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Fiscal Year 2024-25 ANNUAL ACTION PLAN

HOUSING & COMMUNITY DEVELOPMENT JULIA BIDWELL, DIRECTOR

OC Housing & Community Development

1501 E. ST. ANDREW PLACE, 1ST FLOOR SANTA ANA, CA 92705 PHONE: 714.480.6534 FAX: 714.480.2978 For the distribution of Federal and Local Funding for: Public Facilities & Improvements, Housing Rehabilitation and Public Services CDBG, ESG and HOME funds

Public Review Draft: April 12, 2024 - May 13, 2024

Executive Summary

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

1. Introduction

The County, as an urban county entitlement jurisdiction, is eligible to receive Community Planning and Development (CPD) grant funding including Community Development Block Grant Funds (CDBG), Emergency Solutions Grant (ESG), and HOME Investment Partnerships (HOME) funds from the U.S. Department of Housing and Urban Development (HUD) to administer programs and projects on behalf of 12 participating urban county cities with populations below 50,000. They include the cities of Brea, Cypress, Dana Point, La Palma, Laguna Beach, Laguna Hills, Laguna Woods, Los Alamitos, San Juan Capistrano, Seal Beach, Stanton, and Villa Park. In addition, cities with populations over 50,000, are eligible to participate in the CPD programs as entitlement jurisdictions and receive funding directly from HUD. However, the cities of Placentia and Yorba Linda have elected to join the Urban County for the overall implementation of these programs.

HUD provides annual CPD grant funds on a formula basis through CDBG, ESG and HOME funds to jurisdictions who are to develop viable urban communities through the provision of decent housing and a suitable living environment and the expansion of economic opportunities, principally for low- and moderate-income persons. It is anticipated that the County would receive \$3,402,567 in CDBG for FY 2024-2025. The proposed activities as required by the CBDG regulations must meet one of the following three national objectives:

- 1. Benefit low-moderate income persons, and
- 2. Aid in the prevention or elimination of slum or blight, and
- 3. Meet an urgent need.

The County also anticipates receiving \$294,931 as an ESG formula allocation to administer ESG funds in collaboration with the Continuum of Care (CoC) throughout the CoC Service Area, which covers the geographic area of Orange County. The ESG funding supports provision of Essential Services, Shelter Operations rapid rehousing. The ESG program provides funding to:

1. Engage homeless individuals and families living on the street;

2. Improve the number and quality of emergency shelters for homeless individuals and families;

- 3. Help operate these shelters;
- 4. Provide essential services to shelter residents;
- 5. Rapidly re-house homeless individuals and families; and
- 6. Prevent families and individuals from becoming homeless.

In addition, the County anticipates receiving \$1,490,271 in HOME program funds to be used often in partnership with local nonprofit organizations, to fund activities including building, buying, and/or rehabilitating affordable housing for rent or homeownership or providing direct rental assistance to low-income people. During 2020-2021, HUD awarded one-time HOME-ARP funds that are not anticipated to be awarded in future years. However, since the amount of funds were substantial, it is anticipated that much of these funds will continue to be administered throughout the remainder of the 2020-2024 Consolidated Plan (ConPlan).

This Annual Action Plan (Action Plan) covers the fifth year of the Con Plan beginning July 1, 2024, through June 30, 2025. The Action Plan identifies anticipated levels of funding for the program year, describes the geographic areas in which assistance will be provided, and explains the rationale used. In addition, it provides a summary of the actions, activities, and the specific federal and non-federal resources that will be used this year to address the priority needs and specific goals identified by the ConPlan.

2. Summarize the objectives and outcomes identified in the Plan

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

The Urban County of Orange incorporated outcome measures for activities in accordance with the Federal Register Notice dated March 7, 2006, which require the following Performance Measure Objectives/Outcomes to be associated with each activity funded:

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

- Decent Housing (DH)
- Suitable Living Environment (SL)
- Economic Opportunity (EO) General
- Outcome Categories- Activities will meet one of the following
- Availability/Accessibility (1)
- Affordability (2)
- Sustainability (3)

In addition to national objectives and performance outcomes, 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

Needs that have been determined to be a High Priority level will receive funding during the Five-Year Consolidated Plan. The priorities for the FY 2020-2024 Consolidated Plan, established in consultation with residents and community groups, include the following: High Priorities include.

- Senior Centers
- Homeless Facilities
- Neighborhood Facilities
- Water/Sewer Improvements
- Street Improvements
- Sidewalk Improvements
- 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

3. Evaluation of past performance

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

OC Housing and Community Development, the agency in the County that administers the Urban County program, measures productivity and program impact in accordance with HUD Notices. Besides regular site visits to provide technical assistance to subrecipients, all

projects/programs funded by OC Housing and Community Development are officially monitored as needed per fiscal year, which involves the following: performance, compliance, drawdown timeliness and exit monitoring.

• A detailed summary report of prior year's uses and performance is specified in the Consolidated Annual Performance and Evaluation Report (CAPER). As reported in the CAPER for FY 2022-23, the Urban County: A total of (23) public facilities & improvements projects were underway in FY 2022-23 of those, (6) were completed including extended project from FY 2021-22 and (17) were still underway. These projects included ADA accessibility improvements, alleys, curbs/gutters, sidewalks, recreational facilities, senior center, and community center(s). A total of \$1,295,523 was expended for these projects in this program year.

• There were (14) housing rehabilitations projects were underway, of those, (6) were completed including extended projects from FY 2021-22 and (9) are still underway. The (5) were completed expending a total \$717,124 in this project year.

• A total of (4) economic development projects were underway in FY 2022-23, of those, (1) were completed that was extended from the previous year and (3) are underway. A total of \$947,852 was expended in this project year.

• A total of (11) public service projects were undertaken and completed in program year 2022-23. Public services included senior services, health/ mental health services, employment and educational services, homeless shelters and programs, childcare services, and youth services. A total of \$982,3312 was expended.

• General administration and planning was under-taken and affirmatively furthering fair housing for a total of \$864,673 expended.

On April 2, 2020, HUD allocated the first round of funds to the County by regular formula for additional funding under CDBG-CV1 in the amount of \$1,925,926. This funding is specifically targeted to prevent, prepare for, and respond to COVID-19. The County was also allocated \$3,784,847 in CDBG-CV3 funding for the same purpose. The County was also allocated ESG-CV1 funding in the amount of \$772,352 to prevent, prepare for, and respond to COVID-19 among individuals and families who are homeless or receiving homeless assistance; and to support additional homeless assistance and homelessness prevention activities to mitigate the impacts of COVID-19. Additional funding in the form

of ESG-CV2 was allocated to the County in the amount of \$4,992,579 to help inform long-term, innovative solutions for addressing homelessness in the future while combatting COVID-19

While the County received substantial amounts of CDBG-CV1 and CDBG-CV 3 ,ESG-CV1, and ESG-CV2, these resources are not sufficient to address all of the needs of low- and moderate-income and special needs residents in the Urban County. However, the Urban County overall has been successful in implementing its public improvement, housing, and public services projects to meet the objectives established in the ConPlan. Overall, the activities have been successful, and in some cases, have exceeded expectations. The County will continue to proceed in meeting these needs throughout the FY 2020-2024 ConPlan and Annual Action Plans.

4. Summary of Citizen Participation Process and consultation process

Summary from citizen participation section of plan.

Citizen participation 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 that requires 30-day public comment period. 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. The

Annual Action Plan

County works with the participating city subcommittee of City Managers to provide input on funding allocation processes and also provides opportunity for the public to provide input on the funding process through a public comment period on the County's Funding Allocation Policy and Process document prior to the start of the funding process for eligible activities. In addition to outreach to unincorporated community areas to receive input on funding and activities, the participating cities have a public review process prior to submitting the recommended activities and funding for their City Council's review, consider any public comments and approval of the activities. The primary purpose of the CPD programs covered by this Citizen Participation Plan is to improve communities by providing decent housing, a suitable living environment and growing economic opportunities. The County encourages the participation of all its citizens. The Public Notice of the availability of the Annual Action Plan and notice of Public Hearing was published in the OC Register in English, in La Opinion in Spanish and Nguoi Viet in Vietnamese on April 12, 2024.

The Public Comment period will end on May 13, 2024. In addition, electronic links to the draft FY 2024-25 Annual Action Plan were available on the Housing & Community Development's website at ochcd.org. In addition, the Public Notice was posted under the Public Notice link. Copies were made available upon written request. The Public notice was translated into additional languages per the County's language access policy.

5. Summary of public comments

No Public Comments have been received to date.

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

7. Summary

See discussion above.

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

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

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

Agency Role		Name		e	Department/Agency	
CDBG Administrator	ORANGE C	ORANGE COUNTY		OC Community Resources/OC Housing & Community Development		
HOME Administrator	ORANGE C	ORANGE COUNTY		OC Community Resources/OC Housing & Community Development		
ESG Administrator	ORANGE C	ORANGE COUNTY		OC Community Resources/OC Housing & Community Developme		

Table 1 – Responsible Agencies

Narrative (optional)

OC Housing and Community Development, a Division of OC Community Resources, administers the Urban County's CDBG, HOME, and ESG programs as well as CDBG-CV3, ESG-CV1 and ESG-CV2, and HOME-ARP funds.

Consolidated Plan Public Contact Information

OC Housing and Community Development 1501 E. St, Andrew Place, 1st Floor, Santa Ana, CA 92705, Attn: Craig Fee, Community Development Manager at Craig.Fee@occr.ocgov.com

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

1. Introduction

As part of the Consolidated Plan development, the Urban County of Orange undertook an extensive outreach program to consult and coordinate nonprofit agencies, affordable housing providers, and government agencies regarding the needs of the low- and moderate-income community. The outreach program was summarized in the Executive Summary and Citizen Participation sections of the Consolidated Plan. Comments received and results of the survey were summarized in Appendix A to the Consolidated Plan.

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))

To coordinate with various agencies and organizations, the Urban County compiled an outreach list consisting of 311 agencies, including:

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

These agencies were mailed notices of the Urban County's Consolidated Plan process and public meetings and specific agencies were also contacted to obtain data in preparation of the Consolidated Plan. For example, the State Developmental Services Department and State Social Services Department were contacted to obtain data and housing resources for persons with disabilities.

