

URBAN COUNTY OF ORANGE

Consolidated Plan FY 2025-2029 May 20, 2025

OC HOUSING & COMMUNITY DEVELOPMENT 1501 E. ST. ANDREW PLACE, 1ST FLOOR SANTA ANA, CA 92705

DRAFT FOR PUBLIC REVIEW

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Executive Summary

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

Introduction

The County of Orange is located along the Pacific Ocean between Los Angeles County to the north and northwest, San Bernardino County to the northeast, Riverside County to the east, and San Diego County to the southeast. Orange County stretches approximately 40 miles along the coast and extends inland approximately 20 miles, covering 798 square miles.

This Fiscal Year (FY) 2025-2029 Consolidated Plan for the Urban County of Orange serves as the Urban County's official application to HUD for Community Planning and Development (CPD) funds - Community Development Block Grant (CDBG), HOME Investment Partnership, and Emergency Solutions Grant (ESG) funds. The Plan identifies the housing and community development needs in the Urban County and sets forth a strategic plan for addressing the identified needs. It also satisfies the minimum statutory requirements of the CDBG, HOME, and ESG programs. The Plan covers from July 1, 2025 through June 30, 2029.

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 two cities have elected to join the Urban County for the overall implementation of these programs.

Summary of the objectives and outcomes identified in the Plan Needs Assessment Overview

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)
- A 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 will receive funding during the Five-Year Consolidated Plan. The priorities for the FY 2025-2029 Consolidated Plan, established in consultation with residents and community groups, include the following:

High Priority

- Expand and preserve the supply of affordable housing to create housing opportunities for low- and moderateincome 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

In addition, the County may consider Economic Development activities if funding becomes available (Low-Priority).

Evaluation of past performance

During the last Five-Year Consolidated Plan for FY 2020-2024, the Urban County met most of its five-year goals and objectives. Based on the FY 2023-2024 CAPER, several public facilities and infrastructure improvements were made under the 2020-2024 Consolidated Plan, serving 64,846 people. The Urban County also provided façade treatment/business building rehabilitation to 1 business and homeowner housing rehabilitation services to 47 households. The County utilized HOME funds to assist in the construction of 48 affordable rental units and 20 units for persons experiencing homelessness. An estimated 11,943 persons were also served through public services for low and moderate income households and 1,186 were assisted by shelters using CDBG and ESG funds. As of FY 2023, the Urban County has already completed over 100 percent of its COVID-19 response, non-housing community development, and public service goals.

HOME funds are currently set-aside for Permanent Supportive Housing activities under the County's Supportive Housing Notice of Funding Availability (PSH NOFA).

Summary of citizen participation process and consultation process

Citizen participation is one of the most important components of the Consolidated Plan process. To solicit public input during the development of the Consolidated Plan, the Urban County conducted seven community meetings with residents and local housing and service providers. The Urban County also administered a Housing & Community Development Needs Survey.

Community Meetings: The Urban County held five Community Meetings to solicit input on needs during the development of the Consolidated Plan. The meetings were held on the following days:

- Wednesday November 13, 2024, Laguna Woods Council Chambers
- Wednesday November 13, 2024, Stanton City Hall
- Monday November 18, 2024, El Modena Community Center (Unincorporated Area of Orange County)
- Wednesday November 20, 2024, Midway City Community Center
- Thursday January 16, 2025, Anaheim Independencia Community Center

Focus Group Meetings: The County also conducted two focus group meetings, one in-person and one virtual, for nonprofits and government agencies that serve low- and moderate-income persons and those with special needs:

- Thursday November 14, 2024, Virtual Workshop
- Monday December 2, 2024, (HCD Office, Conference Meeting Room) In-Person Workshop

Housing & Community Development Needs Survey: The survey was made available both online and in hard copy form for residents attending community meetings that may require a hard copy. Outreach for the community meetings and the survey included:

- Notices posted on County's website (English, Spanish, Chinese, Korean, and Vietnamese) and Google translate could also be used for other languages.
- Hard copies of notices (English, Spanish, Chinese, Korean, and Vietnamese) were made available in the County Government Offices.
- Emails sent to agencies informing them of the meetings and the availability of the survey.
- Survey QR code/link distributed to a number of local agencies for distribution to their clients.

Public Review of Draft Documents: A 30-day public review was held from April 11 through May 12, 2025. Copies of the draft Consolidated Plan and Action Plan were made available for the public at the following locations:

https://www.ochcd.org/community-development

The final Consolidated Plan, amendments to the Plan, and annual performance reports will be available for five years at the County Government Offices. Residents affected by the Plan's implementation have access to the County's Plans.

Public Hearing: A public hearing before the Board of Supervisors will be held on May 20, 2025 for the final adoption of the Consolidated Plan. The public notice can be found in Appendix A.

Summary of public comments

A summary of the public comments is provided in Appendix B.

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

All comments received were accepted and summarized in Appendix B.

Summary

The Urban County of Orange has undertaken diligent and good faith efforts in outreaching to all segments of the community that may benefit from the CDBG, HOME, and ESG programs.

The Process

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

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

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

Agency Role	Name	Department/Agency
CDBG Administrator	ORANGE COUNTY	OC Community Resources
HOME Administrator	ORANGE COUNTY	OC Community Resources
ESG Administrator	ORANGE COUNTY	OC Community Resources

Table 1 - Responsible Agencies

Narrative

OC Housing & Community Development administers the Urban County's CDBG, HOME, and ESG programs.

Consolidated Plan Public Contact Information

For matters concerning the Urban County of Orange's CDBG, HOME, and ESG programs, contact: Craig Fee, Manager, OC Housing & Community Development, 1501 E St. Andrew Place, Santa Ana, CA, 92705, (714) 480-2996, Craig.Fee@occr.ocgov.com.

PR-10 Consultation – 91.100, 91.110, 91.200(b), 91.300(b), 91.215(l) and 91.315(l)

Introduction

As part of this 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 has been summarized in the Executive Summary and Citizen Participation sections of this Consolidated Plan. Comments received and results of the survey are summarized in Appendix B to this 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 outreach to various agencies and organizations, the Urban County compiled an outreach list consisting of 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;
- Agencies serving the homeless and at-risk homeless, including those that are coordinating re-entry after being discharged from institutions;
- · 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.

The complete outreach list is included in Appendix C. These agencies were -E-mailed notices of the Urban County's Consolidated Plan process and public meetings. In addition, the County coordinated a virtual meeting on November 14, 2024 with entitlement jurisdictions in the County and the Continuum of Care to develop homeless statistics for the Consolidated Plan.

Describe coordination with the Continuum of Care and efforts to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans, and unaccompanied youth) and persons at risk of homelessness

The outreach list includes homeless service agencies in the Santa Ana/Anaheim/Orange Continuum of Care (CoC). The Continuum of Care Strategy was consulted to provide information on homelessness and resources available. Several agencies that provide housing and supportive services for the homeless and those at risk of becoming homeless attended the Focus Group Workshop.

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

As the Continuum of Care lead agency, the County of Orange consulted with ESG recipient jurisdictions in the region to discuss new ESG regulations and to plan for the allocation of ESG funds. The County plans to utilize these funds to assist in homeless prevention and rapid rehousing in ways that:

- Coordinate across regional entitlement jurisdictions by developing and utilizing standardized eligibility and assessment tools;
- Support federal and local goals for priority populations;
- Allow for variations in the program design that responds to the needs and resources of the jurisdiction; and
- Comply with new eligibility and verification requirements (HMIS, housing status, homeless definitions, etc.)

The County of Orange requires all public service projects and activities providing services to homeless individuals and/or families to actively participate in the Homeless Management Information System while prioritizing the strengthening of data collection and participation across the system of care for homeless individuals and families.

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

Agency/Group/Organization	Agency/Group/ Organization Type	What section of the Plan was addressed by Consultation?	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?
Families Forward	Services – Housing Services – Homeless	Housing Needs Assessment	Agency attended the Stakeholder Workshop on November 14th, 2024 and provided input on service needs in the community.
Pathways of Hope	Services – Homeless	Housing Needs Assessment Homelessness Strategy	Agency attended the Stakeholder Workshop on November 14th, 2024 and provided input on service needs in the community.
Tustin Temporary Emergency Shelter	Services – Homeless	Housing Needs Assessment Homelessness Strategy	Agency attended the Stakeholder Workshop on November 14th, 2024 and provided input on service needs in the community.
Fentanyl Solution	Services – Substance Use	Homelessness Strategy Non-Homeless Special Needs	Agency attended the Stakeholder Workshop on November 14th, 2024 and provided input on service needs in the community.
Healthcare In Action	Services – Health Services – Substance Use	Non-Homeless Special Needs	Agency attended the Stakeholder Workshop on November 14th, 2024 and provided input on service needs in the community.
CalOptima Health	Services – Health	Non-Homeless Special Needs	Agency attended the Stakeholder Workshop on November 14th, 2024 and provided input on service needs in the community.
City of Santa Ana	Public Agency	Housing Needs Assessment	Agency attended the Stakeholder Workshop on November 14th, 2024 and provided input on service needs in the community.
City of Westminster	Public Agency	Housing Needs Assessment	Agency attended the Stakeholder Workshop on November 14 th , 2024 and provided input on service needs in the community.
Orangewood Foundation	Services – Youth Services - Education	Non-Homeless Special Needs	Agency attended the Stakeholder Workshop on November 14th, 2024 and provided input on service needs in the community.
Diversified Services	Services - Education Services - Employment	Non-Homeless Special Needs	Agency attended the Stakeholder Workshop on November 14th, 2024 and provided input on service needs in the community.
Human Options	Services – Victims of Domestic Violence	Housing Needs Assessment Non-Homeless Special Needs Homelessness Strategy	Agency attended the Stakeholder Workshop on November 14th, 2024 and provided input on service needs in the community.

Project Hope Alliance	Services – Youth Services – Homeless	Housing Needs Assessment Non-Homeless Special Needs Homelessness Strategy	Agency attended the Stakeholder Workshop on November 14th, 2024 and provided input on service needs in the community.
CAP OC	Services – Youth Services – Families	Housing Needs Assessment Non-Homeless Special Needs	Agency attended the Stakeholder Workshop on November 14th, 2024 and provided input on service needs in the community.
Orange County Community Housing Corporation	Services – Housing	Housing Needs Assessment	Agency attended the Stakeholder Workshop on November 14th, 2024 and provided input on service needs in the community.
John Henry Foundation	Services – Persons with Disabilities	Non-Homeless Special Needs	Agency attended the Stakeholder Workshop on November 14th, 2024 and provided input on service needs in the community.
Family Solutions Collaborative	Services – Homeless	Housing Needs Assessment Homelessness Strategy	Agency attended the Stakeholder Workshop on November 14th, 2024 and provided input on service needs in the community.
Family Assistance Ministries	Services – Homeless	Housing Needs Assessment Homelessness Strategy	Agency attended the Stakeholder Workshop on November 14 th , 2024 and provided input on service needs in the community.
City of Newport Beach	Public Agency	Housing Needs Assessment	Agency attended the Stakeholder Workshop on November 14th, 2024 and provided input on service needs in the community.
Resilience OC	Services – Youth	Non-Homeless Special Needs	Agency attended the Stakeholder Workshop on November 14th, 2024 and provided input on service needs in the community.
Housing is a Human Right Orange County	Services – Housing	Housing Needs Assessment	Agency attended the Stakeholder Workshop on November 14th, 2024 and provided input on service needs in the community.
Providence St. Joseph Health	Services – Health	Non-Homeless Special Needs	Agency attended the Stakeholder Workshop on November 14th, 2024 and provided input on service needs in the community.
Board of Supervisors, Fourth District	Public Agency	Housing Needs Assessment	Agency attended the Stakeholder Workshop on November 14th, 2024 and provided input on service needs in the community.
WISEPlace	Services – Homeless Services – Youth	Housing Needs Assessment Homelessness Strategy	Agency attended the Stakeholder Workshop on November 14th, 2024 and provided input on service needs in the community.

Covenant House California	Services – Homeless Services – Youth	Housing Needs Assessment Homelessness Strategy	Agency attended the Stakeholder Workshop on November 14th, 2024 and provided input on service needs in the community.
The Kennedy Commission	Services – Housing	Housing Needs Assessment	Agency attended the Stakeholder Workshop on November 14th, 2024 and provided input on service needs in the community.
Buena Park Collaborative	Services – Health Services - Education	Non-Homeless Special Needs	Agency attended the Stakeholder Workshop on November 14th, 2024 and provided input on service needs in the community.
County of Orange Housing & Community Development	Public Agency	Housing Needs Assessment Non-Homeless Special Needs Homelessness Strategy Market Analysis	Agency attended the Stakeholder Workshop on November 14th, 2024 and provided input on service needs in the community.
Leading Purpose	Services – Housing Services - Education	Housing Needs Assessment Non-Homeless Special Needs	Agency attended the Stakeholder Workshop on November 14 th , 2024 and provided input on service needs in the community.
Continuum of Care	Services - Homeless	Housing Needs Assessment Non-Homeless Special Needs Homelessness Strategy	Agency attended the Stakeholder Workshop on November 14th, 2024 and provided input on service needs in the community.
HomeAid Orange County	Services – Homeless	Housing Needs Assessment Homelessness Strategy	Agency attended the Stakeholder Workshop on November 14th, 2024 and provided input on service needs in the community.
The Purpose of Recovery	Services – Substance Use	Non-Homeless Special Needs	Agency attended the Stakeholder Workshop on December 2 nd , 2024 and provided input on service needs in the community.
City of La Palma	Public Agency	Housing Needs Assessment	Agency attended the Stakeholder Workshop on December 2 nd , 2024 and provided input on service needs in the community.
Upwards	Services – Youth	Non-Homeless Special Needs	Agency attended the Stakeholder Workshop on December 2 nd , 2024 and provided input on service needs in the community.
Mortgage Link Inc.	Private Lender	Housing Needs Assessment Market Analysis	Agency attended the Stakeholder Workshop on December 2 nd , 2024 and provided input on service needs in the community.

Veterans Affairs	Public Agency	Housing Needs	Agency attended the Stakeholder Workshop on
		Assessment	December 2 nd , 2024 and provided input on service
		Non-Homeless	needs in the community.
		Special Needs	
Families Forward	Services – Housing	Housing Needs	Agency attended the Stakeholder Workshop on
	Services – Homeless	Assessment	December 2 nd , 2024 and provided input on service
			needs in the community.
Saahas for Cause	Services – Youth	Non-Homeless	Agency attended the Stakeholder Workshop on
	Services - Health	Special Needs	December 2 nd , 2024 and provided input on service
			needs in the community.
Seneca FOA	Services – Families	Non-Homeless	Agency attended the Stakeholder Workshop on
	Services - Youth	Special Needs	December 2 nd , 2024 and provided input on service
			needs in the community.
Habitat for Humanity	Services - Housing	Housing Needs	Agency attended the Stakeholder Workshop on
		Assessment	December 2 nd , 2024 and provided input on service
			needs in the community.

Table 2 – Agencies, groups, organizations who participated

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

The Urban County contacted over 1,000 agencies as part of the outreach process for this Consolidated Plan. All applicable agencies and agency types were contacted.

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	Orange County	Potential funding allocations to address homeless needs will complement the CoC Strategy.
2021-2029 Housing Element	Orange County	Potential funding allocations to address homeless needs will complement the Housing Element strategy.
Special Housing Programs	Orange County Housing Authority	Potential funding allocations to address homeless needs.

Table 3 – Other local / regional / federal planning efforts

Describe cooperation and coordination with other public entities, including the State and any adjacent units of general local government, in the implementation of the Consolidated Plan (91.215(I))

The implementation of this Consolidated Plan will involve various agencies of County government, participating/metro cities, nonprofit organizations, and private industry. As part of the public outreach program for the Consolidated Plan, OC Housing & Community Development consulted over 300 agencies, groups, and organizations involved in the development of affordable housing, and/or provision of services to children, elderly persons, persons with disabilities, persons with HIV/AIDS and their families, and homeless persons.

Narrative (optional):

PR-15 Citizen Participation – 91.105, 91.115, 91.200(c) and 91.300(c)

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

Citizen participation is one of the most important components of the Consolidated Plan process. To solicit public input during the development of the Consolidated Plan, the Urban County conducted six Community Workshops for residents and local housing and services providers. The Urban County also administered a Housing & Community Development Needs Survey.

Summarize citizen participation process and how it impacted goal-setting

Community Meetings: The Urban County held five Community Meetings to solicit input on needs during the development of the Consolidated Plan. The meetings were held on the following days:

- Wednesday November 13, 2024, Laguna Woods Council Chambers
- Wednesday November 13, 2024, Stanton City Hall
- Monday November 18, 2024, El Modena Community Center (City of Orange)
- Wednesday November 20, 2024, Midway City Community Center
- Thursday January 16, 2025, Anaheim Independencia Community Center

Focus Group Meetings: The County also conducted two focus group meetings, one in-person and one virtual, for nonprofits and government agencies that serve low- and moderate-income persons and those with special needs:

- Thursday November 14, 2024, Virtual Workshop
- Monday December 2, 2024, Orange County Housing Authority In-Person Workshop

Housing & Community Development Needs Survey: The survey was made available both online and in hard copy form for residents attending community meetings that may require a hard copy. Outreach for the community meetings and the survey included:

- Notices posted on County's website (English, Spanish, Chinese, Korean, and Vietnamese) and Google translate could also be used for other languages.
- Hard copies of notices (English, Spanish, Chinese, Korean, and Vietnamese) were made available in the County Government Offices.
- Emails sent to agencies informing them of the meetings and the availability of the survey.
- Survey QR code/link distributed to a number of local agencies for distribution to their clients.

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Community Meetings	Non-targeted/broad community	Five community meetings were hosted across different cities in Orange County. Participants were asked to discuss and vote on priorities for CDBG, HOME, and ESG funds.	A detailed summary of comments received can be found in Appendix B.	All comments were received and accepted.	
2	Stakeholder Workshops	Housing Professionals and Service Providers	Two stakeholder workshops were conducted, one in-person and one virtual. A total of 41 agencies RSVPed for the virtual meeting and 10 agencies were represented in the in-person workshop.	A detailed summary of comments received can be found in Appendix B.	All comments were received and accepted.	
3	Housing & Community Development Needs Survey	Non-targeted/broad community	A total of 299 responses were recorded including 277 English responses, 20 Spanish responses, one Korean response, and one Vietnamese response.	A detailed summary of comments received can be found in Appendix B.	All comments were received and accepted.	

Table 4 – Citizen Participation Outreach

Needs Assessment

NA-05 Overview

Needs Assessment Overview

During the development of the Consolidated Plan, residents were asked to rank the relative importance of Housing & Community Development needs in a survey. Residents responded to the survey and identified the following topics as top-ranking needs in the Urban County of Orange:

- Community Facilities:
 - Parks and Recreation Facilities
 - Senior Centers
- Business and Jobs:
 - Start-Up Business Assistance
 - Job Creation/Retention
- Residential Infrastructure:
 - Water/Sewer
 - Street Lighting
- Neighborhood Services:
 - Trash and Debris Removal
- Affordable Housing:
 - Affordable Rental Housing
 - Homebuyer Assistance
 - Housing for Seniors
- Community and Special Needs Services:
 - Mental Health Services
 - Youth Activities
 - Childcare Services
 - Health Services

NA-10 Housing Needs Assessment - 24 CFR 91.205 (a,b,c)

Summary of Housing Needs

As defined by HUD in the Comprehensive Housing Affordability Strategy (CHAS) data, housing problems include:

- Units with physical defects (lacking complete kitchen or bathroom);
- Overcrowded conditions (housing units with more than one person per room);
- Housing cost burden (including utilities) exceeding 30 percent of gross income; and
- Severe housing cost burden (including utilities) exceeding 50 percent of gross income.

To dissect the housing problems, the following tables provide the following:

- Table 7 presents the number of households with one or more housing problems (inadequate housing, overcrowding, cost burden of 50 percent, or cost burden of 30 percent) by income and tenure.
- Table 8 summarizes the number of households with more than one or more severe housing problems by income and tenure. Severe housing problems are: inadequate housing; severe overcrowding (1.51 persons or more per room); and housing cost burden of 50 percent.
- Table 9 isolates those households with housing cost burden of over 30 percent (inclusive of those with cost burden of over 50 percent) by income and tenure.
- Table 10 further isolates those households with cost burden of over 50 percent.
- Table 11 presents overcrowding by household type.
- Table 12 is intended to show overcrowding for households with children. However, the American Community Survey provides no data for the Urban County.

However, due to the geographic boundary changes for the Urban County between 2009 (base year provided by HUD in eConPlanning) and 2020, the demographic shifts presented in Table 5 may be due more to boundary changes than actual decreases in population and households.

Demographics	Base Year: 2009	Most Recent Year: 2020	% Change
Population	572,045	577,595	1%
Households	201,210	205,400	2%
Median Income	\$76,509.00	\$94,441.00	23%

Table 5 - Housing Needs Assessment Demographics

Data Source: 2000 Census (Base Year), 2016-2020 ACS (Most Recent Year)

Number of Households Table

	0-30%	>30-50%	>50-80%	>80-100%	>100%
	HAMFI	HAMFI	HAMFI	HAMFI	HAMFI
Total Households	29,515	23,419	35,619	21,365	95,510
Small Family Households	7,484	7,093	13,234	9,420	50,145
Large Family Households	2,190	2,138	4,065	2,820	10,089
Household contains at least one person					
62-74 years of age	8,107	7,007	10,040	5,920	25,298
Household contains at least one person					
age 75 or older	8,788	6,378	7,002	2,871	10,229
Households with one or more children 6					
years old or younger	2,965	2,683	5,000	3,104	7,600

Table 6 - Total Households Table

Data Source: 2016-2020 CHAS

Notes: HAMFI = HUD Area Median Family Income

Housing Needs Summary Tables

1. Housing Problems (Households with one of the listed needs)

			Renter			Owner				
	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total
NUMBER OF HOUSEHOLDS										
Substandard Housing - Lacking complete plumbing or kitchen facilities	949	520	439	140	2,048	69	37	108	15	229
Severely Overcrowded - With >1.51 people per room (and complete kitchen and plumbing)	468	464	739	185	1,856	70	118	285	110	583
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	1,229	929	818	385	3,361	145	248	509	353	1,255
Housing cost burden greater than 50% of income (and none of the above problems)	7,689	4,080	1,645	203	13,617	8,019	4,438	3,863	1,103	17,423
Housing cost burden greater than 30% of income (and none of the above problems)	1,250	2,859	5,905	1,879	11,893	2,170	2,638	5,668	4,414	14,890
Zero/negative Income (and none of the above problems)	1,485	0	0	0	1,485	1,183	0	0	0	1,183

Table 7 – Housing Problems Table

Data Source: 2016-2020 CHAS

2. Housing Problems 2 (Households with one or more Severe Housing Problems: Lacks kitchen or complete plumbing, severe overcrowding, severe cost burden)

			Renter					Owner		
NUMBER OF HOLL	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total
NUMBER OF HOU	SEHOLDS)								
Having 1 or more of four housing problems	10,343	5,995	3,640	904	20,882	8,304	4,853	4,778	1,598	19,533
Having none of four housing problems	4,165	3,574	10,510	6,030	24,279	6,689	8,994	16,669	12,829	45,181
Household has negative income, but none of the other housing problems	0	0	0	0	0	0	0	0	0	0

Table 8 – Housing Problems 2

Data Source: 2016-2020 CHAS

3. Cost Burden > 30%

		Rer	nter		Owner					
	0-30%	>30-50%	>50-80%	Total	0-30%	>30-50%	>50-80%	Total		
	AMI	AMI	AMI		AMI	AMI	AMI			
NUMBER OF HOUSE	NUMBER OF HOUSEHOLDS									
Small Related	3,604	3,599	3,429	10,632	2,395	2,081	4,444	8,920		
Large Related	1,550	1,008	852	3,410	387	660	923	1,970		
Elderly	4,145	2,192	1,788	8,125	6,611	4,036	3,549	14,196		
Other	1,849	1,659	2,239	5,747	997	523	871	2,391		
Total need by income	11,148	8,458	8,308	27,914	10,390	7,300	9,787	27,477		

Table 9 - Cost Burden > 30%

Data Source: 2016-2020 CHAS

4. Cost Burden > 50%

		Rei	nter		Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	
NUMBER OF HOUSEHOLDS									
Small Related	0	0	1,899	1,899	1,955	1,595	0	3,550	
Large Related	0	0	305	305	344	397	395	1,136	
Elderly	3,327	1,224	365	4,916	5,037	2,193	1,397	8,627	
Other	0	1,654	1,125	2,779	847	0	0	847	
Total need by income	3,327	2,878	3,694	9,899	8,183	4,185	1,792	14,160	

Table 10 – Cost Burden > 50%

Data Source: 2016-2020 CHAS

5. Crowding (More than one person per room)

		Renter				Owner				
	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total
NUMBER OF HOUSEHO	DLDS									
Single family households	1,702	1,124	1,313	430	4,569	170	226	539	294	1,229
Multiple, unrelated family households	89	288	244	140	761	65	149	244	168	626
Other, non-family households	0	25	89	4	118	0	4	20	10	34
Total need by income	1,791	1,437	1,646	574	5,448	235	379	803	472	1,889

Table 11 – Crowding Information – 1/2

Data Source: 2016-2020 CHAS

	Renter				Owner			
	0-30%	>30-	>50-	Total	0-30%	>30-	>50-	Total
	AMI	50%	80%		AMI	50%	80%	
		AMI	AMI			AMI	AMI	
Households with								
Children Present								

Table 12 – Crowding Information – 2/2

Describe the number and type of single person households in need of housing assistance.

According to 2019-2023 ACS data, 22 percent of households in the County were single person households. About half of the single person households in the County are homeowners (49.6 percent) and half are renters (50.4 percent). Of the single person households, 41 percent were seniors aged 65 and older. Most of the elderly single person households are homeowners (66.7 percent).

Estimate the number and type of families in need of housing assistance who are disabled or victims of domestic violence, dating violence, sexual assault and stalking.

<u>Persons with Disabilities:</u> According to the 2019-2023 ACS, nine percent of the County's population was affected by one or more disabilities. Among persons living with disabilities in the County, ambulatory and independent living disabilities were the most prevalent (5 percent each), followed by cognitive difficulties (4 percent).

As reported by the State Department of Developmental Services, as of August 2023, 27,676 Orange County residents with developmental disabilities were being assisted by the Orange County Regional Center. Most of these individuals were residing in a private home with their parent or guardian.

<u>Domestic Violence:</u> Human Options is an Irvine based non-profit agency that provides therapy programs, counseling, case management, legal advocacy, and prevention education to victims of domestic violence. During FY 2023, Human Options provided legal advocacy services to 326 individuals and training and education prevention services to 7,753 individuals. During this period, Human Options received 5,349 calls to the Human Options hotline.

What are the most common housing problems?

As mentioned previously, the most common housing problem in the Urban County is housing cost burden. Among the Urban County's renter-households, about 36 percent of all housing problems were related to housing cost burden exceeding 30 percent. Furthermore, approximately 43 percent of housing problems documented among the Urban County's owner-households were related to cost burden exceeding 30 percent. In comparison, units with physical defects, or substandard units, were the least common housing problem for the Urban County.

Are any populations/household types more affected than others by these problems?

Overall, owner households make up 49.6 percent of cost burdened households and renter households make up 50.4 percent of cost burdened households. According to 2016-2020 HUD CHAS data, 61.8 percent of renter-occupied households are cost burdened compared to 42.5 percent of owner-occupied households, comprising 27,914 and 27,477 cost burdened households, respectively. Of the total cost burdened rental households, 38 percent were small households, 12 percent were large households, and 29 percent were elderly households. Small and elderly households were also the most likely to be cost burdened amongst owner-occupied households. Amongst cost burdened homeowners, 52 percent were elderly households, and 33 percent were small households.

Describe the characteristics and needs of Low-income individuals and families with children (especially extremely low-income) who are currently housed but are at imminent risk of either residing in shelters or becoming unsheltered 91.205(c)/91.305(c)). Also discuss the needs of formerly homeless families and individuals who are receiving rapid re-housing assistance and are nearing the termination of that assistance

A 2024 report by the California Housing Partnership found that the median rent in the state has increased 37% since 2000, while incomes have failed to keep pace, increasing only 7% over the same time frame. This has had far-reaching consequences for increasing housing vulnerability for Californians, including Orange County residents. Communities of color are disproportionately at risk of homelessness. The report also found that Black renter households are 33% more severely cost-burdened than white renter households. In Orange County, 82% of extremely low-income households paid greater than half of their income on housing costs in 2023. A 2023 study of Orange County households by United Way found that 52 of Latinx households' incomes are insufficient to meet their basic needs. Additionally, female-headed households and households with less education disproportionately experience financial struggles. These realities lead households to make difficult choices in prioritizing basic needs, exacerbating their vulnerability to losing housing.

Households that are at imminent risk of homelessness need timely prevention assistance and stabilizing resources. This can take the form of eviction prevention through payment of arrears, short-term rental assistance, and housing-focused case management. Households that are at risk of homelessness are vulnerable and often face difficult choices between which basic needs to prioritize. One unexpected emergency expense is enough to hinder their ability to pay their rent or mortgage. Beyond on prevention assistance, many households need access to affordable or subsidized permanent housing resources. Additional resources that support the mitigation of housing vulnerability include free or low-cost childcare, access to low-cost medical services, benefits advocacy, employment services, and affordable transportation.

Rapid rehousing (RRH) services are provided to families and individuals experiencing homelessness who have the financial resources that will enable them to take on the full burden of rent at the conclusion of assistance. This intervention can reduce the amount of time that a household experiences homelessness and can provide the needed support for them to stabilize. The reality is that many families and individuals in RRH programs continue to experience varying degrees of housing vulnerability and their needs continue to mirror other households who are at risk of homelessness as described above. Additionally, these households may need continued rental assistance or linkage to a permanent subsidy, utility assistance, or support finding a more affordable unit.

According to the 2019-2023 ACS, 6.6 percent of families in Orange County live below the poverty level. Comparatively, nine percent of families with children under the age of 18 are below the poverty level. Single-parent female-headed households are significantly more likely to live below the poverty level. Approximately 23 percent of single-parent female-headed families are below the poverty line. Populations with higher poverty levels are more likely to experience hardships such as food insecurity and homelessness.

If a jurisdiction provides estimates of the at-risk population(s), it should also include a description of the operational definition of the at-risk group and the methodology used to generate the estimates:

A 2024 report by the California Housing Partnership found that 129,693 low-income households lack access to affordable housing. To afford the average rent in Orange County, renters need to earn at least \$53.83 per hour, which is 3.4 times the state minimum wage, 21% higher than the statewide average. Within Orange County, 82% of extremely low-income individuals pay greater than half of their income on the cost of housing, exceeding the statewide average. A 2023 real cost measure study from United Way found that 33% of Orange County households fall below the poverty line, despite 98% of these households having at least one working adult. To make these determinations, United Way uses a real cost methodology that factors in the costs of basic needs for a more accurate financial picture specific to the county. 40% of all households in Orange County pay 30% or more of their income on housing costs. Taken in the aggregate, these factors demonstrate that a significant proportion of Orange County households are rent-burdened and likely to be defined as at risk of homelessness.

The County of Orange (County) utilizes the criteria for defining "at risk of homelessness" provided by HUD in determining risk of homelessness in three categories:

- 1. Individuals and families
- 2. Unaccompanied children and youth, and
- 3. Families with children and youth. Detailed criteria for these categories can be found at: https://files.hudexchange.info/resources/documents/AtRiskofHomelessnessDefinition_Criteria.pdf.

Specify particular housing characteristics that have been linked with instability and an increased risk of homelessness

The high and unaffordable cost of housing is the primary driver increasing the risk of homelessness. This economic reality causes households to double up or move in with friends or family, characteristics which further exacerbate housing vulnerability. Informal housing arrangements often lack enforceable housing protections that further increase risk. Households in precarious situations may seek weekly/monthly stays in hotels/motels, which respond to the immediate crisis, but deepen their financial constraints, impacting their ability to save a security deposit and first-month's rent. In Orange County, from 2023-2024, state and federal funding for housing production and preservation decreased by 60%, which increases pressures on demand and further constrains the options available to at-risk households.

Discussion

See above.

NA-15 Disproportionately Greater Need: Housing Problems – 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction

The Orange County 2024 Point in Time Count (2024 PIT Count) revealed that on any given night in Orange County, approximately 7,322 people experience homelessness, representing a 28% increase from 2022. Factors contributing to this increase are primarily the lack of affordable housing, insufficient housing subsidies to support eligible households in need, and increasing rents that have far outpaced increases in income. The current housing market combined with precarious economic conditions have resulted in families facing homelessness due to unemployment, foreclosure, and eviction. A 2024 California Housing Partnership report showed that renters must earn 2.8 times the state minimum wage to afford the average rent in California, so even a full-time job is no guarantee of housing stability, and many struggle to maintain employment even as they lose their apartment. People experiencing homelessness are ethnically. culturally, and socially diverse. Simultaneously, homelessness disproportionately impacts people and communities of color. The 2024 PIT Count found that 7.54% of sheltered and unsheltered persons identified as Black, African American, or African compared with 2.3% of the total Orange County population in 2023. The number of seniors, transitional-aged youth, and veterans experiencing homelessness all increased from 2022 to 2024. The 2024 PIT Count found that 36.84% of people experiencing homelessness were chronically homeless and a significant percentage identified as having a substance use disorder, mental health condition, and/or physical disability, requiring a comprehensive range of resources, intervention, and services to meet their needs. The most critical and essential needs common to all people experiencing homelessness is access to safe and affordable permanent housing. The County recognizes that fully engaging in efforts to address homelessness requires a deeply involved community and accurate data and information. The 2024 PIT Count is a result of the commitment of County officials, the Orange County Continuum of Care (CoC) Board and CoC Members, service providers, volunteers, and Orange County United Way staff and leadership.

Since 1998, the County has coordinated a comprehensive regional CoC to develop and implement a strategy to address homelessness in Orange County. The CoC covers the Orange County jurisdiction, including 34 cities and Unincorporated Areas. Participation from County departments and agencies, local governments, homeless, housing and supportive service providers, community groups (including non-profits, faith-based organizations, interested business leaders, schools, individuals with lived experience, and many other stakeholders) is welcomed and encouraged.

The CoC includes a Board of 17-21 members and is the governing body for the Orange County CoC whose purpose and scope are to implement the CoC program. The CoC Program is designed to promote a community-wide commitment to the goal of ending homelessness through Regional Coordination and collaboration, advocate for funding and resources to end homelessness and provide funding for proven efforts by nonprofit providers, States, and local governments to quickly rehouse people experiencing homelessness while minimizing the trauma and dislocation caused to homeless individuals, families, and communities by homelessness. Also, to promote access to and effective utilization of mainstream programs by homeless individuals and families and the implementation of best practices and evidence-based approaches to homeless programming and services.

The Orange County CoC has several committees aimed at coordinating and collaborating on specific functions and programs associated with the CoC Program. The committees contribute to the ongoing planning, coordination, and collaboration of homeless services and programs to address the needs of individuals and families experiencing homelessness and preventing homelessness.

A disproportionate housing need refers to any group that has a housing need, which is at least 10 percentage points higher than the total population. The following tables identify the extent of housing problems by income and race.

0%-30% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	19,415	3,794	1,940
White	10,509	2,289	1,114
Black / African American	354	34	0
Asian	3,119	723	409
American Indian, Alaska Native	94	0	29
Pacific Islander	70	0	0
Hispanic	5,035	591	299

Table 13 - Disproportionally Greater Need 0 - 30% AMI

Data Source: 2016-2020 CHAS

Notes: *The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4.Cost

Burden greater than 30%

30%-50% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	17,190	6,089	0
White	9,165	4,053	0
Black / African American	238	23	0
Asian	2,719	1,048	0
American Indian, Alaska Native	30	0	0
Pacific Islander	10	0	0
Hispanic	4,815	860	0

Table 14 - Disproportionally Greater Need 30 - 50% AMI

Data Source: 2016-2020 CHAS

Notes: *The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4.Cost

Burden greater than 30%

50%-80% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	18,974	12,704	0
White	10,914	7,990	0
Black / African American	479	194	0
Asian	2,810	1,833	0
American Indian, Alaska Native	59	40	0
Pacific Islander	30	25	0
Hispanic	4,259	2,442	0

Table 15 - Disproportionally Greater Need 50 - 80% AMI

Data Source: 2016-2020 CHAS

Notes: *The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4.Cost

Burden greater than 30%

80%-100% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	9,075	10,793	0
White	5,540	6,818	0
Black / African American	125	305	0
Asian	1,504	1,723	0
American Indian, Alaska Native	10	14	0
Pacific Islander	15	15	0
Hispanic	1,607	1,774	0

Table 16 - Disproportionally Greater Need 80 - 100% AMI

Data Source: 2016-2020 CHAS

Notes: *The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4.Cost Burden greater than 30%

Discussion

Among households earning up to 30 percent AMI, Pacific Islander (100 percent), Black/African American (91.2 percent), and Hispanic (85 percent) were the racial/ethnic groups to be disproportionately impacted by one or more housing problems. These racial/ethnic groups all have rates of housing problems exceeding the urban county average of 77.2 percent.

