Action Plan is the second year in the ConPlan cycle.

The FY 2024-25 Annual Action Plan (AAP) serves as the update to the Consolidated Plan and identifies the distribution of federal funds for specific activities and programs during the program year. In FY 2024-25, it is estimated that the City will receive \$1,957,039 in CDBG funds, \$628,174.21 in HOME funds, and \$173,935 in ESG funds. These funds will support housing, community development and homeless prevention activities. The Annual Action Plan also provides a basis for assessing performance. At the end of the program year, a Consolidated Annual Performance and Evaluation Report (CAPER) provides information on the annual programmatic accomplishments.

#### 2. Summarize the objectives and outcomes identified in the Plan

The main objective of the Annual Action Plan is to outline the City's efforts in meeting the goals that were outlined in its Consolidated Plan. The goals as outlined in the city's 2023-2028 Consolidated Plan are as follows:

- Capital Improvement Activities
- Economic Development Activities
- Health, Safety, and Public Awareness Activities
- Historic Preservation Activities
- Homeless/Homelessness Prevention Activities
- Public Service Activities
- Slum or Blight Activities
- Planning and Administration

#### 3. Evaluation of past performance

The City chose the goals and projects identified in this plan by revisiting its objectives during a series of public meetings and public hearings as part of its citizen participation plan. Evaluation of the most recently completed fiscal year (FY) projects was also factored into the selection of projects. For example, at the end of FY 2022-2023 the City, through its subrecipients was able to:

- Provide fair housing services for 3,739 people.
- Assist 67 persons with homelessness preventions services.
- Rehabilitate 25 households.
- Provide public services that improved the well-being of 61,870 people.
- Improve public facilities that benefited over 43,000 residents.

#### 4. Summary of Citizen Participation Process and consultation process

The City of Moreno Valley Citizen Participation Plan contains the City's policies and procedures for public involvement in the Consolidated Plan process and the use of Federal grant funds. As part of the City's Citizen Participation Plan, the City hosted two (2) public meetings and three (3) public hearings. All citizen participation was accomplished through meetings, published public notices, and online announcements. The City invited residents, non-profit organizations, and surrounding jurisdictions to solicit input on community needs.

The first public meeting took place on November 28, 2023, to review the goals and objectives to be included in the Annual Action Plan. The first public hearing took place on December 5, 2023, to provide residents the opportunity to provide comments regarding priority needs in the community. The proposed Action Plan was available for a 30-day public examination and comment period from March 22, 2024, through May 7, 2024. A second public meeting was held on March 26, 2024, to review the subrecipient applications the City received for funding recommendations. A second public hearing was held on May 7, 2024; at this meeting the City Council reviewed the proposed activity selections, and the public was encouraged to provide comments. A final public hearing took place on May 21, 2024, after the close of the public review period. The final public hearing allowed the public an opportunity to comment on the proposed Action Plan before implementation by the City Council. The information compiled from the meetings was used in determining the needs in the community and the development of strategies. Citizen comments are included as an attachment to this document.

#### 5. Summary of public comments

At public hearing number two, five people spoke. Commenter 1: Spoke about keeping funds invested with providers in the City or County and concerns with applicants asking for large amounts of money. Commenter 2: Expressed their gratitude in receiving previous CDBG funds, the impact of those funds on their participants, and hope for receiving future funding. Commenter 3: Expressed support for Commenter 2 and shared that funds should be invested

locally. Commenter 4: Spoke about concerns with water quality near their home. Commenter 5: Spoke about how there is never enough money to support the work of non-profits.

At public hearing number three, there were six speakers. One speaker disagreed with the recommended funding presented and provided their own recommendation for funding. Another speaker shared their experience with renting their home to people experiencing housing instability and noted that client education and training were important before placing someone in housing. Two speakers were representatives from non-profits recommended for funding spoke about their organizations and expressed their gratitude for being considered for funding. Two other speakers reiterated the importance of supporting non-profits with funding who are doing important community work, while maintaining oversight of how funds are used.

The City also received nine written comments via email asking the City to prioritize funding for childcare providers.

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

All comments were accepted.

#### 7. Summary

See summary noted above.

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

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

Agency Role	Name	Department/Agency
CDBG Administrator	City of Moreno Valley	Grants Division
ESG Administrator	City of Moreno Valley	Grants Division
HOME Administrator	City of Moreno Valley	Grants Division

Table 1 - Responsible Agencies

#### **Narrative (optional)**

The City of Moreno Valley Grants Division is responsible for the development of the Annual Action Plan. The Annual Action Plan was prepared with input from public stakeholders such as local non-profit agencies, social service organizations, and interested members of the public.

#### **Consolidated Plan Public Contact Information**

The primary contacts for matters regarding this plan are Brian Mohan, Assistant City Manager (Administration) and Viviana McDaniel, Grants Division Manager. Primary contacts can be reached at 951-413-3450 or by email at grantadmin@moval.org.

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

#### 1. Introduction

The City's Citizen Participation process allows for residents, local service providers, government entities, and others to provide input during the funding allocation process. A list of organizations, entities, and other participants is included in Table 2 below.

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(I)).

One resource that the City utilizes to assist in coordination is the City's participation in the Riverside County's Continuum of Care (CoC). City staff meets consistently with the CoC. The City's involvement in the CoC allows for open dialogue with key agencies including the Riverside County Department of Public Social Services, the Riverside County Housing Authority, the Department of Mental Health, the County Adult Homeless Unit, local law enforcement and numerous local service providers. The CoC convenes these organizations with the goal of addressing homelessness, but in the process, also discusses other community needs, such as public housing and emergency services needed in the region. Riverside County's CoC is active, and the Board consists of higher-level representatives with the authority to implement change at each respective organization.

The City will continue to be supportive of direct applications for funds from housing providers as well as local Community Housing and Development Organizations (CHDOs). Cooperation with surrounding jurisdictions has been essential in promoting the City's ability to address a wide variety of community needs including housing rehabilitation, housing programs, public services, and public safety. To facilitate organization and solidarity, the City will continue to work with these entities by attending regular meetings, events, and joint endeavors. The City hopes to work with resources available through affordable housing financial institutions. These private businesses will be included in the annual plans as applicable.

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 CoC's primary goal is to address homelessness in the region. The group is charged with developing and implementing Riverside County's five-year plan to end homelessness and address housing in the County. The COC is provided with federal funding to offer homeless services and shelter. Moreno Valley staff regularly attend the CoC meetings. In addition, the city staff assists in organizing and coordinating the Homeless Point in Time (PIT) Counts. Participating in these counts provides staff with a firsthand knowledge of homeless needs through direct interaction with potential recipients of homeless services. Data from the homeless count is applied to determine homeless service needs and levels in the City.

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 CoC serves as the planning body for the County's submission of the Riverside County Consolidated Application for HUD funds such as ESG. City staff have historically participated in rating CoC grantee applications for ESG funding and have been active in helping make determinations for the allocation of funds. The City consults with the CoC by sharing ESG funding recommendations from staff and requesting feedback from the full CoC membership. For the ESG activities proposed within the Action Plan, City representatives consulted with the CoC by forwarding a summary of all applications along with Council recommendations and requesting CoC members provide feedback via e-mail. The City took their feedback into consideration. The administration/operation of HMIS is handled through the County of Riverside. City of Moreno Valley representatives are in constant communication with County HMIS staff and discuss program set-up, schedule for training, and to discuss ESG reporting requirements.

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

	Agency/ Group/ Organization	Agency/ Group/ Organization Type	What section of the Plan was addressed by Consultation?	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?
1	HOUSING AUTHORITY OF RIVERSIDE COUNTY	-Housing -PHA -Other government - County	-Housing Need Assessment -Public Housing Needs -Non-Homeless Special Needs	Throughout the year, the City reviews proposed development sites, the comprehensive plan of the PHA, and any proposed demolition or disposition of public housing developments. In reviewing PHA comprehensive plan the City can determine regional housing needs as established by the PHA. It is anticipated this continued relationship with the PHA will allow the City to identify needs and gaps in service to improve service delivery.
2	RIVERSIDE COUNTY CONTINUUM OF CARE	-Housing -PHA -Services - Housing -Services-Persons with HIV/AIDS -Services-Victims of Domestic Violence -Services-homeless -Other government - County -Regional organization -Planning organization -Civic Leaders	-Housing Need Assessment -Public Housing Needs Homeless -Needs - Chronically homeless -Homeless Needs - Families with children -Homelessness Needs - Veterans -Homelessness Needs - Unaccompanied youth -Homelessness Strategy -Anti-poverty Strategy	The City is a member of the regional CoC. As a result of membership, the City regularly consults with various city, county, and local homeless service providers about all matters of homelessness affecting the area. The City coordinates with the CoC for the Veterans, Youth, and general Point in Time Homeless Count in Moreno Valley.
3	FAIR HOUSING COUNCIL OF RIVERSIDE COUNTY, INC.	-Service-Fair Housing	-Housing Need Assessment	The City outreached to the Fair Housing Council of Riverside County (FHCRC) to assist the City in the development of the Consolidated. FHCRC was also instrumental in providing the City with key fair housing data to complete the Consolidated Plan and is a consistent partner of the City.
4	HABITAT FOR HUMANITY RIVERSIDE INC.	-Housing	-Housing Need Assessment -Non-Homeless Special Needs -Anti-poverty Strategy	The City regularly engages with the organization and discusses the coordination of local housing programs for low/moderate income and special needs populations (elderly and disabled).