Additionally, the Urban County established the Office of Care Coordination within the County Executive Office in 2016. The Office of Care Coordination engages across Orange County, working with cities and community-based organizations to strengthen regional capacity and multi-city, multi-sector investments to prevent and address homelessness and other vulnerable populations, coordinate public and private resources to meet the needs of the homeless and other vulnerable population in Orange County and promote integration of services throughout the community that improve the countywide response. The Office of Care Coordination works in collaboration with the County government, 34 city governments, business sector, philanthropic organizations, community organizations, faith-based organizations, health

care, public safety and other interested stakeholders to promote an effective response to homelessness within Orange County. The Director of Care Coordination works with commission members to focus on regional policy and implementation strategies, affordable housing development, data and gaps analysis, best practice research, social policy, and systemic change.

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.

Coordination with the Orange County Continuum of Care (CoC) is managed by the County of Orange (County), County Executive Office (CEO), Office of Care Coordination which serves as the Administrative Entity and Collaborative Applicant to the Orange County CoC. The Office of Care Coordination serves as the regional facilitator of the annual CoC planning process and provides ongoing information and support to the public and private agencies that make up the Orange County System of Care to address homelessness in the community. The Office of Care Coordination provides technical assistance and administrative support to other local bodies of government, including cities and managed care plans, to ensure a coordinated and comprehensive response to homelessness in Orange County. The Office of Care Coordination also provides support to the Orange County CoC Board, a 21-member governing body for the CoC through policy planning, coordination of funding resources, collective analysis of systemwide data, and strategizing effective performance measures and goals to address the needs of people experiencing homelessness.

In addition, the Office of Care Coordination is the designated lead for the Coordinated Entry System (CES), which works with the Orange County CoC to facilitate the coordination and management of shelter, housing, and supportive services resources and services to effectively connect people in need to interventions that best resolves their housing crisis. The process helps to prioritize the most vulnerable persons with the highest need in the community to ensure that they receive shelter, housing and/or supportive services in an equitable and timely manner. CES policies were reviewed in September 2022, and analysis was conducted to evaluate equitable access to services, including the development of prioritization schemes and assessment processes that promote accessibility and efficiency within the CES, revising and enhancing the existing CES maps and providing a narrative process for navigation purposes, and providing continuous support and training materials to incorporate problem-solving and diversion initiatives through CES. Most recently, the CES policies were updated to include a robust component of CES for survivors of domestic violence, dating violence, sexual assault, or stalking that are defined as experiencing homelessness. The Office of Care Coordination, as the CES Lead, contracted with Homebase, a national technical assistance provider in the field of housing and homelessness, to work with the Orange County CoC on the development of CES policies and procedures for survivors of domestic violence, dating violence, sexual assault, or stalking. The development of the revised policies and procedures included intentional outreach and involvement of survivors and others with lived experience, including members of the Lived Experience Advisory Committee.

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.

As the Orange County Continuum of Care (CoC) Collaborative Applicant and Administrative Entity, the County of Orange (County) works closely with Emergency Solution Grant (ESG) recipient jurisdictions in Orange County (i.e., Anaheim, Garden Grove, Irvine, and Santa Ana) to discuss ESG regulations and to plan for the allocation of ESG funds through the following ways:

- Support of federal and local goals for priority populations.
- Coordination across regional entitlement jurisdictions by developing and utilizing standardized eligibility and assessment tools.
- Compliance with new eligibility and verification requirements (HMIS, housing status, homeless definitions, etc.)
- Allow for variations in the program design that responds to the needs of the jurisdiction and leveraging of existing resources; and
- Review of policies and procedures that will promote equitable provision of services.

Additionally, the County consults with the Office of Care Coordination as the Continuum of Care administrator of the allocation of ESG funding.

The County requires all public service projects and activities providing services to homeless individuals and/or families to actively participate in the Homeless Management Information System (HMIS). The County and the Office of Care Coordination also prioritizes accurate and timely data collection and analysis across the System of Care through HMIS policies and subcommittees dedicated to ensuring that interventions are effective for individuals and families experiencing homelessness.

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

1	1 Agency/Group/Organization Agency/Group/Organization Type	Abrazar, Inc.				
	Agency/Group/Organization Type	Services - Housing				
		Services-Children				
		Services-Elderly Persons				
		Services-Persons with Disabilities				
		Services-Health				
		Services-Education				
		Services-Employment				
		Sonior Transportation Continuur				

 Table 2 – Agencies, groups, organizations who participated.

		Services-Elderly reisons
		Services-Persons with Disabilities
		Services-Health
		Services-Education
		Services-Employment
		Senior Transportation - Continuum of Care/Office of Care Coordination
		Neighborhood Organization
	What section of the Plan was addressed by	Housing Need Assessment
	Consultation?	Non-Homeless Special Needs
	Briefly describe how the Agency/Group/Organization	The Non-Profit was sent the Funding Allocation Policy & Process and the draft
	was consulted. What are the anticipated outcomes of	Annual Action Plan was posted on our website for review and provide input on
	the consultation or areas for improved coordination?	developing the plans.
2	Agency/Group/Organization	City of Brea
	Agency/Group/Organization Type	Other government - Local
	What section of the Plan was addressed by	Public Facilities and Infrastructure
	Consultation?	
	Briefly describe how the Agency/Group/Organization	The City was sent the Funding Allocation Policy & Process and the draft Annual
	was consulted. What are the anticipated outcomes of	Action Plan was posted on our website for review and provide input on
	the consultation or areas for improved coordination?	developing the plans. Each Cooperating City was encouraged to participate in
		the Citizen Participation Process. Cities submitting applications for Community
		Planning and Development grant funds are required to publicly notice and hold
		at least one public meeting to discuss the proposed use of these funds.
		Annual Action Plan 11

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3	Agency/Group/Organization	City of Cypress, CA			
	Agency/Group/Organization Type	Other government - Local			
	What section of the Plan was addressed by Consultation?	Public Facilities and Infrastructure			
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The City was sent the Funding Allocation Policy & Process and the draft Annual Action Plan was posted on our website for review and provide input on developing the plans. Each Cooperating City was encouraged to participate in the Citizen Participation Process. Cities submitting applications for Community Planning and Development grant funds are required to publicly notice and hold at least one public meeting to discuss the proposed use of these funds.			
4	Agency/Group/Organization	City of Laguna Beach			
	Agency/Group/Organization Type	Housing Services-homeless Other government - Local			
	What section of the Plan was addressed by Consultation?	Homeless Needs - Chronically homeless			
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The City was sent the Funding Allocation Policy & Process and the draft Annual Action Plan was posted on our website for review and provide input on developing the plans. Each Cooperating City was encouraged to participate in the Citizen Participation Process. Cities submitting applications for Community Planning and Development grant funds are required to publicly notice and hold at least one public meeting to discuss the proposed use of these funds.			
5	Agency/Group/Organization	City of Laguna Hills			
	Agency/Group/Organization Type	Other government - Local			

	What section of the Plan was addressed by Consultation?	Public Facilities and Infrastructure			
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The City was sent the Funding Allocation Policy & Process and the draft Annual Action Plan was posted on our website for review and provide input on developing the plans. Each Cooperating City was encouraged to participate in the Citizen Participation Process. Cities submitting applications for Community Planning and Development grant funds are required to publicly notice and hold at least one public meeting to discuss the proposed use of these funds.			
6	Agency/Group/Organization	City of Laguna Woods			
	Agency/Group/Organization Type	Other government - Local			
	What section of the Plan was addressed by Consultation?	Public Facilities and Infrastructure			
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The City was sent the Funding Allocation Policy & Process and the draft Annual Action Plan was posted on our website for review and provide input on developing the plans. Each Cooperating City was encouraged to participate in the Citizen Participation Process. Cities submitting applications for Community Planning and Development grant funds are required to publicly notice and hold at least one public meeting to discuss the proposed use of these funds.			
7	Agency/Group/Organization	City of San Juan Capistrano			
	Agency/Group/Organization Type	Other government - Local			
	What section of the Plan was addressed by Consultation?	Public Facilities and Infrastructure			

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The City was sent the Funding Allocation Policy & Process and the draft Annual Action Plan was posted on our website for review and provide input on developing the plans. Each Cooperating City was encouraged to participate in the Citizen Participation Process. Cities submitting applications for Community Planning and Development grant funds are required to publicly notice and hold at least one public meeting to discuss the proposed use of these funds.			
8	Agency/Group/Organization	City of Seal Beach			
	Agency/Group/Organization Type	Other government - Local			
	What section of the Plan was addressed by Consultation?	Public Facilities and Infrastructure			
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The City was sent the Funding Allocation Policy & Process and the draft Annual Action Plan was posted on our website for review and provide input on developing the plans. Each Cooperating City was encouraged to participate in the Citizen Participation Process. Cities submitting applications for Community Planning and Development grant funds are required to publicly notice and hold at least one public meeting to discuss the proposed use of these funds.			
9	Agency/Group/Organization	Fair Housing Council of OC			
	Agency/Group/Organization Type	Housing PHA Services - Housing Services-homeless Other government - County			

	What section of the Plan was addressed by	Housing Need Assessment
	Consultation?	Public Housing Needs
		Homeless Needs - Chronically homeless
		Homeless Needs - Families with children
		Homelessness Needs - Veterans
		Homelessness Needs - Unaccompanied youth
		Homelessness Strategy
		Non-Homeless Special Needs
	Briefly describe how the Agency/Group/Organization	A range of "no-cost" fair housing services provided to eligible clientele
	was consulted. What are the anticipated outcomes of	throughout the County's Urban County program areas that are victimized and
	the consultation or areas for improved coordination?	affected by illegal housing practices were evaluated and have been included in
		the document. Subrecipient shall use the CDBG funds provided under this
		Contract to provide 2,325 low-income people with fair housing education,
		counseling, enforcement services, and landlord-tenant counseling to
		households regarding fair housing laws or alleged discrimination
10	Agency/Group/Organization	Orange County Housing Authority
	Agency/Group/Organization Type	Housing
		РНА
		Services - Housing
		Services-homeless
		Other government - County