For households earning between 31 percent and 50 percent of AMI, American Indian/Alaska Native (100 percent), Pacific Islander (100 percent), Black/African American (91.2 percent), and Hispanic (84.8 percent) households all have rates of housing problems exceeding the urban county average of 73.8 for households earning between 31 and 50 percent of the AMI.

Amongst households earning 51 to 80 percent of AMI, Black/African American, Hispanic, and Asian households had rates of housing problems exceeding the Urban County average. Similarly, amongst households earning 81 to 100 percent of AMI, Asian, Pacific Islander, and Hispanic households had rates of housing problems exceeding the Urban County average of 45.7 percent.

It is relevant to note that because the Urban County is home to relatively few Pacific Islander and American Indian/Alaska Native households, the data for this group may not be as reliable, even though all the households identified have a housing problem.

NA-20 Disproportionately Greater Need: Severe Housing Problems – 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction

A disproportionate housing need refers to any group that has a housing need, which is at least 10 percentage points higher than the total population. The following tables identify the extent of severe housing problems by income and race. Severe housing problems include: inadequate housing; severe overcrowding (1.51 persons or more per room); and housing cost burden of 50 percent.

0%-30% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	17,075	6,149	1,940
White	9,184	3,634	1,114
Black / African American	319	63	0
Asian	2,629	1,217	409
American Indian, Alaska Native	60	34	29
Pacific Islander	70	0	0
Hispanic	4,615	1,014	299

Table 17 - Severe Housing Problems 0 - 30% AMI

Data Source: 2016-2020 CHAS

Notes: *The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4.Cost

Burden over 50%

30%-50% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	11,778	11,470	0
White	6,108	7,105	0
Black / African American	98	163	0

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Asian	1,790	1,979	0
American Indian, Alaska Native	30	0	0
Pacific Islander	0	10	0
Hispanic	3,559	2,099	0

Table 18 - Severe Housing Problems 30 - 50% AMI

Data Source: 2016-2020 CHAS

Notes: *The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4.Cost

Burden over 50%

50%-80% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	8,310	23,374	0
White	4,509	14,420	0
Black / African American	169	498	0
Asian	1,264	3,409	0
American Indian, Alaska Native	34	65	0
Pacific Islander	0	55	0
Hispanic	2,119	4,607	0

Table 19 - Severe Housing Problems 50 - 80% AMI

Data Source: 2016-2020 CHAS

Notes: *The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4.Cost

Burden over 50%

80%-100% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	2,666	17,184	0
White	1,413	10,974	0
Black / African American	10	420	0
Asian	539	2,682	0
American Indian, Alaska Native	0	24	0
Pacific Islander	0	30	0
Hispanic	632	2,747	0

Table 20 - Severe Housing Problems 80 - 100% AMI

Data Source: 2016-2020 CHAS

Notes: *The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4.Cost

Burden over 50%

Discussion

The following proportions of the Urban County populations experience severe housing problems:

- 0 to 30 percent of AMI 67.9 percent
- 31 to 50 percent of AMI 50.7 percent
- 51 to 80 percent of AMI 26.2 percent
- 81 to 100 percent of AMI 13.4 percent

Of households earning less than 30 percent of AMI, Pacific Islander (100 percent), Black/African American (83.5 percent), and Hispanic (77.9 percent) households have rates of severe housing problems exceeding the Urban County average. Amongst households earning 31 to 50 percent of AMI, 100 percent of American Indian/Alaska Native households and 62.9 percent of Hispanic households experience one or more severe housing problems. The variance in rates of severe housing problems lessens in households earning more than 50 percent of the AMI. Still, 34.3 percent of American Indian/Alaska Native households and 31.5 percent of Hispanic households earning between 50 and 80 percent of the AMI experience severe housing problems.

NA-25 Disproportionately Greater Need: Housing Cost Burdens – 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction:

A disproportionate housing need refers to any group that has a housing need which is at least 10 percentage points higher than the total population. The following tables identify the extent of housing cost burden by race.

Housing Cost Burden

Housing Cost Burden	<=30%	30-50%	>50%	No / negative income (not computed)
Jurisdiction as a whole	124,594	40,390	35,837	2,245
White	83,575	24,370	21,608	1,194
Black / African American	1,708	739	568	0
Asian	18,914	6,374	5,260	518
American Indian, Alaska Native	218	73	94	29
Pacific Islander	165	80	75	0
Hispanic	17,519	7,973	7,530	384

Table 21 - Greater Need: Housing Cost Burdens AMI

Data Source: 2016-2020 CHAS

Discussion:

Overall, 38 percent of the households in the Urban County had a housing cost burden (spent more than 30 percent of gross household income on housing) and 18 percent had a severe cost burden (spent more than 50 percent of gross households income on housing). Pacific Islander households were the most likely to experience a housing cost burden (48.4 percent), followed by Hispanic households (46.4 percent), and Black/African American households (43.3 percent). Pacific Islander (23.4 percent), American Indian/Alaska Native (22.7 percent), and Hispanic (22.5 percent) households were most likely to experience severe cost burden. Based on the definition of disproportionate housing need described above, no households were disproportionately affected by severe housing cost burden.

NA-30 Disproportionately Greater Need: Discussion – 91.205(b)(2)

Are there any Income categories in which a racial or ethnic group has disproportionately greater need than the needs of that income category as a whole?

Please see discussions provided under specific needs by income group presented earlier.

If they have needs not identified above, what are those needs?

Housing needs of low- and moderate-income minority households have been previously identified.

Are any of those racial or ethnic groups located in specific areas or neighborhoods in your community?

Overall, the geographic concentrations of the Urban Orange County's minority populations generally overlap with the concentrations of low- and moderate-income residents. Concentrations of non-White populations can be found in the cities of Stanton and Placentia, as well as the unincorporated area of the County just east of Irvine. Small portions of Brea, Laguna Hills and Laguna Woods also have concentrations of minority populations.

NA-35 Public Housing – 91.205(b)

Introduction

The Orange County Housing Authority (OCHA) is a division within Orange County Housing & Community Development that administers the Housing Choice Voucher Program for County residents. OCHA does not currently own or operate any public housing units and there are no public housing projects located within the Urban County.

Totals in Use

Program 7	Гуре								
	Certificate	Mod-	Public				Vouchers		
		Rehab	Housing	Total	Project	Tenant	Specia	I Purpose Vo	ucher
					-based	-based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled*
# of units vouchers									
in use	0	0	0	12,060	864	11,196	810	296	227

Table 22 - Public Housing by Program Type

Data Source: PIC (PIH Information Center)

Notes: *includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition.

Characteristics of Residents

Program Type	Certificate	Mod-	Public			Vouc	hore	
	Certificate	Rehab		Total	Dualast			aaa Varrahar
		Renab	Housing	lotai	Project -based	Tenant -based	Veterans	ose Voucher Family
					-baseu	-baseu	Affairs Supportive Housing	Unification Program
Average								
Annual Income	0	0	0	23,646	14,058	24,352	26,483	29,291
Average length								
of stay	0	0	0	13	3	13	5	8
Average Household size	0	0	0	2	1	2	1	3
# Homeless at admission	0	0	0	2,330	658	1,672	795	68
# of Elderly Program Participants								
(>62)	0	0	0	7,082	479	6,603	451	17
# of Disabled Families	0	0	0	5,107	544	4,563	274	28
# of Families requesting accessibility								
features	0	0	0	823	2	821	6	0
# of HIV/AIDS program								
participants	0	0	0	0	0	0	0	0
# of DV victims	0	0	0	25	4	21	1	0

Table 23 – Characteristics of Public Housing Residents by Program Type PIC (PIH Information Center)

Data Source:

Race of Residents

Program Type	Program Type										
Race	Certificate	Mod-	Public	olic Vouchers							
		Rehab	Housing	Total	Project	Tenant	Specia	I Purpose Vo	ucher		
					-based	-based	Veterans Affairs Supportive	Family Unification Program	Disabled*		
							Housing				
White	0	0	0	6,157	624	5,533	544	242	188		
Black/African											
American	0	0	0	1,285	87	1,198	176	24	21		
Asian	0	0	0	4,354	103	4,251	39	22	13		
American Indian/Alaska											
Native	0	0	0	184	38	146	29	7	2		
Pacific											
Islander	0	0	0	80	12	68	22	1	3		
Other	0	0	0	0	0	0	0	0	0		

Table 24 - Race of Public Housing Residents by Program Type

Data PIC (PIH Information Center)

Source:

Notes: *includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

Ethnicity of Residents

Program 1	уре								
Ethnicity	Certificate	Mod-	Public	Vouchers					
		Rehab	Housing	Total	Project	Tenant	Specia	I Purpose Voi	ucher
					-based	-based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled*
Hispanic	0	0	0	2,246	195	2,051	169	172	59
Not									
Hispanic	0	0	0	9,814	669	9,145	641	124	168

Table 25 – Ethnicity of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Notes: *includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

Section 504 Needs Assessment: Describe the needs of public housing tenants and applicants on the waiting list for accessible units:

OCHA does not currently own or operate any public housing units and there are no public housing projects located within the Orange Urban County.

Most immediate needs of residents of Public Housing and Housing Choice voucher holders

Overall, the need for affordable housing in the Urban County is high, based on the extent of housing problems illustrated by the CHAS data presented earlier and comments received at the Community meetings. According to the 2019-2023 ACS, 10 percent of the County's seniors and 18 percent of those with a disability were living at or below poverty level.

While the disabled population is diverse, persons with mobility impairment face many of the same challenges faced by the elderly in their search for affordable rental housing. Because of their physical limitations, this population needs affordable housing that is located near public transportation, shopping, and medical facilities. In addition to affordable housing, the service needs of Housing Choice voucher holders often include: affordable childcare and after-school recreation and enrichment programs and affordable health care, among others.

How do these needs compare to the housing needs of the population at large

Housing needs of low- and moderate-income households in the Urban County generally reflect the housing needs in the region (refer to discussions above).

Discussion

See discussion above.

NA-40 Homeless Needs Assessment – 91.205(c)

Introduction:

Factors contributing to the rise in homelessness include a lack of housing affordable to low- and moderate-income persons, increases in the number of persons whose income falls below the poverty level, reductions in subsidies to the poor, drug/alcohol abuse, and mental illness. The recent housing market and economic conditions have also resulted in some families facing homelessness due to increased rents, unemployment, and/or underemployment.

During the 2024 Point in Time (PIT) Count, approximately 7,322 people were counted as experiencing homelessness in Orange County. Homeless people in Orange County are diverse: they are young and old, men and women, chronic and newly homeless, alone or in families. Despite their differences, each homeless person is in need of 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. The 2024 PIT Count is a result of the commitment of County officials, service providers, volunteers, 2110C staff and leadership, and homeless people themselves.

Population	Estimate the # of persons experiencing homelessness on a		Estimate the # experiencing homelessness	Estimate the # becoming	Estimate the # exiting homelessness	Estimate the # of days persons
	give	n night	each year	homeless each year	each year	experience homelessness
	Sheltered	Unsheltered		each year		Homelessiless
Persons in Households with	948	180	1,128	46	1036	180
Adult(s) and Child(ren)						
Persons in Households with Only Children	6	0	0	0	9	60
Persons in Households with Only Adults	2,195	3,993	6,188	1,126	3,538	437
Chronically Homeless Individuals	877	1,566	2,443		1184	815
Chronically Homeless Families	3	18	70		48	500
Veterans	80	248	124	56	329	120
Unaccompanied Youth	62	29	308	56	9	60
Persons with HIV	89	86	267	96	84	180

Data Source:

Comments:

Orange County 2024 Point in Time Count

Indicate if the homeless population is:

Has No Rural Homeless

If data is not available for the categories "number of persons becoming and exiting homelessness each year," and "number of days that persons experience homelessness," describe these categories for each homeless population type (including chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth):

The estimates are based on the HUD PIT Count methodology and implemented by the County as the designated CoC administrative entity from the 2024 PIT Count results.

Nature and Extent of Homelessness: (Optional)

Race:	Sheltered:	Unsheltered (optional)		
American Indian, Alaska Native	36	75		
or Indigenous	30	75		
Asian or Asian American	103	164		
Black, African American, or	329	233		
African	329	233		
Middle Eastern of North African	1	40		
Native Hawaiian or Pacific	53	45		
Islander	55	45		
White	1,120	1,772		
Ethnicity:	Sheltered:	Unsheltered (optional)		
Hispanic/Latina/e/o	37	1,509		
White and Hispanic/Latina/e/o	1,275	205		
Multi-Racial & Hispanic/Latina/e/o	20	14		
Multi-Racial and not	51	77		
Hispanic/Latina/e/o	31			

Estimate the number and type of families in need of housing assistance for families with children and the families of veterans.

Families with Children

According to the 2024 PIT Count, there are 1,128 persons comprising 347 families experiencing homelessness in the County. Of the 1,128 people, 443 are adults and 685 are children.

Veterans

In 2024, there were 328 homeless veterans in Orange County. Over 24 percent of homeless veterans are sheltered (including in transitional housing).

Describe the Nature and Extent of Homelessness by Racial and Ethnic Group.

The largest share of the homeless population identified themselves as White, totaling 1,772 unsheltered individuals (42.5 percent) and 1,120 sheltered individuals (35.6 percent). Another 1,509 unsheltered individuals and 37 sheltered individuals identified themselves as Hispanic or Latina/e/o. This does not include the population of multi-racial/ethnic individuals such as those who identified themselves as White and Hispanic/Latina/e/o. The 2024 PIT Count identified 223 unsheltered persons (5.3 percent) and 329 sheltered persons (10.5 percent) that are Black, African American, or African. There were 7 unsheltered persons and 13 sheltered persons that were Black, African American, or African and Hispanic/Latina/e/o.

The White, Hispanic/Latino, and Black/African American populations are all slightly overrepresented in the homeless population compared to the countywide share. According to the 2019-2023 ACS, the non-Hispanic White population represents 37.7 percent of the countywide population. Similarly, 1.5 percent of the County population was Black or African American and 34.1 percent was Hispanic or Latino.

Describe the Nature and Extent of Unsheltered and Sheltered Homelessness.

According to the 2024 PIT Count, of the 7,322 homeless persons counted in Orange County, approximately 43 percent are sheltered, and 57 percent are unsheltered. Orange County has seen less growth in the homeless population over the past five years compared to surrounding counties and the State. The 5-year rate of growth in the County was seven percent compared to 29 percent in surrounding counties and 20 percent statewide. As is the case across the Country, the majority of homeless people live in adult-only households. Based on the 2024 PIT count, there are 99 unsheltered persons and 592 sheltered persons under the age of 18 in the Country.

Information about sheltered homeless persons is gathered on a designated night where the CoC must count all individuals or families who are actively enrolled in a shelter program, while subpopulation information about unsheltered persons is derived from the PIT Count survey. The largest share of the unsheltered homeless population is aged 35 to 44 (26.8 percent) and the largest share of the sheltered population is under the age of 18 (18.8 percent). HUD is placing a policy priority on ending youth homelessness and is particularly interested in gathering data on the numbers of "transition age youth" (those age 18 to 24) who are homeless. In 2024, 308 unhoused individuals aged 18 to 24 were identified in Orange County.

Discussion:

See discussions above.

NA-45 Non-Homeless Special Needs Assessment - 91.205 (b,d)

Introduction:

Certain households, because of their special characteristics and needs, may require special accommodations and may have difficulty finding housing due to their special needs. Special needs groups include the elderly, persons with disabilities, persons with HIV/AIDS, female-headed households, large households, and homeless persons and persons at-risk of homelessness.

Describe the characteristics of special needs populations in your community:

Elderly

According to the 2019-2023 ACS, nearly 16 percent of the population in the County are 65 years and over. More than 30 percent of households countywide have one more people aged 65 or older. Additionally, nine percent of households countywide are seniors aged 65 and older living alone.

Persons with Disabilities

According to the 2019-2023 ACS, 9.3 percent of the County's population is affected by one or more disabilities. Ambulatory difficulties and independent living difficulties were the most prevalent in the County (4.7 percent each), followed by cognitive difficulties (3.8 percent).

Large Households

Large households are those with five or more members. Based on 2019-2023 ACS estimates, 13.6 percent of households countywide are large households. Renter-occupied households are more likely to be large households compared to owner-occupied households. Approximately 14.4 percent of renter-occupied households countywide are large households compared to 12.9 percent of owner-occupied households.

Single-Parent Households

The 2019-2023 ACS estimates that five percent of households in the County were single-parent households with a child under the age of 18. Of the 52,210 single-parent households identified, 78.4 percent were single-parent female-headed households.

Persons with Alcohol/Substance Abuse Addictions

The 2022 Drugs and Alcohol Deaths, Emergency Department Visits, and Hospitalizations Report indicated that between 2009 and 2020, the rate of Emergency Department visits due to drug and alcohol-related diagnoses had increased overall but has begun decreasing since reaching its peak in 2017.

According to the Orange County Health Care Agency 2023 Drug and Alcohol Misuse and Mortality Report, deaths due to drugs and alcohol in Orange County are on the rise. Opioid substances are largely responsible for the increase in drug and alcohol mortality, specifically fentanyl. Drug and alcohol deaths have been increasing sharply since 2020, reaching over 1,400 deaths, or a rate of more than 40 per 100,000 residents by 2021. Drug-related deaths consistently occurred in greater numbers compared to alcohol-related deaths. This difference is even more apparent when deaths due to drugs sharply increased beginning in 2020, contrasting with the shallower climb in mortality by alcohol-related deaths.

Veterans

According to the 2019-2023 ACS, there are 89,830 veterans in Orange County, representing 3.6 percent of the countywide population. The employment rate amongst veterans aged 18 to 64 is 4.7 percent, slightly lower than 5.3 percent for nonveterans. Additionally, the population of veterans below the poverty level is 6.8 percent, lower than 9.2 percent for nonveterans. Veterans are significantly more likely to experience one or more disabilities. Based on 2019-2023 ACS estimates, 28.3 percent of veterans experience a disability compared to 10.3 percent of nonveterans.

What are the housing and supportive service needs of these populations and how are these needs determined?

Elderly

Comments received during the community outreach process, along with prior studies of senior service needs in the County, indicate that one of the greatest needs for seniors is affordable housing, especially in South Orange County.

The Community Needs Survey, facilitated in preparation of this ConPlan, found that housing for seniors was the third most important housing need to respondents, after affordable rental housing and homebuyer assistance.

Transportation is also one of the most common needs identified by older people. The most often cited reason seniors and their caregivers fail to access available services is lack of awareness that such services exist. Marketing of services is an important component to the reduction of gaps in service delivery, but frequently does not occur because underfunded providers are hard pressed to accommodate their current client base.

Persons with Disabilities

Many adults with developmental disabilities will remain dependent upon aging parents. The needs of people with disabilities mirror those of seniors. Seniors and adults with developmental disabilities both need safe affordable housing options, universal design accommodations, readily accessible, reliable transportation and social support services.

Large Households

Overcrowding is a critical issue in the community. Many families are forced to live in a single home because of high housing costs. Many residents in the Urban County have completed illegal (unpermitted) additions or expansions to their housing units and they lack the financial means and knowledge to correct them, once cited by code enforcement staff.

Single Parent Households

Youth services and childcare services ranked second and third, respectively, in importance amongst Community Needs Survey respondents. Affordable childcare was also emphasized by community stakeholders during Stakeholder Workshops held in preparation of this ConPlan. While the need for affordable childcare was expressed by two-parent and one-parent households alike, this need may be more acute for one-parent households who must single-handedly balance their job and role as primary caregiver.

Victims of Domestic Violence

Victims of domestic violence are typically in need of assistance with childcare and early education programs. In addition, this particular group may also have a need for workforce development services, health services, educational programs, and mental health care and counseling.

Persons with Alcohol/Substance Abuse Addictions

Drug and alcohol abuse is often cited as an issue impacting many homeless persons, especially those who are chronically homeless. Rehabilitation services and stable housing options are two important needs for persons with drug and alcohol addictions. The Community Needs Survey found that health and mental health services ranked first and fourth more important amongst community and special needs services.

Veterans

According to the 2023-2024 Orange County Community Indicators Report, the number of sheltered homeless veterans has decreased in recent years. While the unemployment rate for veterans is less than the unemployment rate countywide, certain age groups of veterans are more vulnerable to unemployment. The population of unemployed

veterans of those in the labor force between the ages of 35 to 54 is 3.2 percent compared to 4.1 percent in the nonveteran population. However, the unemployment rate for veterans aged 18 to 34 is 7.4 percent compared to 7.1 percent for nonveterans. Further, the unemployment rate of veterans aged 55 to 64 is 5.1 percent compared to 4.7 percent for nonveterans in this age range.

Discuss the size and characteristics of the population with HIV/AIDS and their families within the Eligible Metropolitan Statistical Area:

Since reporting began in 1981, Orange County has received 14,637 reports of newly diagnosed HIV infections. According to the Orange County Health Care Agency, at the end of 2023, there were 7,044 persons living with HIV or AIDS in the County. An additional estimated 1,137 persons who are unaware of their HIV status may also reside in the County. While case rates have decreased, males continue to be disproportionately impacted by HIV compared to females (meaning an unequal rate compared to the total population). The African American/Black population continues to have the highest case rate, followed by the Hispanic, White, and Asian population.

If the PJ will establish a preference for a HOME TBRA activity for persons with a specific category of disabilities (e.g., persons with HIV/AIDS or chronic mental illness), describe their unmet need for housing and services needed to narrow the gap in benefits and services received by such persons. (See 24 CFR 92.209(c)(2) (ii))

Not applicable.

Discussion:

See discussions above.

NA-50 Non-Housing Community Development Needs - 91.215 (f)

Describe the jurisdiction's need for Public Facilities:

The County has identified the following high priorities under this Consolidated Plan: (1) Expand Affordable Housing Opportunities; (2) Enhance Quality of Life; and (3) Public Services. Non-housing community development needs identified in this section fall under the (2) Enhance Quality of Life priority or (3) Public Services priority. For the use of CDBG funds during Fiscal Years 2025-2029, the County has identified the following public facilities activities to enhance quality of life:

- Park and Recreation Facilities
- Senior Centers
- Homeless Facilities
- Neighborhood Facilities

How were these needs determined?

The County conducted a Housing & Community Development Needs Survey and held a series of five Community meetings, as well as two Focus Group Meetings, to solicit input on needs during the development of the Consolidated Plan, as described in the Citizen Participation Section.

Describe the jurisdiction's need for Public Improvements:

The County has identified the following public improvement activities for the use of CDBG funds during Fiscal Years 2025-2029. Public improvement activities align with the high priority to enhance quality of life in the County:

- Water/Sewer Improvements
- Street and Lighting Improvements
- Sidewalk Improvements

How were these needs determined?

The County conducted a Housing & Community Development Needs Survey and held a series of five Community meetings, as well as two Focus Group Meetings, to solicit input on needs during the development of the Consolidated Plan, as described in the Citizen Participation Section.

Describe the jurisdiction's need for Public Services:

The County has identified the following public service activities for the use of CDBG funds during Fiscal Years 2025-2029. Public service activities fall under the public services high priority identified in this Consolidated Plan.

- Youth and family services (childcare services)
- Health services, including mental health services
- Senior services
- Services for persons experiencing homelessness

How were these needs determined?

The County conducted a Housing & Community Development Needs Survey and held a series of five Community meetings, as well as two Focus Group Meetings, to solicit input on needs during the development of the Consolidated Plan, as described in the Citizen Participation Section.

Housing Market Analysis

MA-05 Overview

Housing Market Analysis Overview:

According to the California Employment Development Department, the unemployment rate in Orange County was 3.8 percent in December 2024, down from a revised four percent in November 2024, and unchanged from the year-ago estimate of 3.8 percent. This compares with an unadjusted unemployment rate of 5.2 percent for California and 3.8 percent for the nation during the same period.

MA-10 Number of Housing Units – 91.210(a)&(b)(2)

Introduction

The Urban Orange County had approximately 219,924 housing units in 2020. Overall, the housing stock was comprised of about 71 percent single-family units (detached and attached), 25 percent multi-family units, and three percent mobile homes, boats, RVs, vans, etc. Approximately 70 percent of the housing units were owner-occupied, and 30 percent were renter-occupied as of 2020. A significantly larger proportion of owner-occupied housing units have three or more bedrooms (79 percent) compared to renter-occupied units (32 percent). Based on 2019-2023 ACS estimates, 72 percent of housing units countywide were built prior to 1989. Given their age, some units may require substantial rehabilitation and improvements.

All residential properties by number of units

Property Type	Number	%
1-unit detached structure	128,225	58%
1-unit, attached structure	29,500	13%
2-4 units	15,344	7%
5-19 units	22,109	10%
20 or more units	18,594	8%
Mobile Home, boat, RV, van, etc.	6,152	3%
Total	219,924	100%

Table 26 - Residential Properties by Unit Number

Data Source: 2016-2020 ACS

Unit Size by Tenure

	Owners		Renters		
	Number	%	Number	%	
No bedroom	443	0%	2,944	5%	
1 bedroom	3,499	2%	12,679	21%	
2 bedrooms	26,355	18%	26,443	43%	
3 or more bedrooms	113,483	79%	19,571	32%	

	Owne	ers	Renters		
	Number	%	Number	%	
Total	143,780	99%	61,637	101%	

Table 27 - Unit Size by Tenure

Data Source: 2016-2020 ACS

Describe the number and targeting (income level/type of family served) of units assisted with federal, state, and local programs.

The following inventory of affordable housing is obtained from the Housing Elements for these individual jurisdictions:

<u>Brea:</u> The City has 587 rent-restricted units across 15 housing developments. In addition, the City's inclusionary housing ordinance has resulted in over 115 affordable homeownership units.

<u>Cypress</u>: The City has 208 affordable units over seven housing development projects. Of the seven projects, three are for seniors and four are for families. Cypress Park Senior Community, Cypress Sunrise, and Tara Village Family utilize RDA set-side or bond programs while Summer Place, Cypress Point Senior Community, 4552 Lincoln Avenue, and 4620 Lincoln Avenue received density bonuses.

<u>Dana Point</u>: The City has four projects providing 98 units of affordable housing including Domingo/Doheny Park Road (24 affordable units for large families) developed by the Orange County Community Housing Corporation, South Cove (17 affordable units), Monarch Coast Apartments (40 affordable units), and Silver Lantern Apartments (17 affordable units) owned by the Caritas Corporation and operated by the Friendship Shelter as permanent supportive housing.

<u>La Palma</u>: The City has 310 affordable units over three housing projects. Camden Place Senior Apartments (35 units) is assisted through Section 8 Assistance, project covenants, Low-Income Housing Tax Credit (LIHTC), HUD, and CalHFA, Casa La Palma (269 units) is assisted through LIHTC, and Tapestry Walk is assisted through project covenants and set-aside funds.

<u>Laguna Beach</u>: There are 159 affordable housing units over seven projects in Laguna Beach. Alice Court (26 units) includes very low income rental studio units, Hagan Place (24 units) includes very low income rental units for persons with HIV/AIDS, Hidden Valley (four units) is made up of low to moderate income ownership units, Mermaid Terrace (25 units) includes senior median income ownership condo units, Vista Aliso (70 units) includes very low income rental units for seniors funded by Section 8 and HUD Section 202 mortgage, 20000 Laguna Canyon Drive (one unit) is a low income work/live rental unit, and 20412 Laguna Canyon Drive(nine units) includes low and moderate income work/live rental units.

<u>Laguna Hills</u>: The City has 101 affordable housing units. Rancho Moulton (51 units) and Rancho Niguel (50 units) are family projects built in the early 1980s with Section 8 construction funds. Rancho Nigel also utilizes LIHTC.

<u>Laguna Woods</u>: There is one assisted multifamily rental housing development in Laguna Woods with a total of 17 affordable housing units. The Sab Sebastian senior condominium utilized a density bonus.

<u>Los Alamitos</u>: Laurel Park Manor, an affordable senior community in the City, offers 71 apartment units including studios and one-bedroom units, as well as a few accessible units for the sensory/mobility impaired. Klein Manor is operated by the Retirement Housing Foundation and charges approximately 30 percent of the resident income for rent.

<u>Placentia</u>: There are four low income rental unit projects in Placentia: Imperial Villas (58 assisted units), Veterans Village (49 assisted units), and Villa La Jolla (54 assisted units), Santa Angelina Senior Community (4 assisted units).

San Juan Capistrano: There are nine affordable housing projects in San Juan Capistrano including Villa Paloma Senior Apartments (84 units), Casa de Amma Assisted Living (11 units), Little Hollywood Rentals (24 units), Seasons Senior Apartments Phase I (92 units), Seasons Senior Apartments Phase II (38 units), Habitat for Humanity (27 units), Capistrano Valley Mobile Estates (one unit), The Groves (75 units), and City Hall/Paseo Adelanto (50 units).

Stanton: There are 893 affordable housing units in the City throughout four projects. Park Stanton Senior Apartments includes 335 affordable units for seniors, Plaza Court includes 102 affordable units for families, Continental Gardens Apartments includes 297 affordable units for families, Stanton Accessible Apartments includes nine affordable units for people with disabilities. Park Stanton Senior Apartments, Plaza Court, and Continental Gardens Apartments utilize LIHTC subsidies while Stanton Accessible Apartments is assisted by HUD, Lluma Homekey project #1 with 71 project based vouchers and 10 units assisted with MHSA funds to complete the project, Clara Vista Homekey project #2 with 59 project based vouchers and Aurora Vista Homekey project #3 with 20 units 9 with MHSA funds.

<u>Villa Park</u>: No government or non-governmental organization-assisted housing is located within the City.

<u>Yorba Linda</u>: The City has 656 affordable rental units throughout eight projects. Of the eight housing developments, five are designated for families and three are for seniors. Applicable programs for Yorba Linda affordable housing developments in Land Write Down, tax credits, RDA set-aside, and density bonus.

<u>County of Orange</u>: There are 2,771 housing units with affordability covenants that received financial assistance from the County of Orange for their development. Housing units that received assistance from the County are located countywide including in the cities of Aliso Viejo, Anaheim, Brea, Buena Park, Costa Mesa, Fountain Valley, Fullerton, Garden Grove, Irvine, Laguna Beach, Midway, Mission Viejo, Orange, Placentia, San Clemente, Stanton, Tustin, Westminster, and Yorba Linda as well as the unincorporated County areas including Ladera Ranch and Midway City.

Provide an assessment of units expected to be lost from the affordable housing inventory for any reason, such as expiration of Section 8 contracts.

The following inventory of at-risk housing units is based on the Housing Elements for these individual jurisdictions:

<u>Brea</u>: According to the City's 2021-2029 Housing Element, there are five affordable housing projects considered at risk during this Housing Element cycle, including 25 units for lower income households at Birch Street Loft Apartments (expires 2029/2030), nine units for lower income households at Orange Villa Senior Apartments (expires 2026), three units for lower income households at Tamarack Pointe Apartments (expires 2026), six units for lower income households at Town and Country Apartments (expires 2024), and 21 units for lower income households at Vintage Canyon Apartments (expires 2029).

<u>Cypress</u>: There are three projects in Cypress at risk of converting to market-rate by 2029 or earlier. Cypress Park Senior Community includes 31 affordable units and has a potential conversion date of March 2029, Summer Place

includes five affordable units and has a potential conversion date of March 2029, and Cypress Sunrise includes 74 affordable units and has a potential conversion date July 2023 for a total of 110 affordable units.

<u>Dana Point</u>: No rent-restricted units are at risk of converting to market-rate rents before 2029.

La Palma: No rent-restricted units are at risk of converting to market-rate rents before 2029.

Laguna Beach: No rent-restricted units are at risk of converting to market-rate rents before 2029.

Laguna Hills: No rent-restricted units are at risk of converting to market-rate rents before 2029.

<u>Laguna Woods</u>: No units within the City are at risk of conversion to market rate before 2029.

Los Alamitos: No units within the City are at risk of conversion to market rate before 2029.

<u>Placentia</u>: the Imperial Villas project (58 assisted units) could convert to market rate within the next 10 years and is therefore considered to be "at-risk."

<u>San Juan Capistrano</u>. There is only one unit at risk of conversion to market-rate before 2029 (Capistrano Valley Mobile Estates) in San Juan Capistrano.

<u>Stanton</u>: Of the four subsidized multifamily rental housing projects in Stanton, Continental Gardens Apartments is the only project at risk of conversion to market-rate. This project, which includes 297 affordable units, has a potential conversion date of 2028.

Villa Park: No units within the City are at risk of conversion to market-rate before 2029.

Yorba Linda: No units within the City are at risk of conversion to market-rate before 2029.

<u>County of Orange</u>: No rent-restricted units are at risk of converting to market-rate rents before 2029 in the unincorporated County. There are two affordable rental projects, Canada & Marquita Apartments in San Clemente (12 assisted units) and Village Heights Apartments in Newport Beach (25 assisted units) supported by the County that are at risk of conversion to market-rate rents in 2026 and 2028, respectively.

Does the availability of housing units meet the needs of the population?

The "Great Recession" during 2007 through 2012 eroded the home equity that many of the County's residents had planned to use for retirement. Tied financially to their homes, these older residents added to the County's growing senior population, as Orange County has always attracted retirees. At the same time, Orange County's high cost of living has led many younger residents to move to surrounding regions and other states in search of lower housing costs. In terms of cost of living, Orange County is currently the eighth most expensive place to live among 300 metropolitan regions in the nation. This ranking is almost entirely due to high housing costs, which are the fifth highest in the nation. Consequently, the proportion of Orange County's population 65 years and older has increased and is projected to reach 21 percent by 2050. This trend is problematic because the increasing older, nonworking population will take up an increasing amount of valuable workforce housing, leaving insufficient housing for the current and future workforce.

According to the 2023-2024 Orange County Community Indicators Report, Orange County added a net 45,600 nonfarm jobs between May 2022 and May 2023, a 2.7 percent increase which brings total nonfarm employment to 1,716,100. Over the same period, the total number of unemployed persons in the region increased from 42,400 to 51,200, an increase of 8,800 or 20.8 percent, due to an increasing labor force participation rate. Looking forward, a potential economic slowdown later in 2023 could slow job growth and increase unemployment. Current trends and projections point to an increasing imbalance between jobs and housing in the near future as Orange County's job growth continues to outpace housing growth.

In Orange County, the number of housing structures with 5+ units per structure increased by more than 6,000 units between 2022 and 2023, a 2.1 percent increase that brought the total to 309,290 structures. As of 2023, 5+ unit structures make up 26.9 percent of all housing units in the county. While more than 4,000 single-family units were built between 2022 and 2023, single family units actually declined as a proportion of the total county housing supply (from 49.9 percent to 49.6 percent). Overall, 14,469 new housing structures were built in Orange County over the past year, with the largest increase occurring in single attached structures (6,863 or 5.0 percent) and the largest decrease in mobile homes (a decline of 1,551 or 4.6 percent). According to the 2023-2024 Orange County Community Indicators Report, housing supply continues to lag demand in Orange County, leading to high home prices and the need for significant investment in all forms of housing, particularly multi-unit housing.

One significant housing supply indicator is the number of building permits, which shrank from 7,867 in 2021 to 5,938 in 2022, a decline of 24.5 percent to the lowest number since 2012, reflecting the significant rise in interest rates that started in the first half of 2022. Despite continued interest rate hikes in 2023, which many predicted would curb housing demand, housing in Orange County remains expensive and in short supply.