5	FAMILY SERVICE ASSOCIATION OF WESTERN RIVERSIDE COUNTY (FSA)	-Services-Children -Services-Elderly Persons -Services-Persons with Disabilities -Services-Persons with HIV/AIDS -Services-Victims of Domestic Violence -Services-Homeless -Services-Health -Services-Education -Services- Employment	-Housing Need Assessment Homeless Needs - Chronically homeless -Homeless Needs - Families with children -Homelessness Needs - Veterans Homelessness -Needs - Unaccompanied youth -Homelessness Strategy -Non-Homeless Special Needs -Anti-poverty Strategy	The City has had a long relationship with Family Services Association (FSA) and meets with the organization periodically to discuss community needs. It is anticipated that the City will continue to collaborate with FSA on meeting the needs of Moreno Valley residents.
6	RIVERSIDE UNIVERSITY HEALTH SYSTEM-PUBLIC HEALTH AND BEHAVIORAL HEALTH	-Services-Health -Health Agency	-Housing Need Assessment -Non-Homeless Special Needs	The City outreached and reviewed information related to needs assessment and the obtained Mental Health Services Act.
7	RIVERSIDE COUNTY OFFICE ON AGING	-Services-Elderly Persons -Services-Persons with Disabilities	-Housing Need Assessment -Non-Homeless Special Needs -Anti-poverty Strategy	The City obtained information on the elderly needs assessment, priority needs, and affordable housing developments serving seniors and disabled persons.
8	CALIFORNIA DEPARTMENT OF PUBLIC HEALTH	-Services-Health -Other government - State	-Housing Need Assessment -Non-Homeless Special Needs	The Departments Health Facilities Consumer System was consulted for purposes of developing an inventory of Intermediate Care Facilities for Developmentally Disabled Persons and Congregate Care Facilities for the Elderly.

Table 2 – Agencies, groups, organizations who participated.

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

All relevant housing, social services and other entities were consulted. Other local/regional/state/federal planning efforts considered when preparing the Plan are listed in the table below.

#### 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	Riverside County Department of Public Social	The CoC plan and the City's Consolidated
	Services	Plan are very consistent in their goals for the
		Region and agree that a regional effort is required.
2020-2024 Area Plan	Riverside County Office on Aging	The 2020-2024 Area Aging Plan provided
		guidance to the needs assessment, priorities, and goals of the Consolidated Plan
General Plan	City of Moreno Valley	The General Plan was consulted to ensure
		that the goals of the Consolidated Plan align
		with the overall City goals.
Housing Element	City of Moreno Valley	The Housing Element was consulted to
		review the goals, policies, and programs
		related to housing conditions and needs.

Table 3 - Other local / regional / federal planning efforts

#### Narrative (Optional)

Pursuant to the ConPlan regulations, during the process of developing the Consolidated Plan the City's consultation process included gathering information on broadband internet service providers, organizations engaged in narrowing the digital divide, agencies whose primary responsibilities include the management of flood prone areas, public land or water resources, and emergency management agencies.

#### Broadband Internet Service Providers/Organization Engaged in Narrowing the Digital Divide:

The FCC definition of broadband includes download speeds faster than 25 Mbps. The City has three types of internet service providers: cable, DSL, and fiber. The internet service providers include AT&T, Frontier, Spectrum, Mediacom, HughesNet and Time Warner. According to Stanford University, the "digital divide" refers to the growing gap between the underprivileged members of society, especially the poor, rural, elderly, and handicapped portion of the population who do not have access to computers or the internet; and the wealthy, middle class, and young Americans living in urban and suburban areas who have access. RIVCOconnect is a Riverside County initiative, supported by the Riverside County Board of Supervisors and Executive Office, and led by Riverside

County Information Technology (RCIT), that seeks to remove the roadblocks that obstruct service providers from building out current infrastructure. RIVCOconnect invites the private sector to deliver broadband services Countywide at speeds of 1 Gbps and above. The Moreno Valley Public Library provides computer labs and online resources to all its patrons.

#### Management of Flood Prone Areas

The flood prone areas within the City have been mapped by the County of Riverside and the Federal Emergency Management Agency (FEMA). The Riverside County Flood Control and Water Conservation District is responsible for the planning and construction of regional flood control facilities. The City retains the responsibility for designing, construction, and maintenance of local drainage facilities. Four types of flooding conditions could occur in Moreno Valley: flooding in defined watercourses; ponding; sheet flow; and dam inundation flooding. Flood levels within defined watercourses vary along many of the drainage ways and floodplains.

#### Emergency Management Agencies

The Moreno Valley Fire Department will be the incident commander, or be working in a unified command, with other responding agencies, depending on the nature of the emergency. The Fire Department maintains a clear understanding of the statutory responsibility and authority it has depending upon the emergency; along with a working knowledge of the Incident Command System, California Disaster and Civil Defense Master Mutual Aid Agreement, and Standardized Emergency Management System (SEMS).

#### Land or Water Resources

According to the General Plan Conservation Element, water resources include two hydrological groundwater basins in the planning area: The Perris Basin and the San Jacinto Basin. The primary purveyor of water in Moreno Valley since the 1950's has been the Eastern Municipal Water District. The State Water Project brought additional imported water to Moreno Valley and EMWD's service area.

#### **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's citizen participation process and efforts were comprised of those noted in *Table 4-Citizen Participation Outreach*. Input received during the public participation process contributed to the goal setting for the Consolidated Plan.

### **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
1	Public Meeting No.1 – Nov. 28, 2023	Non-target/ Broad Community All interested persons	Public Meeting No. 1 was held on Nov. 28, 2023, so that the Finance Subcommittee could review the FY 24-25 AAP Objectives and Policies.  The ad was published in local newspapers on Nov. 10, 2028.	No comments received.	N/A
2	Public Hearing No. 1 – Dec. 5, 2023	Non-target/ Broad Community All interested persons	Public Hearing No. 1 was held on Nov. 28, 2023, so that the City Council could review and adopt the FY 24-25 AAP Objectives and Policies. The ad was published in local newspapers on Nov. 10, 2023.	One comment: concern of non- current Moreno Valley residents accessing low- income housing in the City.	All comments were accepted.
3	NOFA – Dec. 15, 2023	Non-target/ broad Community All interested persons	A newspaper ad was published to announce the FY 2024-25 Notice of Funding Availability (NOFA). The ad was published on Dec. 15, 2023. Applications were due on Jan. 31, 2024.	N/A	N/A
4	NOFA Technical Assistance Workshop – Jan. 10, 2024	Non-target/ broad Community All interested persons	A technical assistance workshop was held to discuss the objectives and policies related to CDBG, HOME and ESG funding.  The workshop was held on Jan. 10, 2024. The workshop was attended by 67 potential applicants attended.	All questions were answered during the workshop.	N/A
5	Public Meeting No.2 – Mar. 26, 2024	Non-target/ Broad Community All interested persons	Public Meeting No. 2 will be held on Mar. 26, 2024, so that the Finance Subcommittee can review the FY 24-25 AAP applicants. The ad was published in local newspapers on Mar. 8, 2024.	No comments received.	N/A
6	Public Hearing No. 2 – May 7, 2024	Non-target/ Broad Community  All interested persons	Public Hearing No. 2 will be held on Apr. 16, 2024, so that the City Council can review the FY 24-25 AAP applicants.  The ad was published in local newspapers on Mar. 29, 2024.	At the public hearing five people spoke. Commenter 1: Spoke about keeping funds invested with providers in the City or County and concerns with applicants asking for large amounts of money. Commenter 2: Expressed their gratitude in receiving previous CDBG funds, the impact of those funds on their participants, and hope for receiving future funding. Commenter 3: Expressed support for Commenter 2 and shared that funds should be invested locally. Commenter 4: Spoke about concerns with water quality near their home. Commenter 5: Spoke about how there is never enough money to support the work of non-profits.	All comments received.