	What section of the Plan was addressed by	Housing Need Assessment			
	Consultation?	Public Housing Needs			
		Homeless Needs - Chronically homeless			
		Homeless Needs - Families with children			
		Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth			
		Homelessness Strategy			
		Non-Homeless Special Needs			
	Briefly describe how the Agency/Group/Organization	The Orange County Housing Authority was sent the Funding Allocation Policy &			
	was consulted. What are the anticipated outcomes of	Process and the draft Annual Action Plan was posted on our website for review			
	the consultation or areas for improved coordination?	and provide input on developing the plans.			
11	Agency/Group/Organization	City of Dana Point			
	Agency/Group/Organization Type	Other government - Local			
	What section of the Plan was addressed by Consultation?	Public Facilities and Infrastructure			
	Briefly describe how the Agency/Group/Organization	The City was sent the Funding Allocation Policy & Process and the draft Annual			
	was consulted. What are the anticipated outcomes of	Action Plan was posted on our website for review and provide input on			
	the consultation or areas for improved coordination?	developing the plans. Each Cooperating City was encouraged to participate in			
		the Citizen Participation Process. Cities submitting applications for Community			
		Planning and Development grant funds are required to publicly notice and hold			
		at least one public meeting to discuss the proposed use of these funds.			
12	Agency/Group/Organization	City of Stanton			
	Agency/Group/Organization Type	Other government - Local			
	What section of the Plan was addressed by Consultation?	Public Facilities and Infrastructure			

Briefly describe how the Agency/Group/Organization	The City was sent the Funding Allocation Policy & Process and the draft Annual			
was consulted. What are the anticipated outcomes of	Action Plan was posted on our website for review and provide input on			
the consultation or areas for improved coordination?	developing the plans. Each Cooperating City was encouraged to participate in the Citizen Participation Process. Cities submitting applications for Community			
	Planning and Development grant funds are required to publicly notice and hold			
	at least one public meeting to discuss the proposed use of these funds.			
Agency/Group/Organization	Workforce Development Board			
Agency/Group/Organization Type	Services-Children			
	Services-Victims of Domestic Violence			
	Services-Employment			
What section of the Plan was addressed by	Economic Development			
Consultation?				
Briefly describe how the Agency/Group/Organization	In collaboration with the County's OC Workforce Development Board (OCWDB),			
was consulted. What are the anticipated outcomes of	the County will continue to offer outreach and training to poverty level families			
the consultation or areas for improved coordination?	and individuals. Through the CoC system, the County will work with the OCWDB			
	job-training providers to ensure that low- and moderate-income persons are			
	trained with employable skills with the potential to earn higher wages.			
	was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination? 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			

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

The Urban County contacted all participating cities and published on County's website for public review.

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	Office of Care	Potential funding allocations to address homeless needs will complement the CoC Strategy.
	Coordination	
FY 2024-25 Funding	Housing &	The FY 2024-25 FAPP supports compliance with the U.S. Department of Housing and Urban
Allocation Policy and	Community	Development (HUD) requirements for conducting a public hearing and notifying the public
Process (FAPP)	Development	the process to be used for distributing Federal housing and community development funds.
		2. Other level (mericus) (for dear laboration of for the

Table 3 – Other local / regional / federal planning efforts

Narrative (optional)

AP-12 Participation – 91.105, 91.200(c)

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

Citizen participation is an important component of the Consolidated Plan process. To solicit public input during the development of the Consolidated Plan, the Urban County conducted four Community Workshops and three Focus Group Workshops for local housing and services providers. The Urban County also administered a Housing and Community Development Needs Survey.

Public Hearing: A Public Hearing was held on November 28, 2023, before the Board of Supervisor for the adoption of the FY 2024-25 Funding Allocation Policy & Process and the adoption of the FY 2024-25 Annual Action Plan is projected to be held on May 21, 2024.

Public Review of Draft Documents: A 30-day public review was held from October 13, 2023, through November 13, 2023, for the FY 2024-25 Funding Allocation Policy and Process. For the FY 2024-25 Annual Action Plan a 30-day public notice was out on April 12, 2024. The FY 2024-25 Annual Action Plan must be submitted to HUD 45 Days before the start of the program year (July 1, 2024) unless HUD announces FY 2024 allocation amounts less than 60 days before the start of the program year but no later than August 16, 2024. The final Consolidated Plan, Annual Action Plan, amendments to the Plan, Funding Allocation Policy & Process and annual performance reports are available for five years at the County Government Offices.

Citizen Participation Outreach

Sort Ord er	Mode of Outre ach	Target of Outre ach	Summary of response/attenda nce	Summary of comments recei ved	Summary of comm ents not accepted and reasons	URL (If applicable)
1	Internet Outreach	Minorities Non-English Speaking - Specify other language: Spanish, Vietnamese, Korean, Chinese Persons with disabilities Residents of Public and Assisted Housing	Public Notices and FY 2024- 25Funding Allocation Policy and Process and FY 2024-25Annual Action Plan was posted on the County's website for public review.	No comments were received on the FY 2024- 25 Funding Allocation Policy & Process. No comments were received to date on the FY 2024- 25Annual Action Plan.	The County invites and accepts all comments.	https://www.ochcd.org/com munity-development

Sort Ord er	Mode of Outre ach	Target of Outre ach	Summary of response/attenda nce	Summary of comments recei ved	Summary of comm ents not accepted and reasons	URL (If applicable)
2	Newspaper Ad	Minorities Non-English Speaking - Specify other language: Spanish and Vietnamese Persons with disabilities Non- targeted/broad community Residents of Public and Assisted Housing	Public notices were published in the OC Register, La Opinion (Spanish) and Nguoi Viet (Vietnamese) for FY 2024- 25Funding Allocation Policy & Process on October 13, 2023. FY 2024-25Annual Action Plan was published on, in the OC Register, LA Opinion (Spanish), Nguoi Viet (Vietnamese).	No comments were received on the FY 2024- 25Funding Allocation Policy & Process. No comments were received to date on the FY 2024- 25 Annual Action Plan. (to be confirmed)	The County invites and accepts all comments.	

	ach	Target of Outre ach	Summary of response/attenda	Summary of comments recei	Summary of comm ents not accepted	URL (If applicable)
			nce	ved	and reasons	
3	ach Public Hearing	ach Minorities Persons with disabilities Non- targeted/broad community Residents of Public and Assisted Housing	•		•	https://board.ocgov.com/mee tings-agendas

Table 4 – Citizen Participation Outreach

Expected Resources

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

Introduction

A number of housing and community development resources are currently available in the Urban County area. They include:

- Community Development Block Grant (CDBG) funds
- Third Round of CDBG Coronavirus Aid, Relief, and Coronavirus Aid, Relief, and Economic Security Act (CARES Act) (CDBG-CV3)
- Emergency Solutions grant (ESG) funds.
- Second round of ESG Coronavirus Aid, Relief, and Coronavirus Aid, Relief, and Economic Security Act (Cares Act) (ESG-CV2)
- State Emergency Solutions grant (ESG) funds.
- General funds
- HOME Investment Partnership Program (HOME) funds
- HUD Housing Choice Voucher Program (through Orange County Housing Authority)
- Workforce Innovation and Opportunity Act (through the County Community Investment division)
- California Housing Finance Agency funds (CALHFA) (multiple housing programs)
- State Housing and Community Development (HCD) housing funds (multiple housing and homeless programs)
- State transportation funds
- Mental Health Services Act (through County Health Care Agency)
- HOME Investment Partnership American Rescue Plan (ARP)
- American Rescue Plan Act Coronavirus State and Local Fiscal Recovery Funds

Anticipated Resources

Program	Source	Uses of Funds	Expe	cted Amour	nt Available Ye	ear 1	Expected	Narrative Description
	of Funds		Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$	Amount Available Remainder of ConPlan \$	
CDBG	public -	Acquisition						The balance of CDBG funds available
	federal	Admin and						over the planning period is based on
		Planning						allocations for FY 2024, estimated
		Economic						program income and funds carried
		Development						over from prior years. This amount
		Housing						does not include amounts leveraged
		Public						from sub-recipients.
		Improvements						
		Public Services	3,402,657	20,000	1,343,084	4,765,741	0	
HOME	public -	Acquisition						The estimated amount of HOME
	federal	Homebuyer						funds available over the planning
		assistance						period is based on allocations for FY
		Homeowner						2023 and estimated program income,
		rehab						excluding funds carried over from
		Multifamily rental						prior years.
		new construction						
		Multifamily rental						
		rehab						
		New construction						
		for ownership						
		TBRA	1,490,271	135,000	0	1,625,271	0	

Program	Source	Uses of Funds	Expe	cted Amoui	nt Available Ye	ear 1	Expected	Narrative Description
	of Funds		Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$	Amount Available Remainder of ConPlan \$	
ESG	public -	Conversion and						The amount of ESG funds available
	federal	rehab for						over the planning period is based on
		transitional						allocations for FY 2023, excluding
		housing						funds carried over from prior years.
		Financial						
		Assistance						
		Overnight shelter						
		Rapid re-housing						
		(rental assistance)						
		Rental Assistance						
		Services						
		Transitional						
		housing	294,931	0	0	294,931	0	

Table 5 - Expected Resources – Priority Table

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

A number of housing and community development resources are currently available in the Urban County area. They include:

- Local General funds
- California Housing Finance Agency funds (CalHFA) (multiple housing programs)
- State Housing and Community Development (HCD) housing funds (multiple housing programs)
- State transportation funds

Annual Action Plan 2024

- State Mental Health Services Act
- Local Housing Successor Agency funding

For CDBG Public Facilities and Improvements Projects, Subrecipients are required to match funds if the project funding amount requested is over \$150,000, with a maximum request of \$350,000 with a 20% match.

HOME funds are matched through leveraged funding in affordable housing projects. ESG funds are matched through leverage of local resources.

F

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

Discussion

In the past, the County has partnered with local jurisdictions to make publicly owned land available for Affordable Housing Development. Currently, no publicly owned land has been identified.