Rental market demand has grown rapidly as a result of uncertainty in the homeownership market. Investors and developers have capitalized on this uncertainty and increased rental demand by progressively investing in the rental market. Investors are purchasing foreclosed homes to place in the rental market, and trends show developers are moving toward higher density multi-family housing. Cities also moved to increase multi-family housing and to rezone land for more efficient usage.

Describe the need for specific types of housing:

The Orange County Housing Authority (OCHA) administers the Housing Choice Voucher Program for all of Orange County, except for the cities of Santa Ana, Garden Grove, and Anaheim. As of 2024, the OCHA provides 9,925 vouchers for low income households. However, available resources are very limited and OCHA cannot meet the demand for assistance. OCHA maintains a long waitlist of 12,000 residents as of 2023 for rental assistance and is not currently accepting any new applications to be put on the waitlist. Further, over 50,000 residents applied for the waitlist but only 12,000 were selected to be on the waitlist.

Furthermore, Orange County has an aging population and the County's prestige attracts high-wage workers from surrounding counties. These populations occupy housing units in Orange County and impede the housing infrastructure from serving the current and future workforce. Units that currently house one or two workers will house few or no workers as Baby Boomers retire "in place." Young adults continue to move out of Orange County, a trend that can be expected to worsen as the County's jobs-to-housing balance deteriorates. Lack of availability and affordability are also not the only factors that drive younger residents out. Demand is growing among younger populations for high-density

mixed-use developments. This is in stark contrast to the County's traditional large suburban development which has attracted higher-income middle-aged and older populations.

The number of renters will likely remain high in Orange County because of the large percentage of households that cannot afford the median-priced home, the constrained housing market, and tight lending as a result of the housing crash.

Discussion

See discussions above.

MA-15 Housing Market Analysis: Cost of Housing - 91.210(a)

Introduction

One of the most important factors in evaluating a community's housing market is the cost of housing and, even more significant, whether the housing is affordable to households who live there or would like to live there. Housing problems directly relate to the cost of housing in a community. If housing costs are relatively high in comparison to household income, a correspondingly high rate of housing cost burden and overcrowding could result.

The cost of homeownership in Orange County has exhibited an upward trend similar to most communities in California. The median sales price for a home in the County was \$1,149,480 in 2024, up 8.3 percent from 2023. High interest rates combined limited supply and high demand have resulted in the upward trend of home prices.

Overall, the rate of homeownership has declined significantly in Orange County since its peak of 63 percent in 2007. By 2011, homeownership levels fell to 59 percent during the market downturn. Rental market demand in the County has grown rapidly as a result of the uncertainty in the homeownership market. Homeownership rates have declined slightly to 56 percent according to the 2019-2023 ACS.

Cost of Housing

	Base Year: 2009	Most Recent Year: 2020	% Change
Median Home Value	\$553,600	\$703,800	27%
Median Contract Rent	\$1,455	\$1,827	26%

Table 28 - Cost of Housing

Data Source: 2000 Census (Base Year), 2016-2020 ACS (Most Recent Year)

Rent Paid	Number	%
Less than \$500	4,195	6.8%
\$500-999	2,783	4.5%
\$1,000-1,499	10,134	16.4%
\$1,500-1,999	19,619	31.8%
\$2,000 or more	24,847	40.3%
Total	61,578	99.9%

Table 29 - Rent Paid

Data Source: 2016-2020 ACS

Housing Affordability

Number of Units affordable to	Renter	Owner
Households earning		
30% HAMFI	3,154	No Data
50% HAMFI	7,465	4,538
80% HAMFI	30,457	13,317
100% HAMFI	No Data	20,390
Total	41,076	38,245

Table 30 - Housing Affordability

Data Source: 2016-2020 CHAS

Monthly Rent

Monthly Rent (\$)	Efficiency (no	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
	bedroom)				
Fair Market Rent	\$1,939	\$2,113	\$2,539	\$3,448	\$4,032
High HOME Rent	\$1,331	\$1,428	\$1,714	\$1,972	\$2,180
Low HOME Rent	\$1,038	\$1,113	\$1,336	\$1,543	\$1,721

Table 31 - Monthly Rent

Data Source: HUD FMR and HOME Rents

Is there sufficient housing for households at all income levels?

According to the CHAS data by HUD, mismatches in terms of supply and affordability exist in the Urban County. Approximately 25,164 households earning less than 30 percent of AMI reside in the Urban County; however, there are only 3,154 dwelling units affordable to those at this income level. Similarly, there are 23,248 households earning between 31 and 50 percent of AMI and only 12,003 housing units affordable to those at this income level. With approximately 43,774 housing units in the Urban County that are affordable to households earning between 51 and 80 percent AMI, there are enough to accommodate the 31,684 households at this income level. It should be noted, however, that a housing unit affordable to a particular income group does not mean the unit is actually occupied by a household in that income group. Therefore, the affordability mismatches are likely to be more severe than as presented by the CHAS data.

How is affordability of housing likely to change considering changes to home values and/or rents?

During 2000–2007, Orange County averaged approximately 10,000 building permits per year. However, during the "Great Recession", the number of approved building permits fell sharply—65 percent lower than average in 2008. According to Housing Element Progress Reports submitted to the California Department of Housing & Community

Development, the County has issued 946 building permits under the implementation of the 6th cycle Housing Element as of February 2025. The lack of new housing units as compared to 2007 will make it more difficult to match long-term workforce housing demand trends leading eventually to an even greater shortage of workforce housing. This expected shortage has led to predictions of a long-term trend of rising housing prices in the County.

Orange County is the State's most densely populated county behind only San Francisco. Because available vacant land is scarce, housing growth will occur primarily through greater density or infill opportunities. The densification of Orange County housing is forecast to accommodate population growth and locate residents proximate to employment centers, shopping and recreation opportunities, and major transportation routes, often including the High Frequency Corridors and Metrolink stations. Some cities have moved toward increased multi-family housing and the rezoning of land for more efficient usage. Increased density can be expected as Orange County attempts to meet the workforce housing demand in the face of land constrictions. Approximately three out of every four housing units projected to be built by 2035 will be some type of attached unit, such as a condominium, townhome, or apartment. The result will be denser housing developments and a future housing stock whose makeup will have a majority of attached units instead of single-family detached structures.

The number of renters will likely remain high in Orange County because of the large percentage of households that cannot afford the median-priced home, the constrained housing market, and tight lending as a result of the housing crash. Renting a home in the County, however, is still costly. As shown in Table 31 above, the 2023 HUD FMR for a two-bedroom unit in Orange County is \$2,539 compared to \$2,222 in Los Angeles County, \$1,751 in Riverside and San Bernardino County.

How do HOME rents / Fair Market Rent compare to Area Median Rent? How might this impact your strategy to produce or preserve affordable housing?

According to the 2019-2023 ACS, the median gross rent in Orange County was \$2,352. The ACS indicates that the median gross rent in Orange County was \$2,025 for an efficiency unit (no bedroom), \$2,037 for a one-bedroom unit, \$2,372 for a two-bedroom unit, \$3,032 for a three-bedroom unit, and over \$3,500 for units with four or more bedrooms.

Median market rents are comparable to the Fair Market Rents (FMR) for all units ranging in size from no bedrooms to four bedrooms (Table 31). However, average rental prices are likely to be higher compared to median rental prices. Even with a Housing Choice Voucher or other rental assistance, the payment standards are not adequate to allow many households to rent, especially in the South Orange County area.

Petitioning for increases in payment standards and facilitating affordable housing development/preservation throughout are important strategies for the Urban County. With the high costs of new development, acquisition/rehabilitation also represents a cost-effective strategy.

Discussion

See discussions above.

MA-20 Housing Market Analysis: Condition of Housing – 91.210(a)

Introduction

Assessing housing conditions in Orange County can provide the basis for developing policies and programs to maintain and preserve the quality of the housing stock. The ACS defines a "selected condition" as owner- or renter-occupied housing units having at least one of the following conditions: 1) lacking complete plumbing facilities; 2) lacking complete kitchen facilities; 3) more than one occupant per room; and 4) selected monthly housing costs greater than 30 percent of household income.

Describe the jurisdiction's definition of "standard condition" and "substandard condition but suitable for rehabilitation":

In the Urban County, substandard housing conditions may consist of the following: structural hazards, poor construction, inadequate maintenance, faulty wiring, plumbing, fire hazards, and inadequate sanitation. Substandard units suitable for rehabilitation are those units where the total rehabilitation costs do not exceed 25 percent of the after-rehabilitation value.

Condition of Units

Condition of Units	Owner-	Occupied	Renter-Occupied		
Condition of office	Number	%	Number	%	
With one selected Condition	45,240	31%	29,929	49%	
With two selected Conditions	928	1%	4,675	8%	
With three selected Conditions	50	0%	125	0%	
With four selected Conditions	0	0%	0	0%	
No selected Conditions	97,545	68%	26,930	44%	
Total	143,763	100%	61,659	101%	

Table 32 - Condition of Units

Data Source: 2016-2020 ACS

Year Unit Built

Year Unit Built	Owner-0	Occupied	Renter-	Occupied
	Number	%	Number	%
2000 or later	19,402	14%	7,248	12%
1980-1999	35,197	24%	15,530	25%
1950-1979	83,613	58%	35,402	57%
Before 1950	5,514	4%	3,468	6%
Total	143,726	100%	61,648	100%

Table 33 - Year Unit Built

Data Source: 2016-2020 CHAS

Risk of Lead-Based Paint Hazard

Risk of Lead-Based Paint Hazard		Occupied	Renter-Occupied	
Nisk of Leau-Daseu Failit Hazaru	Number	%	Number	%
Total Number of Units Built Before 1980	89,127	62%	38,870	63%
Housing Units build before 1980 with children present	11,053	8%	7,351	12%

Table 34 - Risk of Lead-Based Paint

Data Source: 2016-2020 ACS (Total Units) 2016-2020 CHAS (Units with Children present)

Vacant Units

	Suitable for Rehabilitation	Not Suitable for Rehabilitation	Total
Vacant Units			
Abandoned Vacant Units			
REO Properties			
Abandoned REO Properties			

Table 35 - Vacant Units

Need for Owner and Rental Rehabilitation

Given the age of the housing stock in the Urban Orange County, the number of substandard housing units is moderate. Housing age can indicate general housing conditions within a community. Housing is subject to gradual deterioration over time. Deteriorating housing can depress neighboring property values, discourage reinvestment, and eventually impact the quality of life in a neighborhood. According to the 2016-2020 CHAS data presented in Table 33 above, 62 percent of the housing stock in the Urban County was constructed prior to 1980. Approximately 62 percent of owner-occupied housing and 63 percent of renter-occupied housing in the County was built before 1980. Only 4.4 percent of housing units were built before 1950, indicating that a small portion of the housing stock may need significant improvements and rehabilitation.

Estimated Number of Housing Units Occupied by Low or Moderate Income Families with LBP Hazards

Housing age is the key variable used to estimate the number of housing units with lead-based paint (LBP). Starting in 1978, the federal government prohibited the use of LBP on residential property. National studies estimate that 75 percent of all residential structures built prior to 1970 contain LBP. Housing built prior to 1940 is highly likely to contain LBP (estimated at 90 percent of housing units), and in housing built between 1960 and 1979, 62 percent of units are estimated to contain LBP.

According to the 2016-2020 ACS, approximately 62 percent of owner-occupied housing and 63 percent of renter-occupied housing in the Urban County were built prior to 1980. Using the 75 percent national average of potential LBP hazard, an estimated 95,998 units (66,845 owner-occupied and 29,153 renter-occupied units) may contain LBP. Furthermore, approximately 54 percent of households in the Urban Orange County are low- and moderate-income (earn less than 100 percent of AMI). This translates to approximately 51,359 housing units with potential LBP that may be occupied by low- and moderate-income households.

Discussion

See discussions above.

MA-25 Public and Assisted Housing – 91.210(b)

Introduction

The Orange County Housing Authority's (OCHA) does not currently own or operate any public housing units and there are no public housing projects located within the Urban County. There are currently 9,925 total housing vouchers available, including 879 veterans affairs supportive housing vouchers and 1,669 family unification program vouchers.

Totals Number of Units

Program T	уре								
	Certificate	Mod-	Public	Vouchers					
		Rehab	Housing	Total Project Tenant Special Purpose Voucher				ucher	
					-based	-based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled*
# of units									
vouchers available				16,5521	1,272	10,389	1,089	3,501	301
# of accessible units									

*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

Table 36 - Total Number of Units by Program Type

Data Source: PIC (PIH Information Center)

Describe the supply of public housing developments:

The Orange County Housing Authority's (OCHA) does not currently own or operate any public housing units and there are no public housing projects located within the Urban County.

Describe the number and physical condition of public housing units in the jurisdiction, including those that are participating in an approved Public Housing Agency Plan:

The Orange County Housing Authority's (OCHA) does not currently own or operate any public housing units and there are no public housing projects located within the Urban County.

Public Housing Condition

Public Housing Development	Average Inspection Score		
N/A	N/A		

Table 37 - Public Housing Condition

Describe the restoration and revitalization needs of public housing units in the jurisdiction:

The Orange County Housing Authority's (OCHA) does not currently own or operate any public housing units and there are no public housing projects located within the Urban County.

Describe the public housing agency's strategy for improving the living environment of low- and moderate-income families residing in public housing:

While the OCHA does not own and operate public housing, it provides subsidized housing through a number of programs and promotes personal, economic and social upward mobility to provide families the opportunity to make the transition from subsidized to non-subsidized housing.

OCHA has a collaborative relationship with Habitat for Humanity to promote homeownership opportunities for eligible Housing Choice Voucher (HCV) participants. OCHA's Family Self-Sufficiency (FSS) program assists families to achieve their goals and graduate. In addition, OCHA networks with over 180 community organizations and 31 participating cities to ensure awareness of and enforcement of fair housing laws. The Agency also provides housing search assistance when requested. Lists of available units, including accessible units for people with disabilities, are provided to participants and updated weekly. Technical assistance, through referrals to the Fair Housing Council of Orange County, is also provided to owners interested in making reasonable accommodations or units accessible to persons with disabilities.

Furthermore, OCHA works in collaboration with a number of Orange County agencies who have access to a variety of programs and support services that offer; counseling (individual, group, and family), parenting education, after-school recreation and enrichment programs, referral services, domestic violence and anger management education, gang prevention, in-home visitation/parent support programs, and health services referrals. Supportive service providers include:

- Information and Referral: 2-1-1 Orange County. A telephone resource system (available 24/7) that links OC residents to community health & human services & support resources and organizations.
- Legal Resources: Including the Legal Aid Society of Orange County and Fair Housing Council of Orange County.
- Supportive Services: Orange County Health Care Agency and related network of service providers.

Discussion:

See discussions above.

MA-30 Homeless Facilities and Services – 91.210(c)

Introduction

The following estimates of homeless facilities are developed with methodology provided by the Continuum of Care.

Facilities and Housing Targeted to Homeless Households

	Emergency Shelter Beds		Transitional Housing Beds	Permanent Supportive Housing Beds	
	Year Round Beds (Current & New)	Voucher / Seasonal / Overflow Beds	Current & New	Current & New	Under Development
Households with Adult(s) and Child(ren)	811	- 51	827	1,705	NA
Households with Only Adults	2,365		217	1,677	NA
Chronically Homeless Households	N/A		N/A	795	NA
Veterans	2		81	1,186	NA
Unaccompanied Youth	45		63	14	NA

Table 38 - Facilities and Housing Targeted to Homeless Households

Describe mainstream services, such as health, mental health, and employment services to the extent those services are use to complement services targeted to homeless persons

HCA directly provides and subcontracts a wide range of physical health, behavioral health, and substance abuse services. These programs are offered free of cost to persons who are in need and do not have means to cover services. Persons experiencing homelessness are able to access services at clinics throughout the county as well as a number of programs that provide mobile based services. Additionally, the County has administered Whole Person Care funding which provides additional services and resources to persons experiencing homelessness through a Medicaid waiver.

The Office of Care Coordination staffs and facilitates the Commission to End Homelessness established in 2018. The Commission 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.

The Orange County Social Services Agency (OCSSA) provides general assistance benefits as well as disability benefits advocacy assistance. There is a mobile clinic that goes throughout the county that works to engage persons experiencing to ensure that they are able to access general assistance and are also being enrolled in Medi-Cal through CalOptima. They have a number of additional assistance programs that are accessible to persons experiencing homelessness including employment programs.

There are a number of employment service programs throughout the county that persons experiencing homelessness are able to access for support with resume development, job training and job search. There is a county contract with Chrysalis which provides job development services specifically tailored towards people experiencing homelessness.

Several agencies provide services to lower and moderate-income Orange County residents that complement services for the region's homeless population. The Community Action Partnership of Orange County (CAPOC) offers comprehensive services to address the emergency needs of people and provides opportunities for individuals to lift themselves out of poverty. CAPOC operates the Orange County Food Bank, Anaheim Independencia Family Resource Center, El Modena Family Resource Center, and owns a childcare facility that offers affordable care. Other services include financial assistance with utility bills, energy education workshops, energy conservation, home improvements, health and wellness activities, and assistance in accessing underutilized public benefits such as EITC and CalFresh.

Food banks are located throughout Orange County including some that provide cooked meals to persons experiencing homelessness. The largest food back located in Orange County is the Second Harvest Food Bank of Orange County is committed to helping to improve the lives of the County's most vulnerable populations including children, seniors and families. They collaborate with a network of more than 500 local non-profit agencies, including shelters, church pantries, and after-school tutoring programs to distribute high quality, nutritious food to those in need.

Alcohol and Substance Abuse Services administered by OC Heath Care Agency, is alcohol and other drug (AOD) prevention, treatment, and recovery services in Orange County. ADAS works in partnership with California Department of Alcohol and Drug Programs (ADP) to reduce alcoholism, drug addiction and problem gambling in Orange County.

The County has also contracted with community-based organizations for the provision of HIV-related support services. Current community providers include: AIDS Services Foundation, APAIT Health Center, Delhi Center, Laguna Beach Community Clinic, Public Law Center, Shanti Orange County (formerly Laguna Shanti), Straight Talk, and The Center.

List and describe services and facilities that meet the needs of homeless persons, particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth. If the services and facilities are listed on screen SP-40 Institutional Delivery Structure or screen MA-35 Special Needs Facilities and Services, describe how these facilities and services specifically address the needs of these populations.

According to the 2024 Housing Inventory Count (HIC) for Orange County, a total of 3,030 emergency shelter beds were available in Orange County. These beds were located in 57 different facilities. An additional 841 transitional housing beds are also available in 34 facilities. In addition to addressing the immediate needs for temporary housing, these facilities often offer onsite case management resources to support households to address barriers to housing and provide linkage to critically needed resources.

The Orange County Housing Finance Trust, County, and participating cities share a common goal of creating 2,396 permanent supportive housing units by 2029. As of February 2025, there are 1,544 permanent supportive housing units in the County's pipeline.

There are a number of permanent housing resources that service persons experiencing homelessness. These services provide both financial assistance and case management in order to support people with obtaining and stabilizing in permanent housing. Many of these programs are specifically tailored to provide specialized services to groups such as families and veterans.

The Commission to Address Homelessness ("Commission") has collaborated with 211OC and the Santa Ana Office of the Social Security Administration to provide free training sessions consisting of a brief overview of all Social Security programs, including eligibility requirements of the Social Security disability program and the Supplemental Security Income disability program and discussion of the most efficient way to submit claims and how service providers can help address issues unique to homeless clients/applicants.

In addition, the Commission has initiated briefings with service providers and Orange County Transportation Authority (OCTA) to address affordability of bus service with special emphasis on employment-related mobility and access to those with disabilities. The Commission also facilitated presentations and training sessions from Workforce Investment Act One-Stop Employment Center providers and other related providers in preparing the at-risk and homeless population for prospective employment and/or to address underemployment issues.

Since 2013, the OC4Vets collaborative between the County OC Community Services and Health Care Agency has been fully implemented. Through Mental Health Services Act funding, the Orange County Veterans Service Office has a multi-service center that provides at-risk and homeless veterans with services such as mental health, employment, claims benefit, emergency housing assistance, permanent housing assistance, and other critical services.

MA-35 Special Needs Facilities and Services – 91.210(d)

Introduction

A variety of services and facilities targeting persons with special needs are available in Orange County.

Including the elderly, frail elderly, persons with disabilities (mental, physical, developmental), persons with alcohol or other drug addictions, persons with HIV/AIDS and their families, public housing residents and any other categories the jurisdiction may specify, and describe their supportive housing needs

Elderly

Comments received during the community outreach process, along with prior studies of senior service needs in the County, indicate that one of the greatest needs for seniors is affordable housing, especially in South Orange County. Transportation is also one of the most common needs identified by older people. The most often cited reason seniors and their caregivers fail to access available services is lack of awareness that such services exist. Marketing of services is an important component to the reduction of gaps in service delivery, but frequently does not occur because underfunded providers are hard pressed to accommodate their current client base.

Persons with Disabilities

Without action by the County, local cities and nonprofit agencies, too many adults with developmental disabilities will remain dependent upon aging parents. Absent viable sources of safe and affordable housing, the only alternatives would be for people with developmental disabilities to be placed in congregate living settings or large state-operated facilities. The needs of people with disabilities mirror those of seniors. Housing is an important first step. However, as with seniors, housing must be coupled with appropriate and accessible services. Seniors and adults with developmental disabilities both need safe affordable housing options, universal design accommodations, readily accessible, reliable transportation and social support services.

Large Households

Overcrowding is a critical issue in the community. Many families are forced to live in a single home because of high housing costs. Many residents in the County have completed illegal (unpermitted) additions or expansions to their housing units and they lack the financial means and knowledge to correct them, once cited by code enforcement staff.

Single Parent Households

Low cost childcare was a need specifically identified by Orange County residents attending the community workshops. While the need for affordable childcare was expressed by two-parent and one-parent households alike, this need may be more acute for one-parent households who must single-handedly balance their job and role as primary caregiver.

Victims of Domestic Violence

Victims of domestic violence are typically in need of assistance with childcare and early education programs. In addition, this particular group may also have a need for workforce development services, health services, educational programs, and mental health care and counseling.

Persons with Alcohol/Substance Use Disorders

Substance Use is often cited as an issue impacting many homeless persons, especially those who are chronically homeless. Rehabilitation services and stable housing options are two important needs for persons with drug and alcohol addictions.

Veterans

As discussed previously, veterans of certain age groups are more likely to experience unemployment compared to the general public. The population of unemployed veterans of those in the labor force between the ages of 35 to 54 is 3.2 percent compared to 4.1 percent in the nonveteran population. However, the unemployment rate for veterans aged 18 to 34 is 7.4 percent compared to 7.1 percent for nonveterans and the unemployment rate of veterans aged 55 to 64 is 5.1 percent compared to 4.7 percent for nonveterans in this age range. According to the 2019-2023 ACS, there are 89,830 veterans in Orange County representing 3.6 percent of the population.

Describe programs for ensuring that persons returning from mental and physical health institutions receive appropriate supportive housing

The hospital community in Orange County has established a post-discharge, recuperative care program for homeless patients admitted to inpatient care and ready for discharge into recovery. Hospitals refer patients on a voluntary basis and pay for all care and administrative services associated with the program. A centralized business model provides hospitals with a single point of contact for referring patients into the program that is managed by the National Health Foundation (NHF), which screens and approves patients for placement within four hours from the time hospitals submit applications.

HCA determines when and to where clients diagnosed with serious and persistent mental illnesses (SPMI) are discharged from either inpatient stays or outpatient services. HCA works with a number of inpatient providers and coordinates with them to follow the mandates of state laws in regard to "anti-dumping" policies. Patients leaving inpatient settings are assessed for level and type of residential setting.

The Illumination Foundation, which provides services under contract to National Health Foundation, provides basic medical oversight through certified nursing assistants. Hospitals are eligible to be reimbursed a small percentage of their costs when referring patients into the program whose care was covered by the County program for the uninsured. NHF and the Illumination Foundation also routinely distribute informational communications and updates to hospitals, conduct briefings for hospital discharge planners to review protocols, and identify and address administrative challenges. In addition, Illumination Foundation case managers assist clients in finding permanent medical homes, connect them to permanent housing, and provide other services leading to self-sufficiency. A number of other agencies also work together in various roles to ensure housing for individuals diagnosed with SPMI in Orange County, including OC Community Services, Mercy House, Friendship Shelter, Community Care Licensing, and the California Hispanic Commission on Drugs and Alcohol.

Residential care facilities provide supportive housing for persons with disabilities. The following types of facilities are available in Orange County:

- Adult Day Care Facilities (ADCF): Facilities of any capacity that provide programs for frail elderly and developmentally and/or mentally disabled adults in a day care setting.
- Adult Residential Facilities (ARF): Facilities of any capacity that provide 24-hour non-medical care for adults
 ages 18 through 59, who are unable to provide for their own daily needs. Adults may be physically
 handicapped, developmentally disabled, and/or mentally disabled.
- Residential Care Facilities for Children: Facilities of any capacity and provide 24-hour non-medical care and supervision to children in a structured environment. These facilities provide social, psychological, and behavioral programs for troubled youths.
- Residential Care Facilities for the Elderly (RCFE): Facilities that provide care, supervision and assistance with activities of daily living, such as bathing and grooming. They may also provide incidental medical services under special care plans.

These facilities are regulated by the State Department of Social Services (DSS), Community Care Licensing Division. According to DSS licensing data, there are 37 adult day care facilities with a capacity to serve 2,782 persons, 375 adult residential facilities with a capacity to serve 2,503 persons, and 1,055 residential care facilities for the elderly with a capacity to serve 25,244 persons located in the County. Orange County is also served by eight residential small family homes with a capacity for 32 children with special health care needs and 32 children's residential group homes with a capacity for 396 children.

Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. 91.315(e)

Community Action Partnership of Orange County (CAPOC) will continue to work with other agencies to provide services to Orange County residents. CAPOC established the County's first Head Start program and operates the Neighborhood Youth Corps, Legal Aid services, Mobile Health Van, and a helpline for seniors. The Agency's Food Bank just celebrated its 35th anniversary and distributes nearly 15 million pounds of food annually to feed the hungry. CAPOC's Energy & Environmental Services continue to provide utility assistance, weatherization home improvements, and solar energy installations to help low-income households become more energy efficient and lower their energy bills. In addition, the Agency's two-family resource centers continue to help kids succeed, promote financial stability, and support families and seniors so they can thrive.

In partnership with the Orange County Board of Supervisors, the Orange County Workforce Development Board (OCWDB) oversees the County's workforce development system and delivers programs that address the employment and supportive service needs of Orange County. At the core of this system is the Orange County Workforce Solutions network, which includes comprehensive One-Stop Centers (America's Job Center of California, or AJCC), affiliate sites, and youth programs located throughout the County.

Orange County Housing & Community Development is a long-standing partner in the Workforce Solutions network, collaborating with OCWDB and a wide range of community-based organizations to deliver coordinated services across the County. Together, these partners form an integrated system of access points and outreach strategies designed to meet individuals where they are. To expand accessibility, the network includes in-center and virtual services, as well

as a mobile unit that regularly visits public libraries and other trusted community locations—bringing services directly to residents who may not live near a physical site.

Orange County Workforce Solutions One-Stop Centers:

- Deliver individualized services and employment pathways tailored to each participant's needs and goals.
- Coordinate supportive services, including housing referrals, childcare and transportation assistance, behavioral health connections, disability accommodations, and work-related expenses like tools or uniforms.
- Partner across systems to streamline access to resources through collaboration with housing, health, and human services.
- Promote equity and inclusion by expanding access for underserved and underrepresented populations.

Orange County Workforce Solutions offers clients expanded workforce services for individuals at all levels of skill and experience. Provide clients access to multiple employment and training resources offered throughout the system. Supportive services with housing, transportation, childcare, linkage to community services, reasonable accommodations for individuals with disabilities assistance with uniforms, tools, etc. The goal is to continue to create program and services that address the housing and supportive services needs for Orange County residence and expand our workforce system by partnering with community organizations who share our vision.

In The County of Orange Health Care Agency operates a number of programs that serve the various needs of non-homeless special needs residents. The Alcohol and Drug Abuse Services (ADAS) program provides a range of outpatient and residential treatment programs designed to reduce or eliminate the abuse of alcohol and other drugs within the community. The Older Adult Services program provides mobile mental health services and episodic treatment services to community-dwelling older adults (60 and older) that emphasize individual needs, strengths, choices, and involvement in service planning and implementation. We seek to identify those situations, which could benefit from services leading to a better quality of life for older adults disabled by mental illness. The Agency also manages the WIC Program, a supplemental food, nutrition education and breastfeeding support program, for County residents. It serves low to moderate-income pregnant, breastfeeding and postpartum women, and infants/children up to age 5 who are at nutritional risk. The Children and Youth Services (CYS) clinics serve children and adolescents who require mental health services. Problems may include disruptive behavior disorders, mood disorders, anxiety disorders, sleep and eating disorders, adjustment or personality disorders, other severe emotional disorders and family problems. CYS also provides diagnosis and support services for children who have been removed from their homes and are residing in Orangewood Children's Home, Juvenile Hall, group homes and foster placement.

For entitlement/consortia grantees: Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. (91.220(2))

Not applicable.

MA-40 Barriers to Affordable Housing – 91.210(e)

Negative Effects of Public Policies on Affordable Housing and Residential Investment

Lack of Affordable Housing Funds

The high construction and land costs in Orange County render the need for substantial subsidies for affordable housing. However, the availability of funding for affordable housing has been 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. Recent State legislation has aimed to streamline affordable housing development, including exempting certain projects from CEQA processing.

Land Use Policies

Local land use policies could be a constraint to housing development when the requirements for parking, height limit, density, and setbacks result in limiting the number of housing units that can be feasibly constructed on site. Recent changes in State law now require local jurisdictions develop objective standards to facilitate housing development.

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. Many jurisdictions waive, reduce, or defer fees for affordable housing.

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. Recent changes to State law require jurisdictions allow certain types of housing by right without discretionary review as a way to streamline housing development.

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 over eight units. Based on discussions with developers, various prevailing wage requirements typically inflate the development costs by 35 percent.

MA-45 Non-Housing Community Development Assets – 91.215 (f)

Introduction

Orange County is comprised of 34 cities and several unincorporated areas. The Urban County includes the unincorporated areas, 12 small cities with population under 50,000, and two Metro Cities that have elected to join the County's HUD CPD programs. Within the Urban County, many attractive qualities of Orange County continuously contribute to its gradual economic upswing: a diverse industry cluster base, high wage industry composition, innovating and entrepreneurial business climate, a comparatively well-educated and skilled workforce, and its advantageous location in the heart of Southern California promoting international trade activity.

Economic Development Market Analysis

Business Activity

Business by Sector	Number of Workers	Number of Jobs	Share of Workers %	Share of Jobs %	Jobs less workers %
Agriculture, Mining, Oil & Gas Extraction	1,711	1,313	1	1	0
Arts, Entertainment, Accommodations	34,071	35,850	13	16	2
Construction	15,068	18,495	6	8	2
Education and Health Care Services	41,124	37,496	16	16	0
Finance, Insurance, and Real Estate	19,729	19,530	8	9	1
Information	7,093	2,266	3	1	-2
Manufacturing	24,598	23,152	10	10	0
Other Services	8,687	7,742	3	3	0
Professional, Scientific, Management Services	29,996	20,479	12	9	-3
Public Administration	0	0	0	0	0
Retail Trade	26,123	23,328	10	10	0
Transportation and Warehousing	8,414	4,959	3	2	-1
Wholesale Trade	16,870	15,002	7	7	0
Total	233,484	209,612			

Table 39 - Business Activity

2016-2020 ACS (Workers), 2020 Longitudinal Employer-Household Dynamics (Jobs)

Data Source:

Labor Force

Total Population in the Civilian Labor Force	290,076
Civilian Employed Population 16 years and over	276,600
Unemployment Rate	4.63
Unemployment Rate for Ages 16-24	10.11
Unemployment Rate for Ages 25-65	3.31

Table 40 - Labor Force

Data Source: 2016-2020 ACS

Occupations by Sector	Number of People
Management, business and financial	98,559
Farming, fisheries and forestry occupations	8,712
Service	22,658
Sales and office	66,860
Construction, extraction, maintenance and repair	14,108
Production, transportation and material moving	10,100

Table 41 – Occupations by Sector

Data Source: 2016-2020 ACS

Travel Time

Travel Time	Number	Percentage
< 30 Minutes	130,448	54%
30-59 Minutes	83,427	35%
60 or More Minutes	27,055	11%
Total	240,930	100%

Table 42 - Travel Time

Data Source: 2016-2020 ACS

Education:

Educational Attainment by Employment Status (Population 16 and Older)

Educational Attainment	In Labo	Not in Labor Force		
Educational Attainment	Civilian Employed	Unemployed	Not ill Labor Force	
Less than high school graduate	14,535	837	8,664	
High school graduate (includes equivalency)	31,004	1,762	10,725	
Some college or Associate's degree	62,540	2,522	16,299	
Bachelor's degree or higher	118,965	4,742	24,115	

Table 43 - Educational Attainment by Employment Status

Data Source: 2016-2020 ACS

Educational Attainment by Age

	Age				
	18–24 yrs	25–34 yrs	35–44 yrs	45–65 yrs	65+ yrs
Less than 9th grade	272	1,343	3,410	7,341	5,478
9th to 12th grade, no diploma	3,541	2,334	2,897	6,707	5,289
High school graduate, GED, or					
alternative	10,961	10,649	9,161	23,780	19,603
Some college, no degree	17,836	13,770	11,616	32,868	23,274
Associate's degree	2,444	5,076	4,277	13,967	10,218
Bachelor's degree	6,370	22,158	23,546	49,911	27,963
Graduate or professional degree	100	7,780	13,728	30,885	21,088

Table 44 - Educational Attainment by Age

Data Source: 2016-2020 ACS

Educational Attainment – Median Earnings in the Past 12 Months

Educational Attainment	Median Earnings in the Past 12 Months
Less than high school graduate	\$700,609
High school graduate (includes equivalency)	1,086,035
Some college or Associate's degree	1,583,024
Bachelor's degree	2,219,525
Graduate or professional degree	2,404,007

Table 45 - Median Earnings in the Past 12 Months

Data Source: 2016-2020 ACS

Based on the Business Activity table above, what are the major employment sectors within your jurisdiction?

As shown in Table 39, the following sectors employ the most residents in the Urban Orange County: Education/Health Care Services, Arts/Entertainment/Accommodations, and Professional/Scientific/Management Services. Approximately 16 percent of workers are employed in the Education and Health Care Services sector, 13 percent in the Arts, Entertainment, and Accommodations sector, and 12 percent in the Professional, Scientific, and Management Services sector.

Describe the workforce and infrastructure needs of the business community:

Orange County's economy increasingly demands highly educated workers. The current supply of college graduates will not keep up with demand. The County's demographics are currently shifting toward population groups with historically lower levels of educational attainment. In particular, Hispanic residents (who comprise the largest group of young adults) have historically had lower rates of college completion. To address this skill gap, a greater effort in curriculum development and promotion is necessary. As shown in Table 43, the proportion of unemployed residents in

the labor force decreases as educational attainment increases. Approximately 5.4 percent of those with less than a high school diploma in the labor force are unemployed compared to 3.8 percent with a Bachelor's degree or higher.

Another critical challenge facing the County is the issue of baby boomers constraining lower-level job openings that traditionally fall to new workforce entrants. "Replacement jobs" are defined by the California Employment Development Department (EDD) as job openings created when workers retire or permanently leave an occupation. As it stands, future replacement jobs may not be as available as needed due to older generations of workers that are delaying their retirement plans and are willing to take lower-level jobs to support their eventual retirement. Replacement jobs largely consist of lower-wage entry-level jobs in industries with a significant body of temporary workers. This trend of baby boomers occupying traditionally younger workforce starter jobs in all fields transforms their use into survival jobs. As many of these jobs are more reliant on workforce experience than education credentials, senior generations of workers can more easily draw from their larger experience pools to find the right requirements. Baby boomers have been in the workforce longer than younger generations and are likely to be overqualified for these positions, making opportunities for new entrants scarce in what should be a plentiful selection. This preference for the older workforce compounded by the employer-wide trend of operating with leaner teams, which further crowds the younger generation out of the entry-level labor market.