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons
7	Public Hearing No. 3 – May 21, 2024	Non-target/ Broad Community  All interested persons	Public Hearing No. 3 was held on May 21, 2024 (continued from May 7, 2024 meeting), so that the City Council could review and adopt the FY 24-25 AAP.  The ad was published in local newspapers on Apr. 5, 2024.	At public hearing number three, there were six speakers. One speaker disagreed with the recommended funding presented and provided their own recommendation for funding. Another speaker shared their experience with renting their home to people experiencing housing instability and noted that client education and training were important before placing someone in housing. Two speakers were representatives from non-profits recommended for funding spoke about their organizations and expressed their gratitude for being considered for funding. Two other speakers reiterated the importance of supporting non-profits with funding who are doing important community work, while maintaining oversight of how funds are used.	All comments accepted.

Table 4 – Citizen Participation Outreach

### **Expected Resources**

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

Introduction

For FY 2024-2025 the city of Moreno Valley anticipates the resources noted in the table below -Expected Resources

**Anticipated Resources** 

Program	Source	Uses of Funds	Ex	pected Amo	unt Available Ye	ear 2	Expected	Narrative
	of Funds		Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$	Amount Available Remainder of ConPlan \$	Description
CDBG	Public – Federal	-Acquisition -Admin and Planning -Economic Development -Housing -Public Improvements -Public Services	\$1,957,039	\$0	\$103,902.42	\$2,060,941.42	\$5,541,962	A formula-based program that annually allocates funds to metropolitan cities, urban counties, and states for a wide range of eligible housing and community development activities

HOME	Public – Federal	-Acquisition -Homebuyer Assistance -Homeowner Rehab -Multifamily Rental New Construction -Multifamily Rental Rehab -New Construction for Ownership -TBRA	\$628,174	\$0	\$1,210,877.86	\$1,839,051.86	\$2,390,837	A formula-based program that provides allocations to states and units of general local governments, known as participating jurisdictions. Its purpose is to retain and expand the supply of affordable housing principally for low- and extremely low-income families through housing rehabilitation, new construction, first-time home buyer financing, and rental assistance  The City rounded down its "expected amount available" from \$628,174.21 to \$628,174.00 in the table above as the table is not able to accommodate including cents in the amounts. However, the City has accounted for the exact, full amounts available in section AP-35.
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ESG	Public – Federal	Conversion and Rehab for Transitional Housing -Financial Assistance -Overnight Shelter -Rapid Re-Housing (rental assistance) -Rental Assistance Services -Transitional Housing	\$173,935	\$0	\$156,663	\$330,598	\$510,840	A formula -based program that allocates funds to states, metropolitan cities, and urban counties to support emergency shelters and other assistance for homeless individuals and families.
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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.

The City and HUD share an interest in leveraging HUD resources to the maximum extent feasible to address priority needs and associated goals. Volunteer services and private donations provide additional resources to leverage CDBG funds for public service activities.

In the past, Moreno Valley has actively leveraged its affordable housing activities, mostly with Redevelopment Set-aside funds. As the Redevelopment Agency was dissolved, the City continues its efforts to leverage activities with other available resources. Some potential leveraging resources are listed below:

- Low-income Housing Tax Credit (LIHTC): The California Tax Credit Allocation Committee (TCAC) allocates federal and state tax credits to affordable housing projects. Corporations provide equity to build the projects in return for the tax credits.
- Affordable Housing Sustainable Communities Housing Program: AHSC directs investments to historically under invested communities, giving more Californians access to opportunity. At least 50% of AHSC funding is required by state law to be allocated to affordable housing and projects in, or that provide a benefit to, disadvantaged communities.
- Housing Choice Vouchers: The Section 8 rental voucher program provides rental assistance to help very low-income families afford decent, safe, and sanitary rental housing. The County of Riverside Housing Authority pays the owner a portion of the rent (a housing assistance payment (HAP)) on behalf of the family. There are 957 City households currently receiving Section

8 housing vouchers.

Mortgage Credit Certificate Program: Income tax credits are available to first time homebuyers to buy new or existing single-family housing. Riverside County administers programs on behalf of jurisdictions in the County. A Mortgage Credit Certificate (MCC) entitles qualified home buyers to reduce the amount of their federal income tax liability by an amount equal to a portion of the interest paid during the year on a home mortgage.

Matching Requirements: Entitlement cities receiving HOME funds are required to contribute a 25% match of non-HOME funds for every dollar of HOME funds spent. The HOME statute also provides for a reduction of the matching contribution under three conditions: 1. Fiscal distress, 2. Severe fiscal distress, and 3. Presidential disaster declarations. Moreno Valley has been identified by HUD as a fiscally distressed jurisdiction for several consecutive years and has been granted a 100 percent match reduction. The City anticipates that the 'fiscally distressed' classification to continue through the Annual Action Plan period.

The Emergency Solutions Grant program has a 100% match requirement that can be met as a dollar for dollar or with in kind services. During the FY 2024-2025 application process, the City has requested that ESG applicants be prepared to provide the match that would equal amounts of cash or in-kind services.

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

Current land holdings that may be available for affordable housing developments include:

- Day/Alessandro 8.15 acres
- Fir/Heacock 0.90 acres
- JFK/Elm 0.17 acres
- Sheila/Perris 0.18 acre

## **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	Public Facilities and Infrastructure Improvement Activities	2024	2025	Non-Housing Community Development	Target Areas	Public Facilities and Infrastructure	CDBG: \$1,225,977.77	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 648 Persons Assisted
2	Fair Housing Activities	2024	2025	Public Service	Citywide	Housing Discrimination	CDBG: \$56,117.64	3,211 Persons Assisted
3	Public Services Activities	2024	2025	Public Service	Citywide; Target Areas	Public Service	CDBG: \$237,438.21	1,000 Persons Assisted
4	Homeless/Homelessness Prevention Activities	2024	2025	Homeless	Citywide	Homelessness	ESG: \$317,552.88	70 Persons Assisted
5	Housing and Neighborhood Improvement Activities	2024	2025	Housing	Target Areas	Substandard Housing	CDBG: \$150,000 HOME: \$372,000	28 Households Assisted
6	Planning and Administration	2024	2025	Program Administration	Citywide	Planning and Administration	CDBG: \$391,407.80 ESG: \$13,045.13 HOME: \$62,817.40	Other: 0

Table 6 - Goals Summary

	Goal Name	Goal Description
1	Capital Improvement Activities	Acquisition, design, construction, and installation of needed public facilities and improvements located in CDBG income eligible Target Areas where infrastructure is missing or substandard. Public facilities and improvements may include ADA-compliant ramps and sidewalk improvements, storm drains, and water and sewer lines. Improvements shall facilitate pedestrian activity, eliminate flooding, and provide for safer streets within the Target Areas
2	Fair Housing Activities	The promotion of housing choice and support of state and federal fair housing laws to ensure that all residents have access to a decent home in a suitable living environment in the City. Fair Housing activities are met by promoting and affirmatively furthering equitable housing opportunities through education, counseling, enforcement, and training.
3	Public Services Activities	Improving the quantity and quality of public services, principally for low-and- moderate income persons, including the homeless, elderly, and disabled. The following services are identified by order of priority:  1. 'Basic Needs' Related Social Services Programs (such as but not limited to emergency food, shelter (homelessness), and utility assistance)  2. Community Public Safety Programs  3. Programs offering Low-Cost Transportation  4. Employment Services/Programs and Job (Skills) Training  5. Free/Low-Cost programs for School-Aged Youth
4	Homeless/Homelessness Prevention Activities	Improve the quality of life for the city's homeless and those threatened with homelessness by extending emergency services aimed at assisting, protecting, and improving the living conditions and ultimately stabilizing the housing situation of those individual(s).
5	Housing and Neighborhood Improvement Activities	Conserving and improving housing stock through rehabilitation of units occupied by low-and-moderate income households. Activities are designed to: (1) improve existing substandard or deteriorated housing stock that does not meet building, safety, or fire code and (2) achieve the goals identified in the City's Consolidated Plan.
6	Planning and Administration	Overall program management, coordination, monitoring, and evaluation of projects funded by CDBG, HOME and ESG funds and the preparation of the Annual Action Plans and CAPERs.