Annual Goals and Objectives

AP-20 Annual Goals and Objectives

Goals Summary Information

Sort	Goal Name	Start	End	Category	Geographic	Needs Addressed	Funding	Goal Outcome Indicator
Order		Year	Year		Area			
1	Expand Affordable	2020	2024	Affordable		Expand Affordable	CDBG:	Homeowner Housing
	Housing			Housing		Housing	\$1,269,133	Rehabilitated: 101 Household
	Opportunities					Opportunities	HOME:	Housing Unit
							\$1,227,744	
2	Enhance Quality of	2020	2024	Affordable		Enhance Quality of	CDBG:	Public Facility or Infrastructure
	Life			Housing		Life	\$2,104,184	Activities for Low/Moderate
				Non-Housing				Income Housing Benefit: 72,008
				Community				People Assisted
				Development				Facade treatment/business
								building rehabilitation: 20
								Business

Sort	Goal Name	Start	End	Category	Geographic	Needs Addressed	Funding	Goal Outcome Indicator
Order		Year	Year		Area			
3	Public Services	2020	2024	Homeless		Public Services	CDBG:	Public service activities other than
				Non-Homeless			\$570,444	Low/Moderate Income Housing
				Special Needs			ESG:	Benefit: 3725 Persons Assisted
							\$272,812	Tenant-based rental assistance /
								Rapid Rehousing: 108 Households
							HOME:	Assisted
							\$100,000	Homeless Person Overnight
								Shelter: 1117 Persons Assisted
4	Planning and	2020	2024			Planning and	CDBG:	Other: 1 Other
	Administration					Administration	\$632,529	
							HOME:	
							\$162,527	
							ESG: \$22,119	

Table 6 – Goals Summary

Goal Descriptions

1	Goal Name	Expand Affordable Housing Opportunities
	Goal Description	Homeowner Housing Rehabilitated: Home funds will be used in the following year for TBRA and permanent supportive housing
2	Goal Name	Enhance Quality of Life
2	Goal	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 72,008 Persons Assisted
	Description	Facade treatment/business building rehabilitation: up to 20 Businesses

3	Goal Name	Public Services
	Goal	Public service activities other than Low/Moderate Income Housing
	Description	Benefit: 3,725 Persons Assisted Tenant-based rental assistance /Rapid Rehousing: 8 Households Assisted
		Homeless Person Overnight Shelter: 1,117 Persons Assisted
4	Goal Name	Planning and Administration
	Goal	Planning and Administration of all of the activities included in the Annual Action Plan.
	Description	

Projects

AP-35 Projects - 91.220(d)

Introduction

This plan outlines the action steps that the County of Orange will use to address housing and community development needs in the Orange Urban County. The plan includes a listing of activities that the County may undertake during FY 2024-25 (July 1, 2024, through June 30, 2025) that utilize CDBG, HOME, and ESG funds. For FY 2024, the County has a combined CDBG, HOME, and ESG allocation of \$6,715,943 including program income and prior year resources for CDBG. All proposed activities budgets will be proportionally increased or decreased from the estimated funding levels to match actual allocation amounts. Funds from participating subrecipients by either project or administration that are not completely expended, will be kept by the County of Orange for reprogramming purposes.

Projects

#	Project Name
1	Midway City Community Services & Education Center (Abrazar, Inc.)
2	Single Family Housing Rehabilitation (Brea)
3	Single-Family Housing Rehabilitation Program (Cypress)
4	Leisure World Bathroom Accessibility Program (Seal Beach)
5	Safe Home for OC Seniors (County Participating Cities and Unincorporated Areas)
6	Brea Senior Center Improvements (Design) (Brea)
7	ADA Ramps and Senior Center Improvements (Laguna Hills)
8	ADA Pedestrian Accessibility Improvements - Phase 8 (Laguna Woods)
9	2024-25 Apartment Row Street Improvements (Los Alamitos)
10	Community Center Improvements (County) - Midway City
11	Fair Housing Council of Orange County
12	Emergency Shelter(s) (ESG) Shelter, RR, HMIS, ESG Admin
13	County of Orange - CDBG Administration (CDBG) & (PI) Admin
14	Administration City (Placentia)
15	Administration County (Placentia)
16	Public Services Neighborhood Services (Placentia)
17	Public Services Seniors Services (Placentia)
18	Facade Improvements (Placentia)
19	Housing Rehabilitation - SFR (Placentia)
20	Administration City (Yorba Linda)
21	Administration County (Yorba Linda)

#	Project Name
22	Public Services (Senior Nutrition Program) (Yorba Linda)
23	Neighborhood Improvement Program HR - SFR (Yorba Linda)
24	Multi-family Rehabilitation Project-Housing Rehab (Yorba Linda)
25	HOME Administration (10% cap)
26	Affordable Housing HOME
27	County of Orange Emergency Shelter(s) CDBG
28	Alternative Sleeping Location ASL (Laguna Beach)
29	Stanton Community/Senior Center Improvement Project (Stanton)
30	Friendship Shelter - Bridge Housing Program Disability/Accessibility Project A (Laguna Beach)
31	North Seal Beach Community Center Improvements Project (Seal Beach)
27 28 29 30	County of Orange Emergency Shelter(s) CDBG Alternative Sleeping Location ASL (Laguna Beach) Stanton Community/Senior Center Improvement Project (Stanton) Friendship Shelter - Bridge Housing Program Disability/Accessibility Project A (Laguna Beac

Table 7 - Project Information

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

The funding priorities are the same as outlined in the Funding Allocation Policy and Process.

For the purposes of allocating Federal and local resources overall priority will be given to projects that meet a "High" priority need.

- Senior Centers
- Homeless Facilities
- Neighborhood Facilities
- Water/Sewer Improvements
- Street Improvements
- Sidewalk Improvements

AP-38 Project Summary

Project Summary Information
1	Project Name	Midway City Community Services & Education Center (Abrazar)
	Target Area	
	Goals Supported	Public Services
	Needs Addressed	Public Services
	Funding	CDBG: \$64,470
	Description	Funds will be used to provide social services programming at the Community Center. Abrazar, Inc. will be responsible for delivery of continuous support of existing social services programs for residents within the immediate neighborhoods. Services provided include educational, recreational, cultural, and senior citizen programming. Transportation, employment, health and medical information and referrals.
	Target Date	6/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	1200
	Location Description	Midway City Community Center
	Planned Activities	Public Services
2	Project Name	Single Family Housing Rehabilitation (Brea)
	Target Area	
	Goals Supported	Expand Affordable Housing Opportunities
	Needs Addressed	Expand Affordable Housing Opportunities
	Funding	CDBG: \$190,800
	Description	Funds will be used for rehabilitations of single-family low/very-low income, owner-occupied residences. Improvements will include interior and exterior improvements to homes and mobile home units.
	Target Date	6/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	10

	Location Description	City of Brea Low-income neighborhoods
	Planned Activities	Housing Rehabilitation
3		Single-Family Housing Rehabilitation Program (Cypress)
	Project Name	Single-Family Housing Kenabilitation Program (Cypress)
	Target Area	
	Goals Supported	Expand Affordable Housing Opportunities
	Needs Addressed	Expand Affordable Housing Opportunities
	Funding	CDBG: \$169,600
	Description	Funds will be used to support the Home Enhancement Program or HELP II, which provides forgivable loans up to \$20,000 to income eligible homeowners in order to assist them with home improvements.
	Target Date	6/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	7
	Location Description	City of Cypress in Low-income neighborhoods
	Planned Activities	Housing Rehabilitation
4	Project Name	Leisure World Bathroom Accessibility Program (Seal Beach)
	Target Area	
	Goals Supported	Expand Affordable Housing Opportunities
	Needs Addressed	Expand Affordable Housing Opportunities
	Funding	CDBG: \$190,800
	Description	Funds will be used to provide grants to income qualified, disabled seniors to improve bathroom accessibility and safety by converting the tub/shower into an accessible shower stall.
	Target Date	6/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	50
	Location Description	City of Seal Beach Leisure World

	Planned Activities	Housing Rehabilitation
5	Project Name	Safe Home for OC Seniors (County Participating Cities and Unincorporated Areas)
	Target Area	
	Goals Supported	Expand Affordable Housing Opportunities
	Needs Addressed	Expand Affordable Housing Opportunities
	Funding	CDBG: \$212,000
	Description	Funds will be used to provide grants to income qualified, seniors in unincorporated areas throughout the County and participating cities in the Urban County of Orange County. Up to \$20,000 per project.
	Target Date	6/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	10
	Location Description	Low-income unincorporated throughout the County and participating cities in the Urban County of Orange County
	Planned Activities	Housing Rehabilitation
6	Project Name	Brea Senior Center Improvements (Design) (Brea)
	Target Area	
	Goals Supported	Enhance Quality of Life
	Needs Addressed	Enhance Quality of Life
	Funding	CDBG: \$159,000
	Description	Senior Center Improvement Design
	Target Date	6/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	Design of Improvements needed to the Brea Senior Center.
	Location Description	Brea Senior Center
	Planned Activities	Public Facility & Improvements

7	Project Name	ADA Ramps and Senior Center Improvements (Laguna Hills)
	Target Area	
	Goals Supported	Enhance Quality of Life
	Needs Addressed	Enhance Quality of Life
	Funding	CDBG: \$371,000
	Description	This project includes two components: Improvements to the Florence Sylvester Senior Center and ADA sidewalk improvements on Paseo de Valencia and on Alicia Pkwy.
	Target Date	6/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	66,795 LMI Seniors
	Location Description	Florence Sylvester Senior Center – 15 intersections on Paseo de Valencia and Alicia Pkwy (Laguna Hills)
	Planned Activities	Public Facility & Improvements
8	Project Name	ADA Pedestrian Accessibility Improvements - Phase 8 (Laguna Woods)
	Target Area	
	Goals Supported	Enhance Quality of Life
	Needs Addressed	Enhance Quality of Life
	Funding	CDBG: \$159,000
	Description	ADA improvements to sidewalks and curb ramps
	Target Date	6/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	10,770 LMI People
	Location Description	ADA Ramps, sidewalks throughout the city
	Planned Activities	Public Facility & Improvements
9	Project Name	2024-25 Apartment Row Street Improvement Project (Los Alamitos)
	Target Area	

	Goals Supported	Enhance Quality of Life
	Needs Addressed	Enhance Quality of Life
	Funding	CDBG: \$371,000
	Description	Removal, replacement, and repair of sections of asphalt, concrete, and grind overlay of street in the Apartment Row Neighborhood.
	Target Date	6/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	2,573 LMI People
	Location Description	Maple St, Green Ave, Farquhar Ave, Howard Ave, Los Alamitos Blvd, Reagan St (Los Alamitos)
	Planned Activities	Public Facility & Improvements
10	Project Name	Community Center Improvements (County) - Midway City
	Target Area	
	Goals Supported	Enhance Quality of Life
	Needs Addressed	Enhance Quality of Life
	Funding	CDBG: \$212,000
	Description	Funds will be used for improvements to County owned Community Center in Midway City.
	Target Date	6/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	1200 LMI People
	Location Description	Midway City Community Center
	Planned Activities	Public Facility & Improvements
11	Project Name	Fair Housing Council of Orange County
	Target Area	
	Goals Supported	Public Services