A region's housing supply must keep pace with long-term population and job growth in order to balance projected economic growth with the region's ability to house a growing workforce. Even during the Great Recession, Orange County was a net importer of workers from surrounding Southern California counties. The County's jobs-housing imbalance is further compounded by high median housing prices and the sluggish pace of new home construction in recent years. All these factors have led to a notable shortage in workforce housing in the County.

Describe any major changes that may have an economic impact, such as planned local or regional public or private sector investments or initiatives that have affected or may affect job and business growth opportunities during the planning period. Describe any needs for workforce development, business support or infrastructure these changes may create.

With the ever-increasing importance of the internet, establishing infrastructure to enhance internet access is essential for future economic growth.

The Leading Educational Attainment Initiative, sponsored by education and business entities throughout Orange County, is part of the effort to ensure that Latino, Korean, and Vietnamese immigrant parents in Orange County are prepared for college and other advanced education opportunities. This initiative is aimed at making the college education path and demands more comprehensible to high school students and their family members so they will be more willing and able to go to college.

How do the skills and education of the current workforce correspond to employment opportunities in the jurisdiction?

Orange County's diverse and evolving population presents both opportunities and challenges in aligning the skills and education of its workforce with current and future labor market demands. In partnership with the Orange County Board of Supervisors and regional stakeholders, the Orange County Workforce Development Board (OCWDB), operating through the County's Workforce and Economic Development Division (WEDD), continues to lead strategic efforts

aimed at addressing persistent gaps in English proficiency, educational attainment, and workforce readiness—particularly within communities that face systemic barriers to opportunity.

Approximately 20.3% of public school students in Orange County are classified as English Learners (ELs)—a rate higher than the California state average of 17.7%—with Spanish, Vietnamese, Mandarin, and Arabic among the most common primary languages spoken at home (KidsData.org). As highlighted in both the <u>Orange County Workforce Development Regional Plan 2025–2028</u> and <u>CEDS 2024–2029</u>, targeted English as a Second Language (ESL) and vocational ESL programs remain critical for helping multilingual residents gain equitable access to education, training, and employment. These services are especially vital in disinvested communities, where language barriers intersect with broader educational and economic disparities.

In terms of educational attainment, 86.9% of Orange County adults hold at least a high school diploma, and 43.4% possess a bachelor's degree or higher, according to the latest <u>U.S. Census QuickFacts, 2023</u>. However, a mismatch persists between the educational credentials of job seekers and the technical or occupational skills demanded by employers. Industries such as healthcare, advanced manufacturing, information technology, logistics, and construction are projected to see strong growth, yet many of these roles require vocational training or certifications that are not necessarily tied to four-year degrees (EDD Orange County Industry Highlights).

At the same time, Orange County's workforce is aging. Adults aged 65 and over now comprise more than 14.3% of the county's population, and that share is expected to rise to 17.3% by 2045, raising the urgency of succession planning in sectors like healthcare, government, and skilled trades (OC Office on Aging, 2023). Employers are increasingly concerned about retirements reducing institutional knowledge and available talent.

Employer input gathered for the Orange County Workforce Development Regional Plan 2025–2028 also highlighted persistent gaps in both hard and soft skills. While there has been notable expansion in areas like digital marketing and coding, many job postings still reflect unmet demand for communication, customer service, critical thinking, and digital literacy—skills that are essential across occupations. Regional labor market analyses comparing job postings with local candidate profiles confirm these mismatches, particularly in fields such as accounting, nursing, and warehousing.

In response, OCWDB, through WEDD, is working collaboratively with community colleges, adult education providers, and employers to modernize curriculum, support employer-informed training, and expand access to sector-based career pathways and work-based learning models. These investments are designed to prepare residents for sustainable careers while strengthening Orange County's economic resilience amid demographic shifts and evolving industry demands.

Describe any current workforce training initiatives, including those supported by Workforce Investment Boards, community colleges and other organizations. Describe how these efforts will support the jurisdiction's Consolidated Plan.

In partnership with the Orange County Board of Supervisors and regional stakeholders, the Orange County Workforce Development Board (OCWDB), operating through the County's Workforce and Economic Development Division (WEDD), oversees the County's workforce development strategy, investments, and workforce training initiatives. OCWDB's system of Workforce Solutions Centers, youth and adult employment programs, and collaborative partnerships provide critical access to career services, skills training, and employment support—advancing the

jurisdiction's Consolidated Plan goals of reducing economic inequities and increasing access to meaningful employment.

With support and partnerships from County departments, education partners, and community-based organizations, targeted initiatives deliver a range of training and employment opportunities and access to industry-informed education and upskilling resources that align with regional labor market needs and help residents—particularly those facing barriers—achieve economic self-sufficiency. These opportunities include:

- Targeted employment and training services for CALWORKs participants through TANF funding, offering classroom-based vocational training, on-the-job training, and subsidized work experience to improve readiness for first-time or entry-level employment.
- Work-based learning opportunities such as on-the-job training (OJT), customized training, and paid work
 experience, tailored to individual learning styles and occupational goals. These models help individuals earn
 while they learn, strengthening both immediate and long-term employability.
- The Senior Community Service Employment Program (SCSEP), which provides part-time paid work experience for adults aged 55 and older at nonprofit and public agencies, supporting older job seekers in gaining marketable skills and reentering the workforce.
- Veterans-focused programs, such as OC4Vets, that offer job coaching, career navigation, behavioral health services, and housing support to veterans and their families—regardless of discharge status—through integrated partnerships with the County Health Care Agency, Veterans Service Office, and other stakeholders.
- Work Experience (WEX) and Transitional Job placements for individuals with limited or interrupted work histories. These structured, short-term opportunities help participants build essential workplace skills and reconnect with the labor market.
- Pre-apprenticeship and registered apprenticeship programs developed in partnership with labor organizations, community colleges, and employers across sectors such as construction, healthcare, advanced manufacturing, and IT. These programs provide earn-and-learn pathways to long-term, highquality careers with advancement potential.
- Training and credential programs delivered through partnerships with community colleges and Regional
 Occupational Programs (ROPs), which provide access to industry-recognized certificates, stackable
 credentials, and job-focused coursework in sectors such as healthcare, business, logistics, and technology.

Together, these workforce training initiatives are guided by WIOA principles and directly support the jurisdiction's Consolidated Plan by increasing employment access, fostering economic mobility, and building a resilient, future-ready workforce.

Does your jurisdiction participate in a Comprehensive Economic Development Strategy (CEDS)?

Yes.

Orange County develops its own Comprehensive Economic Development Strategy (CEDS) in collaboration with regional stakeholders, following the guidelines established by the U.S. Economic Development Administration (EDA). In partnership with the County Board of Supervisors, the Orange County Workforce Development Board (OCWDB) serves as the County's CEDS committee, overseeing the development and submission of the strategy to ensure alignment with EDA requirements. The CEDS provides a locally based, regionally driven framework for economic development and is a prerequisite for EDA funding eligibility. It informs strategic planning to support inclusive economic

growth, workforce development, infrastructure investment, and regional resilience. More information on the CEDS process is available at eda.gov/resources/comprehensive-economic-development-strategy.

If so, what economic development initiatives are you undertaking that may be coordinated with the Consolidated Plan? If not, describe other local/regional plans or initiatives that impact economic growth.

The 2024–2029 Orange County Comprehensive Economic Development Strategy (CEDS) and the 2025–2029 Consolidated Plan are distinct, yet complementary frameworks developed to guide the County's economic and community development efforts.

The CEDS focuses on enhancing the County's economic competitiveness, supporting workforce development, and promoting key industry clusters. The Consolidated Plan addresses housing and community development needs, prioritizing the requirements of the County's low- and moderate-income residents.

While each plan serves a different primary purpose, they intersect significantly in areas such as workforce development and infrastructure improvement, ensuring a holistic approach to enhancing the quality of life and economic opportunities for all residents.

The CEDS outlines six overarching goals that align with and support the objectives of the Consolidated Plan:

- 1. Provide World-Class Education, Career, and Workforce Opportunities to Address the Skills Gap
- Support and promote community college and certification programs aimed at closing the skills gap.
- Ensure academic institutions at all levels have adequate support to promote college and career readiness.
- Increase access to and participation in Career Technical Education (CTE) programs.
- Develop and promote targeted education and training programs in key industry clusters, including Advanced Manufacturing, Biotechnology, and Information Technology.
- Improve attraction and retention of young families and professionals into the region to help expand the labor market.
- Continue to anticipate new and emerging technologies that require additional training or education to better anticipate the labor needs of businesses and industries.
- 2. Focus on Residents Living in Disinvested Communities
- Develop specific project proposals focused on Red Zones/Disinvested Communities to help spur economic and employment growth.
- Create and promote collaborative training and education programs that cater specifically to the needs of residents in Red Zones/Disinvested Communities.
- Improve access to high-quality, high-paying employment opportunities.
- Increase support and improve access to English Language Learner (ELL) services and courses for both K-12 students and adults.
- 3. Promote Key Industry Clusters
- Encourage the support, expansion, and retention of key industry clusters in the region through improved collaboration between regional stakeholders and industry leaders.
- Form industry groups to better promote opportunities in existing and emerging clusters such as Advanced Manufacturing or Green Energy.

- Promote collaboration between industry leaders and academic and training organizations to ensure a steady pool of qualified workers from which organizations can hire.
- 4. Improve Orange County's Economic Competitiveness in a Global Economy
- Increase promotion of the County as a national and international hub for business development and trade.
- Foster a positive, welcoming environment for existing foreign businesses and entrepreneurs to expand into.
- Increase investment and support of small businesses and start-ups while promoting innovation and entrepreneurship.
- Attract and retain international students at local colleges and universities.
- 5. Plan and Develop State-of-the-Art Infrastructure
- Expand and improve existing transportation infrastructure to help reduce congestion and travel times for commuters.
- Focus on expanding affordable housing options to help better attract and retain young families and professionals into the region.
- Support the expansion of communication networks such as broadband internet access and wireless technologies—especially in Red Zones and Disinvested Communities.
- 6. Foster Greater Regional Collaboration by Increasing Economic and Workforce Development Partnerships
- Convene meetings and/or conferences that encourage cross-pollination between Orange County economic and workforce development organizations and professionals.
- Ensure that economic and workforce development conversations are informed by the latest research into the Orange County labor market.
- Ensure that these discussions take all Orange County residents into account, including the County's Disinvested Communities.

These CEDS goals and strategies are designed to work in tandem with the objectives of the Consolidated Plan, as well as the County's Regional and Local Workforce Development Plans—creating a coordinated approach to economic and community development that enhances opportunity, supports economic mobility, and improves quality of life for all Orange County residents.

Discussion

See discussions above.

MA-50 Needs and Market Analysis Discussion

Are there areas where households with multiple housing problems are concentrated? (include a definition of "concentration")

At the countywide level, Orange County is generally perceived as a highly affluent County. However, this perception has masked the underlying economic distress occurring within the County's borders, especially since the onset of the Great Recession, which hit Orange County particularly hard due to massive layoffs in the construction and financial services industries. Particularly north of the SR-22 and in some areas to the south of SR-22, there are clear pockets of economic distress at the census tract level.

The 2024-2029 Orange County Comprehensive Economic Development Strategy (CEDS) has identified a number of Red Zones within the County. Red Zones are census tracts in the region with unemployment rates two percentage points above the national average and average per capita incomes which are less than 80 percent of the national average. Despite significant recent economic disruptions, the number of Orange County Red Zones have declined from 71 in the 2013-2018 CEDS to 55 in the 2019-2023 CEDS to 48 in the 2024-2029 CEDS.

One tract in Placentia and one tract in Seal Beach are the only Red Zones identified in Urban County cities. Red Zones represent areas of great need and opportunities for attention and investment.

Red Zone census tracts have a significantly larger language gap compared to the County overall, which coincides with a large foreign-born population. Minority populations, most notably Hispanic, Asian, and Black residents, account for a disproportionate percent of the population in Red Zone census tracts. According to the 2024-2029 CEDS Report, Orange County has a per capita income of \$51,343 and an unemployment rate of 4.2 percent compared to \$26,951 and 9.4 percent in Red Zones.

Are there any areas in the jurisdiction where racial or ethnic minorities or low-income families are concentrated? (include a definition of "concentration")

According to the 2019-2023 ACS, the racial/ethnic composition of the population in Orange County was: 38 percent White (non-Hispanic); 34 percent Hispanic/Latino; 22 percent Asian; four percent two or more races; and two percent Black/African American.

A minority concentration area is defined as a Census block group whose proportion of a specific racial/ethnic group is greater than the County's proportion of that same racial/ethnic group. The specific percentage varies according to the race/ethnicity being analyzed. Concentrations of low- and moderate-income households and non-White population are shown in **Error! Reference source not found.** and Figure 2. Overall, the geographic concentrations of the Urban Orange County's minority populations generally overlap with the concentrations of low- and moderate-income residents.

What are the characteristics of the market in these areas/neighborhoods?

Tracts in two cities in the Urban County have been identified as a Red Zone by the 2024-2029 Orange County Comprehensive Economic Development Strategy (CEDS): Placentia and Seal Beach. Approximately 14 percent and 21 percent of the populations in Placentia and Seal Beach, respectively, reside in Red Zones. Placentia is one of only a few cities in the County that saw population growth in recent years. Red Zone communities have unemployment rates of 7.3 percent and per capita incomes of \$33,009 or lower. In 2022, Orange County had an average per capita income of \$51,343 and an unemployment rate of 4.2 percent. Conversely, Red Zones had an average per capita income of \$26,951 and an unemployment rate of 9.4 percent.

Are there any community assets in these areas/neighborhoods?

The 2024-2029 Orange County Comprehensive Economic Development Strategy (CEDS) has identified a top goal to focus on residents living in disinvested communities. Key strategies under this goal include developing specific project proposals focused on Red Zones/Disinvested Communities to help spur economic and employment growth, creating and promoting collaborative training and education programs with cater specifically to the needs of residents in Red

Zones/Disinvested communities, improving access to high-quality, high-paying employment opportunities, and increasing support and improving access to English Language Learner (ELL) services and courses for both K-12 students and adults.

Are there other strategic opportunities in any of these areas?

The 2024-2029 Orange County Comprehensive Economic Development Strategy (CEDS) has identified several goals and key strategies to support Red Zones/Disinvested areas. The following strategies have been identified to support Red Zone/Disinvested communities specifically:

- Develop specific project proposals focused on Red Zones/Disinvested Communities to help spur economic and employment growth.
- Create and promote collaborative training and education programs which cater specifically to the needs of residents in Red Zones/Disinvested communities.
- Improve access to high-quality, high-paying employment opportunities.
- Increase support and improve access to English Language Learner (ELL) services and courses for both K-12 students and adults.
- Support the expansion of communication networks such as broadband internet access and wireless technologies especially in Red Zones and Disinvested Communities.
- Ensure that these discussions take all Orange County residents into account, including the county's Disinvested Communities.

MA-60 Broadband Needs of Housing occupied by Low- and Moderate-Income Households - 91.210(a)(4), 91.310(a)(2)

Describe the need for broadband wiring and connections for households, including low- and moderate-income households and neighborhoods.

The Urban County is moving forward with broadening the community's ease of access to broadband services, including the low- and moderate-income neighborhoods. The Urban County is served by major providers such as AT&T U-Verse, Spectrum, and Cox Communications. Most affordable housing developments in California require multiple layers of funding sources, such as Low-Income Housing Tax Credits (LIHTC) and HUD funds. These programs either mandate or encourage broadband services. All newly constructed affordable housing developments in the County have access to broadband services.

Describe the need for increased competition by having more than one broadband Internet service provider serve the jurisdiction.

The Urban County is served by over 20 broadband internet service providers. There is no need to increase competition.

MA-65 Hazard Mitigation - 91.210(a)(5), 91.310(a)(3)

Describe the jurisdiction's increased natural hazard risks associated with climate change.

Pursuant to California Planning and Zoning laws, jurisdictions in California are required to periodically update their General Plans. Specifically, the General Plan is required to include a Safety Element. The Safety Element evaluates all risks of natural and man-made hazards throughout the community, including low- and moderate-income neighborhoods, and establishes goals, policies, and implementing actions to mitigate the risks of natural and man-made hazards. Jurisdictions within Orange County are required to update the Safety Element along with the update to the Housing Element, which was due October 2021. The County adopted its Housing Element and submitted for review by the State Department of Housing and Community Development (HCD) on February 11, 2025.

In addition to the Safety Element, the County also implements a Hazard Mitigation Plan. The Orange County and Orange County Fire Authority Local Hazard Mitigation Plan identifies Orange County's natural hazards and presents a variety of actions and projects, proposed or in progress, that can help mitigate the risks these hazards pose. The federal Disaster Mitigation Act of 2000 requires all local governments to create such a disaster plan in order to qualify for hazard mitigation funding. Since 2010, the County of Orange has partnered with the Orange County Fire Authority to produce a Multi-Jurisdiction Hazard Mitigation Plan, focusing on natural hazards in the County unincorporated area, as well as fire hazards in the Orange County Fire Authority (OCFA) service area and County and OCFA facilities. The Local Hazard Mitigation Plan was updated in December 2021, and analyzes climate change impacts related to water supply and demand, sea level rise, water quality, flooding, property, infrastructure, services, and ecosystem and habitat vulnerability. The Hazard Mitigation Plan states that Climate change has the possibility of producing impacts that span many sectors of the economy and reaches well beyond the areas experiencing physical sea level rise or long-term temperature rise. The impacts would be complex and can be direct or indirect. A few examples of direct impacts are productivity from agriculture could decrease; wildfire hazard could increase; drinking water levels could decrease; wildlife mortality rates and damage to wildlife and fish habitat could increase. The consequences of these impacts may result in reduced income for businesses, increased prices for food and resources, unemployment, reduced tax revenues due to reduced expenditures, increased crime, foreclosures on bank loans to businesses, and migration. The web of impacts would be complex making it challenging to come up with financial estimates of damages. The impacts of climate change can be categorized as economic, environmental, or social.

Multiple cities in the Urban County are working to establish plans to address natural hazard risks associated with climate change. Brea, Dana Point, Laguna Beach, Laguna Hills, Laguna Woods, and La Palma have completed Greenhouse Gas Emissions Inventories. Dana Point has subsequently adopted a Greenhouse Gas Reduction Plan and an Energy Action Plan to mitigate the risks that have been associated with climate change and their greenhouse gas emissions.

Describe the vulnerability to these risks of housing occupied by low- and moderate-income households based on an analysis of data, findings, and methods.

Currently, natural absorbers of carbon dioxide are not able to take in all of the carbon dioxide being emitted into the atmosphere, increasing the greenhouse effect. As the population in the Urban County grows and electricity sources are stretched to meet the increased electricity demands, greenhouse gas emissions will increase, and energy prices will rise. Becoming more energy efficient will allow Urban County households, including low- and moderate-income households, to save money in the long-term on living necessities.

Strategic Plan

SP-05 Overview

Strategic Plan Overview

The Strategic Plan is the centerpiece of the Consolidated Plan. The Plan describes:

- General priorities for assisting households;
- Programs to assist those households in need; and
- Five-year objectives identifying proposed accomplishments.

The Strategic Plan also addresses the following areas:

- Anti-poverty strategy;
- Lead-based paint hazard reduction;
- Reduction of barriers to affordable housing; and
- Institutional Structure/Coordination among agencies.

SP-10 Geographic Priorities – 91.215 (a)(1)

Geographic Area

The County does not target Low- and Moderate-Income areas. The County promotes Sub-recipients to provide services to low-to-moderate income residents individually or they may choose to do PF&I projects in selected LMI block groups per the section on General Priorities.

General Allocation Priorities

Currently, the County uses a competitive funding application process to distribute CDBG, and HOME funds. The County establishes a Funding Allocation Policy and Process (FAPP) that is a planning document that outlines the priorities listed in the Consolidated Plan to address local Housing & Community Development needs with Federal and local resources in preparing the Annual Action Plan (AAP). The FAPP also includes estimated funding goals for eligible housing, community development, and/or economic development activities; the process for distributing funding; funding priorities; funding exceptions; and overall requirements to be met when using Federal and local funds. Individual participating cities, County departments, are required to submit applications for funding. OC Housing & Community Development works with the independent Application Review Panel to rank each application according to the Consolidated Plan priorities, urgency of needs, readiness of projects, experience of program/project administrators, and cost-effectiveness. The panel is an evaluation team comprised of professionals knowledgeable about Housing & Community Development, and housing activities. The panel reviews and scores the applications for funding based exclusively on the written submission by the applicants. Many factors, such as the administrative burden of the program, the number of eligible census block groups, annexations, and population growth in the participating cities, weigh into the analysis of the most efficient and effective way to distribute CPD funds to meet the high-priority activities outlined in this Consolidated Plan.

The competitive basis for funding distribution has the advantage of flexibly dealing with the changing needs and geographic disparities in terms of needs and resources. Using this method, the County is able to devote resources to communities where the needs are most urgent and extensive. In addition to priority and non-priority ranked projects, the Urban County Program also undertakes certain activities that are exempt from the competitive process.

Exemptions from the Funding Allocation Process:

- Administration The Urban County Program utilizes a percentage of Housing & Community Development allocations to administer the CDBG, ESG and HOME programs.
- Orange County's obligations to a specific community center within the unincorporated area.
- Public Service Activities such as Orange County's Emergency Shelter Program, and other low-threshold emergency shelters located in participating cities to receive remaining CDBG Public Services funds (capped at 15 percent of total CDBG allocation, plus receipted Program Income) and ESG funds.
- Fair Housing and Equal Opportunity related activities as mandated by HUD.

CDBG program funds will be distributed and expended based on program criteria. Housing rehabilitation programs will be provided on a citywide basis in each participating city and in the unincorporated County areas based on low- and moderate-income qualified residents. Supportive services will be available throughout the Urban County to low- and moderate-income residents and persons with special needs. Public and infrastructure improvements will be located primarily in the Urban County's low- and moderate-income areas. HOME funds will be distributed to those projects that meet priority needs, are timely and meet other evaluation factors that indicate a strong probability the project will come to fruition. ESG funds and CDBG funds for Public Services will be awarded to projects using a non-competitive process that will best serve the priority needs of homeless individuals, families, those at risk of becoming homeless and Public Services that serve the community operating County owned facilities.

Describe the basis for allocating investments geographically within the jurisdiction (or within the EMSA for HOPWA)

The County utilizes CDBG, HOME, and ESG funds for projects and programs operated throughout the Urban County. HUD requires use of the following website to determine whether Block Groups Qualify: <u>LMISD Map Application 2016-2020 - Overview</u>.

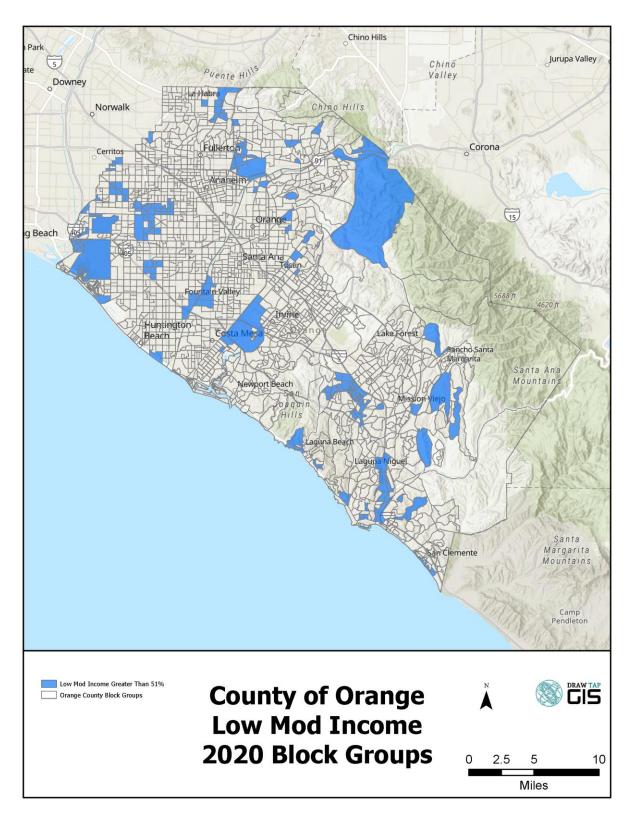


Figure 1: Low and Moderate Income Block Groups (2020)

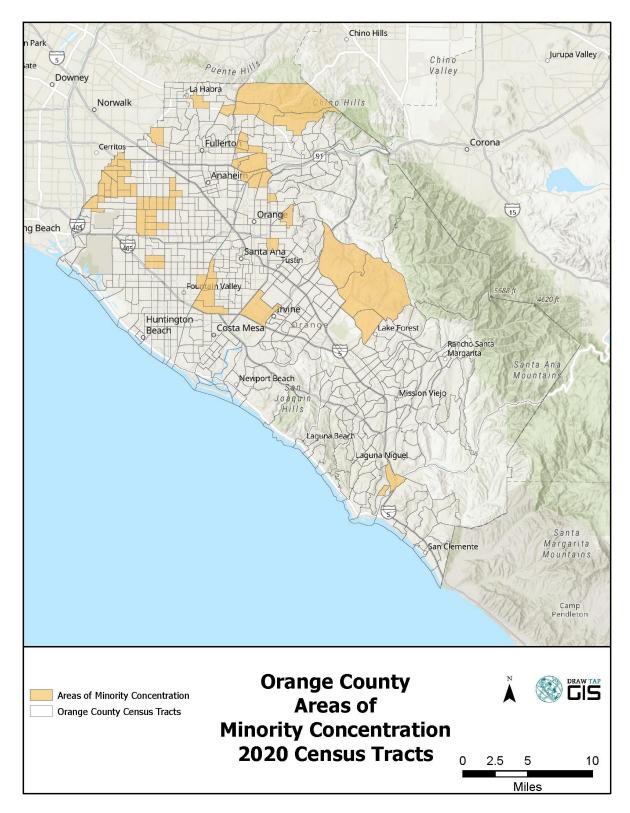


Figure 2: Racial/Ethnic Minority Concentration Tracts (2020)

SP-25 Priority Needs - 91.215(a)(2)

Priority Needs

1	Priority Need Name	Expand Affordable Housing Opportunities
	Priority Level	High
	Population	Extremely Low
	•	Low
		Moderate
		Large Families
		Families with Children
		Elderly
	Geographic Areas Affected	Urban County
	Associated Goals	Expand Affordable Housing Opportunities
	Description	Expand and preserve the supply of affordable housing to create housing opportunities for
		low- and moderate-income households and homeless individuals and families.
	Basis for Relative Priority	There is a need for affordable housing in the Urban County. Housing problems in the Urban
		County impact renter-households more significantly, with 46 percent of all renter-households
		experiencing at least one housing problem (inadequate housing, overcrowding, cost burden
		of 50 percent, or cost burden of 30 percent), compared to 30 percent of owner-households.
		In Community Meetings, residents commented on the lack of affordable housing in the Urban
		County.
2	Priority Need Name	Enhance Quality of Life
	Priority Level	High
	Population	Extremely Low
		Low
		Moderate
		Elderly
		Frail Elderly
	O	Persons with Physical Disabilities
	Geographic Areas Affected	Urban County CDBG Areas
	Associated Goals	Enhance Quality of Life
	Description	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
	Desir to Deletion Diseit	infrastructure and facilities.
	Basis for Relative Priority	These needs were identified based on the results of the Housing & Community Development
		Needs Survey and comments received during a series of five Community Meetings and one
		Focus Group Meeting to solicit input on needs. These meetings were held during the development of the Consolidated Plan, as described in the Citizen Participation Section.
3	Priority Need Name	Public Services
٥	Priority Level	
	Priority Level	High

	Population	Extremely Low			
	Opulation	Low			
		Moderate			
		Chronic Homelessness			
		Individuals			
		Families with Children			
		Mentally III			
		Chronic Substance Abuse			
		veterans			
		Persons with HIV/AIDS			
		Victims of Domestic Violence			
		Unaccompanied Youth			
		Elderly			
		Frail Elderly			
		Persons with Mental Disabilities			
		Persons with Physical Disabilities			
		Persons with Developmental Disabilities			
		Persons with Alcohol or Other Addictions			
		Persons with HIV/AIDS and their Families			
		Victims of Domestic Violence			
	Geographic Areas Affected	Urban County			
	Associated Goals	Public Services			
	Description	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.			
	Basis for Relative Priority	Comments received during the community outreach process, along with prior studies of			
		senior service needs in the County, indicate that transportation is one of the most common			
		needs identified by older people. The needs of people with disabilities mirror those of			
		seniors. Seniors and adults with developmental disabilities both need safe affordable			
		housing options, universal design accommodations, readily accessible, reliable			
		transportation and social support services. Low-cost childcare was a need specifically			
		identified by Orange County residents attending the Community Meetings.			
4	Priority Need Name	Economic Development			
	Priority Level	Low			
	Population	Extremely Low			
	·	Low			
		Moderate			
		Small Business			
	Geographic Areas Affected	Urban County			
	Associated Goals	Provide services and projects that support economic opportunity.			
	Description	This program will provide assistance to private and for-profit business. Assistance may			
	Description	include grants, loans, loan guarantees, and technical assistance; and providing economic			
		development services in connection with economic development activities.			
	Pagic for Polative Priority	Although this is a low-priority need due to funding availability, the high number of low-income			
	Basis for Relative Priority				
		households combined with economic development needs identified in Community Meetings			
1					
_	Delaste Na c I Na c	and Stakeholder Workshops made this a priority, if funding becomes available.			
5	Priority Need Name Priority Level	Planning and Administration High			

Population	Other
Geographic Areas Affected	Urban County
Associated Goals	Planning and Administration
Description	The Urban County will implement the goals and objectives of the Consolidated Plan by delivering a variety of Housing & Community Development programs and activities. The Urban County will also continue to comply with the planning and reporting requirements of the Consolidated Plan regulations and CDBG, HOME, and ESG regulations. Annually, the Urban County will monitor its use of CDBG, HOME, and ESG funds to ensure effective and appropriate use of funds.
Basis for Relative Priority	Compliance with all HUD Consolidated Plan and CDBG, HOME, and ESG program regulations is a requirement for participation in this program.

Table 46 - Priority Needs Summary

Narrative (Optional)

In establishing five-year priorities for assistance, the Urban County has considered input from various sources including: the Housing & Community Development Needs Survey, demographic and empirical data analysis, interviews with staff and service providers, and direct input by residents and stakeholders during public workshops. CDBG, HOME, and ESG funds would be used to primarily support activities identified as High Priority Needs:

- 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.

Economic development has been included in this Consolidated Plan as a Low Priority Need for the purpose of CDBG funds. The County will implement actions related to economic development if funding and resources are allowed.

SP-30 Influence of Market Conditions – 91.215 (b)

Influence of Market Conditions

Affordable Housing	Market Characteristics that will influence
Туре	the use of funds available for housing type
New Unit Production	The Urban County may use HOME Program funds, Housing Successor Agency, and Mental Health Services Act Housing Program funds, among other sources for affordable housing production. The
	focus of the HOME program is to improve and /or expand the County's affordable housing stock.
	The Urban County will continue to commit its HOME funds towards promoting the development of
	additional affordable housing units and maintaining existing affordable housing in participating
	cities, County unincorporated islands, and partnerships with several entitlement cities in Orange
	County. The 2025-2029 CP identifies the acquisition, construction, and rehabilitation of affordable
	housing as a high priority.
Rehabilitation	Given the age of the housing stock in the Urban Orange County, the number of substandard
	housing units is moderate. Housing age can indicate general housing conditions within a
	community. Housing is subject to gradual deterioration over time. Deteriorating housing can
	depress neighboring property values, discourage reinvestment, and eventually impact the quality
	of life in a neighborhood. According to the 2019-2023 ACS, 62 percent of the housing stock in the
	Orange County was constructed prior to 1980. Approximately 62 percent of owner-occupied
	housing and 63 percent of renter-occupied housing in the County was built before 1980.
	Approximately four percent of housing units are built before 1950, indicating that a small portion of
	the housing stock may need significant improvements and rehabilitation.
Acquisition, including	
preservation	rehabilitation of affordable permanent housing. In addition to Federal funding, Housing Successor
	Agency funds may also be used to support affordable housing activities.

Table 47 - Influence of Market Conditions

SP-35 Anticipated Resources - 91.215(a)(4), 91.220(c)(1,2)

Introduction

A number of Housing & Community Development resources are currently available in the Urban County area. They include: . These resources are anticipated to serve the general community, including, but not limited to, Urban County Housing and Community Development activities.

- Community Development Block Grant (CDBG) funds
- HOME Investment Partnerships Program (HOME) funds
- Emergency Solutions Grant (ESG) funds
- HUD Housing Choice Voucher Program (through the Orange County Housing Authority)
- California Housing Finance Agency funds (CalHFA)
- State Housing & Community Development housing funds
- Low-Income Housing Tax Credits
- Cal Optima Health
- State transportation funds

Anticipated Resources

Program	Source	Uses of Funds	Expected Amo	unt Available	Year 1		Expected	Narrative Description
-	of Funds		Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$	Amount Available Remainder of ConPlan	,
CDBG	Public – federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	\$3,443,121				\$13,772,484	The estimated amount of CDBG funds available over the planning period is based on allocations from FY 2024, excluding funds carried over from prior years.
HOME	Public – federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership	\$1,245,674.61				\$4,982,696	The estimated amount of HOME funds available over the planning period is based on allocations from FY 2024, excluding funds carried over from prior years.
ESG	Public – federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing	\$299,058				\$1,196,232	The estimated amount of ESG funds available over the planning period is based on allocations from FY 2024, excluding funds carried over from prior years.

Table 48 - Anticipated Resources

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

Local and state budget deficits and rising construction and land costs are factors that will continue to limit the County's ability to leverage projects. However, the County continues to aggressively leverage its funding partnerships with public, private and non-profit groups.

In addition, a well-planned CoC for the homeless has already been created which leverages Continuum of Care Grants and Emergency Solutions Grants funds. The County can also leverage HUD Section 202 and 811 funds in conjunction with non-profit sponsors to expand the supply of housing for the senior and special needs populations. In general, OC Housing & Community Development funded projects are highly successful at leveraging other financing sources, as OC Housing & Community Development loan commitments are usually the first source of funding committed to a development.

The Urban County's non-profit and public sector partners contribute non-federal funds to meet the HOME match requirement. To ensure compliance with ESG match requirements, the County requires verification of matching funds by service providers who submit documentation for reimbursement of expenditures.

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

See discussions above.

SP-40 Institutional Delivery Structure – 91.215(k)

Explain the institutional structure through which the jurisdiction will carry out its consolidated plan including private industry, non-profit organizations, and public institutions.

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
ORANGE COUNTY	Government	Economic Development	Jurisdiction
		Homelessness	
		Non-homeless special	
		needs	
		Planning	
		neighborhood	
		improvements	
		public facilities	
		public services	
Orange County Housing	PHA	Rental	Region
Authority			

Table 49 - Institutional Delivery Structure

Assess of Strengths and Gaps in the Institutional Delivery System

A primary strength in the institutional structure through which the Consolidated Plan will be implemented, is the coordination and collaboration between the various agencies of County government, participating cities, a robust network of nonprofit organizations, and private industry. Orange County's Housing and Community Development (HCD), a component of Orange County Community Resources (OCCR), is responsible for oversight of the Consolidated Plan/Annual Plan processes. HCD administers Orange County's affordable housing development and the distribution of key funding sources including Community Development Block Grant (CDBG), Home Investment Partnership Program (HOME), and Emergency Solutions grant (ESG). A variety of county agencies play key roles in the delivery of critical services and resources to people at risk of and experiencing homelessness. The Heath Care Agency (OCHCA) provides key medical, behavioral health, and street outreach services. The Social Services Agency (OCSSA) administers essential benefits including CalFresh and cash aid that serve as a safety net, while supporting access to Medi-Cal so that residents may access care. The Office of Care Coordination serves as the administrative entity for the CoC, and administers a variety of federal, state, and local funds to address homelessness countywide.