### **Projects**

#### **AP-35 Projects – 91.220(d)**

#### Introduction

The City of Moreno Valley has selected a variety of proposed activities and activities aimed at meeting the goals and priority needs established in the Consolidated Plan. For HOME, the City has allocated the allowable max of 10% Administration to be utilized for staffing and administration. The mandatory 15% CHDO set aside has also been allocated. The remaining funds will be used to fund Housing and Neighborhood Improvement Activities.

For ESG, the City has allocated the allowable max of 7.5% Administration to be utilized for staffing and administration. The city will then fund activities that address homelessness and homelessness prevention activities.

For CDBG, the City has allocated the maximum 15% Public Service cap for FY 2024-25. The 20% Administration cap will be utilized for staffing and administration. The remaining 65% will fund other eligible activities.

#### **Projects**

#	Project Name
1	HOME – PROGRAM ADMINISTRATION (2024)
2	HOME – CHDO SET ASIDE (2024)
3	HOME – HABITAT FOR HUMANITY RIVERSIDE: CRITICAL HOME REPAIR (2024)
4	HOME – HABITAT FOR HUMANITY RIVERSIDE: MOBILE HOME REPAIR (2024)
5	ESG – PLANNING AND ADMINISTRATION (2024)
6	ESG – PATH OF LIFE: RAPID REHOUSING (2024)
7	ESG – PATH OF LIFE: EMERGENCY SHELTER (2024)
8	CDBG – PLANNING AND ADMINISTRATION (2024)
9	CDBG – FAMILY SERVICE ASSOCIATION: SENIOR NUTRITION PROGRAM (2024)
10	CDBG – JUNIOR LEAGUE OF RIVERSIDE: DIAPER BANK OF THE INLAND EMPIRE (2024)
11	CDBG – KINGDOM CAUSES dba CITY NET: STREET OUTREACH AND ENGAGEMENT &
	BRIDGE HOUSING (2024)
12	CDBG – OPERATION SAFE HOUSE: EMERGENCY SHELTER FOR YOUTH (2024)
13	CDBG – VOICES FOR CHILDREN: COURT APPOINTED SPECIAL ADVOCATE (CASA)
	PROGRAM (2024)
14	
	CDBG – FRIENDS OF MORENO VALLEY SENIOR CENTER: MOVAN (2024)
16	CDBG – ASSISTANCE LEAGUE OF RIVERSIDE: OPERATION SCHOOL BELL (2024)
17	CDBG – FAIR HOUSING COUNCIL OF RIVERSIDE COUNTY: FAIR HOUSING & LANDLORD-
17	TENANT COUNSELING (2024)
18	CDBG – GRID ALTERNATIVES: CITY OF MORENO VALLEY LOW-INCOME ENERGY
10	ASSISTANCE PROGRAM (2024)
19	CDBG – CITY OF MORENO VALLEY CAPITAL PROJECTS DIVISION: BAY AVENUE
	SIDEWALK IMPROVEMENTS (2024)
20	HOME – UNENCUMBERED FUNDS (2024)

**Table 7 - Project Information** 

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

Moreno Valley seeks to meet the federal national objectives of (1) providing benefits to the low and moderate income, (2) removing areas of slum and blight, and (3) meeting urgent or emergency community needs. The City also seeks to prioritize in a way that can assist goals set by the City Council including Revenue Diversification & Preservation, Public Safety, Positive Environment Community Image, and Neighborhood Pride & Cleanliness. Every year, in accordance with HUD's requirements, Moreno Valley re-evaluates and updates its program specific Objectives and Policies to ensure they adequately reflect the current needs of the community. The updated Objectives and Policies must then be adopted at the local level by the City Council for the upcoming program year. CDBG, HOME, and ESG Objectives and Policies primarily focus on: (1) defining the City's funding priorities, (2) offering activity selection criteria, and (3) providing guidance for staff when reviewing and recommending programs and activities for funding.

## **AP-38 Project Summary**

### **Project Summary Information**

	Project Name	HOME - PROGRAM ADMINISTRATION (2024)
	Target Area	City Wide
	Goals Supported	Planning and Administration
	Needs Addressed	Planning and Administration
	Funding	HOME: \$62,817.40
	Description	Comprehensive planning and administration of the HOME grant program.
1	Target Date	6/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	N/A
	Location Description	14177 Frederick St., Moreno Valley, CA 92552
	Planned Activities	Administration of the HOME program including project management, various reporting, research, environmental reviews, completion of the Annual Action Plan, preparation of the CAPER report, on-site monitoring, etc.
	Project Name	CHDO SET ASIDE - 2024
	Target Area	CDBG Target Area(s)
2	Goals Supported	Housing and Neighborhood Improvement Activities
	Needs Addressed	Substandard Housing
	Funding	HOME: \$94,226.10

	Description	Mandatory 15% set-aside
	Target Date	TBD
	Estimate the number and type of families that will benefit from the proposed activities	TBD
	Location Description	TBD
	Planned Activities	Mandatory reservation of 15% annual HOME grant for a CHDO project (to be identified). The City plans to reach out to local CHDO's and attempt to successfully establish or research viable projects for low- moderate income households.
	Project Name	HABITAT FOR HUMANITY - CRITICAL HOME REPAIR (2024)
	Target Area	Citywide
	Goals Supported	Housing and Neighborhood Improvement Activities
	Needs Addressed	Substandard Housing
	Funding	HOME: \$267,000
3	Description	The Critical Home Repair program (CHR) is a one-time home preservation service that offers interior and exterior repairs designed to assist homeowners living in a single-family home or mobile home secured to the permanent foundation as their primary residence within the City limit of Moreno Valley. The interior repairs consist of electrical, plumbing, flooring, wall repairs, kitchen repairs, termite work, air conditioning, insulation, bath repairs, heating and furnaces, ceiling repairs, etc. The exterior maintenance includes replacement or repairs of roofing, house trims, siding, awnings, steps, entrance, door, windows, porch deck, handicap access ramps, weatherization, tree removal, and any other maintenance to ensure health, safety, and code enforcement compliance.
	Target Date	6/30/2026

	Estimate the number and type of families that will benefit from the proposed activities	12 households assisted
	Location Description	12 households will be assisted through citywide limits.
	Planned Activities	Units will be rehabilitated to ensure health, safety, and code enforcement compliance. These may include activities to repair or replace the interior or exterior electrical, plumbing, floor, roof, etc.
	Project Name	HABITAT FOR HUMANITY - MOBILE HOME REPAIR (2024)
	Target Area	Citywide
	Goals Supported	Housing and Neighborhood Improvement Activities
	Needs Addressed	Substandard Housing
	Funding	HOME: \$105,000
4	Description	The Mobile Home Repair program (MHR) is designed to assist low to moderate income (no more than 80% of the Median HH Income) mobile homeowners in the City of Moreno Valley with interior and exterior repairs to address substandard living conditions. Health and safety issues as well as code violations are addressed first. Exterior issues may also be addressed if they are deemed health and safety related.
	Target Date	6/30/2026
	Estimate the number and type of families that will benefit from the proposed activities	6 households assisted
	Location Description	6 households will be assisted through citywide limits.
	Planned Activities	Units will be rehabilitated with interior and exterior repairs to address substandard living conditions. Health and safety issues as well as code violations are addressed first. Exterior issues may also be addressed if they are deemed health and safety related.