	Needs Addressed	Public Services
	Funding	CDBG: \$52,000
	Description	Utilize funds to provide fair housing education, six community events, counseling, enforcement, and landlord/tenant counseling and updates to the AI.
	Target Date	6/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	2325 LMI People
	Location Description	Participating Cities and unincorporated areas of Orange County.
	Planned Activities	Administration
12	Project Name	Emergency Shelter(s) (ESG) Shelter, RR, HMIS, ESG Admin
	Target Area	
	Goals Supported	Public Services Planning and Administration
	Needs Addressed	Public Services Planning and Administration
	Funding	ESG: \$294,931
	Description	Funds will be utilized for the emergency shelter program, including Rapid Rehousing and HMIS.
	Target Date	6/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	462 Homeless People and 8 Rapid Rehousing.
	Location Description	Orange County Emergency Shelter(s) (Year-Round/Seasonal)
	Planned Activities	Shelter, RR, HMIS, ESG Admin
13	Project Name	County of Orange - CDBG Administration (CDBG) & (PI) Admin
	Target Area	
	Goals Supported	Planning and Administration

	Needs Addressed	Planning and Administration
	Funding	CDBG: \$506,735
	Description	Funds will be utilized for administration of HUD-sponsored Urban County programs
	Target Date	6/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	County of Orange
	Planned Activities	Administration
14	Project Name	Administration City (Placentia)
	Target Area	
	Goals Supported	Planning and Administration
	Needs Addressed	Small Business Relief Program.
	Funding	CDBG: \$31,940
	Description	Funds will be utilized for administration of the City of Placentia HUD- sponsored programs.
	Target Date	6/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	City of Placentia
	Planned Activities	Administration
15	Project Name	Administration County (Placentia)
	Target Area	
	Goals Supported	Planning and Administration
	Needs Addressed	Planning and Administration
	Funding	CDBG: \$39,836

	Description	Administration for City of Placentia HUD – sponsored programs, CAPER, AAP.
	Target Date	6/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	Administration
16	Project Name	Public Services Neighborhood Services (Placentia)
	Target Area	
	Goals Supported	Planning and Administration
	Needs Addressed	Planning and Administration
	Funding	CDBG: \$32,832
	Description	City of Placentia/Public Services Neighborhood Services - Funds will be used for the operations and support staff on the Neighborhood Services Division for various food distribution programs and coordinating services for low-income residents.
	Target Date	6/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	800 Low-income People
	Location Description	City of Placentia
	Planned Activities	Operation and support staff on the Neighborhood Services Division for various food distribution programs and coordination services for low-income residents.
17	Project Name	Public Services Seniors Services (Placentia)
	Target Area	
	Goals Supported	Public Services
	Needs Addressed	Public Services
	Funding	CDBG: \$21,000

	Description	Senior Services (Lunch Program)
	Target Date	6/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	450 Low Income Seniors
	Location Description	City of Placentia
	Planned Activities	Senior lunch program
18		
	Project Name	Façade Improvements (Placentia)
	Target Area	
	Goals Supported	Enhance Quality of Life
	Needs Addressed	Enhance Quality of Life
	Funding	CDBG: \$321,069
	Description	Housing Rehabilitation Businesses
	Target Date	6/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	Up to 20 businesses
	Location Description	LMI areas in the City of Placentia
	Planned Activities	Rehabilitation of up to 20 Businesses front Facade in old town
19	Project Name	Housing Rehabilitation - SFR (Placentia)
	Target Area	
	Goals Supported	Enhance Quality of Life
	Needs Addressed	Enhance Quality of Life
	Funding	CDBG: \$52,500
	Description	Housing Rehab-SFR
	Target Date	6/30/2025

	Estimate the number	4-5 Units
	and type of families	
	that will benefit from	
	the proposed	
	activities	
	Location Description	LMI SFR in the City of Placentia
	Planned Activities	SF Rehabilitation
20	Project Name	Administration City (Yorba Linda)
	Target Area	
	Goals Supported	Planning and Administration
	Needs Addressed	Enhance Quality of Life
		Planning and Administration
	Funding	CDBG: \$24,848
	Description	Funds will be utilized for administration of the City of Yorba Linda HUD-
		sponsored programs.
	Target Date	6/30/2025
	Estimate the number	
	and type of families	
	that will benefit from	
	the proposed	
	activities	
	Location Description	City of Yorba Linda
	Planned Activities	Admin
21		
	Project Name	Administration County (Yorba Linda)
	Project Name Target Area	Administration County (Yorba Linda)
	-	Administration County (Yorba Linda) Planning and Administration
	Target Area	
	Target Area Goals Supported	Planning and Administration
	Target Area Goals Supported Needs Addressed	Planning and Administration Planning and Administration

	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	City of Yorba Linda
	Planned Activities	Admin
22	Project Name	Public Services (Senior Nutrition Program) (Yorba Linda)
	Target Area	
	Goals Supported	Public Services
	Needs Addressed	Enhance Quality of Life
	Funding	CDBG: \$40,514
	Description	Funds will be used to provide a Senior Nutrition Program. The program assists in providing nutritional meals to low/moderate income senior citizens or disabled persons.
	Target Date	6/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	150 Seniors
	Location Description	Yorba Linda Community Center
	Planned Activities	Senior Nutrition Program
23	Project Name	Neighborhood Improvement Program HR - SFR (Yorba Linda)
	Target Area	
	Goals Supported	Enhance Quality of Life
	Needs Addressed	Enhance Quality of Life
	Funding	CDBG: \$90,000
	Description	Funds will be used to provide rehabilitation grants to qualified homeowners for general property improvements and repairs to meet local codes, standards, and ordinances.
	Target Date	6/30/2025

	Estimate the number and type of families that will benefit from the proposed activities	17 units
	Location Description	LMI SFR in the City of Yorba Linda
	Planned Activities	SFR Rehabilitation
24	Project Name	Multi-family Rehabilitation Project-Housing Rehab (Yorba Linda)
	Target Area	
	Goals Supported	Enhance Quality of Life
	Needs Addressed	Enhance Quality of Life
	Funding	CDBG: \$85,564
	Description	Funds will be used to replace a roof on a majority of low/moderate income senior citizen condo complex.
	Target Date	6/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	Household Assisted 2-3 Buildings
	Location Description	Evergreen Villas in the City of Yorba Linda
	Planned Activities	Roofing Improvements
25	Project Name	HOME Administration (10% cap)
	Target Area	
	Goals Supported	Expand Affordable Housing Opportunities
	Needs Addressed	Expand Affordable Housing Opportunities
	Funding	HOME: \$162,527
	Description	Funds will be utilized for administration of development of affordable housing opportunities.
	Target Date	6/30/2025

	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	County of Orange
	Planned Activities	Affordable Housing Admin.
26	Project Name	Affordable Housing HOME
	Target Area	
	Goals Supported	Expand Affordable Housing Opportunities
	Needs Addressed	Expand Affordable Housing Opportunities
	Funding	HOME: \$1,462,744
	Description	County will use funds for affordable housing development opportunities and TBRA.
	Target Date	6/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	County of Orange
	Planned Activities	Housing Development
27	Project Name	County of Orange - Emergency Shelter(s) CDBG
	Target Area	
	Goals Supported	Public Services
	Needs Addressed	Public Services
	Funding	CDBG: \$219,302
	Description	Funds will be used to provide essential services, operations, emergency shelter, showers, and meals for homeless clients.
	Target Date	6/30/2025

	Estimate the number	
	and type of families	
	that will benefit from	
	the proposed	
	activities	
	Location Description	County of orange Emergency Shelter(s)
	Planned Activities	Emergency Homeless Shelter.
28	Project Name	Alternative Sleep Location ASL Emergency Shelter (Laguna Beach)
	Target Area	
	Goals Supported	Public Services
	Needs Addressed	Public Services
	Funding	CDBG: \$140,326 (MOU)
	Description	Funds will be used to provide emergency shelter for 45 homeless
		individuals from the city of Laguna Beach and surrounding cities
	Target Date	6/30/2025
	Estimate the number	45 People
	and type of families	
	that will benefit from	
	the proposed	
	activities	
	Location Description	Alternative Sleep Shelter 20652 Laguna Canyon Rd (Laguna Beach)
	Planned Activities	Emergency Homeless Shelter.
29	Project Name	Stanton Community/Senior Center Improvement Project (Stanton)
	Target Area	
	Goals Supported	Public Services
	Needs Addressed	Public Services
	Funding	\$371,000
	Description	ADA renovations, enhancement, and improvements to ensure all
	-	members of the community are able to access and utilize the
		Community/Senior Center bathrooms

	Target Date	6/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	2952 People
	Location Description	City of Stanton Community and Senior Center
	Planned Activities	Public Facility & Improvements
30	Project Name	Friendship Shelter – Bridge Housing Program Disability/Accessibility Project A (Laguna Beach)
	Target Area	
	Goals Supported	Public Services
	Needs Addressed	Public Services
	Funding	\$216,435
	Description	The project is intended to renovate the women's restroom at the shelter to make it ADA accessible
	Target Date	6/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	95 People
	Location Description	Shelter located at 1335 S. Coast Hwy
	Planned Activities	Emergency Homeless Shelter.
31	Project Name	North Seal Beach Community Center Improvements Project (Seal Beach)
	Target Area	
	Goals Supported	Public Facility & Improvements
	Needs Addressed	These upgrades will provide ADA accessibility and energy-efficiency as well as encourage outdoor use and efficient use of indoor areas

Funding	\$371,000
Description	Funds will be used to upgrade the structure to improve ADA accessibility, replace the interior and exterior lighting to improve energy efficiency
Target Date	6/30/2025
Estimate the number and type of families that will benefit from the proposed activities	4623 People
Location Description	North Seal Beach Community Center
Planned Activities	Public Facilities and Improvements

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 "Urban County" of Orange is comprised of 12 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 12 participating cities include Brea, Cypress, Dana Point, Laguna Beach, Laguna Hills, Laguna Woods, La Palma, Los Alamitos, San Juan Capistrano, 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.

The County coordinates with a subcommittee of participating City Managers to review funding allocation policy and process for distribution of CDBG funds prior to the beginning of each funding cycle. Currently, the County uses a competitive funding application process to distribute CDBG funds for Public Facility & Improvements and Housing Rehabilitation activities. Individual participating cities and County departments are required to submit applications for funding. OC Housing and Community Development works with an Evaluation Committee to rank each application. The Committee ranks the applications according to the Consolidated Plan priorities, urgency of needs, readiness of projects, experience of program/project administrators, and cost-effectiveness. The committee consists of an evaluation team comprised of professionals knowledgeable about community development, community services, and housing activities. 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 Annual Action 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. Using this method, the County is able to devote resources to communities where the needs are most urgent and extensive.