Orange County has developed a comprehensive, coordinated, and regional CoC strategy that includes the participation of all thirty-four cities in the County, county agencies, the County's homeless housing and service providers, and other community groups (including non-profits, local governmental agencies, faith-based organizations, people with past and current lived experience of homelessness, interested business leaders, schools, and many other stakeholders) to identify the gaps and unmet needs of the County's Homelessness Response System. The CoC planning process is continually sustained with regular community wide efforts. Throughout the year the Commission to End Homelessness

(Commission), and other interested parties, continue the process of identifying gaps and priority needs, and examining new strategies to strengthen the current system of care. This planning process includes identification of the greatest needs of people experiencing homelessness in Orange County and assessing the funding priorities to address these needs.

The Commission 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.

Availability of services targeted to homeless persons and persons with HIV and mainstream services

Homelessness Prevention Services	Available in the Community	Targeted to Homeless	Targeted to People with HIV
Homelessness Prevention Services			
Counseling/Advocacy	Х		Х
Legal Assistance	Х	Х	
Mortgage Assistance	Χ		
Rental Assistance	Х	Х	X
Utilities Assistance	X	X	X

Street Outreach Services				
Law Enforcement	Х	Х		
Mobile Clinics	Х	Х		
Other Street Outreach Services	Х	Х		

Supportive Services			
Alcohol & Drug Abuse	Х	X	
Childcare Childcare	Х	Х	
Education	Х	X	
Employment and Employment Training	Х	Х	
Healthcare	Х	Х	
HIV/AIDS	Х	X	Х
Life Skills	Х	X	
Mental Health Counseling	Х	X	
Transportation	Х	X	

Other		
Other		

Table 50 - Homeless Prevention Services Summary

Describe how the service delivery system including, but not limited to, the services listed above meet the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth)

To meet the needs of the people experiencing homelessness in the region, Orange County utilizes ESG, CDBG, CoC and HHAP funds to support the County's Homeless System of Care by providing street outreach, emergency shelters, transitional housing, permanent housing, PSH, rapid re-housing, homelessness prevention, and supportive services. In collaboration with the CoC, the OCHCA has also implemented Proposition 63 Full-Service Partnership Programs. These programs have created outreach options for people experiencing homelessness to access services starting at the street outreach level and continuing until the individual and/or family is well established in PSH.

The CoC continues to identify priorities in addressing homelessness and allocates funding to agencies in the county to implement a broad range of housing, supportive services and activities.

The Commission developed the Homeless Service System Pillars Report (Pillars), which includes four pillars - Prevention, Outreach and Supportive services, Shelter, and Housing – that provide key interventions to assist individuals and families at risk of or experiencing homelessness. The Pillars are utilized as a framework in the design and development of programs that address the needs of individuals and families at risk of or experiencing homelessness across Orange County.

HUD prioritizes serving the most vulnerable in its annual CoC Program Notice of Funding Opportunity (NOFO). The Orange County CoC has prioritized PSH programs in the annual CoC Program NOFO Project Priority Listing to ensure those who are most vulnerable in the region are receiving permanent housing and support services to ensure housing stability. The Commission, in turn, has since followed the Federal government's lead and recommended policies for the CoC to meet the permanent housing priority and include the populations, which HUD has identified as a priority. PSH is intended for people experiencing chronic homelessness, which includes someone who has experienced homeless for a year or more and has a permanent disability. Further, the County, in partnership with its CoC partners, works to ensure that resources are allocated towards the development of emergency and transitional shelter. The County will continue to create and prioritize new permanent housing opportunities for people experiencing chronic homelessness.

Describe the strengths and gaps of the service delivery system for special needs population and persons experiencing homelessness, including, but not limited to, the services listed above

Based on the findings from the 2024 Orange County PIT Count and Survey, a total of 7,322 individuals are homeless on any given night in shelters and on the streets in Orange County on the night of April 4, 2024. However, availability of beds is limited to those needing emergency shelters, transitional housing, or permanent housing, with an estimated 3,030 Emergency Shelter and 841 Transitional Housing beds throughout the County according to the 2024 Homeless Inventory Count (HIC). Orange County continues to increase its available shelter beds working towards providing shelter for a larger percentage of persons experiencing homelessness.

Orange County continues to make significant progress in reducing the number of veterans experiencing homelessness. With the available resources and progress this is a strength and area that Orange County has seen strong reductions and impact.

The biggest gaps in Orange County are the availability of permanent housing resources such as permanent supportive housing and rapid re-housing. With a high rent market there is a need for more resources that have ongoing rental subsidies attached. Orange County has a high rental market with the challenge around availability of affordable housing options. This impacts the length of time that it is taking permanent housing programs to locate housing. With high rental costs this makes rapid re-housing challenging for many households experiencing homelessness. Orange County has looked for ways in which to reduce the amount of time that it takes for programs to locate permanent housing and resources to encourage property owners to work with homeless service programs.

The annual setting of priority needs and gaps for Orange County's system of care is facilitated through the Continuum of Care, Commission to Address Homelessness and Implementation Groups, the Homeless Providers Forum, and the results of annual homeless needs assessment.

Provide a summary of the strategy for overcoming gaps in the institutional structure and service delivery system for carrying out a strategy to address priority needs

Orange County is committed to efficiently and effectively addressing the needs of people experiencing homelessness. The Commission has identified the four pillars that constitute the system of care. These pillars include prevention, outreach and supportive services, shelter, and housing. The pillars serve as a framework to inform policy, and act as guide for the structure and delivery of services that address homelessness. The four pillars are devised to operate in an integrated and mutually reinforcing capacity, thus strengthening the system of care.

Pillar #1: Prevention

Orange County will place continued emphasis on homelessness prevention. This short-term intervention is provided to individuals and families at risk of homelessness or experiencing a housing crisis to achieve housing stability, with the goal of keeping individuals and families in their homes and avoid an eviction with short-term interventions to stabilize housing. Orange County is committed to supporting programs that keep individuals in families in their housing through prevention including rental assistance, eviction prevention, and stabilization services. This approach mitigates the trauma of becoming homeless for households, while easing the burden on the remaining three pillars.

Pillar #2: Outreach and Supportive Services

Orange County is committed to connecting with the most vulnerable and unsheltered individuals experiencing homelessness and connecting them to the support and services they need. Orange County's approach to outreach includes actively seeking, reaching out to, and engaging individuals experiencing homelessness, most often as the first step towards ending their homelessness. Supportive services are community-based services that support individuals and families to develop self-sufficiency and independence while on their journey to permanent and sustainable housing. The goal of this pillar is persistent and frequent interactions to facilitate engagement, ensuring effective transitions from street to shelter, and ultimately permanent housing. Supportive services provide client-centered wraparound services to support sustainment of housing placements in the community. Collaborative efforts including efforts by county departments and contracted nonprofit providers are actively underway countywide to accomplish this goal.

Pillar #3: Shelter

Shelter is a temporary residence providing safety and protection from exposure and functioning as a safety net at times of crisis for individuals and families experiencing homelessness. Through the provision of shelter, Orange County's goal is to support steps towards achieving housing and financial stability. Emergency shelters and navigation centers serve as the entry points to a broader array of supportive services, with linkages to longer term programs and/or permanent housing opportunities.

Pillar # 4: Housing

Housing is the solution to end a person's homelessness and provides a sustainable place to live long-term. Housing programs and capacity that end a person's homelessness by providing a permanent home with supportive services to ensure sustainability and stability.

SP-45 Goals Summary – 91.215(a)(4)

Goals Summary Information

Sort Order	Goal Name	Start	End	Category	Geographic	Needs	Funding	Goal Outcome Indicator
		Year	Year		Area	Addressed		
1	Expand Affordable	2025	2029	Affordable	Urban County	Expand	CDBG: \$3,866,800	240 Rental units constructed:
	Housing			Housing		Affordable	HOME: \$6,213,033	280 Household Housing Unit
	Opportunities					Housing	ESG: \$0	
						Opportunities		Homeowner Housing Rehabilitated:
								430 Household Housing Unit
2	Enhance Quality of	2025	2029	Affordable	Urban County	Enhance	CDBG: \$9,383,890	Public Facility or Infrastructure Activities
	Life			Housing	CDBG Target	Quality of Life	HOME: \$0	other than Low/Moderate Income
				Non-Housing	Areas		ESG: \$0	Housing Benefit:
				& Community				76,928 Persons Assisted
				Development				
3	Public Services	2025	2029	Homeless	Urban County	Public	CDBG: \$2,595,470	Public service activities other than
				Non-		Services	HOME: \$0	Low/Moderate Income Housing Benefit:
				Homeless			ESG: \$1,383,146	18,585 Persons Assisted
				Special				
				Needs				
4	Economic	2025	2029	Economic	Urban County	Economic	CDBG- if funding available	If funding available
	Development			Development		Development		
5	Planning and	2025	2029	Administration	Urban County	Planning and	CDBG: \$3,463,110	N/A
	Administration					Administration	HOME: \$690,340	
							ESG: \$112,145	

Table 51 – Goals Summary

Goal Descriptions

Goal Name	Goal Description			
Expand Affordable Housing Opportunities	Expand and preserve the supply of affordable housing to create housing opportunities for			
	low- and moderate-income households and homeless individuals and families.			
Enhance Quality of Life	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.			
Public Services	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.			
Economic Development	Provide assistance to private and for-profit businesses to support economic development			
	in the Urban County.			
Planning and Administration	The Urban County will implement the goals and objectives of the Consolidated Plan by			
	delivering a variety of Housing & Community Development programs and activities. The			
	Urban County will also continue to comply with the planning and reporting requirements of			
	the Consolidated Plan regulations and CDBG, HOME, and ESG regulations. Annually, the			
	Urban County will monitor its use of CDBG, HOME, and ESG funds to ensure effective and			
	appropriate use of funds.			

Estimate the number of extremely low-income, low-income, and moderate-income families to whom the jurisdiction will provide affordable housing as defined by HOME 91.315(b)(2)

The County anticipates utilizing HOME funds to expand the affordable rental housing inventory by a minimum of 80 units during this Consolidated Plan period.

SP-50 Public Housing Accessibility and Involvement – 91.215(c)

Need to Increase the Number of Accessible Units (if Required by a Section 504 Voluntary Compliance Agreement)

The public housing needs of Urban Orange County residents are met by the Orange County Housing Authority (OCHA), a division within Orange County Housing & Community Development. Most recently, OCHA has collaborated with the OC Housing & Community Development and the Orange County Health Care Agency for the following housing projects that are designed to accommodate residents with special needs:

- Doria II (Irvine): 10 units set aside to assist MHSA eligible households from OCHA's waiting list. The
 initial term of the HAP contract is 15 years, effective Jan 1, 2014. All 10 units are currently leased up.
- San Clemente Senior Apts. (San Clemente): 27 units set aside to assist 15 MHSA Chronically Disabled, and 12 seniors with a Chronic Health condition.
- Cerritos Senior Apts. (Unincorporated Anaheim): 19 units to assist MHSA households.
- Avenida Villas: 28 units to assist MHSA households. The initial term of the HAP contract is 10 years, effective January 2013. All 28 units are currently leased up.
- Heroes Landing (Santa Ana): 76 units for veterans and includes mental health counseling and wellness services, pro bono legal assistance, and educational and employment opportunities through the Heroes Landing Community Collaborative.
- Casa Querencia (Santa Ana): 57 units serving individuals experiencing chronic homelessness, including those with mental and physical disabilities.
- Placentia Veterans Village: 50 units serving homeless and/or disabled veterans.
- Altrudy Senior Apartments (Yorba Linda): 48 units serving lower income seniors.
- The Groves (Irvine): 75 units serving lower income seniors.
- Villa St. Joseph (Orange): 50 units serving lower income seniors.
- Ascent (Buena Park): 57 units serving extremely low-income individuals experiencing homelessness.
- Mountain View (Lake Forest): 71 units serving lower income individuals and families.
- Cartwright (Irvine): 60 units serving lower income individuals and families.
- Santa Angelina Senior Community (Placentia): 65 units serving low income seniors.
- Orchard View Gardens (Buena Park): 66 units serving seniors, currently under development.
- Huntington Beach Senior Housing (Huntington Beach): 43 units serving seniors, currently under development.
- Iluma (Stanton): 72 units serving individuals experiencing homelessness and chronic homelessness.
- Aurora Vista (Stanton): 21 units serving individuals experiencing homelessness and chronic homelessness.
- Mesa Vista Phase I (Costa Mesa): 40 units serving individuals experiencing homelessness and chronic homelessness.

OCHA takes efforts to ensure that their units are maintained to the highest standard of decent, safe, and sanitary housing. OCHA also maintains (and updates weekly) a list of all available units, including accessible units, in the lobby of its main office.

Activities to Increase Resident Involvements

OCHA has established a Resident Advisory Board, the membership of which represents the residents assisted by OCHA. The Board was consulted in the development of OCHA's Five-Year and Annual Public Housing Agency Plan.

Is the public housing agency designated as troubled under 24 CFR part 902?

No.

Plan to remove the 'troubled' designation

Not applicable.

SP-55 Barriers to affordable housing – 91.215(h)

Barriers to Affordable Housing

Lack of Affordable Housing Funds: The high construction and land costs in Orange County render the need for substantial subsidies for affordable housing. However, the availability of funding for affordable housing has been severely affected by the dissolution of redevelopment agencies in the State of California. In Orange County, state and federal funding for construction and preservation of housing decreased by 60% from 2023 to 2024.

Land Costs and Supply: The decreasing supply of available land combined with high land acquisition costs can disincentivize developers from pursuing affordable projects and contribute to rising housing costs throughout the market. This is particularly challenging in coastal communities.

Land Use Policies: Local land use policies could be a constraint to housing development when the requirements for parking, height limit, density, and setbacks result in limiting the number of housing units that can be feasibly constructed on site. Zoning that restricts residential density can adversely limit the efficiency of land utilization and hinder construction of projects that meet community needs. Recent changes in State law now require local jurisdictions develop objective standards to facilitate housing development. In California, policies have led jurisdictions to favor commercial developments that pay sales tax and require fewer public services over housing projects.

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. Development fees are levied on builders as a condition for construction. These fees have increasingly been utilized to fund infrastructure and tend to be higher in California than other parts of the county, which can directly influence development activities.

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. Recent changes to state law require jurisdictions allow certain types of housing by right without discretionary review as a way to streamline housing development.

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 over eight units. Based on discussions with developers, various prevailing wage requirements typically inflate the development costs by 35 percent.

Strategy to Remove or Ameliorate the Barriers to Affordable Housing

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 & 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. The current Housing Element planning period covers through October 2029. For the next update cycle, jurisdictions in Orange County are collectively responsible for the planning to accommodate over 183,000 new housing units.

Furthermore, the State legislative had passed numerous housing bills with the goal of facilitating housing production by streamlining development process, establishing objective development standards, providing funding and incentives, and making local governments accountable for compliance with State law.

To address neighborhood resistance to affordable housing, OC Housing & Community Development encourages all developers to work closely with local residents and community groups. In efforts to educate the public about Housing & Community Development and affordable housing efforts, the County also consults with the Kennedy Commission, a nonprofit organization that provides advocacy and education related to affordable housing in the County. The 2021-2029 Housing Element establishes actions to remove barriers to affordable housing, including through Zoning Code amendments, affordable housing development incentives, and fair housing initiatives.

SP-60 Homelessness Strategy – 91.215(d)

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

People experiencing chronic homelessness are the primary targets of most outreach activities presently conducted in Orange County. The two organizations most frequently involved in these efforts are the OCHCA and City Net. These two agencies dispatch outreach teams to cities and unincorporated areas throughout the Orange County region. These

teams are dispatched on a referral basis, as well as through the agency's outreach schedule. Frequently, the OCHCA and the Mental Health Association collaborate and coordinate activities and services for individual clients. The Orange County Outreach & Engagement (OC O&E) program serves individuals experiencing unsheltered homelessness in Orange County. The program's services focus on linking individuals to needed housing, physical health, behavioral health, and other supportive services by addressing their barriers to care. This is accomplished through developing and building trusting relationships with the homeless community and collaborating with other service providers.

The OCHCA manages several state and locally-funded programs that conduct outreach to homeless individuals, through workers offering mental health services, substance abuse prevention, and AIDS/HIV prevention services. The OCHCAs Comprehensive Health Assessment Team - Homeless (CHAT-H) is a public health nursing home visitation program serving residents of Orange County who are experiencing or at risk of homelessness and have health needs. The CHAT-H team works closely with Behavioral Health Services, BHS Outreach and Engagement, CalOptima, and Social Services. This team is instrumental in dispatching Mobile Unit Teams that provide field-based direct client services though mobile medical vans. The Mobile Unit Team has demonstrated success in serving people experiencing or at risk of homelessness.

There are also some local law enforcement agencies that have dedicated patrol officers to outreach to the homeless, sometimes independently and in other cases in partnership with County mental health workers. Independent and informal outreach efforts are also conducted through private organizations, including homeless service providers, faith-based organizations, service clubs, and private individuals. These services frequently include meals and/or food at local congregations, parks, and established gathering sites for people who are homeless.

Several cities in Orange County are implementing Street Medicine pilot programs through CalOptima Health and their selected contracted providers. CalAIM funding will support the long-term sustainability and operability of these programs. These services augment existing outreach efforts by targeting the most medically vulnerable individuals experienced unsheltered homelessness and providing primary care, behavioral health services, housing navigation, and enhanced care management in a field-based capacity. Street medicine teams work in a coordinated and collaborative capacity with OC O&E teams, local law enforcement and emergency services, and other nonprofits serving the community.

To address homelessness in Orange County, it is essential that the programs and services aimed at preventing homelessness be strengthened and that potential clients be identified before their situation deteriorates and a crisis occurs. The primary goals of a community-wide homeless prevention system are to identify and assist those at-risk of homelessness as quickly as possible and to offer ongoing case management and linkage to supportive services to address the underlying causes of the housing instability. The Commission has recognized prevention as the first pillar of the homeless services system of care with the understanding that early intervention strategies can be enhanced and implemented beyond the traditional homelessness prevention. For example, childcare for low-income households can support families in increasing their income by allowing both parents to work. Targeting practices and interventions may be facilitated by using a risk assessment tool or prioritization that measures risk. This may include further targeted outreach at specific zip codes, local businesses and working with landlords.

The CoC utilizes a Coordinated Entry System (CES) to effectively connect individuals and families at-risk of homelessness or experiencing homelessness to appropriate services and housing interventions to secure permanent and stable housing in Orange County through:

- Dynamic prioritization
- Collaborative coordination
- Intentional resource utilization
- Equitable resource distribution
- Regional service planning area prioritization

The CES lead agency, the County, is empowered by the Orange County CoC to manage the process of determining and updating the prioritization for all CoC funded PSH and CoC and ESG funded RRH as well as any other housing resource that voluntarily participates in the CES.

Addressing the emergency and transitional housing needs of homeless persons

The Homelessness Response System in Orange County is focused on providing the support and resources needed to assist people experiencing homelessness to transition to permanent housing. In Orange County, a variety of private, federal, state, and county-funded programs provide the housing-focused services to support households to navigate the complex processes to secure and maintain housing. Orange County has implemented programs such a Regional Care Coordination (RCC), in collaboration with several nonprofit partners, that emphasize connecting the vulnerable individuals experiencing homelessness to housing as quickly as possible. RCC provides intensive, integrated, and comprehensive case management services that work collaboratively to place individuals in housing and link them to the resources that promote long-term housing retention. RCC programs follow clients as they navigate the system of care to ensure successful coordination. Many providers serving people experiencing homelessness leverage CalAIM services that include community supports, housing navigation, and deposit assistance, which can support shortening the duration that people experience homelessness and help remove barriers. Each subpopulation has unique needs for housing and support, and the robust variety of providers ensures that there are services available that specifically address those needs. Housing-focused services are available for people experiencing chronic homelessness, transitional-aged youth (TAY), families, veterans, and victims of domestic violence. Orange County promotes, prioritizes, and fosters a collaborative and coordinated system of care. In addition to effective housing navigation and case management, programs are available that offer RRH to individuals, TAY, and families. These programs can quickly facilitate access to units quickly and reduce the amount of time households experience homelessness. In addition to addressing the immediate housing needs of people experiencing homelessness, Orange County is committed to providing prevention resources to keep households from becoming homeless and has worked collaboratively to implement a Homelessness Prevention and Stabilization Pilot (HPSP) program, while seeking to expand prevention services countywide.

Those who are experiencing chronic homelessness have the highest barriers when trying to obtain permanent housing. HUD definition of chronic homelessness as someone who has a long term disabled and is experiencing homelessness for more than a year. The Behavioral Health Services Act (BHSA), which was approved by voters in March 2024, updates and renames the Mental Health Services Act (MHSA). Orange County will continue to implement the existing MHSA Three-Year plan through its conclusion on June 30, 2026. This continuity of implementation ensures continue access to critically needed programs such as Full Service Partnership (FSP) which provide intensive support to persons with severe and persistent mental illness. Existing MHSA funds including those for FSP, MHSA Housing Program, and No Place Like Home (NPLH) can continue to be used for housing for the County's 2023-2026 plan. Starting in 2026, 30% of Orange County's BHSA allocation will be prioritized for people with significant behavioral health needs who are at-risk of or experiencing homelessness, with half of that amount allocated to serve people experiencing chronic

homelessness. Orange County is committed to ensuring continuity of care while maximizing the opportunity to advance the support and service available to this vulnerable population.

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 goal of the current model of homeless case management is to move clients towards self-sufficiency and a permanent home. This current system model works well when partnered with a variety of supportive services. In Orange County, a variety of private, federal, state and county-funded programs offer job training courses, childcare, work-appropriate clothing, food bags and/or meals, among other services. Many of these services follow clients through their shelter stay(s), and sometimes even after they have found permanent housing. The diversity of non-profit service providers in Orange County has meant that many different types of clients can be served simultaneously. 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, chronically homeless men and women, individuals with mental health issues and their families, and individuals with physical and developmental disabilities and their families.

Historically, the most difficult clients to house are the chronically homeless. Most chronically homeless people have a disability that requires significant and costly support. The Mental Health Services Act (MHSA) Housing Program is a critical program that provides permanent housing with supportive services that cater to the needs of this hard-to-serve group. In addition to the MHSA Housing Program, other housing and supportive services are provided through the MHSA Housing program and Supports component of the MHSA for clients enrolled in a Full-Service Partnership Program. Clients of these programs must be seriously mentally ill adults or older adults or seriously mentally ill/seriously emotionally disturbed children and youth. The programs are client and family-driven and provide flexible resources that are tailored to each client's specific needs.

Help low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families who are likely to become homeless after being discharged from a publicly funded institution or system of care, or who are receiving assistance from public and private agencies that address housing, health, social services, employment, education or youth needs

One of the risk factors for losing housing and experiencing homelessness is the lack of affordable housing and low-income. The Orange County system of care includes 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 family has been placed in permanent housing. The Behavioral Health Services Act (BHSA), which was approved by voters in March 2024, updates and renames the Mental Health Services Act (MHSA). OCHCA Behavioral Health will continue to implement the existing MHSA Three-Year plan through its conclusion on June 30, 2026. The program components that support prevention provided through this implementation include prevention and early intervention, workforce education and training, and community program planning. These components enable households to access care, access employment resources, and facilitate stakeholder engagement to promote stabilization in the community. Orange County is actively engaged in implementing the changes accompanying the implementation of BHSA and the redistribution of local funding to support prevention and workforce development activities.

SP-65 Lead based paint Hazards – 91.215(i)

Actions to address LBP hazards and increase access to housing without LBP 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.

How are the actions listed above related to the extent of lead poisoning and hazards?

According to the 2019-2023 ACS, approximately 62 percent of owner-occupied housing and 63 percent of renter-occupied housing in the Urban County were built prior to 1980. Using the 75 percent national average of potential LBP hazard, an estimated 95,998 units (89,127 owner-occupied and 38,870 renter-occupied units) may contain LBP. Furthermore, approximately 54 percent of households in the Urban Orange County are low- and moderate-income (earn less than 100 percent of AMI). This translates to approximately 51,359 housing units with potential LBP that may be occupied by low- and moderate-income households.

How are the actions listed above integrated into housing policies and procedures?

The County continues to address the problem of lead-based paint through its implementation of the Lead-Safe Housing Regulation, which targets housing constructed before 1978 and where children under age six are most at risk of being affected by the hazards of lead-based paint. The County of Orange has designed its various housing programs to comply with 24 CFR Part 35. In addition, County housing rehabilitation programs allow for the abatement of lead-based paint as an eligible activity for assistance.

SP-70 Anti-Poverty Strategy – 91.215(j)

Jurisdiction Goals, Programs and Policies for reducing the number of Poverty-Level Families

The challenges associated with poverty–stress, strained family relationships, substandard housing, lower educational attainment, limited employment skills, unaffordable childcare, and transportation difficulties – make it hard for low-income families to obtain and maintain employment, and therefore housing and basic needs. Economic stability can have lasting and measurable benefits for both parents and children.

The County seeks to reduce the number of people living in poverty (extremely low-income households earning less than 30 percent of the AMI) by providing a number of programs including housing assistance, supportive services, economic development assistance, and job training opportunities. The County will continue to leverage opportunities to support funding for Community Based Development Organizations, cities, and other groups to provide training and employment opportunities to extremely low-income persons. In collaboration with the County's Workforce Development (OCDB), the County will continue to offer outreach and training to poverty level families and individuals. Through the CoC system, the County will work with the OCDB job-training providers to ensure that low- and moderate-income persons are trained with employable skills with the potential to earn higher wages.

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

How are the Jurisdiction poverty reducing goals, programs, and policies coordinated with this affordable housing plan

OCHA's 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, and rehabilitate existing housing contribute to curbing poverty in the County.

SP-80 Monitoring – 91.230

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

The goal of the County's CDBG Monitoring Plan is to document and determine performance includes, but is not limited to, the approved application, technical submission, amendments, annual performance reports, financial and other record keeping documents, and correspondence related to the Projects.

For an effective CDBG and ESG program, activities must be monitored on a consistent basis. Monitoring visits in part determine if the Subrecipient is carrying out its program and activities within the timeline denoted in the Subrecipient contract. It also ensures that the required records are maintained to demonstrate compliance with applicable regulations. Housing and Community Development staff conducts monitoring site visits each year. Multiple visits can be conducted if deemed necessary by manager for Community Development after review of monitoring reports. Housing and Community Development has continued to improve its monitoring activities with an emphasis on documenting and measuring performance, program accomplishments, and program impacts (outcomes). On-site visits to Subrecipients and Project locations have increased, and standardization of the processes and reporting documents has enhanced the results.

Housing and Community Development continues to move forward in its application of technology. At present, Housing and Community Development maintains and tracks a wide variety of Project and activity related data including allocations, accomplishments, performance and overall Project/activity status.

Once funds are awarded, Project leaders contact Subrecipients to discuss monies allocated and reconfirm that the Scope of Services and accomplishment data presented in the initial application are unchanged. During the contract preparation phase, Project Leaders collaborate with Subrecipient staff to review all contract requirements such as labor standards; Lead-Based Paint; payment processes based on performance; invoicing; Grantee Performance Reports (GPR); insurance requirements; contract milestones; and expected accomplishment levels.

All Projects/programs funded through Housing and Community Development are subject to two official monitoring's per fiscal year (entrance and exit monitoring) and a third if requested or deemed necessary.

Technical Assistance

In addition to the required monitoring visits staff conducts, site visits to provide technical assistance (TA) at the request of Subrecipients. Additionally, TA is provided at the discretion of the Project leaders should the determination be made that the Subrecipient will benefit from the additional training. TA is provided as often as deemed necessary to ensure successful completion of the Projects.

APPENDIX A

Public Notice

NOTICE OF PUBLIC HEARING COUNTY OF ORANGE/OC HOUSING & COMMUNITY DEVELOPMENT

Draft FY 2025-29 Consolidated Plan, Draft FY 2025-29 Citizen Participation Plan,
Draft FY 2025-26 Annual Action Plan and Draft Amendment #2 FY 2020-21 Annual Action Plan

NOTICE IS HEREBY GIVEN that the Orange County Board of Supervisors will hold a public hearing to consider the Draft FY 2025-29 Consolidated Plan, Draft FY 2025-29 Citizen Participation Plan, Draft FY 2025-26 Annual Action Plan and Draft Amendment #2 to the FY 2020-21 Annual Action Plan

DATE OF HEARING: Tuesday, May 20, 2025

TIME OF HEARING: 9:30 a.m. or as soon thereafter as possible

LOCATION OF HEARING: County Administration North (CAN)

Board Hearing Room, First Floor 400 W. Civic Center Drive Santa Ana. California 92701

To view a live internet broadcast of the meeting visit https://board.ocgov.com/board-meeting-media-archive. The public may send comments for upcoming Board meetings by emailing response@ocgov.com. Comments submitted before the start of Board meetings will be part of the public record and distributed to the Board members for their consideration, please include Board Date and topic for comment.

The Draft FY 2025-29 Consolidated Plan is a comprehensive document that provides a basis and five-year strategy for the use of all federal funds granted to the Urban County of Orange by the U.S. Department of Housing and Urban Development (HUD) under the Community Development Block Grant (CDBG), Home Investment Partnership (HOME), and Emergency Solutions Grant (ESG) programs. The information in the draft Consolidated Plan is generated from community surveys and public meetings. Notice of public meetings and surveys were made available both online and in hard copy form. This draft plan represents responses to the public meeting and surveys, as well as the demographic information compiled by the County's Consolidated Plan consultant. City staff and direct service providers were also surveyed to obtain a comprehensive overview of the priorities in the Urban County communities for CDBG, HOME, and ESG funding.

The Draft FY 2025-29 Citizen Participation Plan provides a framework and process by which the County's consolidated planning and reporting efforts comply with the citizen participation requirements published by HUD. This Draft FY 2025-29 Citizen Participation Plan is prepared and implemented in accordance with the guidance provided in HUD Regulations 24 CFR Part 91.105.

The Draft FY 2025-26 Annual Action Plan (AAP) is an all-encompassing document that provides a basis and strategy for the annual use for all federal funds granted to the Urban County of Orange by HUD. The AAP also addresses related local funding received by OC Housing & Community Development. The AAP indicates preliminary awards based on estimated HUD funds for FY 2025-26. These appropriations support public facilities and improvements, public services, housing rehabilitation, and affordable housing development activities that benefit low-and moderate-income households.

The Draft Amendment #2 to the FY 2020-21 Annual Action Plan recommends reallocating unspent \$34,802.26 in CDBG-CV3 funding from the Laguna Beach ASL Emergency Shelter to Emergency Shelter(s) County of Orange.

INVITATION TO BE HEARD:

Notice is hereby given to provide the public a 30-day review period beginning April 11, 2025, and ending May 12, 2025, to submit any concerns and/or comments. All persons favoring or opposing the Draft FY

2025-29 Consolidated Plan, Draft FY 2025-29 Citizen Participation Plan, Draft FY 2025-26 Annual Action Plan, or Draft Amendment #2 to the FY 2020-21 AAP are invited to present their views in writing or before the Board of Supervisors.

Comments:

All interested agencies, groups, or individuals are invited to review the Draft FY 2025-29 Consolidated Plan, Draft FY 2025-29 Citizen Participation Plan, Draft FY 2025-26 Annual Action Plan and Draft Amendment #2 to the FY 2020-21 AAP and submit written comments for consideration. Upon request, copies are available at the OC H&CD office, OC H&CD website https://ochcd.org/community-development or by Email request to craig.fee@occr.ocgov.com. Written comments must be postmarked by May 12, 2025, and addressed to OC Housing & Community Development, 1501 E. St Andrew Place, 1st Floor, Santa Ana, CA 92705, Attention: Mr. Craig Fee or e-mailed to craig.fee@occr.ocgov.com. The County of Orange will consider all written comments received prior to the scheduled public hearing. For further information email or call Craig Fee at (714) 480-2996.

Publish and translated: April 11, 2025, in the: Orange County Register, La Opinion, and Nguoi Viet

APPENDIX B

Comments Received

No comments have been received to date

APPENDIX C

Outreach

APPENDIX C

Outreach

Community Needs Survey

Received 299 total responses: 277 English, 20 Spanish, 1 Korean, 1 Vietnamese, 0 Chinese

Weighted Ranking

Community Facilities

- 1. Parks and Recreation Facilities
- 2. Senior Centers
- 3. Health Care Facilities
- 4. Community Centers
- 5. Youth Centers
- 6. Child Care Centers
- 7. Libraries

Business and **Jobs**

- 1. Start-Up Business Assistance
- 2. Job Creation/Retention
- 3. Employment Training
- 4. Economic Development
- 5. Small Business Loans
- 6. Business Mentoring
- 7. Urgent Need

Residential Infrastructure

- 1. Water/Sewer
- 2. Street Lighting
- 3. Sidewalk
- 4. Drainage
- 5. Street/Alley
- 6. Curb Ramps for ADA Accessibility

Neighborhood Services

- 1. Trash and Debris Removal
- 2. Tree Planting
- 3. Code Enforcement
- 4. Cleanup of Abandoned Lots and Buildings
- Graffiti Removal.