	Project Name	ESG – PLANNING AND ADMINISTRATION (2024)
	Target Area	City Wide
	Goals Supported	Planning and Administration
	Needs Addressed	Planning and Administration
	Funding	ESG: \$13,045.13
5	Description	Comprehensive planning and administration of the ESG grant program.
	Target Date	6/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	N/A
	Location Description	14177 Frederick St., Moreno Valley, CA 92552
	Planned Activities	Administration of the ESG program including project management, various reporting, research, environmental reviews, completion of the Annual Action Plan, preparation of the CAPER report, on-site monitoring, etc.
	Project Name	PATH OF LIFE: RAPID REHOUSING (2024)
	Target Area	Citywide
	Goals Supported	Homeless/Homeless Prevention Services
	Needs Addressed	Homeless/Homeless Prevention Services
6	Funding	ESG: \$213,191.88
	Description	This project will assist unsheltered individuals and families in the City of Moreno Valley. Rapid Rehousing will provide emergency housing and case management services to unsheltered individuals and families by placing them in scattered site apartments throughout the city or county and guiding them to obtain permanent housing.
	Target Date	6/30/2026

	Estimate the number and type of families that will benefit from the proposed activities	46 Persons Assisted
	<b>Location Description</b>	Citywide
	Planned Activities	This project will assist unsheltered individuals and families in the City of Moreno Valley.
	Project Name	PATH OF LIFE: EMERGENCY SHELTER (2024)
	Target Area	Citywide
	Goals Supported	Homeless/Homeless Prevention Services
	Needs Addressed	Homeless/Homeless Prevention Services
	Funding	ESG: \$104,361
7	Description	This project will assist unsheltered individuals and families from Moreno Valley. This Emergency Shelter service will provide them with shelter, showers, three meals, and case management services. Case Managers assess Shelter Guests' needs and create an Individual Service Plan, which is reviewed at weekly meetings when progress is evaluated, and new goals are set. This funding will increase vital case management.
	Target Date	6/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	20 Persons Assisted
	<b>Location Description</b>	Citywide
	Planned Activities	This project will assist unsheltered individuals and families in the City of Moreno Valley.
	Project Name	CDBG – PLANNING AND ADMINISTRATION (2024)
8	Target Area	City Wide
	Goals Supported	Planning and Administration

	Needs Addressed	Planning and Administration
	Funding	CDBG: \$391,407.80
	Description	Comprehensive planning and administration of the CDBG grant program.
	Target Date	6/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	N/A
	<b>Location Description</b>	14177 Frederick St., Moreno Valley, CA 92552
	Planned Activities	Administration of the CDBG program including project management, various reporting, research, environmental reviews, completion of the Annual Action Plan, preparation of the CAPER report, on-site monitoring, etc.
	Project Name	CDBG – FAMILY SERVICES ASSOCIATION: SENIOR NUTRITION PROGRAM (2024)
	Target Area	Citywide
	Goals Supported	Public Services Activity
	Needs Addressed	Public Services Activity
	Funding	CDBG: \$20,000
9	Description	Family Service Association (FSA) Senior Nutrition Program provides seniors with one nutritionally balanced meal Monday- Friday.
	Target Date	6/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	437 Persons Assisted
	Location Description	Services will be provided by the Family Services Association primarily located at the City of Moreno Valley Senior Center.
	Planned Activities	Family Service Association (FSA) Senior Nutrition Program provides seniors with one nutritionally balanced

	Project Name	meal Monday - Friday at the Moreno Valley Senior Center.  Meals are also provided through an in- home delivery service to seniors who are unable to get to the center because of illness, disability, or lack of transportation.  CDBG - JUNIOR LEAGUE OF RIVERSIDE: DIAPER BANK OF THE INLAND EMPIRE (2024)
	Target Area	Citywide
	Goals Supported	Public Services Activity
	Needs Addressed	Public Services Activity
	Funding	CDBG: \$15,000
10	Description	The Diaper Bank of the Inland Empire provides diapers/wipes to Riverside and San Bernardino County families with limited access to basic needs.
	Target Date	6/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	135 Persons Assisted
	Location Description	Events will be hosted throughout Moreno Valley.
	Planned Activities	The Diaper Bank of the Inland Empire provides diapers/wipes to Riverside and San Bernardino County families with limited access to basic needs.
	Project Name	CDBG – KINGDOM CAUSES dba CITY NET: STREET OUTREACH AND ENGAGEMENT & BRIDGE HOUSING (2024)
	Target Area	Citywide
11	Goals Supported	Public Services Activity
11	Needs Addressed	Public Services Activity
	Funding	CDBG: \$67,438.21
	Description	This activity will provide street outreach and engagement and bridge housing for neighbors experiencing homelessness in Moreno Valley. While in case

		management, clients will be able to exit from the street into bridge housing via motel rooms while pursuing an individualized housing plan. The goal of the program is to use case management to move people from the street directly into Permanent Supportive Housing.
	Target Date	6/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	11 People Assisted
	Location Description	City of Moreno Valley
	Planned Activities	This activity will provide street outreach and engagement and bridge housing for neighbors experiencing homelessness in Moreno Valley.
	Project Name	CDBG - OPERATION SAFE HOUSE: EMERGENCY SHELTER FOR YOUTH (2024)
	Target Area	Citywide
	Goals Supported	Public Services Activity
	Needs Addressed	Public Services Activity
	Funding	CDBG: \$15,000
12	Description	Direct services will be provided to youth who enter the emergency shelter.
	Target Date	6/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	20 Persons Assisted
	Location Description	Services will be provided to run away, homeless, at-risk youth and their families from the city of Moreno Valley by Operation Safehouse primarily located at 9685 Hayes Street, Riverside, CA.
	Planned Activities	Direct services will be provided to youth who enter the emergency shelter.
13	Project Name	CDBG - VOICES FOR CHILDREN, COURT APPOINTED SPECIAL ADVOCATE (CASA) PROGRAM (2024)

	Target Area	Citywide
	Goals Supported	Public Services Activity
	Needs Addressed	Public Services Activity
	Funding	CDBG: \$25,000
	Description	Voices for Childrens Court Appointed Special Advocate (CASA) program addresses the needs of abused and neglected City of Moreno Valley youth in foster care by providing them with the comprehensive, individualized advocacy of a CASA volunteer in court and throughout the community.
	Target Date	6/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	12 Persons Assisted
	Location Description	The CASA program services will be delivered directly to the youth throughout the city of Moreno Valley.
	Planned Activities	Voices for Childrens Court Appointed Special Advocate (CASA) program addresses the needs of abused and neglected City of Moreno Valley youth in foster care by providing them with the comprehensive, individualized advocacy of a CASA volunteer in court and throughout the community.
	Project Name	CDBG -RIVERSIDE AREA RAPE CRISIS CENTER: BUILDING SAFE COMMUNITIES (2024)
	Target Area	City Wide
14	Goals Supported	Public Services Activity
	Needs Addressed	Public Services Activity
	Funding	CDBG: \$15,000
	Description	Riverside Area Rape Crises Center (RARCC) Safe Communities Project is a community outreach program to promote health and wellness within families and eliminate the prevalence of gender-based violence in low- to-

Annual Action Plan

		moderate income communities. Program objectives have additionally been expanded to include gender-based violence prevention, family resiliency, and the ending of generational cycles of trauma.
	Target Date	6/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	33 Persons Assisted
	Location Description	Program delivery will be accomplished through community-based workshops and presentations at Moreno Valley partner sites.
	Planned Activities	Riverside Area Rape Crises Center (RARCC) Safe Communities Project is a community outreach program to promote health and wellness within families and eliminate the prevalence of gender-based violence in low- to- moderate income communities. Program objectives have additionally been expanded to include gender-based violence prevention, family resiliency, and the ending of generational cycles of trauma.
	Project Name	CDBG - FRIENDS OF MORENO VALLEY SENIOR CENTER: MOVAN SENIOR TRANSPORTATION PROGRAM (2024)
	Target Area	Citywide
	Goals Supported	Public Services Activity
	Needs Addressed	Public Services Activity
15	Funding	CDBG: \$65,000
	Description	MoVan is a transportation van for twelve passengers plus 2 wheelchairs, provided Monday through Friday. The MoVan is a safe, convenient form of transit service specially designed to meet mobility needs of Moreno Valley seniors 60 years or older and disabled adult residents
	Target Date	6/30/2025

	Estimate the number and type of families that will benefit from the proposed activities	154 Persons Assisted
	Location Description	Rides will be offered citywide.
	Planned Activities	MoVan transports curb-to-curb to our Senior Community Center as well as to medical/dental/optical appointments, grocery shopping, food distribution pickups and professional service appointments.
	Project Name	CDBG - ASSISTANCE LEAGUE OF RIVERSIDE: OPERATION SCHOOL BELL (2024)
	Target Area	Citywide
	Goals Supported	Public Services Activity
	Needs Addressed	Public Services Activity
	Funding	CDBG: \$15,000
16	Description	Operation School Bell is a program provided to elementary, middle, and high school students with a goal of assisting them in removing barriers to learning. The program provides new school clothes and dental kits to homeless and economically disadvantaged children.
	Target Date	6/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	200 Persons Assisted
	Location Description	Operation School Bell is available to students attending a school in the Moreno Valley School District, as well as students in the Val Verde School District who reside in Moreno Valley.
	Planned Activities	The program provides new school clothes and dental kits to homeless and economically disadvantaged children.
17	Project Name	CDBG - FAIR HOUSING COUNCIL OF RIVERSIDE COUNTY: FAIR HOUSING AND LANDLORD TENANT COUNSELING (2024)
	Target Area	Citywide

	Goals Supported	Public Service Activities
	Needs Addressed	Housing Discrimination
	Funding	CDBG: \$56,117.64
	Description	The Fair Housing Council of Riverside County, Inc. (FHCRC) proposes to offer a full menu of fair housing services which affirmatively address and promote fair housing rights and obligations as defined and articulated under the Federal Fair Housing Act and the California State Law Enactments under the Rumford and Unruh Civil Rights Acts.
	Target Date	6/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	3,211 Persons Assisted
	Location Description	Fair Housing Council of Riverside County is available to persons in the City of Moreno Valley.
	Planned Activities	The Fair Housing Council of Riverside County, Inc. (FHCRC) proposes to offer a full menu of fair housing services which affirmatively address and promote fair housing rights and obligations as defined and articulated under the Federal Fair Housing Act and the California State Law Enactments under the Rumford and Unruh Civil Rights Acts.
	Project Name	CDBG - GRID ALTERNATIVES: CITY OF MORENO VALLEY LOW-INCOME ENERGY ASSISTANCE PROGRAM (2024)
	Target Area	Citywide
18	Goals Supported	Housing and Neighborhood Improvement Activities
	Needs Addressed	Substandard Housing
	Funding	GRID Alternatives Inland Empire will install solar electric systems for eligible Moreno Valley, low-income homeowners earning no more than 80% of AMI.