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 Facility 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 and meet other underwriting factors that indicate a strong probability the project will come to fruition. ESG funds will be awarded to projects that will best serve the priority needs of homeless

individuals and families and those at risk of becoming homeless.

Geographic Distribution

Target Area	Percentage of Funds

Table 8 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

The Urban County has not established geographic target areas for expending funds.

Discussion

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

The Orange Urban County plans to utilize CDBG and HOME funds to support a number of authorized housing activities, including various residential rehabilitation programs and an affordable housing development program. HOME funds may be allocated to assist in the development of affordable rental units for households experiencing homelessness and tenant based rental assistance.

In 2018, a Housing Funding Strategy (Strategy) was completed and based on the 2017 homeless point in time count, indicated that there were 2,700 permanent supportive housing units needed. In 2022, an update to the Strategy was completed based on the 2022 homeless point in time count and although some progress had been made it indicated 2,396 permanent supportive housing units are needed. The goal is to develop these units by 2029.

The County and cities have collaborated on the development of permanent supportive housing in Orange County. The County together with the City of Stanton (a participating City) leveraged State Homekey funding for the development of 3 former motels into permanent supportive housing opportunities. This includes the use of Federal HOME funds in one of the developments.

The County of Orange has issued a series of Notice of Funding Availabilities (NOFA's) to make funding and project based vouchers available for the development of permanent supportive housing. In collaboration with the Orange County Housing Authority, the Continuum of Care, cities, developers and various stakeholders including the County's managed health care provider, CalOptima, there has been a large investment in the development of supportive and affordable housing.

Since 2018, across Orange County, a total of 1,340 affordable and supportive housing units were completed/built, 895 units are under construction and 788 units are in progress of funding.

One Year Goals for the Number of Households to be Supported	
Homeless	7,202
Non-Homeless	40
Special-Needs	0
Total	226

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

One Year Goals for the Number of Households Supported Through	
Rental Assistance	100
The Production of New Units	18
Rehab of Existing Units	106
Acquisition of Existing Units	0
Total	224

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

Discussion

Homeless-<u>The Orange County Continuum of Care expects to serve approximately 7,000 persons</u> experiencing homelessness by providing them access to emergency shelter and/or transitional housing beds. The Orange County Continuum of Care expects to serve approximately 2,500 persons experiencing homelessness in securing permanent housing placements and ending their homelessness.

AP-60 Public Housing – 91.220(h)

Introduction

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/OC Homeless, Housing and Community Development.

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

There are no public housing projects in Orange County.

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

There are no public housing projects in Orange County.

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

Not applicable.

Discussion

See discussion above.

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

Factors contributing to the increase in persons experiencing homelessness in Orange County include a lack of affordable housing for extremely low, low/moderate-income households. An increase in the number of persons whose income falls below the poverty level, reductions in housing subsidies to those eligible, extensive history of untreated drug/alcohol use, and the de-institutionalization of facilities for those with mental illness diagnosis. The recent housing market and economic conditions have also resulted in some families and individuals at risk of or experiencing homelessness due to home foreclosures, evictions, unemployment, and/or underemployment.

With the implementation of the Coordinated Entry System, the Orange County community has identified the lack of affordable housing in the area as the largest challenge to housing those experiencing chronic homelessness. When housing is found in the private market, it often has requirements that are challenging for those experiencing homelessness to meet, such as background checks, low credit history, lack of earned income and many more. Many landlords and owners have established policies that deny tenancy to individuals with felonies or other criminal backgrounds. Unfortunately, this has been an identified barrier for several individuals experiencing homelessness which have criminal backgrounds. This barrier makes it challenging to secure housing and causes delays within the housing navigation process.

The target population of persons experiencing homelessness in Orange County is composed of diverse groups ranging from families with minors to single adult individuals, veterans, disabled individuals, minorities, and those that are 62 years of age and older. Despite their differences, each person experiencing homelessness needs safe and permanent housing. The County of Orange recognizes that fully engaging in efforts to end homelessness requires a deeply involved community and accurate information. Based on the findings from the 2022 Orange County Point-In-Time Count, a total of 5,718 persons are experiencing homelessness on any given night. This represents a decrease of roughly 16% from the 2019 PIT Count (or a decrease of 1,142 individuals). The County of Orange conducted a 2024 Point In Time Count and expects to have updated data in May 2024.

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

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

Since 1998, the County of Orange (County) has had a comprehensive, coordinated, and regional Continuum of Care strategy that includes participation of all 34 cities in Orange County, County Departments, 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 other stakeholders to identify the gaps and unmet needs of the persons experiencing homelessness in Orange County. Homeless needs and priorities continue to be identified through the Orange County Continuum of Care (CoC) system. All CoC committees are public and inclusive to participation of all stakeholders including homeless and formerly homeless individuals. In addition, the CoC consults with and engages homeless individuals to participate in the Point-in-Time Count and Survey of the homeless and the various committees and subcommittees of the CoC to address the emergency shelter and transitional housing needs of homeless persons. The Orange County CoC established a Lived Experience Advisory Committee to ensure that the voices and perspectives of individuals with current and/or past lived experience of homelessness are heard and considered in the decision-making process of the CoC Board and provide a way to share recommendations and feedback on the CoC's programs and services.

The County of Orange continues to work on addressing and reducing homelessness countywide. Part of the implementation of programs established to serve the population is setting goals and meeting milestones in order to track progress. During this fiscal year, The County's Office of Care Coordination has worked to implement a Care Coordination Services Program to provide services that help respond and address the unsheltered homeless conditions and provide comprehensive care coordination, inclusive of case management, disability benefit application assistance and advocacy, and housing navigation services to individuals experiencing homelessness in each Service Planning Area (SPA) – North, Central, and South – to secure permanent housing placement for the individual. Additionally, the County's goal is to provide a program where individuals experiencing chronic, unsheltered homelessness are connected to a care coordinator who will provide a "whatever it takes" approach to getting an individual permanently housed and also increase equitable service access across Orange County regardless of where a person is experiencing homelessness.

The County's goal in providing access to programs for persons experiencing homelessness, gives individuals the opportunity to assess individual needs, and create linkages to emergency shelter services as well as community linkages to connect individuals to the Coordinated Entry System in order to increase the permanent supportive housing options available.

Additionally, the County conducted the 2023 Homeless Survey, a comprehensive survey of individuals currently experiencing unsheltered homelessness. This would be a local effort asking questions that provide insight into homelessness efforts that are working, not working, gaps and barriers in services, as well as access to available resources.

Addressing the emergency shelter and transitional housing needs of homeless persons

The County of Orange (County) has allocated \$184,332 in Federal Emergency Solutions Grant (ESG) funds and \$219,302 in Community Development Block Grant (CDBG) funds during FY 2024-25 for essential services, operations, emergency shelter, showers, and meals for individuals experiencing

homelessness.

In order to continue to increase the shelter bed capacity across Orange County, the County rehabbed a facility located at 1000 N. Kraemer Place in Anaheim in 2017 to provide trauma informed Emergency Shelter services with a 200-bed capacity serving the North Service Planning Area of the count called Bridges at Kraemer Place. CDBG funds were allocated to support the rehabilitation of this shelter facility. The County continues to fully fund the operations of the Program. In 2021, the County also rehabbed a facility located at 2229 S. Yale Street in the City of Santa Ana to provide trauma informed Emergency Shelter services with a 425-bed capacity serving the Central Service Planning Area called the Yale Navigation Center. Additionally, the County continues to invest in the operations of emergency shelter programs operated by Cities by contributing ongoing funding. These investments have supported the creation of a minimum of 500 beds for people experiencing homelessness.

Most recently, the County was able to open three Homekey Program sites which leverage the resources and efforts of the State in providing a COVID-19 response for those vulnerable individuals experiencing homelessness targeting those who are chronically homeless and are at high risk for illness due to age and/or underlying health conditions. The Homekey Program sites provided up to 192 beds of non-congregate shelter in the City of Stanton and the City of Huntington Beach; however, these facilities are in the process of or have transitioned to permanent housing for people experiencing 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

The Homeless System of Care is established to create and provide services to those experiencing homelessness by working collaboratively with a variety of supportive services that can address the current needs and barriers with a goal of self-sufficiency and a permanent home. The system also aims to prevent recurring episodes of homelessness by ensuring individuals are connected to wrap around services and community services. In Orange County, a variety of private, federal, state and county-funded programs offer job training courses, childcare, work-appropriate clothing, food donations and/or meals, among other services. Many of these services are aimed to follow clients through their homeless episode(s) and as they move within the system of care up until they have identified permanent housing. Throughout the past 30 years, a variety of non-profit service providers that created a robust system of care in Orange County which are accessible to individuals experiencing homelessness. Each provider tends to specialize in a particular type of client in order to tailor services effectively. Currently served populations include, but are not limited to families, victims of domestic violence, veterans, men, and women experiencing chronic homelessness, individuals with mental health issues and their families, and individuals with physical and developmental disabilities and their families. In addition, County of Orange

(County) serves as the Coordinated Entry System (CES) Lead for the Orange County Continuum of Care (CoC) and is responsible for the implementation of a CES that address the needs of persons experiencing homelessness in Orange County, including adult only households, families with minor children, veterans, and Transitional Aged Youth. The primary goal of CES is to facilitate a participant centered process that streamlines access to the most appropriate services and housing interventions for individuals experiencing homelessness or at risk of experiencing homelessness in Orange County. The CES aims to meet individualized preferences and needs with the goal of supporting participants return to stable housing. Persons experiencing homelessness and at risk of experiencing homelessness gain access to housing and supportive services more seamlessly through regionally coordinated access. The Orange County (CoC) Board has established committees that focus on the diverse subpopulations such as veteran, families, Transitional Age Youth (TAY) etc. The County also applied to be the Administrative Entity on behalf of the Orange County (CoC) for allocation of State ESG funds. This has brought an additional \$1,208,146 of funding to the County to address the housing needs of persons experiencing homeless. Many persons experiencing chronic homelessness also have a disability that requires an additional level of support. One program that is developing permanent housing units tied to supportive services is the Mental Health Services Act (MHSA) Housing Program. In June 2018, the Board of Supervisors received and filed the Housing Funding Strategy which delineated specific actions needed to achieve the goal of developing 2,700 supportive housing units over a six-year period and approved the MHSA \$70.5 million Permanent Supportive Housing Spending Plan. The \$70.5 million in MHSA is in addition to the \$25 million previously allocated in 2018, for a combined total of \$95.5 million towards the development of supportive housing. 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 adults or older adults experiencing serious mental illness or a child or youth experiencing an emotional disturbance. The programs provide flexible resources that are tailored to each client's specific needs. Since the adoption of the Housing Funding Strategy in June 2018, the County has allocated a combined \$98.7 million dollars in County funds including, but not limited to HOME and HOME American Rescue Plan (HOME ARP) to promote the acquisition, new construction, and acquisition/rehabilitation of supportive housing for households experiencing homelessness through a Notice of Funding Availability. In December 2022, the County received and filed an updated 2022 Housing Funding Strategy based on the 2022 Point in Time Count with an updated goal of developing 2,396 supportive housing units by 2029. The Orange County Housing Finance Trust (OCHFT) was also formed in 2019 which is a joint powers authority between the County of Orange and the Cities throughout the County with the purpose of funding housing. In 2022, the OCHFT awarded funding to assist the development of three (3) projects that will add another 191 units, for a total of 1,065 affordable and supportive housing units.