Affordable Housing

- 1. Affordable Rental Housing
- 2. Homebuyer Assistance
- 3. Housing for Seniors
- 4. Homeowner Housing
- 5. Housing for Persons with Disabilities
- 6. Rental Housing Rehabilitation
- 7. Fair Housing Services
- 8. Energy Efficient Improvements
- 9. Accessibility Improvements
- 10. Housing for Large Families
- 11. Lead-Based Paint/Test Abatement

Community and Special Needs Services

- 1. Mental Health Services
- 2. Youth Activities
- 3. Child Care Services
- 4. Health Services
- 5. Transportation Services
- 6. Anti-Crime Programs
- 7. Senior Activities
- 8. Domestic Violence Services
- 9. Homeless Shelters/Services
- 10. Substance Abuse Services
- 11. Legal Services
- 12. Centers/Services for Persons with Disabilities
- 13. HIV/AIDS Centers and Services

Consolidated Plan ORANGE COUNTY

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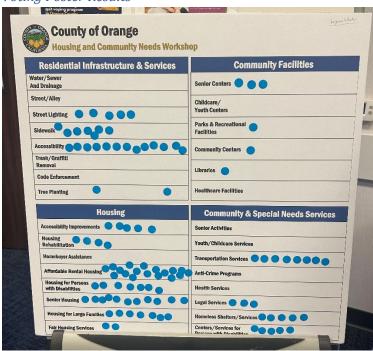
Community Meetings

Laguna Woods (November 13, 2024)

Discussion and Concerns

- Housing for essential workers (large family housing)
- Accessibility/ADA improvements
- Transportation services
- Minor improvements and energy efficiency improvements
- Housing needs for homeless
- Housing needs for persons with disabilities

Voting Poster Results



Stanton (November 13, 2024)

Discussion and Concerns

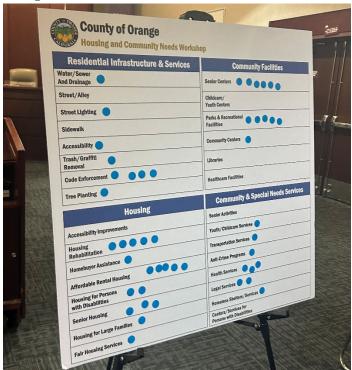
- Code enforcement (trash and debris, property maintenance)
- Drainage issues
- Reliance on community facilities, particularly recreational spaces (i.e., splash pads) for multi-family home residents without AC
- Housing rehabilitation including ADA improvements
- Affordable rental housing
- Health services
- Legal services
- Need for additional fire protection

Consolidated Plan ORANGE COUNTY

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OMB Control No: 2506-0117 (exp. 09/30/2021)

Voting Poster Results

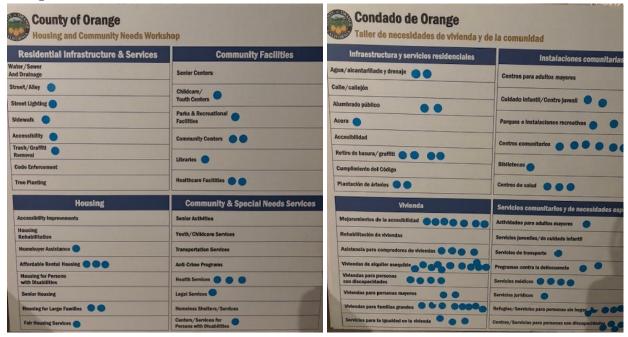


El Modena (November 18, 2024)

Discussion and Concerns

- Affordable housing and rental payment issues
- Park accessibility including wheelchair accessible playgrounds
- Street safety concerns (unlawful parking, poor lighting)
- Therapy clinics, financial aid for funeral costs, and increased legal aid for immigration and renter problems

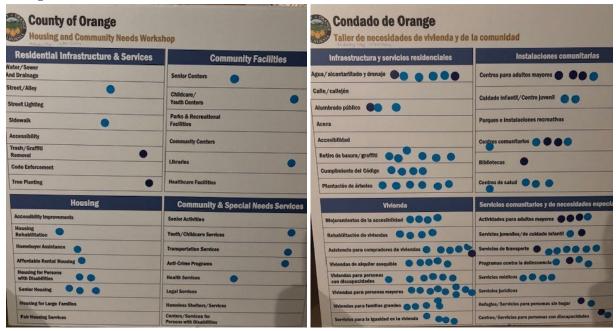
Voting Poster Results

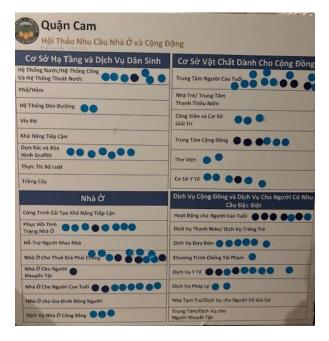


Midway City (November 20, 2024)

- Senior housing needs
- Water/sewer improvements
- Affordable rental housing
- Senior centers
- Transportation services

Voting Poster Results





Anaheim Independencia (January 16, 2025)

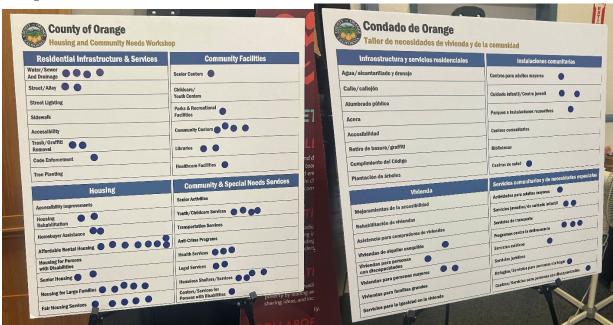
Consolidated Plan ORANGE COUNTY

127

OMB Control No: 2506-0117 (exp. 09/30/2021)

- Unaffordable rental prices
- Youth services
- Crime support
- Homelessness services, especially for families with children
- Job training/skills not keeping up with living/housing costs
- Services for seniors
- Services for victims of domestic violence

Voting Poster Results



Stakeholder Workshops

Santa Ana In-Person Workshop (December 2, 2024)

Attendance

- Kelley Gallivan The Purpose of Recovery
- Beunda Deines City of La Palma
- Sherizan Sonner Mortgage Link Inc.
- Katherine Fuentes Upwards
- Holly Sumner Veterans Affairs
- Nishttra Mohendra Families Forward
- Shubha Nair Saahas for Cause
- Crystal Sarco Seneca FOA
- Marisol Johnson Dayle McIntosh Center
- Alfonso Ceja Habitat for Humanity

Consolidated Plan ORANGE COUNTY

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OMB Control No: 2506-0117 (exp. 09/30/2021)

- · Concern about elderly population with limited incomes
- County to consider economic development as a priority
- Grassroots engagement efforts
- Use of social media and text to disseminate information
- Public transportation
- Homeless services, especially for youth and transitional aged youth
- Services for persons with substance abuse issues
- Childcare
- Accessible housing units

Virtual Workshop (November 14, 2024)

Attendance

- Families Forward
- Pathways of Hope
- Tustin Temporary Emergency Shelter
- HHROC
- Alan Achterberg Gemini Consulting
- Fentanyl Solution
- Healthcare in Action
- CalOptima Health
- City of Santa Ana
- City of Westminster
- Tustin Temporary Shelter
- Orangewood Foundation
- Diversified Services
- Massareen IIc
- Human Options
- Project Hope Alliance
- CAP OC
- Orange County Community Housing Corp
- Project Hope Alliance
- John Henry Foundation
- Family Solutions Collaborative
- Family Assistance Ministries
- City of Newport Beach
- Resilience OC
- Housing is a Human Right Orange County
- Providence St. Joseph Health
- Board of Supervisors, Fourth District
- WISEPlace
- Covenant House California
- The Kennedy Commission
- Buena Park Collaborative

Consolidated Plan ORANGE COUNTY

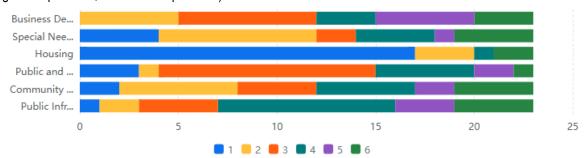
- Rep. Correa CA46
- Leading Purpose
- Continuum of Care
- HomeAid Orange County

129

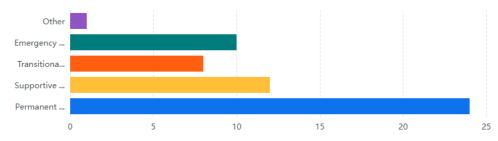
- Free or affordable cell phones
- Housing assistance for homeless
- Supportive housing
- Affordable housing options for seniors
- Support services for underserved populations (rental assistance, programs for foster youth, child care services for single parents)
- Need for more homeless services, especially for youth

Survey Results

1. How would you rank the following housing and community development needs in order of importance (1= highest importance, 6 = lowest importance)?



- 2. How can the County best communicate with persons experiencing homelessness about programs and services?
 - a. Grassroots outreach
 - b. Incentives (hygiene products/services)
 - c. Technological support/smart phones
 - d. Partner with agencies
 - e. Advertisements in public spaces, social media
- 3. What type of housing would you like to see the County pursue to address the needs of unhoused individuals?



- 4. What types of support services are needed to help special needs populations (e.g., persons experiencing homelessness, persons with disabilities)?
 - a. Health
 - b. Food
 - c. Youth
 - d. Housing navigation
 - e. Rental Assistance, renter rights education
 - f. Child care

Consolidated Plan ORANGE COUNTY

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- g. Transportation
- h. Substance use and mental health
- i. Workforce development
- 5. Are there any underserved areas or communities that would benefit from additional social/housing services? If so, what areas of the County?
 - a. Elderly
 - b. Undocumented adults
 - c. LGBTQ
 - d. Family
 - e. At risk of homelessness
 - f. Homeless youth
 - g. Victims of domestic violence
 - h. Labor/sex trafficking victims
 - i. Far south Orange County
 - j. West Anaheim

COUNTY OF ORANGE



2025-2029 CONSOLIDATED PLAN

TAKE OUR COMMUNITY NEEDS SURVEY

The County of Orange is preparing its 2025-2029 CDBG Consolidated Plan, which will prioritize the housing and community development needs of the County's low- and moderate-income residents. The Consolidated Plan will influence the allocation of Community Development Block Grant (CDBG), Emergency Solutions Grants (ESG), and HOME Investment Partnerships Program (HOME) funds to address those needs over the next five years. Your input will be used to help the County develop funding priorities and allocate funds effectively to address these needs.

Use the link or scan the QR code on your phone to take our online survey



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SPANISH



CHINESE

www.surveymonkey.com/r/K2HYSWw.surveymonkey.com/r/5LPQQY9



KOREAN

www.survevmonkev.com/r/5V8HSKT



/IETNAMESE

www.surveymonkev.com/r/5V7PWJK

COUNTY OF ORANGE



2025-2029 CONSOLIDATED PLAN

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www.survevmonkev.com/r/K2HYSFY



www.surveymonkey.com/r/5LPQQY9



www.surveymonkey.com/r/5V8HSKT



VIETNAMESE www.surveymonkey.com/r/5V7PWJM

오렌지 카운티



2025~2029 통합형 플래

커뮤니티 요구 사항 설문조사 참여하기

오렌지 카운티는 카운티 내 저소득층과 중산층 주민의 주택 및 지역사회 개발 요구 사항을 우선시하는 2025~2029 CDBG 통합 플랜을 준비 중입니다. 통합 계획은 향후 5년 동안 이러한 요구 사항을 해결하기 위하여 지역사회 개발 일괄 보조금(CDBG), 긴급 솔루션 보조금(ESG), 주택 투자 협력 자금 지원제도(HOME) 기금 배분에 영향을 미칠 것입니다. 귀하의 의견은 카운티가 자금 운용의 우선순위를 정하고 이러한 요구 사항들을 해결하기 위해 자금을 효과적으로 배분하는 데 사용됩니다.

이 링크를 사용하거나 휴대전화로 OR 코드를 스캔하여 온라인 설문조사에 참여하십시오.





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CONDADO DE ORANGE



PLAN CONSOLIDADO 2025-2029

TOME LA ENCUESTA SOBRE LAS NECESIDADES DE NUESTRA COMUNIDAD

El Condado de Orange está preparando su Plan Consolidado de CDBG 2025-2029, por medio del cual se dará prioridad a las necesidades de vivienda y desarrollo comunitario de los residentes de ingresos bajos o moderados del Condado. El Plan Consolidado influirá en la asignación de fondos para el Subsidio en Bloque para el Desarrollo Comunitario (CDBG), Subsidios para Soluciones de Emergencia (ESG) y el Programa de Sociedades de Inversiones HOME (HOME) con el fin de atender esas necesidades durante los próximos cinco años. Sus comentarios se utilizarán para ayudar al Condado a establecer prioridades en el financiamiento y la distribución de los fondos de manera efectiva para atender estas necesidades.

Use el enlace o escanee el código QR en su teléfono para tomar en línea nuestra encuesta



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2025-2029 年綜合計劃

參與我們的社區需求調查

奧蘭治縣正在準備其 2025-2029 年 CDBG 綜合計劃,該計劃將優先考慮該縣中低收入居民的住房和社區發展需求。綜合計劃將影響社區發展整筆撥款 (CDBG)、緊急解決方案撥款 (ESG) 和 HOME 投資合作夥伴計劃 (HOME) 資金的分配,以滿足未來五年的相關需求。您的意見將幫助該縣制定資金優先事項並有效分配資金,以滿足這些需求。

使用以下連結或使用手機掃描下方QR碼來參加我們的線上調查



英語 www.surveymonkey.com/r/K2MDFX5



西班牙語 www.surveymonkey.com/r/K2HYSFY



www.surveymonkey.com/r/5LPQQY9



后草早

十年ロロ <u>www.surveymonkey.com/r/5V8HSKT</u>



越南語

www.surveymonkey.com/r/5V7PWJK



KẾ HOẠCH TỔNG HỢP NĂM 2025-2029

THAM GIA KHẢO SÁT NHU CẦU CỘNG ĐỒNG CỦA CHÚNG TÔI

Quận Cam đang chuẩn bị Kế Hoạch Tổng Hợp CDBG Năm 2025-2029, trong đó ưu tiên các nhu cầu phát triển nhà ở và cộng đồng dành cho cư dân có thu nhập thấp và trung bình trên địa bàn Quận. Kế Hoạch Tổng Hợp sẽ ảnh hưởng đến việc phân bổ quỹ Tài Trợ Trọn Gói Phát Triển Cộng Đồng (Community Development Block Grant, CDBG), Tài Trợ Giải Pháp Khẩn Cấp (Emergency Solutions Grants, ESG) và Chương Trình Đối Tác Đầu Tư HOME (HOME Investment Partnerships Program, HOME) để giải quyết những nhu cầu đó trong năm năm tới. Những ý kiến đóng góp của quý vị sẽ được sử dụng để giúp Quận phát triển các mục ưu tiên tài trợ và phân bổ kinh phí hiệu quả nhằm giải quyết những nhu cầu này.

Sử dụng đường liên kết hoặc quét mã QR trên điện thoại của quý vị để tham gia khảo sát trực tuyến



TIỂNG ANH



TIÊNG TÂY



TIÊNG TRUNG

www.surveymonkey.com/r/K2MDFX5<u>www.surveymonkey.com/r/K2HYSFY</u> <u>www.surveymonkey.com/r/5LPQQY9</u>



www.surveymonkey.com/r/5V8HSKT



TIẾNG VIÊT

www.survevmonkev.com/r/5V7PWJK

SAMPLE NEWSLETTER

County of Orange Housing & Community Development Seeks Input from [Insert City] Residents for 2025-2029 Consolidated Plan

The County of Orange receives approximately \$4 million in federal funds from the U.S. Department of Housing and Urban Development (HUD) each year for housing and community development projects in certain County jurisdictions, which includes our city of [Insert City].

These annual grants can be used to provide decent housing, suitable living environments, and expanded economic opportunities, for low- and moderate-income persons in our city. In creating the 2025-2029 Consolidated Plan, the County needs your help to identify the priorities for improvements and public services in our community.

To have a voice in how the County invests this money in [Insert City], please complete the Resident Needs Survey by December 31, 2024.

Please select the survey link or QR code in your preferred language to complete the survey.

English: https://www.surveymonkey.com/r/K2MDFX5
Spanish: https://www.surveymonkey.com/r/5LPQQY9
Korean: https://www.surveymonkey.com/r/5V8HSKT
Vietnamese: https://www.surveymonkey.com/r/5V7PWJK

Resident Needs Survey Available Now:











The County is also hosting five community outreach meetings to facilitate community input.

Please join us:

Laguna Woods City Hall

November 13, 2024 at 10:00 a.m. City of Laguna Woods Council Chambers 24264 El Toro Rd. Laguna Woods, CA 92637

Midway City Community Center

November 20, 2024 at 10:00 a.m. 14900 Park Ln. Midway City, CA 92655

Stanton Community Center

November 13, 2024 at 5:30 p.m. Stanton City Hall 7800 Katella Ave. Stanton, CA 90680

El Modena Community Center

November 18, 2024 at 6:00 p.m. 18672 E Center Ave. Orange, CA 92869

Anaheim Independencia Community Center

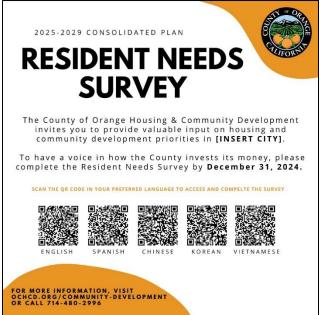
November 20, 2024 at 6:00 p.m. 10841 Garza Ave. Anaheim, CA 92804

SOCIAL MEDIA GRAPHICS

Social media graphics are available to promote the survey and advertise community workshops. Please click the link to access the graphics and customize with your city and community workshop information.

https://www.canva.com/design/DAGUhhdxeG0/K7rkRBRVJm3XHuO3iCQA3w/edit?utm_content=DAGUhhdxeG0&utm_campaign=designshare&utm_medium=link2&utm_source=sharebutton





MAYOR City of ADDRESS City, California ZIP
SUBJECT: FY 2025-2029 Consolidated Plan (for use of Federal Community Development funding)
Dear Mayor:
I need your help in notifying your residents about an important community survey regarding the use of Federal Housing and Community development funding in your city.
As the administrator of the Urban County program, the U.S. Department of Housing and Urban Development (HUD) requires the County update a Five-Year Consolidated Plan based on the current housing and community development needs of low-income communities and residents within the participating cities and unincorporated areas of Orange County. Your city is a participating city, and we are in the process of compiling input for the upcoming FY 2025-2029 Consolidated Plan to be submitted to HUD by May 2025.
In order to receive feedback from your city and residents on housing and community development needs for low-income communities and residents, I am asking if you would help us publicize the scheduled meetings and surveys as widely as possible, targeting low-income communities and residents in your city. To facilitate this, I've included a media toolkit your city can use to get the word out and we are reaching out to your community development and housing staff hoping to make this survey available on your city's website.
We appreciate your help in making sure this survey reaches the residents in your community. That input will be valuable to setting accurate priorities for the investment of Federal housing and community development funding in the FY 2025-2029 Consolidated Plan.
Sincerely,

BOARD OFFICE





County of Orange - Community Survey

WE WANT TO HEAR FROM YOU! WHAT ARE THE HOUSING AND COMMUNITY DEVELOPMENT NEEDS IN YOUR NEIGHBORHOOD?

The County of Orange receives approximately \$4 million in federal funds each year for housing and community development projects in the following jurisdictions:

County Unincorporated Areas
Brea
Cypress
Dana Point
Laguna Beach

Laguna Hills
Laguna Woods
La Palma
Los Alamitos
Placentia

San Juan Capistrano Seal Beach Stanton Villa Park Yorba Linda

The annual grants can be used to provide decent housing, suitable living environments, and expanded economic opportunities, for low and moderate income persons. The County wants you to have a voice in how it invests this money. Please assist us by filling out this survey.

As you complete the survey, please consider the following: 1) The needs of your neighborhood; and 2) how they can be improved. Keep in mind that available funding is limited and prioritizing your responses is of great importance.

What City/Community do you live	e in? ZIP code	_
Are you a senior? (62+)	_ Do you have a disability?	

Survey continued on next page



Survey Example																			
Need for Commun lowest)	ity Fa	cilitie	es: Ra	ank the	e follo	wing p	rogra	ms i	n order of importa	nce to the	e com	munit	y. (1	= higl	nest, :	3 =			
Indoor Community	Cente	rs								∠ ☑				ა _					
Libraries														<u> </u>					
Outdoor Parks & Re	ecreat	ion F	aciliti	es					\square										
n the survey exampl he most (1 = highest	t) and	"Libr	aries"	as the	e item	they v	would	leas	t prefer to see im	proved (3	= low	est).							
Need for Community Facilities	Rank the following needs in order of importance to the communit (1 = highest, 7 = lowest)							'	Need for Busi Development Jobs		impo	ortanc	the following needs in order of rtance to the community. highest, 7 = lowest)						
i aciiilles		1	2	3	4	5	6	7			1	2	3	4	5	6	7		
Senior Centers									Start-up Busin Assistance										
Youth Centers									Small Business Loans	S									
									Job										
Child Care Center	rs								Creation/Reter	ntion									
Park and Recreational Facilities									Employment T	raining									
Health Care Facili	ities								Business Ment	toring									
Community Cente	ers								Economic Development										
Libraries									Urgent Need										
Need for Residential Infrastructure	impo	ortano	ce to t	ving notine co	mmur	n orde nity.	r of	N	eed for eighborhood ervices	Rank the importar	nce to	the c	omm	unity.	der o	f			
	1		2	3	4	5	6			1	2	;	3	4		5			
Drainage									ree Planting										
Water/Sewer								R	rash & Debris emoval			С							
Street/Alley									raffiti Removal										
Street Lighting								E	ode nforcement										
Sidewalk								Α	leanup of bandoned ots & Buildings			[
Curb Ramps for ADA																			

Accessibility



Need for Affordable Housing	Rank the following needs in order of importance to the community. (1 = highest, 11 = lowest)												
_		1	2	3	4	5	6	7	,	8	9	10	11
ccessibility Improvements]				
Iomeowner Housing Rehabilitat	ion]				
ental Housing Rehabilitation]				
Iomebuyer Assistance]				
ffordable Rental Housing]				
lousing for Disabled]				
lousing for Seniors]				
lousing for Large Families]				
air Housing Services]				
ead-Based Paint/Test Abateme	nt]				
nergy Efficient Improvements]				
leed for Community and special Needs Services		nk the fo highes 2				6	7	8	9	10	11	12	13
Senior Activities													
outh Activities													
Child Care Services													
ransportation Services													
nti-Crime Programs													
lealth Services	П		П										
lental Health Services													
egal Services	П	П	П	П									
Iomeless Shelters/Services													
Oomestic Violence Services	П	П											
Substance Abuse Services													
Centers/Services for Disabled													
HV/AIDS Centers & Services													
ernet Access													
part of the CDBG program, the Cit								reside	ents	use ava	ailable	services	
you have highspeed internet ac							NO						
you answered "YES" please answe	er pa	ırt (a). If	you a	nswere	d "NO"	please	e answ	er par	t (b).				
a) If yes, which provider do you ι	ıse?			(b) If no,	please	e seled	ct reas	son (check	all tha	t apply)	
T&T				N	ot intere	ested							
Cox				U:	se Inter	net At	Work/S	School	1				
arthLink				To	о Ехре	ensive							
-Mobile					se Inter ommuni			Locati	ion (e	e.g., lib	ary,		
/iasat				0	ther								
Other		_											
lease write in any needs no	t lis	ted ab	ove:										
	_												



THANK YOU!



1501 E St. Andrew Place Santa Ana CA 92705

Attn: Craig Fee

Please return surveys to: OC Housing & Community Development by December 31, 2024

THIS SURVEY IS ALSO AVAILABLE ONLINE AT:

https://www.surveymonkey.com/r/K2MDFX5





URBAN COUNTY OF ORANGE

Annual Action Plan

FY 2025-2026

May 20, 2025

OC HOUSING & COMMUNITY DEVELOPMENT 1501 E. ST. ANDREW PLACE, 1ST FLOOR SANTA ANA, CA 92705

DRAFT FOR PUBLIC REVIEW

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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 a independent living, including shortening the period of time that ind and families experience homelessness, facilitating access for home individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becomin homeless again.	and lividuals eless g
Helping low-income individuals and families avoid becoming home especially extremely low-income individuals and families and those being discharged from publicly funded institutions and systems of as health care facilities, mental health facilities, foster care and other facilities, and corrections programs and institutions); or, receiving from public or private agencies that address housing, health, social employment, education, or youth needs.	e who are: care (such er youth assistance I services,
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policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building code and charges, growth limitations, and policies affecting the return on residential investment	es, fees
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Executive Summary

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

1. Introduction

The County of Orange (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 cities in Orange County 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 households. It is anticipated that the County would receive \$3,443,121 in CDBG for Fiscal Year 2025-2026. The proposed activities are required by the CBDG regulations and must meet one of the following three national objectives:

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

The County also anticipates receiving \$299,058 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 and 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:
- 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 \$1,245,674.61 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 2025-2029 Consolidated Plan (ConPlan).

This FY 2025-26 Annual Action Plan (Action Plan) covers the first year of the ConPlan beginning July 1, 2025, through June 30, 2026. 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 incorporated outcome measures for activities are 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 identified within 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 2025-2029 Consolidated Plan, established in consultation with residents and community groups, include the following:

High Priority

- 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

In addition, the County may consider Economic Development activities if funding becomes available (Low-Priority).

Some of the high priority activities include:

- Housing Rehabilitation
- Affordable Housing development
- Park and Recreation Facilities
- Senior Centers
- Homeless Facilities
- Neighborhood Facilities
- Water/Sewer Improvements
- Street and Lighting Improvements
- Sidewalk Improvements
- Youth and family services (childcare services)
- Health services, including mental health services
- Senior services
- Services for persons experiencing homelessness

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 (OC HCD), the agency in the County that administers the Urban County program, measures productivity and program impact in accordance with HUD Notices. Aside from regular site visits to provide technical assistance to subrecipients; all projects/programs funded by OC HCD are monitored each fiscal year. The monitoring involves the following oversight: 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 2023-24, the CAPER describes and evaluates how Community Development Block Grant (CDBG), HOME Investment Partnerships (HOME), and Emergency Solutions Grant (ESG) funds, received from the HUD, were expended to meet the CP five-year strategic goals for the reporting period July 1, 2023, to June 30, 2024.

Below is a summary of accomplishments made in FY 2023-24:

CDBG and CDBG-CV Funds:

Economic Development \$529,871 for 1 Façade Improvement, for 1 business.

Public Facilities and Improvements- A focus of CDBG activities for FY 2023-24 has been the planning and implementation of multiple public facilities and improvements including ADA accessibility improvements, recreational facilities, senior and community centers. (7) projects were completed expending a total \$1,248,332 in this project year.

A total of (7) public service projects benefitted county residents in FY 2023-24. Public services included senior services, health/ mental health services, employment and educational services, homeless shelters and programs, childcare services, youth services and CDBG-CV activities to

prepare for, respond to and recover from the COVID-19 pandemic. A total of \$517,545 was expended.

- A total of (116) Housing Rehabilitation projects were completed. A total of \$397,242.
- A total of (1) project, administration was undertaken to affirmatively further fair housing, a total of \$52,000 was expended.
- A total of (1) project administration was completed. A total of \$685,979 was expended in FY 2023-24.

HOME Funds:

The County of Orange administers the HOME Program throughout the unincorporated areas of the County, in Urban County Participating Cities, and in entitlement cities. HOME funding is typically utilized to:

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

In FY 2023-24:

- \$950,000 was expended for the development of 48 units of Affordable Housing at Casa Paloma in Midway City, unincorporated County which utilizes 48 Project-Based Vouchers (PBVs).
- \$500,000 was expended to rehabilitate four HOME-funded units at Aurora Vista (formerly Riviera Motel) which utilizes 20 PBVs, 10 of which are VASH PBVs.
- \$90,425 was expended for tenant based rental assistance.
- \$365,555 in administrative funding was expended.

ESG Funds:

In FY 2023-24, the County allocated ESG funding to the County's Office of Care Coordination (OCC) through an MOU to help support the operations of the emergency shelter, rapid re-housing program and HMIS for households that were either at-risk of or experiencing homelessness in Orange County. A total of \$344,331 was expended in Federal ESG funds.

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 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 from the development or execution of its Consolidated Plan. The County is entitled to receive annual grant funding from the CDBG, HOME, and ESG programs. It is the policy of the 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 (Urban County) 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 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).

It is the policy of the County to follow its Citizen Participation Plan and to encourage and facilitate a wide range of 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 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, including minorities and non-English speaking persons, as well as persons with disabilities.

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 11, 2025.

The Public Comment period will end on May 12, 2025. In addition, electronic links to the draft FY 2025-26 Annual Action Plan were available on the OC 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

No Public Comments have been received to date.

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		Department/Agency
CDBG Administrator	ORAI	NGE COUNTY	OC Community D	nity Resources/OC Housing & Development
HOME Administrator	ORAI	NGE COUNTY	OC Community D	nity Resources/OC Housing & Development
ESG Administrator	ORAI	NGE COUNTY	OC Community D	nity Resources/OC Housing & Development

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 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 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 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;
- Agencies serving the homeless and at-risk homeless, including those that are coordinating re-entry after being discharged from institutions;
- 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 notified 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.

Additionally, the 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. The outreach list includes homeless service agencies in the Santa Ana/Anaheim/Orange County of Care Council (CoC). The Continuum of Care Strategy was consulted to provide information on

homelessness and resources available. Several agencies that provide housing and supportive services for the homeless and those at risk of becoming homeless attended the Focus Group Workshop.

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 Continuum of Care lead agency, the County consulted with ESG recipient jurisdictions in the region to discuss new ESG regulations and to plan for the allocation of ESG funds. The County plans to utilize these funds to assist in homeless prevention and rapid rehousing in ways that:

- Coordinate across regional entitlement jurisdictions by developing and utilizing standardized eligibility and assessment tools;
- Support federal and local goals for priority populations;
- Allow for variations in the program design that responds to the needs and resources of the jurisdiction; and
- Comply with new eligibility and verification requirements (HMIS, housing status, homeless definitions, etc.)

The County also consulted with the Commission to Address Homelessness, the governing body of the Ten- Year Plan to End Homelessness to ensure the alignment of proposed ESG activities as they relate to the goals and strategies outlined in the plan.

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 while prioritizing the strengthening of data collection and participation across the system of care for homeless individuals and families.

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

Table 2 - Agencies, groups, organizations who participated.

	- 190110100, groups, organizations tric	A
1	Agency/Group/Organization	Abrazar, Inc.
'	Agency/Group/Organization Type	Services - Housing
		Services-Children
		Services-Elderly Persons
		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	Housing Need Assessment
	by Consultation?	Non-Homeless Special Needs

2	Briefly describe how the Agency/Group/Organization 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?	The Non-Profit 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. City of Brea Other government - Local 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
2	Agonov/Croup/Organization	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.
3	Agency/Group/Organization	City of Cypress, CA
	Agency/Group/Organization Type What section of the Plan was addressed	Other government - Local Public Facilities and Infrastructure
	by Consultation?	
	Briefly describe how the	The City was sent the Funding Allocation
	Agency/Group/Organization was	Policy & Process and the draft Annual Action
	consulted. What are the anticipated	Plan was posted on our website for review
	outcomes of the consultation or areas for improved coordination?	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? Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Public Facilities and Infrastructure 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

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	Briefly describe how the	The City was sent the Funding Allocation
	Agency/Group/Organization was	Policy & Process and the draft Annual Action
	consulted. What are the anticipated	Plan was posted on our website for review
	outcomes of the consultation or areas	and provide input on developing the plans.
	for improved coordination?	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	Public Facilities and Infrastructure
	by Consultation?	
	Briefly describe how the	The City was sent the Funding Allocation
	Agency/Group/Organization was	Policy & Process and the draft Annual Action
	consulted. What are the anticipated	Plan was posted on our website for review
	outcomes of the consultation or areas	and provide input on developing the plans.
	for improved coordination?	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	Housing Need Assessment
	by 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 was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	A range of "no-cost" fair housing services provided to eligible clientele throughout the County's Urban County program areas that are victimized and 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 PHA Services - Housing Services-homeless Other government - County
	What section of the Plan was addressed by Consultation?	Housing Need Assessment 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
11	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination? Agency/Group/Organization Type	The Orange County Housing Authority 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. City of Dana Point
	Agency/Group/Organization Type What section of the Plan was addressed by Consultation?	Other government - Local 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?	Policy & Process and the draft Annual Action Plan was posted on our website for review
	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	The City was sent the Funding Allocation
Agency/Group/Organization was	
consulted. What are the anticipated	
outcomes of the consultation or areas	and provide input on developing the plans.
for improved coordination?	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.
13 Agency/Group/Organization	Families Forward
Agency/Group/Organization Type	Services – Housing
	Services – Homeless
What section of the Plan was addressed	Housing Needs Assessment
by Consultation?	
Briefly describe how the	
Agency/Group/Organization was	
consulted. What are the anticipated	
outcomes of the consultation or areas	
for improved coordination?	

13	Agency/Group/Organization	Pathways of Hope
	Agency/Group/Organization Type	Services – Homeless
	What section of the Plan was	Housing Needs Assessment
	addressed by Consultation?	Homelessness Strategy
	Briefly describe how the	Agency attended the Stakeholder Workshop
	Agency/Group/Organization was	on November 14 th , 2024 and provided input
	consulted. What are the anticipated	on service needs in the community
	outcomes of the consultation or areas	
	for improved coordination?	

14	Agency/Group/Organization	Tustin Temporary Emergency Shelter
	Agency/Group/Organization Type	Services – Homeless
	What section of the Plan was	Housing Needs Assessment
	addressed by Consultation?	Homelessness Strategy
	Briefly describe how the	Agency attended the Stakeholder Workshop
	Agency/Group/Organization was	on November 14th, 2024 and provided input
	consulted. What are the anticipated	on service needs in the community.
	outcomes of the consultation or areas	·
	for improved coordination?	
15	Agency/Group/Organization	Fentanyl Solution
	Agency/Group/Organization Type	Services – Substance Use
	What section of the Plan was	Homelessness Strategy
	addressed by Consultation?	Non-Homeless Special Needs
	Briefly describe how the	Agency attended the Stakeholder Workshop
	Agency/Group/Organization was	on November 14th, 2024 and provided input
	consulted. What are the anticipated	on service needs in the community
	outcomes of the consultation or areas	
	for improved coordination?	
16	Agency/Group/Organization	Healthcare In Action
	Agency/Group/Organization Type	Services – Health
		Services – Substance Use
	What section of the Plan was	Non-Homeless Special Needs
	addressed by Consultation?	'
	Briefly describe how the	Agency attended the Stakeholder Workshop
	Agency/Group/Organization was	on November 14th, 2024 and provided input
	consulted. What are the anticipated	on service needs in the community.
	outcomes of the consultation or areas	,
	for improved coordination?	
17	Agency/Group/Organization	CalOptima Health
	Agency/Group/Organization Type	Services – Health
	What section of the Plan was	Non-Homeless Special Needs
	addressed by Consultation?	,
	Briefly describe how the	Agency attended the Stakeholder Workshop
	Agency/Group/Organization was	on November 14th, 2024 and provided input
	consulted. What are the anticipated	l
	outcomes of the consultation or areas	
	for improved coordination?	
18	Agency/Group/Organization	City of Santa Ana
	Agency/Group/Organization Type	Public Agency
	What section of the Plan was	Housing Needs Assessment
	addressed by Consultation?	
	Briefly describe how the	Agency attended the Stakeholder Workshop
	Agency/Group/Organization was	on November 14 th , 2024 and provided input
	consulted. What are the anticipated	on service needs in the community.
	outcomes of the consultation or areas	_
	for improved coordination?	
	protoa oooramadoni	

19	Agency/Group/Organization	City of Westminster
	Agency/Group/Organization Type	Public Agency
	What section of the Plan was	Housing Needs Assessment
	addressed by Consultation?	
	Briefly describe how the	Agency attended the Stakeholder Workshop
	Agency/Group/Organization was	on November 14 th , 2024 and provided input
	consulted. What are the anticipated	on service needs in the community.
	outcomes of the consultation or areas	•
	for improved coordination?	
20	Agency/Group/Organization	Orangewood Foundation
	Agency/Group/Organization Type	Services – Youth
		Services - Education
	What section of the Plan was	Non-Homeless Special Needs
	addressed by Consultation?	
	Briefly describe how the	Agency attended the Stakeholder Workshop
	Agency/Group/Organization was	on November 14 th , 2024 and provided input
	consulted. What are the anticipated	on service needs in the community
	outcomes of the consultation or areas	
	for improved coordination?	
21	Agency/Group/Organization	Diversified Services
	Agency/Group/Organization Type	Services – Education
		Services - Employment
	What section of the Plan was	Non-Homeless Special Needs
	addressed by Consultation?	
	Briefly describe how the	Agency attended the Stakeholder Workshop
	Agency/Group/Organization was	on November 14 th , 2024 and provided input
	consulted. What are the anticipated	on service needs in the community.
	outcomes of the consultation or areas	
	for improved coordination?	
22	Agency/Group/Organization	Human Options
	Agency/Group/Organization Type	Services – Victims of Domestic Violence
	What section of the Plan was	Housing Needs Assessment
	addressed by Consultation?	Non-Homeless Special Needs
	Dulatha danadh 1 1 11	Homelessness Strategy
	Briefly describe how the	Agency attended the Stakeholder Workshop
	Agency/Group/Organization was	on November 14 th , 2024 and provided input
	consulted. What are the anticipated outcomes of the consultation or areas	on service needs in the community
23	for improved coordination? Agency/Group/Organization	Project Hone Alliance
23	Agency/Group/Organization Agency/Group/Organization Type	Project Hope Alliance Services – Youth
	Agency/Group/Organization Type	Services – Youth Services – Homeless
	What section of the Plan was	Housing Needs Assessment
	addressed by Consultation?	Non-Homeless Special Needs
	addressed by Consultation!	Homelessness Strategy
		Homolessiless offategy

	Briefly describe how the	Agency attended the Stakeholder Workshop
	Agency/Group/Organization was	on November 14 th , 2024 and provided input
	consulted. What are the anticipated	on service needs in the community.
	outcomes of the consultation or areas	on service needs in the community.
	for improved coordination?	
24		CA POC
24	Agency/Group/Organization	Services – Youth
	Agency/Group/Organization Type	
	Miles and an attention of the Discourse	Services – Families
	What section of the Plan was	Housing Needs Assessment
	addressed by Consultation?	Non-Homeless Special Needs
	Briefly describe how the	Agency attended the Stakeholder Workshop
	Agency/Group/Organization was	on November 14 th , 2024 and provided input
	consulted. What are the anticipated	on service needs in the community.
	outcomes of the consultation or areas	
	for improved coordination?	
25	Agency/Group/Organization	Orange County Community Housing
		Corporation
	Agency/Group/Organization Type	Services – Housing
	What section of the Plan was	Housing Needs Assessment
	addressed by Consultation?	
	Briefly describe how the	Agency attended the Stakeholder Workshop
	Agency/Group/Organization was	on November 14 th , 2024 and provided input
	consulted. What are the anticipated	on service needs in the community.
	outcomes of the consultation or areas	
	for improved coordination?	
26	Agency/Group/Organization	John Henry Foundation
	Agency/Group/Organization Type	Services – Persons with Disabilities
	What section of the Plan was	Non-Homeless Special Needs
	addressed by Consultation?	
	Briefly describe how the	Agency attended the Stakeholder Workshop
	Agency/Group/Organization was	on November 14 th , 2024 and provided input
	consulted. What are the anticipated	on service needs in the community.
	outcomes of the consultation or areas	
	for improved coordination?	
27	Agency/Group/Organization	Family Solutions Collaborative
	Agency/Group/Organization Type	Services – Homeless
	What section of the Plan was	Housing Needs Assessment
	addressed by Consultation?	Homelessness Strategy
	Briefly describe how the	Agency attended the Stakeholder Workshop
	Agency/Group/Organization was	on November 14 th , 2024 and provided input
	consulted. What are the anticipated	on service needs in the community.
	outcomes of the consultation or areas	
	for improved coordination?	
28	Agency/Group/Organization	Family Assistance Ministries
	Agency/Group/Organization Type	Services – Homeless