	Description	CDBG: \$150,000
	Target Date	6/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	10 Households Assisted
	Location Description	Citywide
	Planned Activities	GRID Alternatives Inland Empire will install solar electric systems for eligible Moreno Valley, low-income homeowners earning no more than 80% of AMI.
	Project Name	CDBG – CITY OF MORENO VALLEY CAPITAL PROJECTS DIVISION: BAY AVENUE SIDEWALK IMPROVEMENTS (2024)
	Target Area	Target Areas
	Goals Supported	Capital Improvement Activities
	Needs Addressed	Capital Improvement Activities
	Funding	CDBG: \$1,225,977.77
19	Description	This project provides the construction of new concrete sidewalks, curbs and gutters and driveways approaches along both sides of Bay Avenue, between Day Street & Grant Street within the city's HUD_CDBG target areas. Construction of new concrete sidewalks will enhance ADA access and provide continuous enhanced safe paths of travel for Pedestrians along the proposed locations.
	Target Date	6/30/2026
	Estimate the number and type of families that will benefit from the proposed activities	This project will benefit approximately 648 persons.
	Location Description	This project will potentially benefit City residents in the HUD-CDBG Low/Mod Census Tracts.
	Planned Activities	Construction of new concrete sidewalks will enhance ADA access and provide continuous enhanced safe paths of travel for Pedestrians along the proposed locations.

	Project Name	HOME UNENCUMBERED FUNDS (2024)
	Target Area	Citywide
	Goals Supported	Housing and Neighborhood Improvement Activities
	Needs Addressed	Substandard Housing
	Funding	\$1,310,008
20	Description	TBD
	Target Date	No Target Date
	Estimate the number and type of families that will benefit from the proposed activities	TBD
	Location Description	TBD
	Planned Activities	TBD

#### 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 CDBG Target Areas consist of census tracts within the City that are qualified as having a population of 51% or more low to moderate income residents.

In February 2019, Notice CPD 19-02 was released to publicize the new Low and Moderate-Income Summary Data (LMISD), based on the 2015 America Community Survey (ACS). Commencing July 1, 2021, the City formally adjusted and adopted its Target Area Maps to reflect the most recent data released.

#### **Geographic Distribution**

Target Area	Percentage of Funds
Target Area	7%
City Wide	93%

Table 8 - Geographic Distribution

#### Rationale for the priorities for allocating investments geographically

When determining the geographic locations where Moreno Valley will allocate their investments, the city staff consider if the activity or program will physically be located within an already designated CDBG Target Area, and in line with whether the program will directly benefit the low-to-moderate income population in that area. Poverty levels act as a measure of need for an area, providing staff with insight into the state of the population within that area and helps guide City representatives to fund services accordingly. City representative also take public demand into account, recommendations from other city departments (such as Capital Activities, or the Police Department), reports from CDBG subrecipients which track referrals and measure trends in service levels, recommendations of other local entities like the County partners (the Continuum of Care, Department of Social Services, local Housing Authority, Economic Development Agency) and local non-profits.

#### **Discussion**

Moreno Valley utilizes geographic distribution designations that further describe where the City will focus its programs. An activity can be designated as serving either: (1) 'Citywide", or (2) 'in the CDBG Target Areas'. "Citywide' is a designation used for programs that offer services to the entire community. Many public programs provide services to the entire City, the nature of these program services is often to exclusively serve low-to-moderate income persons. If a program is designated as 'CDBG Target Area' it is confined exclusively to the CDBG Target Area. In general, CDBG Target Areas typically include older sections of the City where much of the building stock and infrastructure is deteriorated or fails to meet current standards. Many structures need minor or major rehabilitation with some structures in need of extensive reconstruction. The areas lack adequate drainage systems, water lines, street lighting, and street improvements.

### **Affordable Housing**

### AP-55 Affordable Housing – 91.220(g)

#### Introduction

The City plans to utilize all programs available (whether City, County, State, or Federal) to meet the affordable housing needs of the community.

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

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

One Year Goals for the Number of Ho Through	ouseholds Supported
Rental Assistance	25
The Production of New Units	0
Rehab of Existing Units	9
Acquisition of Existing Units	0
Total	34

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

#### **Discussion**

Through the Housing Authority of the County of Riverside (HACR), the City can offer its residents affordable housing through the County's Public Housing programs. HACR administers and manages approximately 1,100 Section 8 properties and 66 Public Housing units in Moreno Valley. For the purposes of consistency, the City defines affordable housing consistent with those defined in the HOME regulations as noted in 2 CFR 92.525 for rental housing and 2CFR 92.254 for homeownership.

#### **AP-60 Public Housing – 91.220(h)**

#### Introduction

The Housing Authority of Riverside County (HACR) addresses the public housing needs of the cities within Riverside County. The Public Housing Program is intended to provide decent, safe, and sanitary housing to low and moderate-income families, seniors, and persons with disabilities.

#### Actions planned during the next year to address the need for public housing.

Moreno Valley residents who received Housing Choice Vouchers (or Section 8) are below 50% of the area median income and approximately 75% of the recipients were below 30% of the area median income. The countywide Section 8 waiting list in the past has been as high as approximately 68,000 families. Based on the large numbers of families waiting for Section 8 assistance, the City supports the HACR goal to: expand the supply of assisted housing by applying for additional rental vouchers via annual competitions for the U.S. Department of Housing and Urban Development (HUD) affordable housing funding available to Public Housing Authorities; improve the quality of assisted housing; leverage private or other public funds to create additional housing opportunities; and expand and promote self-sufficiency programs. The City actively pursues opportunities for local affordable housing activities as well as non-housing public service programs that contribute to the overall affordable housing needs of the community and eases the financial burden of its struggling, low-income residents. To further collaborate, the City of Moreno Valley will continue to review the Riverside County Agency's Action Plan and monitor the affordable housing needs of the area. The City reviews proposed development sites, the comprehensive plan, and any proposed demolition or disposition of public housing developments.

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

The Riverside County Housing Authority encourages public housing residents to become more involved in management and to participate in homeownership opportunities through its Public Housing Resident Initiatives (PHRI). The Riverside County Housing Authority seeks to facilitate the successful transition of residents from public housing residency to economic independence and/or from welfare-dependence to increased earning capacity or sustained work. This Initiative builds upon the efforts of the local welfare plan and other self-sufficiency efforts of the Housing Authority and targets public housing residents who are receiving welfare assistance. The goals of the PHRI are to reduce welfare dependence by assisting residents in returning to the work force in a job commensurate with their abilities; reduce poverty by assisting residents in increasing their self-sufficiency by enhancing their employment or earning potential; and to increase homeownership among public housing residents. Local partners including public agencies and community-based nonprofits, as well as faith-based organizations provide self-sufficiency services including job training, employment opportunities, computer instruction, etc. The Family Self Sufficiency (FSS) Program was established to assist Section 8 residents and enable families to gain economic independence from all governmental assistance. Supportive

services offered to participating families include:

- Remedial Education and Classroom Training
- Employment Training and Placement
- Counseling/Case Management
- Credit Counseling and Money Management
- Childcare
- Transportation

The Housing Authority has also established a "Homeownership Program" (HP). The HP assists eligible participants in the Section 8 program, who are also participants of the Family-Self Sufficiency Program (FSS) by offering a single down payment assistance grant. To maximize the use of resources available to home seekers, the Housing Authority program also targets families who take part in the Riverside County Economic Development Agency's (EDA) First Time Home Buyer Program (FTHB). In combination, the HP/FTHB partnership enables families to realize their dream of becoming homeowners by providing them with financial assistance and other resources that they would not normally have access to.