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,

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employment, education, or youth needs.

The most fundamental risk factor in experiencing homelessness is acute poverty. Orange County has many organizations, both private and public, providing resources to those at risk of homelessness. 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 household has been placed in permanent housing.

Implementation of the Mental Health Services Act (MHSA) in Orange County has provided a large array of supportive services for those who are homeless 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.

CalAIM is a five-year initiative by the Department of Health Care Services (DHCS) to improve the quality of life and health outcomes of the Medi-Cal population by meeting people where they are in life, addressing social drivers of health and breaking down barriers in accessing care. CalAIM offers Medi-Cal members coordinated and equitable access to services that address their physical, behavioral, developmental, dental, and long-term care needs. CalAIM is a population health approach that prioritizes prevention and whole-person care. It extends services and supports beyond hospitals and health care settings directly into California communities.

The initiative leverages Medi-Cal as a tool to help address many of the complex challenges facing California's most vulnerable residents, including individuals experiencing homelessness, children with complex medical conditions, justice-involved populations with significant clinical needs and the aging population.

CalAim has three primary goals:

- 1. Identify and manage member risk and needs through whole-person care approaches and address social determinants of health.
- 2. Move Medi-Cal to a more consistent and seamless system by reducing complexity and increasing flexibility.

3. Improve quality outcomes, reduce health disparities, and drive delivery system transformation and innovation through value-based initiatives, modernization of systems and payment reform.

Discussion

Please see above.

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

Introduction:

The County recognizes that barriers to affordable housing exist and continues to employ strategies to overcome them.

Lack of Affordable Housing Funds: The availability of consistent funding for affordable housing was severely affected by the dissolution of redevelopment agencies in the State of California.

Environmental Protection: State law (California Environmental Quality Act and California Endangered Species Act) and federal law (National Environmental Policy Act and Federal Endangered Species Act) regulations require environmental review of proposed discretionary projects (e.g., subdivision maps, use permits, etc.). Costs and time delay resulting from the environmental review process are also added to the cost of housing.

Land Use Policies: Housing growth is expected to slow in many South County cities as they reach "buildout" because the trend of higher density housing is not widely accepted in these areas. Homeowners' associations and their related CC&Rs, the predominant development form after the 1970s that most of South Orange County was developed under, may also prevent local land use flexibility and the policies necessary to address workforce housing challenges over the long-term.

Planning and Development Fees: Planning and development impact fees, such as for transportation, water, and sewer infrastructure improvements, often add to the overall cost of development.

Permit and Processing Procedures: Builders and developers frequently cite the cost of holding land during the evaluation and review process as a significant factor in the cost of housing. Processing times vary with the complexity of the project. Holding costs associated with delays in processing have been estimated to add between 1.1 percent and 1.8 percent to the cost of a dwelling unit for each month of delay.

State and Federal Davis-Bacon Prevailing Wages: The State Department of Industrial Relations (DIR) expanded the kinds of projects that require the payment of prevailing wages. Prevailing wage adds to the overall cost of development. A prevailing wage must also be paid to laborers when federal funds are used to pay labor costs for any project over \$2,000 or on any multi-family project with federal funding sources. over eight units. Based on discussions with developers, various prevailing wage requirements typically inflate the development costs by 30-40 percent.

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.

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 "byright" development of affordable housing units on commercial, industrial, and certain high density residential zoned sites through an administrative approval process. 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.

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.

In March 2023, the County released a 2023 NOFA making up to \$67.1 million dollars in combined sources (including HOME and HOME ARP) and up to 210 project-based vouchers available to support supportive housing development. In March 2024, the County released a 2023 NOFA First Amendment making up to \$32.7 million dollars in combined sources (including HOME and HOME-ARP) and up to 218 project-based vouchers available to support supportive housing development.

OC Housing and Community Development encourages all developers to work closely with residents and community groups in the development of housing. The County's 2014-21 Housing Element established an action that the County's Affordable Housing Project Manager and OC Housing and 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.

Discussion:

See discussions above.

AP-85 Other Actions - 91.220(k)

Introduction:

Priority Needs established in the FY 2020-2024 Five-Year Consolidated Plan, which form the basis for establishing objectives and outcomes in the FY 2024-25 One-Year Action Plan, are as follows:

- 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

<u>High Priority</u>

- Expand and preserve the supply of affordable housing to create housing opportunities for lowand 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.

Actions planned to address obstacles to meeting underserved needs.

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 planned to foster and maintain affordable housing.

The Orange Urban County plans to utilize CDBG and HOME funds to support a number of authorized housing activities, including various residential rehabilitation programs and an affordable housing development program. HOME funds may be allocated to assist in the development of affordable rental units for households experiencing homelessness and tenant based rental assistance.

In 2018, a Housing Funding Strategy (Strategy) was completed and based on the 2017 homeless point in time count, indicated that there were 2,700 permanent supportive housing units needed. In 2022, an update to the Strategy was completed based on the 2022 homeless point in time count and although some progress had been made it indicated 2,396 permanent supportive housing units are needed. The goal is to develop these units by 2029.

The County and cities have collaborated on the development of permanent supportive housing in Orange County.

The County of Orange has issued a series of Notice of Funding Availabilities (NOFA's) to make funding and project based vouchers available for the development of permanent supportive housing. In collaboration with the Orange County Housing Authority, the Continuum of Care, cities, developers and various stakeholders including the County's managed health care provider, CalOptima, there has been a large investment in the development of supportive and affordable housing.

Since 2018, across Orange County, a total of 1,340 affordable and supportive housing units were completed/built, 895 units are under construction and 788 units are in progress of funding.

In addition, in 2019 the Orange County Housing Finance Trust (OCHFT) was formed as a joint power's authority between the County of Orange and cities throughout the county. OCHFT was created for the purpose of funding housing specifically assisting the homeless population and persons and families of extremely low, very low, and low income within the County of Orange. There are now 23 active member jurisdictions. They include the County of Orange and the cities of Aliso Viejo, Anaheim, Buena Park, Costa Mesa, Dana Point, Fountain Valley, Fullerton, Garden Grove, Huntington Beach, La Habra, Laguna Beach, Laguna Hills, Laguna Niguel, Mission Viejo, Newport Beach, Orange, Placentia, San Juan Capistrano, Santa Ana, Stanton, Tustin, Westminster. Without this collaborative effort, new funding

from the State would not be possible.

This influx of County funds made it possible for OCHFT to be awarded \$4.75 million in State Local Housing Trust Funds in 2023 to assist in the development of six (6) projects.

Actions planned to reduce lead-based paint hazards.

In Orange County, the Childhood Lead Poisoning Prevention Program (CLPPP) follows children with abnormal or high blood lead levels, making home visits to families of affected children to determine the source of lead and provide education about lead poisoning. Program staff also coordinates health care needs; follow-up visits when needed and provides outreach and educational presentations to the community. CLPPP also provides resources to cities with significant number of older housing units to help respond to complaints of deteriorated lead-based paint and other lead-related hazards in residential housing.

The CLPPP's Environmental Health Department is currently working toward:

- Using progressive notification and action to achieve elimination of lead hazards identified during environmental investigations.
- Developing and implementing programs for training of investigation and enforcement agency personnel on identifying and correcting lead hazards in high-risk jurisdictions.
- Providing educational materials on renovation and remodeling activities to housing and building departments, for public distribution; and
- Encouraging building departments to incorporate informing about lead-safe work practices into their building permit process (such as attaching renovation pamphlets to building permits) for housing built before 1978.

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

OCHA's 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.

Furthermore, 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 addressing poverty and homelessness in the County. In addition, to the funding and project-based vouchers, the County has made available for the development of supportive housing. The County updated the Housing Funding Strategy for the development of 2,396 supportive

housing units by 2029.

Actions planned to develop institutional structure.

The institutional structure, through which this Annual Action Plan will be implemented, includes various agencies of County government, participating cities, nonprofit organizations, and private industry. OC Housing and Community Development has oversight responsibility for the Consolidated Plan/Annual Plan processes including oversight of regulatory requirements such as NEPA, Fair Housing, Section 3, etc. OC Housing and Community Development is a component of OC Community Resources, which consists of OC Animal Care, OC Community Services, OC Housing and Community Development, OC Parks, and OC Public Libraries.

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

OC Housing and Community Development is responsible for the administration and compliance of programs and grant management. Housing and Community Development performs audits, compliance, and legal notification procedures required by HUD.

Housing and Community Development oversees housing community development activities, such as public infrastructure, housing rehabilitation, community development, preservation and improvement activities, affordable rental housing, 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, San Juan Capistrano, Stanton, and 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.

Nonprofit organizations play a vital role in implementing the Annual Action Plan. Nonprofit organizations 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.

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.

Discussion:

See discussion above.

Program Specific Requirements

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

Introduction:

The following describes other program-specific requirements.

Community Development Block Grant Program (CDBG) Reference 24 CFR 91.220(I)(1)

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

1. The total amount of program income that will have been received before the start of the	
next program year and that has not yet been reprogrammed	20,000
2. The amount of proceeds from section 108 loan guarantees that will be used during the	
year to address the priority needs and specific objectives identified in the grantee's strategic	
plan.	0
3. The amount of surplus funds from urban renewal settlements	0
4. The amount of any grant funds returned to the line of credit for which the planned use	
has not been included in a prior statement or plan	0
5. The amount of income from float-funded activities	0
Total Program Income:	20,000

Other CDBG Requirements

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

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

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

as follows:

FY 2023-24 HOME funds will be used primarily for the development of affordable housing.