	18/1 () () () () () () () ()	11 ' 11 1 1 1
	What section of the Plan was	Housing Needs Assessment
	addressed by Consultation?	Homelessness Strategy
	Briefly describe how the	Agency attended the Stakeholder Workshop
	Agency/Group/Organization was	on November 14 th , 2024 and provided input
	consulted. What are the anticipated	on service needs in the community.
	outcomes of the consultation or areas	
	for improved coordination?	
29	Agency/Group/Organization	City of Newport Beach
	Agency/Group/Organization Type	Public Agency
	What section of the Plan was	Housing Needs Assessment
	addressed by Consultation?	
	Briefly describe how the	Agency attended the Stakeholder Workshop
	Agency/Group/Organization was	on November 14 th , 2024 and provided input
	consulted. What are the anticipated	on service needs in the community.
	outcomes of the consultation or areas	
	for improved coordination?	
30	Agency/Group/Organization	Resilience OC
	Agency/Group/Organization Type	Services – Youth
	What section of the Plan was	Non-Homeless Special Needs
	addressed by Consultation?	Tron fromologo opecial froduc
	Briefly describe how the	Agency attended the Stakeholder Workshop
	Agency/Group/Organization was	on November 14 th , 2024 and provided input
	consulted. What are the anticipated	on service needs in the community.
	outcomes of the consultation or areas	on service needs in the community.
	for improved coordination?	
31	Agency/Group/Organization	Housing is a Human Right Orange County
<u> </u>	Agency/Group/Organization Type	Services – Housing
	What section of the Plan was	Housing Needs Assessment
	addressed by Consultation?	Trodomy Noodo / Goodomont
	Briefly describe how the	Agency attended the Stakeholder Workshop
	Agency/Group/Organization was	on November 14 th , 2024 and provided input
	consulted. What are the anticipated	on service needs in the community.
	outcomes of the consultation or areas	on service needs in the community.
	for improved coordination?	
32	Agency/Group/Organization	Providence St. Joseph Health
	Agency/Group/Organization Type	Services – Health
	What section of the Plan was	Non-Homeless Special Needs
	addressed by Consultation?	The state of the s
	Briefly describe how the	Agency attended the Stakeholder Workshop
	Agency/Group/Organization was	on November 14 th , 2024 and provided input
	consulted. What are the anticipated	on service needs in the community.
	outcomes of the consultation or areas	
	for improved coordination?	
33	Agency/Group/Organization	Board of Supervisors, Fourth District
	Agency/Group/Organization Type	Public Agency
	gooj, orospi organization ijpo	. a.m., (going)

	What satism of the Discourse	I I a construction of A and a second
	What section of the Plan was	Housing Needs Assessment
	addressed by Consultation?	
	Briefly describe how the	Agency attended the Stakeholder Workshop
	Agency/Group/Organization was	on November 14 th , 2024 and provided input
	consulted. What are the anticipated	on service needs in the community
	outcomes of the consultation or areas	,
	for improved coordination?	
34	Agency/Group/Organization	WISEPlace
34		
	Agency/Group/Organization Type	Services – Homeless
		Services – Youth
	What section of the Plan was	Housing Needs Assessment
	addressed by Consultation?	Homelessness Strategy
	Briefly describe how the	Agency attended the Stakeholder Workshop
	Agency/Group/Organization was	on November 14th, 2024 and provided input
	consulted. What are the anticipated	on service needs in the community
	outcomes of the consultation or areas	3 33. 7100 filoddo iif afo doffilliainty
	for improved coordination?	
25		Cayanant Hayaa California
35	Agency/Group/Organization	Covenant House California
	Agency/Group/Organization Type	Services – Homeless
		Services – Youth
	What section of the Plan was	Housing Needs Assessment
	addressed by Consultation?	Homelessness Strategy
	Briefly describe how the	Agency attended the Stakeholder Workshop
	Agency/Group/Organization was	on November 14th, 2024 and provided input
	consulted. What are the anticipated	on service needs in the community
	outcomes of the consultation or areas	on connections are community
	for improved coordination?	
36	Agency/Group/Organization	The Kennedy Commission
30		-
	Agency/Group/Organization Type	Services – Housing
	What section of the Plan was	Housing Needs Assessment
	addressed by Consultation?	
	Briefly describe how the	Agency attended the Stakeholder Workshop
	Agency/Group/Organization was	on November 14 th , 2024 and provided input
	consulted. What are the anticipated	on service needs in the community.
	outcomes of the consultation or areas	-
	for improved coordination?	
37	Agency/Group/Organization	Buena Park Collaborative
	Agency/Group/Organization Type	Services – Health
	3: -y: -:	Services - Education
	What section of the Plan was	Non-Homeless Special Needs
	addressed by Consultation?	Transfer of the second records
	Briefly describe how the	Agency attended the Stakeholder Workshop
	Agency/Group/Organization was	on November 14 th , 2024 and provided input
		on service needs in the community.
	for improved coordination?	
	consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	on service needs in the community.

38	Agency/Group/Organization	County of Orange Housing & Community Development
	Agency/Group/Organization Type	Public Agency
	What section of the Plan was	Housing Needs Assessment
	addressed by Consultation?	Non-Homeless Special Needs
		Homelessness Strategy
		Market Analysis
	Briefly describe how the	Agency attended the Stakeholder Workshop
	Agency/Group/Organization was	on November 14 th , 2024 and provided input
	consulted. What are the anticipated	on service needs in the community.
	outcomes of the consultation or areas	
	for improved coordination?	
39	Agency/Group/Organization	Leading Purpose
	Agency/Group/Organization Type	Services – Housing
		Services - Education
	What section of the Plan was	Housing Needs Assessment
	addressed by Consultation?	Non-Homeless Special Needs
	Briefly describe how the	Agency attended the Stakeholder Workshop
	Agency/Group/Organization was	on November 14 th , 2024 and provided input
	consulted. What are the anticipated	on service needs in the community
	outcomes of the consultation or areas	
	for improved coordination?	
40	Agency/Group/Organization	Continuum of Care
	Agency/Group/Organization Type	Services - Homeless
	What section of the Plan was	Housing Needs Assessment
	addressed by Consultation?	Non-Homeless Special Needs
	Duisfly describe how the	Homelessness Strategy
	Briefly describe how the	
	A managed Consum (Our contractions	Agency attended the Stakeholder Workshop
	Agency/Group/Organization was	on November 14 th , 2024 and provided input
	consulted. What are the anticipated	
	consulted. What are the anticipated outcomes of the consultation or areas	on November 14 th , 2024 and provided input
41	consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	on November 14 th , 2024 and provided input on service needs in the community.
41	consulted. What are the anticipated outcomes of the consultation or areas for improved coordination? Agency/Group/Organization	on November 14 th , 2024 and provided input on service needs in the community. HomeAid Orange County
41	consulted. What are the anticipated outcomes of the consultation or areas for improved coordination? Agency/Group/Organization Agency/Group/Organization Type	on November 14 th , 2024 and provided input on service needs in the community. HomeAid Orange County Services – Homeless
41	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	on November 14 th , 2024 and provided input on service needs in the community. HomeAid Orange County Services – Homeless Housing Needs Assessment
41	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?	on November 14 th , 2024 and provided input on service needs in the community. HomeAid Orange County Services – Homeless Housing Needs Assessment Homelessness Strategy
41	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	on November 14 th , 2024 and provided input on service needs in the community. HomeAid Orange County Services – Homeless Housing Needs Assessment Homelessness Strategy Agency attended the Stakeholder Workshop
41	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	on November 14 th , 2024 and provided input on service needs in the community. HomeAid Orange County Services – Homeless Housing Needs Assessment Homelessness Strategy Agency attended the Stakeholder Workshop on November 14 th , 2024 and provided input
41	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	on November 14 th , 2024 and provided input on service needs in the community. HomeAid Orange County Services – Homeless Housing Needs Assessment Homelessness Strategy Agency attended the Stakeholder Workshop
41	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 the consultation or areas	on November 14 th , 2024 and provided input on service needs in the community. HomeAid Orange County Services – Homeless Housing Needs Assessment Homelessness Strategy Agency attended the Stakeholder Workshop on November 14 th , 2024 and provided input
	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 the consultation or areas for improved coordination?	on November 14 th , 2024 and provided input on service needs in the community. HomeAid Orange County Services – Homeless Housing Needs Assessment Homelessness Strategy Agency attended the Stakeholder Workshop on November 14 th , 2024 and provided input on service needs in the community.
41	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 the consultation or areas for improved coordination? Agency/Group/Organization	on November 14 th , 2024 and provided input on service needs in the community. HomeAid Orange County Services – Homeless Housing Needs Assessment Homelessness Strategy Agency attended the Stakeholder Workshop on November 14 th , 2024 and provided input on service needs in the community. The Purpose of Recovery
	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 the consultation or areas for improved coordination?	on November 14 th , 2024 and provided input on service needs in the community. HomeAid Orange County Services – Homeless Housing Needs Assessment Homelessness Strategy Agency attended the Stakeholder Workshop on November 14 th , 2024 and provided input on service needs in the community.

	Briefly describe how the	Agency attended the Stakeholder Workshop
	Agency/Group/Organization was	on December 2 nd , 2024 and provided input on
	consulted. What are the anticipated	service needs in the community.
	outcomes of the consultation or areas	
	for improved coordination?	
43	Agency/Group/Organization	City of La Palma
	Agency/Group/Organization Type	Public Agency
	What section of the Plan was	Housing Needs Assessment
	addressed by Consultation?	3
	Briefly describe how the	Agency attended the Stakeholder Workshop
	Agency/Group/Organization was	on December 2 nd , 2024 and provided input on
	consulted. What are the anticipated	service needs in the community.
	outcomes of the consultation or areas	der vice needs in the community.
	for improved coordination?	
44	Agency/Group/Organization	Upwards
	Agency/Group/Organization Type	Services – Youth
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs
	Briefly describe how the	Agency attended the Stakeholder Workshop
	•	
	Agency/Group/Organization was	on December 2 nd , 2024 and provided input on
	consulted. What are the anticipated	service needs in the community.
	outcomes of the consultation or areas	
45	for improved coordination?	
45	Agency/Group/Organization	Mortgage Link Inc.
	Agency/Group/Organization Type	Private Lender
	What section of the Plan was	Housing Needs Assessment
	addressed by Consultation?	Market Analysis
	Briefly describe how the	Agency attended the Stakeholder Workshop
	Agency/Group/Organization was	on December 2 nd , 2024 and provided input on
	consulted. What are the anticipated	service needs in the community.
	outcomes of the consultation or	
	7areas for improved coordination?	
46	Agency/Group/Organization	Veterans Affairs
	Agency/Group/Organization Type	Public Agency
	What section of the Plan was	Housing Needs Assessment
	addressed by Consultation?	Non-Homeless Special Needs
	Briefly describe how the	Agency attended the Stakeholder Workshop
	Agency/Group/Organization was	on December 2 nd , 2024 and provided input on
	consulted. What are the anticipated	service needs in the community.
	outcomes of the consultation or areas	_
	for improved coordination?	
47	Agency/Group/Organization	Families Forward
	Agency/Group/Organization Type	Services – Housing
		Services – Homeless
	What section of the Plan was	Housing Needs Assessment
	addressed by Consultation?	

	Briefly describe how the	Agency attended the Stakeholder Workshop
	Agency/Group/Organization was	on December 2 nd , 2024 and provided input on
	consulted. What are the anticipated	service needs in the community.
	outcomes of the consultation or areas	-
	for improved coordination?	
48	Agency/Group/Organization	Saahas for Cause
	Agency/Group/Organization Type	Services – Youth
		Services - Health
	What section of the Plan was	Non-Homeless Special Needs
	addressed by Consultation?	
	Briefly describe how the	Agency attended the Stakeholder Workshop
	Agency/Group/Organization was	on December 2 nd , 2024 and provided input on
	consulted. What are the anticipated	service needs in the community.
	outcomes of the consultation or areas	-
	for improved coordination?	
49	Agency/Group/Organization	Seneca FOA
	Agency/Group/Organization Type	Services – Families
		Services - Youth
	What section of the Plan was	Non-Homeless Special Needs
	addressed by Consultation?	
	Briefly describe how the	Agency attended the Stakeholder Workshop
	Agency/Group/Organization was	on December 2 nd , 2024 and provided input on
	consulted. What are the anticipated	service needs in the community.
	outcomes of the consultation or areas	
	for improved coordination?	
50	Agency/Group/Organization	Habitat for Humanity
	Agency/Group/Organization Type	Services - Housing
	What section of the Plan was	Housing Needs Assessment
	addressed by Consultation?	
	Briefly describe how the	Agency attended the Stakeholder Workshop
	Agency/Group/Organization was	on December 2 nd , 2024 and provided input on
	consulted. What are the anticipated	service needs in the community.
	outcomes of the consultation or areas	
	for improved coordination?	
51	Agency/Group/Organization	City of Los Alamitos
	Agency/Group/Organization Type	Public Agency
	What section of the Plan was	Housing Needs Assessment
	addressed by Consultation?	

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	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.
52	Agency/Group/Organization	City of Villa Park
	Agency/Group/Organization Type	Public Agency
	What section of the Plan was addressed by Consultation?	Housing Needs Assessment
	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.

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
- HOME Investment Partnership Program (HOME) funds
- Emergency Solutions Grant (ESG) funds.
- HUD Housing Choice Voucher Program (through Orange County Housing Authority)
- Workforce Innovation and Opportunity Act (through the Workforce & Economic Development 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)

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amou	ınt Available Y	'ear 1		Expected Amount Available Remainder of ConPlan \$	Narrative
			Annual Allocation \$	Program Income \$	Prior Year Resource s	Total \$		Description
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	3,443,121	20,000	575,412	4,038,533	13,852,484	The balance of CDBG funds available over the planning period is based on allocations for FY 2025, estimated program income and funds carried over from prior years. This amount does not include amounts leveraged from sub-recipients.

Program	Source of Funds	Uses of Funds	Expected Amount Year 1 Annual Allocation \$	Program Income \$	Prior Year Resources \$	Total \$	Expected Amount Available Remainder of ConPlan	Narrative Description
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership	1,245,674.61	135,000	0	1,380,674. 61	5,522,698	The estimated amount of HOME funds available over the planning period is based on allocations for FY 2025 and estimated program income, excluding funds carried over from prior years.

Program	Source of Funds	Uses of Funds	Expected A	mount Availa	ble Year 1	Expected	Narrative Description	
			Annual Allocation \$	Program Income \$	Prior Year Resources \$	Total \$	Amount Available Remainder of ConPlan \$	
ESG	public - federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing	299,058	0	0	299,058	1,196,232	The amount of ESG funds available over the planning period is based on allocations for FY 2025, excluding funds carried over from prior years.

Table 59 - 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
- State Mental Health Services Act
- Local Housing Successor Agency funding

For CDBG Public Facilities and Improvements Projects, Subrecipients can request an amount of \$250,000 maximum funding with no match and \$450,000 maximum funding amount with a 20% match.

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

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 Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Expand Affordable Housing Opportunities	2025	2026	Affordable Housing		Expand Affordable Housing Opportunities	CDBG: \$ 773,360 HOME: \$1,242,606.61	Homeowner Housing Rehabilitated: 86 Household Housing Units, 3 Buildings
2	Enhance Quality of Life	2025	2026	Affordable Housing Non-Housing Community Development		Enhance Quality of Life	CDBG: \$1,876,778	Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit: 19,232 People Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
3	Public Services	2025	2026	Homeless Non-Homeless Special Needs		Public Services	CDBG: \$519,094 ESG: \$276,629	Public service activities other than Low/Moderate Income Housing Benefit: 3,717 Persons Assisted Rapid Rehousing: 8 Households Assisted Homeless Person Overnight Shelter: 1,117 Persons Assisted
4	Economic Development	2025	2026	Non-Housing Community Development	City of Placentia	Façade Commercial Rehabilitation	CDBG \$176,679	1-2 Businesses
5	Planning and Administration	2025	2026			Planning and Administration	CDBG: \$692,622 HOME: \$138,068 ESG: \$22,429	Administration

Table 60 – Goals Summary

Goal Descriptions

Goal Name	Goal Description
Expand Affordable Housing Opportunities	Homeowner Housing Rehabilitated:86 units, 3 buildings, HOME funds will be used in the following year for permanent supportive housing
Enhance Quality of Life	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 19,232 Persons Assisted
Public Services	Public service activities other than Low/Moderate Income Housing Benefit: 3,717 Persons Assisted Rapid Rehousing: 8 Households Assisted Homeless Person Overnight Shelter: 1,117 Persons Assisted
Economic Development	Façade Commercial Rehabilitation 1-2 Businesses
Planning and Administration	Planning and Administration of all of the activities included in the Annual Action Plan.

Projects AP-35 Projects – 91.220(d) Introduction

This plan outlines the action steps that the County 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 2025-26 (July 1, 2025, through June 30, 2026) that utilize CDBG, HOME, and ESG funds. For FY 2025-26, the County has a combined CDBG, HOME, and ESG allocation of \$5,718,265.61 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 for reprogramming purposes and may be used for Waitlisted projects.

Projects

#	Project Name
1	County of Orange - Emergency Shelter(s) CDBG
2	County of Orange - Emergency Shelter(s) ESG
3	County of Orange - Emergency Shelter(s) Rapid Rehousing
4	County of Orange – Emergency Shelter(s) (HMIS)
5	Alternative Sleep Location ASL Emergency Shelter (Laguna Beach)
6	Midway City Community Services & Education Center (Abrazar, Inc.)
7	Single Family Housing Rehabilitation (Brea)
8	Single-Family Housing Rehabilitation Program (Cypress)
9	Leisure World Bathroom Accessibility Program (Seal Beach)
10	ADA Ramps Improvements (Laguna Hills)
11	ADA Pedestrian Accessibility Improvements - Phase 9 (Laguna Woods)
12	Stanton Community/Senior Center Improvement Project (Stanton)
13	Alipaz Street & Sidewalk Improvements (San Juan Capistrano)
14	County of Orange - Community Center Improvements (Midway City)
15	Affordable Housing HOME
16	Affordable Housing-HOME PI
17	County of Orange - CDBG Administration (CDBG) & (PI) Admin
18	County of Orange – ESG Administration
19	County of Orange – HOME Administration (HOME) & (PI)
20	Fair Housing Council of Orange County
21	Administration City (Placentia)
22	Administration County (Placentia)

23	Public Services Neighborhood Services (Placentia)
24	Public Services Seniors Services (Placentia)
25	Façade Improvements (Placentia)
26	Housing Rehabilitation - SFR (Placentia)
27	ADA Pedestrian Accessibility Improvements (Placentia)
28	Administration City (Yorba Linda)
29	Administration County (Yorba Linda)
30	Public Services (Senior Nutrition Program) (Yorba Linda)
31	Neighborhood Improvement Program HR - SFR (Yorba Linda)
32	Multi-family Rehabilitation Project-Housing Rehab (Yorba Linda)
	Waitlisted Projects If Funding Becomes Available
1	(ADA) Pedestrian Accessibility Improvement Phase IX (Laguna Woods)
2	Serra Park Playground Replacement (San Juan Capistrano)
3	HVAC & Senior Center Improvements (Stanton)

Table 61 - 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.

- Housing Rehabilitation
- Affordable Housing development
- Park and Recreation Facilities
- Senior Centers
- Homeless Facilities
- Neighborhood Facilities
- Water/Sewer Improvements
- Street and Lighting Improvements
- Sidewalk Improvements
- Youth and family services (childcare services)
- Health services, including mental health services
- Senior services
- Services for persons experiencing homelessness

AP-38 Project Summary

Project Name	Target Area	Goals Supported	Needs Addressed	Funding	Description	Target Date	Estimate the number and type of families that will benefit from the proposed activities	Location Description	Planned Activities
County of Orange - Emergency Shelter(s)		Public Services	Public Services	CDBG: \$222,282	Funds will be used to provide essential services, operations, emergency shelter, showers, and meals for homeless clients.	6/30/2026	610 People	County of Orange Emergency Shelter(s)	Emergency Homeless Shelters.

Project Name	Target Area	Goals Supported	Needs Addressed	Funding	Description	Target Date	Estimate the number and type of families that will benefit from the proposed activities	Location Description	Planned Activities
County of Orange - Emergency Shelter(s)		Public Services	Public Services	ESG: \$179,434	Funds will be used to provide essential services, operations, emergency shelter, showers, and meals for homeless clients.	6/30/2026	462 People	County of Orange Emergency Shelter(s)	Emergency Homeless Shelter

Project Name	Target Area	Goals Supported	Needs Addressed	Funding	Description	Target Date	Estimate the number and type of families that will benefit from the proposed activities	Location Description	Planned Activities
County of Orange - Emergency Shelter(s)		Public Services	Public Services	ESG: \$76,195	Funds will be used for Rapid Rehousing	6/30/2026	8 Household s	County of Orange Emergency Shelter(s)	Rapid Rehousing

Project Name	Target Area	Goals Supported	Needs Addressed	Funding	Description	Target Date	Estimate the number and type of families that will benefit from the proposed activities	Location Description	Planned Activities
County of Orange - Emergency Shelter(s)		Public Services	Public Services	ESG: \$21,000	Funds will be used for HMIS	6/30/2026	N/A	County of Orange Emergency Shelter(s)	HMIS

Project Name	Target Area	Goals Supported	Needs Addressed	Funding	Description	Target Date	Estimate the number and type of families that will benefit from the proposed activities	Location Description	Planned Activities
Alternative Sleep Location ASL Emergency Shelter (Laguna Beach)		Public Services	Public Services	CDBG: \$140,326 (MOU)	Funds will be used to provide emergency shelter for 45 homeless individuals from the city of Laguna Beach and surrounding cities	6/30/2026	45 People	Alternative Sleep Shelter 20652 Laguna Canyon Rd (Laguna Beach)	Emergency Homeless Shelter

Project Name	Target Area	Goals Supported	Needs Addressed	Funding	Description	Target Date	Estimate the number and type of families that will benefit from the proposed activities	Location Description	Planned Activities
Midway City Community Services & Education Center (Abrazar)		Public Services	Public Services	CDBG: \$64,470	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	6/30/2026	1200	Midway City Community Center	Public Services

Project Name	Target Area	Goals Supported	Needs Addressed	Funding	Description	Target Date	Estimate the number and type of families that will benefit from the proposed activities	Location Description	Planned Activities
Single-Family Housing Rehabilitation Program (Brea)		Expand Affordable Housing Opportuniti es	Expand Affordable Housing Opportunitie s	CDBG: \$190,800	Funds will be used for rehabilitation of low/very-low income owner occupied residences. Improvement s will include interior and exterior improvement s to homes and mobile home units.	6/30/2026	10 Household s	City of Brea	Housing Rehabilitatio n

Project Name	Target Area	Goals Supported	Needs Addressed	Funding	Description	Target Date	Estimate the number and type of families that will benefit from the proposed activities	Location Description	Planned Activities
Single-Family Housing Rehabilitation Program (Cypress)		Expand Affordable Housing Opportuniti es	Expand Affordable Housing Opportunitie s	CDBG: \$169,600	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 improvement s.	6/30/2026	5 Household s	City of Cypress	Housing Rehabilitatio n

Project Name	Target Area	Goals Supported	Needs Addressed	Funding	Description	Target Date	Estimate the number and type of families that will benefit from the proposed activities	Location Description	Planned Activities
Leisure World Bathroom Accessibility Program (Seal Beach)		Expand Affordable Housing Opportuniti es	Expand Affordable Housing Opportunitie s	CDBG: \$190,800	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.	6/30/2026	50 Household s	City of Seal Beach Leisure World	Housing Rehabilitatio n

Project Name	Target Area	Goals Supported	Needs Addressed	Funding	Description	Target Date	Estimate the number and type of families that will benefit from the proposed activities	Location Description	Planned Activities
ADA Ramps Improvement s (Laguna Hills)		Enhance Quality of Life	Enhance Quality of Life	CDBG: \$265,000	Funds will be used for 42 curb ramp replacements at intersections bounded by La Paz Road, Cabot Road, and Paseo de Valencia. These existing curb ramps do not meet current design standards because they lack truncated domes, do not have zero-inch curb lips at the point of entry, and/or do not have Federallymandated yellow truncated domes	6/30/2026	1,210 People	Intersection s bounded by La Paz Road, Cabot Road, and Paseo de Valencia (Laguna Hills)	Public Facility & Improveme nts

ADA Pedestrian Accessibility Improvement s - Phase 9 (Laguna Woods)		Enhance Quality of Life	Enhance Quality of Life	CDBG: \$265,000	Funding will be used for ADA Pedestrian Accessibility Improvements-a pivotal initiative that aligns with the City's strategic goals of fostering inclusivity and enhancing urban environments. This phase prioritizes the needs of vulnerable groups within our community, including older adults and individuals with disabilities who face mobility and visual impairments. These groups primarily consist of low to moderate-income residents who greatly benefit from improved public infrastructure.	6/30/2026	10,770 People	ADA Ramps, sidewalks throughout the city	Public Facility & Improveme nts
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Project Name	Target Area	Goals Supported	Needs Addressed	Funding	Description	Target Date	Estimate the number and type of families that will benefit from the proposed activities	Location Description	Planned Activities
Stanton Community/S enior Center Improvement Project (Stanton)		Enhance Quality of Life	Enhance Quality of Life	\$477,000	Funds will be used for City of Stanton Community Center Improvement s HVAC and Generator	6/30/2026	2,952 People	City of Stanton Community and Senior Center	Public Facility & Improveme nts

Project Name	Target Area	Goals Supported	Needs Addressed	Funding	Description	Target Date	Estimate the number and type of families that will benefit from the proposed activities	Location Description	Planned Activities
Alipaz Street & Sidewalk Improvement s (San Juan Capistrano)		Enhance Quality of Life	Enhance Quality of Life	\$477,000	Funds will be used for reconstruction of 4,400 linear feet of Alipaz St. including construction of new sidewalks on Alipaz St., ADA ramps on Alipaz St; curb and gutter improvement s, ADA trolley stops, bike lane improvement s, and street lighting.	6/30/2026	3,100 People	Alipaz St. (San Juan Capistrano)	Public Facility & Improveme nts

Project Name	Target Area	Goals Supported	Needs Addressed	Funding	Description	Target Date	Estimate the number and type of families that will benefit from the proposed activities	Location Description	Planned Activities
County of Orange - Community Center Improvement s (Midway City)		Enhance Quality of Life	Enhance Quality of Life	\$212,000	Funds will be used for improvement s to County owned Community Center in Midway City.	6/30/2026	1,200 People	Orange County Community Center (Midway City)	Public Facility & Improveme nts
Affordable Housing HOME		Expand Affordable Housing Opportuniti es	Expand Affordable Housing Opportunitie s	HOME: \$1,121,106.6 1	County will use funds for affordable housing development opportunities	6/30/2026	8-10 units	County of Orange	Housing Developme nt
Affordable Housing- HOME PI		Expand Affordable Housing Opportuniti es	Expand Affordable Housing Opportunitie s	\$121,500	County will use funds for affordable housing development opportunities.	6/30/2026	1 unit	County of Orange	Housing Developme nt

Project Name	Target Area	Goals Supported	Needs Addressed	Funding	Description	Target Date	Estimate the number and type of families that will benefit from the proposed activities	Location Description	Planned Activities
County of Orange - CDBG Administratio n (CDBG) & (PI)		Planning and Administrat ion	Planning and Administrati on	CDBG: \$517,936	Funds will be utilized for administration of HUD-sponsored Urban County programs	6/30/2026	N/A	County of Orange	Administrati on
County of Orange – ESG Administratio n		Planning and Administrat ion	Planning and Administrati on	ESG: \$22,429	Funds will be utilized for administration of HUD-sponsored Urban County programs	6/30/2026	N/A	County of Orange	Administrati on
County of Orange - HOME Administratio n (HOME) & (PI)		Planning and Administrat ion	Planning and Administrati on	HOME: \$138,068	Funds will be utilized for administration of HUD-sponsored Urban County programs	6/30/2026	N/A	County of Orange	Administrati on

Project Name	Target Area	Goals Supported	Needs Addressed	Funding	Description	Target Date	Estimate the number and type of families that will benefit from the proposed activities	Location Description	Planned Activities
Fair Housing Council of Orange County		Public Services	Public Services	CDBG: \$52,000	Utilize funds to provide fair housing education, six community events, counseling, enforcement, and landlord/tena nt counseling	6/30/2026	2,325 People	Participating Cities and unincorpora ted areas of Orange County.	Administrati on
Administratio n City (Placentia)		Planning and Administrat ion	Small Business Relief Program.	CDBG: \$35,242	Funds will be utilized for administration of the City of Placentia HUD-sponsored programs.	6/30/2026	N/A	City of Placentia	Administrati on

Project Name	Target Area	Goals Supported	Needs Addressed	Funding	Description	Target Date	Estimate the number and type of families that will benefit from the proposed activities	Location Description	Planned Activities
Administratio n County (Placentia)		and	Planning and Administrati on	CDBG: \$35,242	Administratio n for City of Placentia HUD – sponsored programs, CAPER, AAP.	6/30/2026	N/A		Administrati on

Project Name	Target Area	Goals Supported	Needs Addressed	Funding	Description	Target Date	Estimate the number and type of families that will benefit from the proposed activities	Location Description	Planned Activities
Public Services Neighborhoo d Services (Placentia)		Public Services	Public Services	CDBG: \$31,864	City of Placentia/Pub lic Services Neighborhoo d Services - Funds will be used for the operations and support staff on the Neighborhoo d Services Division for various food distribution programs and coordinating services for low-income residents.	6/30/2026	800 Low- income People	City of Placentia	
Public Services Seniors Services (Placentia)		Public Services	Public Services	CDBG: \$21,000	Senior Services (Lunch Program)	6/30/2026	450 Low Income Seniors	City of Placentia	

Project Name	Target Area	Goals Supported	Needs Addressed	Funding	Description	Target Date	Estimate the number and type of families that will benefit from the proposed activities	Location Description	Planned Activities
Façade Improvement s (Placentia)		Enhance Quality of Life	Enhance Quality of Life	CDBG: \$176,679	Commercial Rehabilitation	6/30/2026	Up to two businesses	City of Placentia	
Housing Rehabilitation - SFR (Placentia)		Enhance Quality of Life	Enhance Quality of Life	CDBG: \$52,500	Housing Rehab-SFR	6/30/2026	4-5 Units	City of Placentia	SF Rehabilitatio n
ADA Pedestrian Accessibility Project (Placentia)		Enhance Quality of Life	Enhance Quality of Life	\$180,778	Funds will be used to remove barriers by installing ADA-compliant curb ramps and sidewalks city-wide.	6/30/2026	8,600 People	City of Placentia	Public Facility & Improveme nts

Project Name	Target Area	Goals Supported	Needs Addressed	Funding	Description	Target Date	Estimate the number and type of families that will benefit from the proposed activities	Location Description	Planned Activities
Administratio n City (Yorba Linda)		Planning and Administrat ion	Planning and Administrati on	CDBG: \$26,101	Funds will be utilized for administration of the City of Yorba Linda HUD-sponsored programs.	6/30/2026		City of Yorba Linda	Admin
Administratio n County (Yorba Linda)		Planning and Administrat ion	Planning and Administrati on	CDBG: \$26,101	Administratio n for City of Yorba Linda HUD - sponsored programs, CAPER, AAP	6/30/2026		City of Yorba Linda	Admin

Project Name	Target Area	Goals Supported	Needs Addressed	Funding	Description	Target Date	Estimate the number and type of families that will benefit from the proposed activities	Location Description	Planned Activities
Public Services (Senior Nutrition Program) (Yorba Linda)		Public Services	Public Services	CDBG: \$39,152	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.	6/30/2026	150 People	Yorba Linda Community Center	Senior Nutrition Program

Project Name	Target Area	Goals Supported	Needs Addressed	Funding	Description	Target Date	Estimate the number and type of families that will benefit from the proposed activities	Location Description	Planned Activities
Neighborhoo d Improvement Program HR - SFR (Yorba Linda)		Enhance Quality of Life	Enhance Quality of Life	CDBG: \$90,000	Funds will be used to provide rehabilitation grants to qualified homeowners for general property improvement s and repairs to meet local codes, standards, and ordinances.	6/30/2026	17 units	City of Yorba Linda	SF Rehabilitatio n
Multi-family Rehabilitation Project- Housing Rehab (Yorba Linda)		Enhance Quality of Life	Enhance Quality of Life	CDBG: \$79,660	Funds will be used to replace a roof on a majority of low/moderate income senior citizen condo complex.	6/30/2026	3 Buildings	Evergreen Villas in the City of Yorba Linda	Roofing Improveme nts

Project Name	Target Area	Supported	Needs Addressed	Funding	Description	Target Date	Estimate the number and type of families that will benefit from the proposed activities	Location Description	Planned Activities
WAITLISTED I	PROJEC	I 9 IF FUNDIN	RECOMES	AVAILIBLE	T=	1	1		
(ADA) Pedestrian Accessibility Improvement Phase IX (Laguna Woods)		Enhance Quality of Life	Enhance Quality of Life	\$265,000	Funds will be used for the installation of ADA-compliant vibrotactile pedestrian systems at six strategically chosen intersections within the City of Laguna Woods	6/30/2026	10,770 People	Six strategicall y chosen intersectio ns within the City of Laguna Woods	Public Facility & Improveme nts

Project Name	Target Area	Goals Supported	Needs Addressed	Funding	Description	Target Date	Estimate the number and type of families that will benefit from the proposed activities	Location Description	Planned Activities
Serra Park Playground Replacemen t (San Juan Capistrano)		Enhance Quality of Life	Enhance Quality of Life	\$265,000	Funds will be used for playground equipment replacement, pour a play surface and 2 benches at the Serra Park in the City of San Juan Capistrano	6/30/2026	3010 People	City of San Juan Capistrano	Public Facility & Improveme nts

Project Name	Target Area	Goals Supported	Needs Addressed	Funding	Description	Target Date	Estimate the number and type of families that will benefit from the proposed activities	Location Description	Planned Activities
HVAC & Senior Center Improvement s (Stanton)		Enhance Quality of Life	Enhance Quality of Life	\$477,000	Funds will be used for HVAC Construction & Mobilization, removal & replacement of existing HVAC units. ADA Handrails, SDS Stairway lift improvement s, cabinets at the City of Stanton Senior Center	6/30/2026	2,952 People	City of Stanton Senior Center	Public Facility & Improveme nts

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. However, the County has not established any specific geographic target area for expending funds.

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	
	NA	

Table 62 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

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

Discussion

See discussions above.

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 has issued a series of Notice of Funding Availabilities (NOFA's) to make funding and 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.

One Year Goals for the Number of	f Households to be Supported
Homeless	9,500
Non-Homeless	0
Special-Needs	0
Total	9,500

Table 64 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Through	of Households Supported
Rental Assistance	0
The Production of New Units	18
Rehab of Existing Units	86
Acquisition of Existing Units	О
Total	104

Table 65 - One Year Goals for Affordable Housing by Support Type

Discussion

Homeless- The Orange County Continuum of Care expects to serve approximately 7,000 persons 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 deinstitutionalization 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 recognizes that fully engaging in efforts to end homelessness requires a deeply involved community and accurate information. Based on the findings from the 2024 Orange County Point-In-Time Count, a total of 7,322 persons are experiencing homelessness on any given night. This represents an increase of about 28 percent from the 2022 PIT Count (or an increase of 1,604 individuals).

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 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 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 has allocated \$179,434 in Federal Emergency Solutions Grant (ESG) funds and \$222,282 in Community Development Block Grant (CDBG) funds during FY 2025-26 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.