If the PHA is designated as troubled, describe the way financial assistance will be provided or other assistance.

Not applicable.

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

The of the City's highest priorities for the use of grant funds is to address the emergency shelter and housing needs of homeless persons. In the coming year, Moreno Valley will continue to dedicate funding toward homeless services. The City will assist homeless people with emergency vouchers and other critical support funded through partnership with homeless service providers. It will also continue to subsidize affordable housing development that offers long-term affordable housing opportunities. With its Emergency Solutions Grant (ESG) entitlement funding, Moreno Valley can offer programs that will help quickly house homeless individuals and prevent loss of housing for those at risk of becoming homeless.

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

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

In line with the HUD requirements, the City has developed a comprehensive Homeless Strategy that involves reaching out to homeless people, assessing, and addressing their individual emergency/ housing needs. To reach these individuals, the City extends CDBG funding to a variety of public service subrecipients who in turn provide the direct services including street outreach, case management, housing search assistance, emergency housing/motel vouchers, food, and counseling. These social service programs are often the primary source for referrals and assistance to homeless persons. Most of the homeless population become aware of available programs through word of mouth and seek out services by calling the service provider or traveling to their local office. The City also provides funds for reporting homelessness assistance through the Riverside County's Homeless Management Information System (HMIS).

Riverside County has worked with the chronic homeless population for several years through the Mental Health Homeless Intervention Team (HIT) program. The HIT Team actively seeks out homeless people, throughout Riverside County, who are living on the streets and/or in unsheltered locations. The teams focus on areas of high homeless concentration. Support workers are trained to recognize symptoms of mental illness and substance abuse. Support workers also possess the interpersonal skills necessary to solicit and provide information in a friendly, respectful, non-threatening manner. They are familiar with various community resources that serve the homeless population, both public and private. At a minimum, all homeless persons contacted on the streets are provided with information and referrals to programs relevant to their needs. Once the chronic homeless persons have been identified, and if mentally ill and willing to participate, they are enrolled into a series of programs by the Department of Mental Health.

• Addressing the emergency shelter and transitional housing needs of homeless people.

Addressing the housing needs of the homeless is the primary objective of the ESG program and one of the City's highest priorities for the use of CDBG public service dollars. ESG funding will be allocated to address the emergency shelter and housing needs of homeless people located

in Moreno Valley. The City's ESG program allocation will be used to leverage the homeless prevention efforts originally initiated by CDBG. However, ESG will provide additional funding that will be used to assist, protect, and improve living conditions for the homeless and provide for the following eligible activities:

- Outreach to homeless individuals and families living on the street.
- Improve the number and quality of emergency shelters for homeless individuals and families.
- Help operate these shelters.
- Provide essential services to shelter residents.
- Rapidly re-house homeless individuals and families.
- Prevent families/individuals from becoming homeless.
- Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again.

The City of Moreno Valley will continue to engage with systems that assists efforts for persons and families to transition to permanent housing and independent living through a variety of resources involving the continued partnerships and financial support to local nonprofit service providers and participation and support to the Riverside County Continuum of Care. Additionally, the Riverside County's Department of Public Social Services (DPSS) is considered the "umbrella" anti-poverty agency for the region. The goal of self-sufficiency for persons can be accomplished by moving poor families out of poverty. DPSS interacts with needy residents on many levels, and assists them through childcare, education, employment, training, health and human services, homelessness, and housing with available mainstream programs.

Helping low-income individuals and families avoid becoming homeless, especially
extremely low-income individuals and families and those who are: being
discharged from publicly funded institutions and systems of care (such as health
care facilities, mental health facilities, foster care and other youth facilities, and
corrections programs and institutions); or, receiving assistance from public or
private agencies that address housing, health, social services, employment,
education, or youth needs.

The Riverside County CoC has a standing six-year cooperative agreement between various key organizations and agencies that establish county-wide protocols and procedures intended to prevent people from being discharged from public and private institutions (programs) into homelessness. The agreement includes County Mental Health, Veterans, Sheriff's, and Children's Services Independent Living Program, as well as the Southern California Hospital Association, and administrators of the 2-1-1 telephone referral program, Community Connect of

Riverside County. With the services made available via ESG funding, Community Connect and other partners can formally register its programs to ensure that the public is referred to appropriate ESG services, among others. City public service providers assist those threatened with homelessness by providing referrals and coordinating with other agencies to locate assistance for the family or individuals. Additionally, Moreno Valley dedicates ESG entitlement funding toward homeless prevention and rapid-re-housing efforts.

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

As a condition of receiving federal funding for the CDBG and HOME programs, cities must certify that it will affirmatively further fair housing as required by the Fair Housing Act. The Act includes policies that ensure that persons are not denied equal opportunities in connection with housing because of their race, color, national origin, religion, disability, sex, or familial status. In compliance, prior to the start of each Consolidated Plan period, Moreno Valley prepares an Analysis of Impediments (AI) to Fair Housing Choice Report. As part of the report, the City of Moreno Valley is required to:

- 1. Conduct an analysis to identify impediments to fair housing choice within the jurisdiction.
- 2. Take appropriate actions to overcome the effects of any impediments identified through that analysis; and Maintain records reflecting the analysis and actions in this regard. The Al is a review of impediments or barriers that affect the rights of fair housing choice and serves as a basis for fair housing planning. It provides detailed information to policy makers, administrative staff, housing providers, lenders, and fair housing advocates to assist in building public support for fair housing efforts.

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.

Key components that the city will engage in to ameliorate and/or remove barriers to affordable housing as follows:

- When feasible, consider reducing, waiving, or deferring development fees to facilitate the provision of affordable housing.
- Periodically review and revise City development standards to facilitate quality housing that is affordable to lower and moderate-income households.
- Monitor all regulations, ordinances, departmental processing procedures and fees
  related to the rehabilitation and/or construction of dwelling units to assess their impact
  on housing costs.
- Ensure that water and sewer providers are aware of the City's intentions for residential development throughout the City.

### **AP-85 Other Actions – 91.220(k)**

#### Introduction

The following is a summary of critical components of 'other' necessary actions to be taken, including how the City plans to overcome obstacles to meeting underserved needs, create plans to foster and maintain affordable housing, plans to reduce lead-based paint hazards, to reduce the number of poverty-level families, develop institutional structure, and actions planned to enhance coordination between public and private housing and social service agencies.

#### Actions planned to address obstacles to meeting underserved needs.

The primary obstacle in meeting the needs of underserved communities (low-income families, seniors, homeless, etc.) is the lack of funding available to local public and private agencies. The economic downturn resulted in a decline in federal funding and the elimination of Redevelopment agencies and the associated tax increment/housing set-aside funding. It has also resulted in a decline in funding donations to local non-profits. This loss in revenue has not been fully overcome; however, staff can take the following actions in efforts to address the needs of the City's underserved communities, effectively:

- Continue to establish partnerships with other agencies to better prioritize and utilize resources, conduct more detailed research and citizen participation each year to prioritize the needs of the underserved, seek out additional resources, and apply for grants where there are opportunities.
- 2. Formally adjust the programs Objectives and Policies to reflect the updated prioritization and allocate; accordingly, even if it means shifting away from what's been historically funded. Create new programs/temporary emergency programs to address urgent issues.
- 3. Work hand in hand with subrecipients to adjust budgets, services, and restructure programs to better fit the needs of the underserved.

#### Actions planned to foster and maintain affordable housing.

Homeownership opportunities for low-income households will be made available through the City's Single Family Residential Acquisition, Rehabilitated, and Resale (SFR-ARR) component of the Neighborhood Stabilization Program. The City of Moreno Valley's affordable housing portfolio includes 29 different multi-family rental activities. Through the Housing Authority of the County of Riverside (HACR), the City is also able to offer its residents affordable housing through the County's Public Housing programs. HACR administers and manages approximately 86 Section 8 properties in Moreno Valley.

#### Actions planned to reduce lead-based paint hazards.

#### City Housing Programs

Moreno Valley offers a Mobile Home Repair Program and a Single-Family Home Repair program. Habitat for Humanity Riverside operates both programs and administers this HOME

funded program. All homeowners participating in this grant program receive a copy of the "Protect Your Family from Lead in Your Home," a lead-based paint disclosure booklet, and are asked to sign an acknowledgment that is included in the loan application. If the unit was constructed after 1978, an exemption form is prepared and placed in the project file. If the home was constructed prior to 1978, a subcontractor provides a lead-based paint inspection and risk assessment of the property. If the property is found to contain lead-based paint, mitigation measures are incorporated as a part of the revitalization work.