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 County had previously provided homebuyer assistance utilizing HOME funds and housing rehabilitation assistance As a condition of receiving HOME and CDBG grant or loan funds, the County requires the applicant to enter into a covenant agreement that is recorded against the property and runs with the land. The agreement contains a recapture restriction stipulating that during the affordability period if the unit is sold, the grant or loan must be paid in full.

The County offers Mortgage Assistance Program (MAP) loans to assist eligible low-income first-time homebuyers on a first-come, first-serve basis to purchase their own decent affordable houses in the unincorporated areas of Orange County and in certain participating Cities within the County. MAP loans provide eligible first-time homebuyers part of the purchase price of their home to bridge the gap between the total purchase price of the home and the home buyer's down payment, closing costs and 1st mortgage. Eligible first-time homebuyer's annual income must not exceed 80% of the Area Median Income (AMI). The total sales prices for a HOME funded property shall not exceed the maximum HOME purchase price (85% of the medium home sales price) for Orange County. All applicants must attend a homebuyer education workshop offered by a HUD approved Housing Counseling Agency. Borrowers must qualify for and obtain first mortgage loan from a participating lender. Potential homebuyers may obtain additional information the on OC Housing & Community Development website which links to the administrator for the County's MAP Program at www.ochcd.org/housing-development/homeowner-program.

In accordance with the requirements of the HOME Program (24 CFR Part 92), these properties assisted with HOME funds are subject to affordability restrictions. Since in all cases the County's MAP provides HOME direct assistance to eligible first-time home buyers in the form of loans, all homebuyers that receive a MAP loan have received direct HOME assistance. Therefore, the County uses recapture provisions to enforce the HOME affordability requirements in its homebuyer program and does not use resale provisions.

Borrowers must occupy the Property as Borrower's principal place of residence for thirty (30) years from the date the loan is made. Prior to the 30th year, Borrower has the right to prepay the outstanding principal amount of the loan plus the simple interest that is due. If Borrower prepays the original amount of the loan plus simple interest, the Deed of Trust, and the requirement that Borrowers must occupy the Property as Borrower's principal place of residence will no longer be in effect. In the case of refinance, Borrowers must notify the County of Orange. Borrowers can refinance the loan as long as they do not take cash out when the refinance is completed.

MAP loans from the County are deferred loans. This means that Borrowers do not have to make any payments on the loan for 30 years, provided the Borrower owns and occupies the home and does not violate any of the terms of the Mortgage Assistance Program loan. The loan carries a simple interest rate of three percent (3%). Thirty (30) years from the date the loan is made, the Borrower will be required to repay the principal amount of the loan (direct HOME subsidy) plus all accrued interest.

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:

During the thirty-year affordability period, if the Borrower is going to transfer all or any part of the property (either voluntarily through a sale, or involuntarily through a foreclosure or similar transaction), it must notify the County, in advance and in writing and receive the County's written approval. At transfer, the Borrower will be required to repay the loan with the net proceeds of sale/distribution of proceeds at foreclosure. If there are insufficient net proceeds for the County to recapture the loan plus interest, the County will recapture the full amount of net proceeds available, and the loan will be considered satisfied. Net proceeds are the sales price of the home minus the first mortgage repayment and any applicable closing costs.

Certain transfers are **not** permitted, including transfers: (i) by a Borrower to an existing spouse or domestic partner who is also an obligor under the Note; (ii) by a Borrower to a spouse or domestic partner where the spouse or domestic partner becomes the co-owner of the Property; (iii) between spouses as part of a marriage dissolution proceeding; (iv) to an existing spouse or domestic partner of Borrower by devise or inheritance following the death of Borrower; (v) by Borrower into an inter vivos trust in which Borrower is the beneficiary; (vi) by deed of trust or imposition of a lien subordinate to the Deed of Trust or (vii) refinance of the First Mortgage or any CalHFA Mortgages, meeting the requirements of Section 11 of the Promissory Note.

MAP loans are repaid per the terms of a Promissory Note which is secured by a Deed of Trust. In addition, the County executes a Borrower Disclosure Statement with the Borrower, in order to convey all the HOME requirements that apply during the affordability period (principal residence, recapture requirements, default).

The County will conduct yearly monitoring to ensure that Borrowers are in compliance with the terms of their MAP loan, including, but not limited to, the requirement that Borrowers use the home as their principal place of residence. In the event of noncompliance during the period of affordability by the Borrower under the terms of the MAP loan or their First Mortgage loan, the total amount of the Borrower's Map loan and simple interest owed shall immediately become due and payable. Noncompliance occurs when an owner (1) vacates the unit or rents the unit to another

household or, (2) sells the home without the County receiving recaptured funds due at time of sale.

In the event of noncompliance with the affordability requirements, or default on any loan terms, all outstanding principal plus simple interest is due and immediately payable. If the Borrower is unable to repay the loan when due, an additional financial penalty may be imposed by the County per the terms of the Borrower's Promissory Note.

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:

This plan does not include use of HOME funds to refinance existing debts for multifamily housing.

- If applicable to a planned HOME TBRA activity, a description of the preference for persons with special needs or disabilities. (See 24 CFR 92.209(c)(2)(i) and CFR 91.220(I)(2)(vii)).
 Home funds for TBRA are used for a preference of Homeless individuals or families.
- 6. If applicable to a planned HOME TBRA activity, a description of how the preference for a specific category of individuals with disabilities (e.g., persons with HIV/AIDS or chronic mental illness) will narrow the gap in benefits and the preference is needed to narrow the gap in benefits and services received by such persons. (See 24 CFR 92.209(c)(2)(ii) and 91.220(I)(2)(vii)). N/A
- If applicable, a description of any preference or limitation for rental housing projects. (See 24 CFR 92.253(d)(3) and CFR 91.220(l)(2)(vii)). Note: Preferences cannot be administered in a manner that limits the opportunities of persons on any basis prohibited by the laws listed under 24 CFR 5.105(a). Home funds are used to develop permanent supportive housing and for individuals experiencing homelessness.

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

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

The Emergency Solutions Grant (ESG) Written Standards were last approved by the Orange County Continuum of Care (Orange County CoC) in 2022. The approved version is included as an attachment.

The latest draft version of the ESG Written Standards is included as an attachment. The ESG Written Standards will be reviewed and approved by the County of Orange (County) as the Collaborative Applicant and Administrative Entity to the Santa Ana/Anaheim/Orange County Continuum of Care (Orange County CoC), the Orange County CoC, and local ESG recipients including representatives from the County, City of Anaheim, City of Garden Grove, City of Irvine, City of Anaheim, and City of

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Santa Ana (ESG Collaborative) to finalize the document. The updated ESG Written Standards were adopted by the CoC Board in June 2022. The County continued to review and make updates to the ESG Written Standards at least annually, or as needed, to include and refine updated program guidelines, appendices for COVID-19 related policies and procedures, and approved waivers approved by the funding agency. Any adjustments made to the ESG Written Standards will go through a review and approval workflow process to ensure coordination and collaboration of policies, program design and standards that result in positive outcomes and impacts to the community.

Collaboration allows for input on the standards and implementation process developed by organizations that directly provide homelessness and housing services, including Street Outreach, Emergency Shelter services and operations, Homelessness Prevention and Rapid Rehousing. Subrecipients are required to develop and implement written policies and procedures in compliance ESG regulations and program objectives. County and local entitlement jurisdictions will work closely with subrecipients and provide technical assistance to ensure compliance with eligibility and verification requirements for all ESG activities. Additionally, the ESG Collaborative will continue to develop assessment and evaluation tools to standardize monitoring forms and processes and review performance data to ensure the effectiveness of the program design and standards, minimize any duplication of efforts and align with systemwide values and priorities.

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

Provided are the current standards utilized by subrecipient which also meet HUD requirements. Provisions in the CoC Program interim rule at 24 CFR 578.7(a)(8) require that CoC's establish a Centralized or Coordinated Assessment System (CES). HUD's primary goals for coordinated entry processes are that assistance be allocated as effectively as possible and that it be easily accessible no matter where or how people present. Most communities lack the resources needed to meet all the needs of people experiencing homelessness. Managed by the Office of Care Coordination, County of Orange operates a coordinated entry system with components for adult-only households and families with minor children. In addition, a by-name registry is maintained for transitional aged youth and veterans.

12/CES%20Policies%20and%20Procedures%20Final 231221 Approved.pdf

At this time, the CoC has implemented Coordinated Entry for Permanent Supportive Housing, Other Permanent Housing, Rapid Rehousing, Supportive Services Only, Emergency Shelters for Families and Homeless Prevention Assistance.

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

As the Collaborative Applicant and Administrative Entity, the County of Orange (County) Office of Care Coordination collaborates and convenes with the Orange County CoC and local participating cities in prioritizing ESG activities that will best support individuals and families experiencing homelessness, close gaps in services and strategize systemwide performance measures. This includes developing partnerships with various organizations across the CoC, continuous improvement of planning, program implementation and data collection, and promoting programs that demonstrate sustainability for funded projects. The funding for emergency shelter has been established as a high priority regionally.

As the Administrative Entity, the County subawards are made through a procurement process in accordance with 25 CCR § 8403 and the County of Orange Contract Policy Manual using a Request for Proposal. The procurement process is competitive in selecting subrecipients and consists of adequate public notice, a statement of objectives and requirements, minimum qualification criteria, and evaluation criteria for all proposals. Selection and distribution of grant funds receive CoC Board approval prior to award.

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 County of Orange (County) Office of Care Coordination, in collaboration with the Orange County Continuum of Care (CoC) Board, has established the Lived Experience Advisory Committee (Advisory Committee). The Advisory Committee functions in an advisory capacity to the CoC Board and works with the County as the Collaborative Applicant and Administrative Entity to include community-level feedback from individuals with current and past lived experience of homelessness in the review and development of policies, procedures and funding decisions impacting homeless services in Orange County.

As the Advisory Committee convenes on a monthly basis, the County brings policies, processes, and funding opportunities as part of the process of receiving feedback from individuals with lived expertise. If the County is unable to meet the homeless participation requirement in 24 CFR 576.405(a), the County will consult with the Advisory Committee for feedback and recommendations in the review of policies and services funded under ESG.

5. Describe performance standards for evaluating ESG.

Refer to the ESG written standards (attached)