#### Countywide Lead Hazard Control Program

While the City of Moreno Valley does not currently have a stand-alone lead prevention program, the City will continue to work closely with the County of Riverside to address these issues. The County has adopted a regional strategy to control lead hazards. The County's strategy thoroughly spells out the control methods used once lead-based paint hazards have been identified. It also describes its typical public outreach efforts which include: the distribution of bilingual educational brochures, public presentations, informational booths at the mall and community events, immunization clinics, testing within Target Areas, use of public media for outreach, as well as a "Free Testing Program."

#### Actions planned to reduce the number of poverty-level families.

The City strives to reduce the poverty rates of the city's population and neighborhoods.

Specific actions to reduce poverty are described below:

<u>Provide Job Skills Training to Persons Living in the R/ECAP</u>: The City can fund activities that provide jobs skills training to unemployed people living in the R/ECAP. A key poverty reducing strategy is to provide appropriate technical education and training to low wage workers and unemployed workers in the labor force.

Increase Participation in Poverty Reducing Programs by Persons Living in the R/ECAP: The City will work to inform families living in the R/ECAP of poverty reducing programs such as the Earned Income Tax Credit (EITC). Research has demonstrated that increasing participation in safety net programs helps to reduce poverty rates.

Provide Job search and Placement Services to Low Wage and Unemployed Workers Living in the R/ECAP and High Poverty Neighborhoods: Annually, the city's Business Employment Resource Center (BERC) can provide job seekers with access to resources that are necessary to search and acquire employment within the city and surrounding areas. Assistance will be provided with preparing resumes; job applications and job search as well as one-on-one mock interviews.

#### Policies to reduce the number of poverty-level families include:

Anti-Poverty Policy #1: To continue to support and coordinate with public and private

efforts aimed at preventing and reducing poverty level incomes.

- Anti-Poverty Policy #2: To conduct outreach with public and private agencies whose mission is to reduce poverty level incomes.
- Anti-Poverty Policy #3: Allocate CDBG and ESG funds to projects and activities that will help persons and families who have incomes below the poverty level.

#### Actions planned to develop institutional structure.

The City of Moreno Valley benefits from a solid institutional structure and relationships with various local public and private agencies. The City will continue to work at strengthening its dialogue with Riverside County agencies such as the Departments of Mental Health and Public Social Services, specifically to address regional homeless issues, and staff will continue to serve on the Continuum of Care Consortium which provides opportunities to work with local public and non-profit agencies. The City will maintain open dialogue with the Riverside County Housing Authority and focus on the use of resident initiatives in public housing. The City helped form a Non-Profit Coalition in efforts to increase collaboration amongst service providers and better meet the needs of the community and shall continue to support their efforts. The City will remain a member of the March Joint Powers Authority, created for the repurposing of the March Air Reserve Base. Additionally, the City will continue to coordinate with all the local Chambers of Commerce, as well as administer the Business Roundtables, and Nonprofit Roundtables which encourage communication with professionals from a variety of industries including health care, transportation, education, and other local businesses.

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

The City's goal is to continue to establish collaborative relationships between governmental and social service agencies to assure the effective delivery of services to low-income individuals by maintaining open communication with sub-recipients and other consolidated planning partners; Utilizing technology to share, distribute information, foster and maintain constant contact with community planning partners; and Recommending and participating in committees aimed at filling gaps where they exist.

## **Program Specific Requirements**

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

### 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.

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	
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	

## 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 as follows:

Not applicable. The City does not intend to use HOME funding beyond those noted in Section 92.205.

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:

The City normally engages in HOME funded rehabilitation and rental activities not homebuyer activities. However, when homeownership programs were developed under the NSP 3 program, leveraged with HOME, the City ensured that Resale or Recapture Requirements were integrated directly into the Affordable Housing Agreement with the development partner. The requirements were delineated within the Conditions, Covenants, and Restrictions (CC&R) in detail and in accordance with 92.254.

- 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:
  - Not applicable. The City does not plan to engage in HOME funded acquisition of single-family units as described in 24 CFR 92.254(a)(4).
- 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:
  - Not applicable. The City has no plans to refinance existing debt secured by multifamily housing rehabilitated with HOME funds during the upcoming program year FY 2024-2025.

#### Emergency Solutions Grant (ESG) Reference 91.220(I)(4)

#### 1. Include written standards for providing ESG assistance.

Per grant requirements, the ESG standards include:

- 1. Standard policies and procedures for evaluating individuals and family's eligibility for assistance under ESG.
- 2. Policies and procedures for determining and prioritizing which eligible families and individuals will receive homelessness prevention assistance and which eligible families and individuals will receive rapid re-housing assistance.
- 3. Policies and procedures for coordination among emergency shelter providers, essential service providers, homelessness prevention and rapid re-housing assistance providers and mainstream service and housing providers.
- 4. Standards for determining the share of rent and utilities cost that each program participant must pay, if any, while receiving homeless prevention and rapid re-housing assistance.
- 5. Standards for determining how long a program participant will be provided with rental assistance and whether the amount of that assistance will adjust over time.
- 6. Standards for determining the type, amount, and duration of housing stabilization and/or relocation services to provide a program participant, including the limits, if any, on the homelessness prevention or rapid re-housing assistance that each program participant may receive, such as the maximum amount of assistance, maximum number of months the program participant receives assistance, or the maximum number of times the program participant may receive assistance.

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

The McKinney-Veto Homeless Assistance Act requires that communities operate a Continuum of Care (CoC) program designed to assist homeless persons with housing and/or services with the goal of long-term stability. Riverside County's Department of Public Social Services (DPSS) has been the lead agency in coordinating the CoC including securing membership and ensuring that CoC's various legal responsibilities are met. Current members include the County, various entitlement cities, non-profit/service providers, homeless persons, and members of the public. As a collaborative, the group must assess the needs of the areas homeless and affordable housing needs then develop a regional plan to address them. They also promote a community-wide commitment to ending homelessness, provide for funding for local efforts to address homelessness, and promote effective use of mainstream programs, including designing and operating a software system called the Homeless Management Information System (HMIS) intended to minimize duplication of services. Moreno Valley consults with the CoC by sharing ESG funding recommendations issued at the City level and requesting feedback from the full CoC membership.

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

The ESG sub-awards follows the standard annual application process along with the City's CDBG and HOME programs. The City's competitive process includes required public notifications and issuance of a Notice of Funding Availability (NOFA). In efforts to reach as many applicants as possible the City advertised in local publication of general circulation, online, and through e-mail blasts to interested parties. Moreno Valley also offered an on-line application workshop aimed at providing program information and application assistance. As part of the application process, in preparation of the Action Plan, the City contracted a third party to collaborate with City Staff as the Technical Review Committee for review of the ESG applications. Each application was reviewed two times, once for completeness and HUD eligibility and once for completion of the City's formal

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evaluation form. Return applicant's prior performance in terms of meeting their established goals, expenditure and administrative requirements were evaluated with the input of City's grant management staff. The applications received by the Technical Review Committee were presented to the City Council during Public Hearing No. 2. In line with the City's policies and objectives, the final project selections shall be made by the City Council via final Public Hearings.

This FY 24-25 the City intends to allocate its ESG funds in the following manner:

- Planning & Administration: \$ 13,045.13
- Emergency Shelter Activity (Subrecipient Path of Life): \$104,361
- Rapid Rehousing Activity (Subrecipient Path of Life): \$56,528.88; unused funds (\$156,663) from FY23 will also be used towards rapid rehousing activities.

Unused FY 23 funds will also be reprogrammed for Rapid Rehousing Program.

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

The homeless requirements under 24 CFR 576.405(a) and 91.220 (1)(4) (iv) indicates that the City's policy making entity must have at least one homeless or formerly homeless individual on its panel. The City contends that it has met the homeless participation requirement via the consultation process with the CoC. The CoC has a member who is formally homeless and an active participant.

5. Describe performance standards for evaluating ESG.

The City shall work with ESGs subrecipient to form the appropriate performance standards customized for the specific ESG activity being carried out. These agreed upon standards will need to be consistent with ESG regulations, City's Consolidated Plan, and the adopted ESG written standards. The ESG performance standards shall be included in the subrecipient's grant agreement. The City shall also continue to consult with the CoC members to discuss the ESG program including performance standards.