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 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 addresses 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 veterans, families, Transitional Age Youth (TAY) etc. The County also applied to be the Administrative Entity on behalf of the Orange County (CoC) for the 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 and the Cities throughout the County with the purpose of funding housing. As of February 2025, the OCHFT has funded 1,677 permanent 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, 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 "build- out" 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 "by- right" 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

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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) adopts a housing element as a required component of the general plan. In its adopted 2021-2029 Housing Element, the County identified several changes to its zoning code to facilitate affordable housing development, including adopting Objective Design Standards for residential development. The County's Housing Element also includes an objective that the County's Affordable Housing Project Manager and OC Housing and Community Development staff continue to provide public information about affordable housing opportunities to the public and housing developers, and to 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.

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.

In September 2024 the County temporarily suspended the 2023 Supportive Housing NOFA as amended to prioritize resources for Homekey+. In November 2024 the County released a Request for Information/Qualifications to identified qualified developers with experience creating permanent supportive housing for consideration for funding through the State of California Homekey+ program. Through this process the County identified a list of five potential developers that may be eligible for future funding. Applications for Homekey+ are due in May 2025. The County is working with a developer on a prospective Homekey+ site and application.

In March 2025, the County released a 2025 NOFA making up to \$12.05 million in combined funding (including HOME, HOME-ARP, MHSA, Housing Successor Agency and 15G Reserves funds) and up to 150 project-based vouchers available to support supportive housing development.

Discussion:

See discussions above.

AP-85 Other Actions – 91.220(k) Introduction:

Priority Needs for the County are as follows:

The following Priority Needs have been identified for the County of Orange:

High Priority

- 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

In addition, the County may consider Economic Development activities if funding becomes available (Low-Priority).

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 County, Orange County cities, non-profits and local agencies collaborate on a variety of actions to foster and maintain affordable housing using federal, state and local funding.

CDBG program funds are distributed and expended based on program criteria. HOME funds are

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distributed to projects that meet priority needs, are timely and meet other evaluation factors that indicate a strong probability the project will come to fruition. ESG funds and CDBG funds for Public Services are awarded to projects using a non-competitive process that will best serve the priority needs of homeless individuals, families, those at risk of becoming homeless and Public Services that serve the community operating County owned facilities. The County's CoC for the homeless leverages Continuum of Care Grants, Emergency Solutions Grants, and State EFSP and EHAP funds, and the County can also leverage HUD Section 202 and 811 funds in conjunction with non-profit sponsors to expand the supply of housing for the senior and special needs populations. The County plans to pursue the National Housing Trust Fund when it becomes available to leverage its affordable housing development efforts, including new construction and acquisition/rehabilitation.

The County also utilizes local funding to leverage affordable housing projects and for Emergency Shelter programs. Non-profit and public sector partners contribute non-federal funds to meet the HOME match requirement. To ensure compliance with ESG match requirements, the County requires verification of matching funds by service providers who submit documentation for reimbursement of expenditures.

In 2019, the Orange County Housing Finance Trust (OCHFT) was formed as a joint power's authority between the County 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. There are now 28 active member jurisdictions. Participating cities share a common goal of creating 2,700 permanent supportive housing units and 2,700 affordable units by June 30, 2025.

In November 2024 the County released a Request for Information/Qualifications to identified qualified developers with experience creating permanent supportive housing for consideration for funding through the State of California Homekey+ program. Through this process the County identified a list of five potential developers that may be eligible for future funding.

The County's Mortgage Assistance Program (MAP) provides silent down payment assistance loans to assist low-income first-time homebuyers to help with the down payment to purchase a home. Homebuyers must occupy the property as their primary residence.

The County also consults with the Kennedy Commission, a nonprofit organization that provides advocacy and education related to affordable housing in the County, to help educate the public about Housing & Community Development and affordable housing efforts.

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.

The County seeks to reduce the number of people living in poverty (extremely low-income households earning less than 30 percent of the AMI) by providing a number of programs including housing assistance, supportive services, economic development assistance, and job training opportunities. The County will continue to leverage opportunities to support funding for Community Based Development Organizations, cities, and other groups to provide training and employment opportunities to extremely low-income persons. In collaboration with the County's Workforce Investment Board (OCDB), the County will continue to offer outreach and training to poverty level families and individuals. Through the CoC system, the County will work with the OCDB job-training providers to ensure that low- and moderate-income persons are trained with employable skills with the potential to earn higher wages. In addition, the County's funding (through CDBG and ESG funds) of human service programs for basic needs, food distribution, and case management for homeless and those at risk of homelessness support the goals and strategies of reducing poverty.

Actions planned to develop institutional structure.

The 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.

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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.

Total Program Income:	20,000
5. The amount of income from float-funded activities	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
3. The amount of surplus funds from urban renewal settlements	0
The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan.	
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

Other CDBG Requirements

1. The amount of urgent need activities

0

2. The estimated percentage of CDBG funds that will be used for activities that100.00% 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.

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 2025-26 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.

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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. 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.

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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.

5. 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.

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

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 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 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 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.

The County's, OCC, is the lead for CES. CES partners with a network of service providers for a no wrong door approach for access to CES, follows a standardized entry protocol and prioritization for placement policy and utilizes a single, standardized assessment tool to screen applicants for available programs throughout Orange County. The current CES

Annual Action Plan policies were approved by the CoC Board on December 2023 – https://ceo.ocgov.com/sites/ceo/files/2023-12/CES Policies and Procedures Final_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 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 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)

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Emergency Solutions Grant (ESG) Written Standards

County of Orange and Orange County Continuum of Care

Emergency Solutions Grant (ESG) Reference 24 CFR 576.400. 91.220

Emergency Solutions Grant Written Standards

The County of Orange (County), through the Orange County Community Resources (OCCR) and the County Executive Office (CEO) Office of Care Coordination, is responsible for coordinating and implementing the Emergency Solutions Grant (ESG) Orange County Written Standards. The ESG regulations, the Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act, and the Continuum of Care (CoC) Program Interim Rules state that the CoC, in consultation with recipients of ESG program funds within the geographic area, must:

- Establish and consistently follow written standards for providing eligible services and assistance that aligns with CoC policies;
- Establish performance targets appropriate for population and program type; and
- Monitor recipient and subrecipient performance.

Pursuant to the Code of Federal Regulations 24 CFR Part 578, the County, in coordination with local ESG jurisdictions and the Orange County CoC, has developed the following written standards. These standards will apply to all projects and activities that receive County ESG funding. These are intended as basic minimum standards to which subrecipients can make additions and/or enforce more stringent standards applicable to their own projects. In addition, all projects must comply with the funding process under which the project was originally awarded and the HEARTH Act. All programs that receive ESG funding are required to abide by these written standards.

Overview of HEARTH Act

- Approved on May 20, 2009, and amended the McKinney-Vento Homeless Assistance Act.
- Amendments allow for increased flexibility in who may be served and what activities may be carried
- Consolidates three separate homeless assistance programs administered by the United Stated
 Department of Housing and Urban Development (HUD) under the McKinney-Vento Homeless
 Assistance Act into a single grant program and creates the ESG Program and the Rural Housing Stability
 Assistance Program (RHSP).
- Change of focus from homeless shelter to homelessness prevention.

ESG and CoC Coordination & Collaboration

These written standards have been developed and reviewed by an ad hoc group of ESG grantees within Orange County known as the ESG Collaborative. The ESG Collaborative includes members of the County, the City of Anaheim, City of Garden Grove, City of Santa Ana, City of Irvine and the Orange County CoC. This collaboration allows for input on the standards and implementation process developed by organizations that directly provide homeless and housing services, Street Outreach, Emergency Shelter Operations, Rapid Re-housing (RRH), and Homelessness Prevention (HP). The ESG Written Standards have been adopted/approved by the CoC Board, County and City ESG recipients. These written standards will be reviewed and revised at least annually, or as needed, to continue to build upon and refine this document.

State and Federal Compliance

ESG recipients are required to comply with state and federal statutes relating to nondiscrimination, including the Fair Housing Act, Section 504 of the Rehabilitation Act, Title VI of the Civil Rights Act, Title II of the Americans with Disabilities Act, and Title III of the American with Disabilities Act.

Housing First Model

HUD encourages all ESG grantees and subrecipients, as well as the CoC, to implement a "housing first" approach when providing assistance. The housing first approach prioritizes rapid placement and stabilization in permanent housing; it does not have service participation requirements or preconditions (such as sobriety or a minimum income threshold).

Transitional housing and supportive services only projects may also be considered to utilize the housing first approach, if the projects operate with low-barriers, work to quickly move people into permanent housing, do not require participation in supportive services, and do not require any preconditions for moving into transitional housing.

Universal Assessment

All ESG and CoC Programs in Orange County are required to utilize standard and universal assessments approved by the Orange County CoC Board. A Homeless Prevention Assessment serves as a triage tool to determine if the individual or family may be diverted, need prevention assistance, or need to be further assessed to determine what is the best housing intervention for them. If the individual or family is determined to need further assessment, a standard assessment is completed for households to be considered for permanent housing opportunities available through the Coordinated Entry System (CES) while continuing to engage in diversion and problem-solving strategies. The assessments and prioritization factors approved by the Orange County CoC Board were developed to ensure that the household's level of need and eligibility are made in an informed, reasonable, and objective manner while prioritizing limited resources to the most vulnerable households.

Homeless Management Information System

All subrecipients are required to participate in the Homeless Management Information System (HMIS) per the ESG and CoC Interim Rule (24 CFR 576 and 578). HMIS provides an opportunity to document homelessness and helps to ensure coordination between service providers while avoiding duplication of services and client data. 2-1-1 Orange County was designated as the HMIS Lead by the Orange County CoC. Subrecipients are required to adhere to all privacy protection practices in accordance with the HMIS Policies and Procedures as approved by the Orange County CoC Board to ensure that participating organizations maintain the security and privacy of confidential client data referred to as Protected Personal Information (PPI).

Reporting - HMIS

- The HEARTH Act makes HMIS participation a statutory requirement for ESG recipients and subrecipients. The subrecipients work with the CoC to ensure the screening, assessment, and referral of program participants are consistent with the written standards.
- The subrecipient will ensure that data on all persons served and all activities assisted under ESG are entered into a community-wide HMIS in the area in which those persons and activities are located.
- Victim service providers cannot, and Legal Services Organizations may choose to not participate in HMIS. Providers that do not participate in HMIS must use a comparable database that produces unduplicated, aggregate reports instead.
- Eligible Cost include, but not limited to the following:
 - Hardware, Equipment and Software Costs
 - Staffing: Paying salaries for operating HMIS
 - Training and Overhead-Technical support, leasing space, and utilities for space used by HMIS staff

Comparable Database for Victim Services

If the subrecipient is a victim services or a legal services provider that use a comparable database, it may use ESG funds to establish and operate a comparable database that collects client-level data over time and generates unduplicated aggregate reports based on the data. Information entered into a comparable database must be provided to the HMIS Lead, upon request.

Data Sharing Requirement

Data sharing is a multi-directional sharing relationship between multiple organizations. In order to systematically share data, the participating agencies must jointly establish a data sharing network formalized by the execution of guidelines, with the understanding they agree to future updates to the guidelines made by the HMIS Lead.

ESG Agreements

The ESG recipient enters into an agreement with ESG subrecipients. In general, these subrecipient agreements define:

- Key program components or activities (including benchmarks for success);
- Level of ESG funding and budgeting;
- Anticipated source and amount of matching funds (24CFR 576.201) contributed by the subrecipient;
- Applicable laws and regulations; and
- Participation in the Orange County Continuum of Care's HMIS (or comparable database for qualified victim service providers) and Coordinated Entry System
- Documentation and reporting requirements.

Expenditure Limits 24 CFR 576.100

Funds used for street outreach and emergency shelter activities will be limited to the greater of:

- 60 percent of the jurisdiction's total current fiscal year (FY) grant for ESG; or
- The amount of FY 2010 ESG grant funds that were committed to street outreach and emergency shelter.

The total amount of ESG funds that may be used for administrative activities cannot exceed 7.5 percent of the recipient's FY grant.

Matching Funds Requirements 24 CFR 576.201

- The subrecipient must make matching contributions to supplement the recipient's ESG program in an amount that equals the amount of ESG funds provided by HUD.
- Matching contributions may be obtained from any eligible source, including any federal source other than the ESG program, as well as state, local, and private sources. Additional requirements apply to matching contributions from a federal source of funds.
- Matching contributions must be provided after the date that HUD signs the grant agreement.

<u>Uniform Administrative Requirements 2 CFR 200</u>

The use of ESG funding is subject to the applicable requirements of 2 CFR Part 200, *Uniform Administrative Requirements, Cost Principals, and Audit Requirements for Federal Awards*. The purpose of 2 CFR Part 200 is to streamline the Federal Government's guidance on administrative requirements to more effectively focus Federal resources on improving performance and outcomes, while ensuring the financial integrity of the Federal programs in partnership with non-federal stakeholders (e.g., grantees and subrecipients). 2 CFR Part 200 supersedes,

consolidates, and streamlines requirements from eight (8) OMB Circulars: A-21, A-87, A-89, A-102, A-110, A-122, A-133, and A-50. Subrecipients are required to maintain an acceptable general accounting system. A subrecipient's general accounting system must include:

- 1. *Internal Controls (2 CFR 200.303):* All ESG subrecipients must establish and maintain effective internal control over the grant award that provides reasonable assurance that funds are managed in compliance with federal statutes, regulations, and the terms and conditions of the ESG grant award.
 - These internal controls should be in compliance with guidance in "Standards for Internal Control in the Federal Government" issued by the Comptroller General of the United States or the "Internal Control Integrated Framework", issued by the Committee of Sponsoring Organizations of the Treadway Commission (COSO).
 - Comply with the U.S. Constitution, federal statutes, regulations, and the terms and conditions of the ESG grant award.
 - Evaluate and monitor subrecipient compliance with statutes, regulations and the terms and conditions of ESG grant award.
 - Take prompt action when instances of noncompliance are identified including noncompliance identified in audit findings.
 - Take reasonable measures to safeguard protected personally identifiable information and other information the Federal awarding agency or pass-through entity designates as sensitive or considers sensitive consistent with applicable federal, State, local, and tribal laws regarding privacy and responsibility over confidentiality.
- 2. *Independent Single Audit (2 CFR 200.514):* All ESG subrecipients that expend more than \$750,000 of Federal funds (include all Federal sources) in a single year must have a single audit conducted. Copies of the Single Audit must be sent to the County as well as HUD.

General (2 CFR 200.514(a)). The audit must be conducted in accordance with the Generally Accepted Government Auditing Standards (GAGAS), and cover the entire operations of the auditee, or, at the option of the auditee, such audit must include a series of audits that cover departments, agencies, and other organizational units that expended or otherwise administered federal awards during such audit period, provided that each such audit must encompass the financial statements and schedule of expenditures of federal awards for each such department, agency, and other organizational unit, which must be considered to be a non-federal entity. The financial statements and schedule of expenditures of federal awards must be for the same audit period.

Financial statements (2 CFR 200.514(b)). The auditor must determine whether the financial statements of the auditee are presented fairly in all material respects in accordance with generally accepted accounting principles. The auditor must also determine whether the schedule of expenditures of federal awards is stated fairly in all material respects in relation to the auditee's financial statements as a whole.

Internal control (2 CFR 200.514(c)). The compliance supplement provides guidance on internal controls over Federal programs based upon the guidance in Standards for Internal Control in the Federal Government issued by the Comptroller General of the United States and the Internal Control - Integrated Framework, issued by the Committee of Sponsoring Organizations of the Treadway Commission (COSO).

In addition to the requirements of the GAGAS, the auditor must perform procedures to obtain an understanding of internal control over Federal programs sufficient to plan the audit to support a low assessed level of control risk of noncompliance for major programs.

The auditor must:

- a. Plan the testing of internal control over compliance for major programs to support a low assessed level of control risk for the assertions relevant to the compliance requirements for each major program; and
- b. Perform testing of internal control as planned above.

When internal control over some or all of the compliance requirements for a major program are likely to be ineffective in preventing or detecting noncompliance, the planning and performing of testing are not required for those compliance requirements. However, the auditor must report a significant deficiency or material weakness in accordance with Section 200.516, assess the related control risk at the maximum, and consider whether additional compliance tests are required because of ineffective internal control.

Compliance (2 CFR 200.514(d)). In addition to the requirements of GAGAS, the auditor must determine whether the auditee has complied with federal statutes, regulations, and the terms and conditions of Federal awards that may have a direct and material effect on each of its major programs.

- The principal compliance requirements applicable to most Federal programs and the compliance requirements of the largest Federal programs are included in the compliance supplement. Compliance supplement means an annually updated authoritative source for auditors that serves to identify existing important compliance requirements that the Federal Government expects to be considered as part of an audit. Auditors use it to understand the Federal program's objectives, procedures, and compliance requirements, as well as audit objectives and suggested audit procedures for determining compliance with the relevant Federal program.
- For the compliance requirements related to Federal programs contained in the compliance supplement, an audit of these compliance requirements will meet the requirements of this part. Where there have been changes to the compliance requirements and the changes are not reflected in the compliance supplement, the auditor must determine the current compliance requirements and modify the audit procedures accordingly. For those Federal programs not covered in the compliance supplement, the auditor must follow the compliance supplement's guidance for programs not included in the supplement.
- When internal control over some or all of the compliance requirements for a major program are likely
 to be ineffective in preventing or detecting noncompliance, the planning and performing of testing
 are not required for those compliance requirements. However, the auditor must report a significant
 deficiency or material weakness in accordance with Section 200.516, assess the related control risk at
 the audit follow-up.

Audit follow-up (2 CFR 200.514(e)). The auditor must follow-up on prior audit findings, perform procedures to assess the reasonableness of the summary schedule of prior audit findings prepared by the auditee in accordance with Section 200.511(b), and report, as a current year audit finding, when the auditor concludes that the summary schedule of prior audit findings materially misrepresents the status of any prior audit finding. The auditor must perform audit follow-up procedures regardless of whether a prior audit finding relates to a major program in the current year.

Data collection form. As required in Section 200.512(b)(3), the auditor must complete, and sign specified sections of the data collection form.

3. Record Keeping (2 CFR 200). All records must be maintained for a minimum of four (4) years.

Financial records, supporting documents, statistical records, and all other ESG records pertinent to the ESG grant award must be retained for a period of four years from the date of submission of the final expenditure report or, for awards that are renewed quarterly or annually, from the date of the submission of the quarterly or annual financial report, respectively, as reported to the awarding agency or pass-through entity in the case of a subrecipient. Awarding agencies and pass-through entities must not impose any other record retention requirements upon non-federal entities. The only exceptions are the following:

- If any litigation, claim, or audit is started before the expiration of the four-year period, the records must be retained until all litigation, claims, or audit findings involving the records have been resolved and final action taken.
- When the subrecipient is notified in writing by the federal awarding agency, cognizant agency for audit, oversight agency for audit, cognizant agency for indirect costs, or pass-through entity to extend the retention period.
- Records for real property and equipment acquired with federal funds must be retained for four years after final disposition.
- When records are transferred to or maintained by the federal awarding agency or pass-through entity, the four-year retention requirement is not applicable to the non-Federal entity.
- Records for program income transactions after the period of performance. In some cases, recipients must report program income after the period of performance. Where there is such a requirement, the retention period for the records pertaining to the earning of the program income starts from the end of the non-federal entity's fiscal year in which the program income is earned.
- Indirect cost rate proposals and cost allocations plans. This paragraph applies to the following types of documents and their supporting records such as indirect cost rate computations or proposals, cost allocation plans, and any similar accounting computations of the rate at which a particular group of costs is chargeable (such as computer usage chargeback rates or composite fringe benefit rates).
 - If submitted for negotiation. If the proposal, plan, or other computation is required to be submitted to the Federal Government (or to the pass-through entity) to form the basis for negotiation of the rate, then the four-year retention period for its supporting records starts from the date of such submission.
 - If not submitted for negotiation. If the proposal, plan, or other computation is not required to be submitted to the federal government (or to the pass-through entity) for negotiation purposes, then the four-year retention period for the proposal, plan, or computation and its supporting records starts from the end of the fiscal year (or other accounting period) covered by the proposal, plan, or other computation.

Financial Management

Grantees and subrecipients in the ESG program must ensure compliance with regulations and requirements pertaining to the following key areas of financial management outlined in Financial Management Systems (24 CFR 85.20 and 24 CFR 84.20-28) for the following areas:

- Usage of funds
- Internal controls
- Cash management
- Procurement property
- Audits

- Required funding match
- Budget controls
- Accounting controls
- Asset controls

Documentation of Homelessness 24 CFR 576.500 (b)

ESG subrecipients are required to maintain adequate documentation of homelessness status to determine

eligibility of persons served by the ESG program.

A copy of this documentation must be maintained by the subrecipient in the participant's file.
 Documentation includes 3-day notice to pay or quit, public agency written verification of homelessness, or self-certification of homelessness are examples of required proof to require and maintain in participant file.

Definitions of Homelessness and At-Risk of Homelessness 24 CFR 91.5

The following are the homeless definitions and categories as defined in 24 CFR Parts 91, 582 and 583:

- 1. An individual who lacks a fixed, regular, and adequate nighttime residence, meaning:
 - i. An individual with a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, including a car, park, abandoned building, bus or train station, airport, or camping ground; or
 - ii. An individual living in a supervised publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state, or local government programs for lowincome individuals).
- 2. An individual who will imminently lose their primary nighttime residence, provided that:
 - i. The primary nighttime residence will be lost within 14 days of the date of application for homeless assistance;
 - ii. No subsequent residence has been identified; and
 - iii. The individual lacks the resources or support networks, e.g., family, friends, faith-based or other social networks, needed to obtain other permanent housing.
- 3. Unaccompanied youth under 25 years of age who do not otherwise qualify as homeless under this definition, but who:
 - i. Are defined as homeless under section 387 of the Runaway and Homeless Youth Act (42 U.S.C. 5732a), section 637 of the Head Start Act (42 U.S.C. 9832), section 41403 of the Violence Against Women Act of 1994 (42 U.S.C. 14043e-2), section 330(h) of the Public Health Service Act (42 U.S.C. 254b(h)), section 3 of the Food and Nutrition Act of 2008 (7 U.S.C. 2012), section 17(b) of the Child Nutrition Act of 1966 (42 U.S.C. 1786(b)) or section 725 of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a);
 - ii. Have not had a lease, ownership interest, or occupancy agreement in permanent housing at any time during the 60 days immediately preceding the date of application for homeless assistance;
 - iii. Have experienced persistent instability as measured by two moves or more during the 60-day period immediately preceding the date of applying for homeless assistance; and
 - iv. Can be expected to continue in such status for an extended period of time because of chronic disabilities, chronic physical health or mental health conditions, substance addiction, histories of domestic violence or childhood abuse (including neglect), the presence of a child or youth with a disability, or two or more barriers to employment, which include the lack of a high school degree or General Education Development (GED), illiteracy, low English proficiency, a history of incarceration or detention for criminal activity, and a history of unstable employment; or

4. Any individual who:

i. Is fleeing, or is attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions that relate to violence against the individual or a family member, including a child, that has either taken place within the individual's or family's primary nighttime residence or has made the individual or family afraid to return to their primary nighttime

- residence;
- ii. Has no other residence; and
- iii. Lacks the resources or support networks, e.g., family, friends, faith-based or other social networks, to obtain other permanent housing.

The following is the at-risk of homelessness definition as defined in 24 CFR Parts 91, 582 and 583:

- 1. An individual or family who:
 - i. Has an annual income below 50 percent of median family income for the area, as determined by HUD;
 - ii. Does not have sufficient resources or support networks, e.g., family, friends, faith-based or other social networks, immediately available to prevent them from moving to an emergency shelter or another place described in paragraph (1) of the homeless definition in this section; and
 - iii. Meets one of the following conditions:
 - (A) Has moved because of economic reasons two or more times during the 60 days immediately preceding the application for homelessness prevention assistance;
 - (B) Is living in the home of another because of economic hardship;
 - (C) Has been notified in writing that their right to occupy their current housing or living situation will be terminated within 21 days after the date of application for assistance;
 - (D) Lives in a hotel or motel and the cost of the hotel or motel stay is not paid by charitable organizations or by Federal, State, or local government programs for low-income individuals;
 - (E) Lives in a single-room occupancy or efficiency apartment unit in which there reside more than two persons or lives in a larger housing unit in which there reside more than 1.5 persons reside per room, as defined by the U.S. Census Bureau;
 - (F) Is exiting a publicly funded institution, or system of care (such as a health-care facility, a mental health facility, foster care or other youth facility, or correction program or institution); or
 - (G) Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in the recipient's approved consolidated plan.

Monitoring and Site Visits

Monitoring can take a number of forms and can include review of progress reports, telephone consultation, and performance on-site assessments. The three basic goals for oversight and monitoring of the progress and performance of ESG grantees/recipients include:

- Ensure that ESG funds are used effectively to assist homeless individuals and families and that the basic ESG program goals are met;
- Ensure compliance with ESG regulations and program requirements in the usage of funds and in carrying out program activities; and
- Enhance and develop the management capacity of grantees or recipients.

Participation of Homeless Persons in Policymaking and Operations 24 CFR 576.405

Pursuant to 24 CFR 576.405, recipients of ESG funds must provide for the participation of not less than one homeless or formerly homeless persons in a policy-making function within the subrecipient's organization. If the recipient is unable to meet this requirement, they must instead develop and implement a plan to consult with homeless or formerly homeless persons in a policy-making function regarding any facilities, services, or other assistance that received funding under ESG. All subrecipients of ESG funds are required to involve or encourage involvement of participants in the operation of an ESG- funded program or facility.

<u>Termination of Assistance 24 CFR 576.402:</u>

Assistance provided through ESG-funded activities to program participants that violate program requirements may be terminated. Written procedures must describe the specific program requirements and the termination, grievance, or appeal processes; this should include the procedures for a participant to request a hearing regarding the termination of their assistance. The federal regulation at 24 CFR 576.402 describes the termination provision:

- (a) If a program participant violates program requirements, the recipient or subrecipient may terminate the assistance in accordance with a formal process established by the recipient or subrecipient that recognizes the rights of individuals affected. The recipient or subrecipient must exercise judgment and examine all extenuating circumstances in determining when violations warrant termination so that a program participant's assistance is terminated only in the most severe cases.
- (b) Program participants receiving rental assistance or housing relocation and stabilization services. To terminate rental assistance or housing relocation and stabilization services to a program participant, the required formal process, at a minimum, must consist of:
 - (1) Written notice to the program participant containing a clear statement of the reason(s) for termination;
 - (2) A review of the decision, in which the program participant is given the opportunity to present written or oral objections before a person other than the person (or a subordinate of that person) who made or approved the termination decision; and
 - (3) Prompt written notice of the final decision to the program participant.
- (c) Ability to provide further assistance. Termination under this section does not bar the recipient or subrecipient from providing further assistance at a later date to the same family or individual.

Conflict of Interest 24 CFR 576.404:

The provision of any type or amount of ESG assistance may not be conditioned on an individual's or family's acceptance or occupancy of emergency shelter or housing owned by the subrecipient, or a parent or subsidiary of the subrecipient. No subrecipient may, with respect to individuals or families occupying housing owned by the subrecipient, or any parent or subsidiary of the subrecipient, carry out the initial evaluation required under 24 CFR 576.401 or administer homelessness prevention assistance under 24 CFR 576.103.

The subrecipient must maintain written standards of conduct covering conflicts of interest and governing the actions of its employees engaged in the selection, award and administration of contracts. No employee, officer, or agent may participate in the selection, award, or administration of a contract supported by a grant award if he or she has a real or apparent conflict of interest. Such a conflict of interest would arise when the employee, officer, or agent, any member of his or her immediate family, his or her partner, or an organization which employs or is about to employ any of the parties indicated herein, has a financial or other interest in or a tangible personal benefit from a firm considered for a contract. The officers, employees, and agents of the subrecipient may neither solicit nor accept gratuities, favors, or anything of monetary value from contractors or parties to subcontracts. However, the subrecipient may set standards for situations in which the financial interest is not substantial, or the gift is an unsolicited item of nominal value. The standards of conduct must provide for disciplinary actions to be applied for violations of such standards by officers, employees, or agents of the subrecipient.

If the subrecipient has a parent, affiliate, or subsidiary organization that is not a state, local government, or Indian tribe, the subrecipient must maintain written standards of conduct covering organizational conflicts of interest. Organizational conflicts of interest means that because of relationships with a parent company, affiliate, or subsidiary organization, the subrecipient is unable or appears to be unable to be impartial in conducting a procurement action involving a related organization.

No persons (as described in persons covered) who exercise or have exercised any functions or responsibilities with

respect to ESG activities or who are in a position to participate in a decision making process or gain inside information with regard to such activities, may obtain a financial interest or benefit from the activity, or have an interest or benefit from the activity, or have an interest in any contract, subcontract or agreement with respect thereto, or the proceeds derived from an assisted activity, either for themselves or those with whom they have family or business ties, during their tenure or for one year thereafter.

Persons Covered: The Conflict of Interest provisions apply to any person who is an employee, agent, volunteer, consultant, officer, elected official or appointed official of:

- the State and/or,
- a unit of general local government and/or,
- any designated public agencies representative and/or
- subrecipients and contractors receiving ESG funds.

Exceptions: Upon the written request of the recipient, HUD may grant an exception to the provisions listed on a case-by-case basis, taking into account the cumulative effects of the criteria and threshold requirements met as stated in 24 CFR 576.404 (b)(3).

Reimbursement Responsibilities

Subrecipients will be responsible for submitting reimbursement requests, on a monthly basis, for eligible and reasonable expenditures. The following may be included in the reimbursement request. Specific items may vary from jurisdiction to jurisdiction and will be detailed in contracts:

- Request cover page and summary page
- Cancelled checks, bank statements, electronic payment receipts, etc.
- Invoices, billing, contract, lease agreements, etc. (late charges are not eligible)
- HMIS reporting

Final reimbursement request must be submitted no later than the date specified in the ESG subrecipient agreement.

Five ESG Program Components

The table below compares the two types of eligible ESG participants and which of the five ESG funding components each participant group may receive:

Component	Participants who are Homeless	Participants who are at risk of Homelessness
Street Outreach	X	
Emergency Shelter	X	
Homelessness Prevention		X
Rapid Rehousing	X	
Homeless Management Information System (HMIS)	Х	Х

Standards for Programs Components

Street Outreach 24 CFR 576.101

<u>Eligible Participants</u>: Individuals and families experiencing unsheltered homelessness, meaning those who qualify under paragraph (1) (i) of the definition of "homeless."

<u>Eligible Activities</u>: Essential services to eligible participants provided on the street or in parks, abandoned buildings, bus stations, campgrounds, and in other such settings where unsheltered persons are staying. Staff salaries related to carrying out street outreach activities is also eligible.

Eligible Costs:

Standards for targeting and providing essential services related to Street Outreach include:

- Engagement Activities to locate, identify, and build relationships with unsheltered homeless people for the purpose of providing immediate support, intervention, and connections with homeless assistance programs and/or mainstream social services and housing programs.
- Case Management Assessing housing needs and arranging/coordinating/monitoring the delivery of individualized services.
- Emergency Health Services Outpatient treatment for urgent medical conditions provided by licensed medical professionals in community-based settings (e.g., streets, parks, and campgrounds) to eligible participants unwilling or unable to access emergency shelter or healthcare facility.
- Emergency Mental Health Services Outpatient treatment for urgent mental health conditions provided by licensed professionals in community-based settings (e.g., streets, parks, and campgrounds).
- Transportation Travel by outreach workers, social workers, medical professionals or other service providers during the provision of eligible street outreach services.
- Services to Special Populations Address the special needs of homeless youth, victims of domestic violence and related crimes/threats, and/or people living with HIV/AIDS who are literally homeless.

Emergency Shelter 24 CFR 576.102

<u>Eligible Participants</u>: Eligible Participants are individuals and families who are experiencing homelessness, as defined in 24 CFR 91.5.

<u>Eligible Activities</u>: ESG funds may be used to provide essential services to persons in emergency shelters, major renovation of an emergency shelter, or conversion of a building into an emergency shelter, and shelter operating costs. Staff costs related to carrying out emergency shelter activities is also eligible.

Eligible Costs:

Overview of eligible costs include:

- Essential Services Provide essential services to individuals and families who are in an emergency shelter are as follows:
 - Case Management
 - Life Skills Training
 - Child Care
 - Education Services
 - Employment Assistance and Job Training

- Outpatient Health Services
- Legal Services
- Mental Health Services
- Substance Abuse Treatment Services
- Transportation
- Services for Special Populations

Note: Agencies providing Emergency Shelter must include in their policies and procedures the processes of intake and enrollment, diversion, referrals to mainstream resources and services, documentation of participant progress and discharge. This includes standards regarding length of stay and safeguards to meet the safety and shelter needs of special populations and individuals, and families who have the highest barriers to housing and are likely to be homeless the longest.

Prohibition Against Involuntary Family Separation: The age of a child under age 18 must not be used as a basis for denying any family's admission to an emergency shelter that uses ESG funding or services and provides shelter to families with children under the age of 18.

- Renovation and Conversion include labor, materials, tools, and other costs for renovations. When ESG funds are used for renovations, other than major rehabilitation or conversion, the minimum period of use to be maintained as a shelter for homeless individuals and families is three (3) years. If the rehabilitation costs of an emergency shelter exceed 75 percent of the value of the building before rehabilitation (major rehabilitation) or if the costs to convert a building into an emergency shelter exceeds 75 percent of the value of the building after the conversion, then the minimum period of use is ten (10) years, including soft costs, or conversion of a building to be used as an emergency shelter. The maximum funding allowed is \$5,000.
- Shelter Operations includes the costs of maintenance necessary for the operation of an emergency shelter. In the case when no appropriate emergency shelter is available for a homeless family or individual, a hotel or motel voucher will also be considered eligible cost. Additional eligible shelter operation costs include the following:
 - Maintenance (including minor and/or routine repairs)
 - Food
 - Insurance
 - Rent
 - Furnishings
 - Security
 - Supplies necessary for the operation of the emergency shelter
 - o Fuel
 - Utilities
 - Equipment

Homelessness Prevention 24 CFR 576.103

<u>Purpose</u>: To prevent people from moving into an emergency shelter or from entering an unsheltered homelessness situation. Funding may also be used to help such people regain stability in their current housing or other permanent housing and achieve stability within that housing.

<u>Eligible Participants</u>: Individuals and families who are *at imminent risk, or at risk, of homelessness*, meaning those who qualify under paragraph (2) and (3) of the homeless definition or those who qualify as at risk of homelessness. Individuals and families must have an income at, or below, 30% of median family income for the area (AMI).

<u>Eligible Activities</u>: Eligible activities include Housing Relocation, Stabilization Services and Short- and Medium-Term Rental Assistance.

Rapid Rehousing 24 CFR 576.104

<u>Purpose:</u> Provides short and medium-term rental assistance to move homeless persons and families (with or without a disability) as rapidly as possible into permanent housing in market rate housing.

<u>Eligible Participants:</u> Serve participants who meet the criteria under paragraph (1) of the "homeless" definition in 24 CFR Part 576.2 or who of the "homeless" definition and live in an emergency shelter or other place described in paragraph (1) of the "homeless" definition. Eligible participants are individuals and families that are literally homeless currently living in an emergency shelter or place not meant for human habitation.

Subrecipients must maintain standards to help homeless persons living on the streets or in an emergency shelter transition as quickly as possible into permanent housing, and then, to help such persons achieve stability in that housing.

<u>Eligible Activities</u>: Eligible activities include Housing Relocation, Stabilization Services and Short- and Medium-Term Rental Assistance.

Housing Relocation and Stabilization Services 24 CFR 576.105

The following guidelines apply to both Rapid-Rehousing and Homelessness Prevention.

FINANCIAL ASSISTANCE	SUPPORTIVE SERVICES
Moving costs	Housing search & placement
Rent application fees	Housing Stability Case Management
Last month's rent	Mediation
Utility payments –up to 24 months of payments per program participant (including up to 6 months arrears per service)	Credit repair
Security deposit –equal to no more than 2 months' rent	Legal Services
Standard utility deposits	
Emergency Transfer Lease-Breaking Fees	

Short- and Medium-Term Rental Assistance 24 CFR 576.106

TYPES OF RENTAL ASSISTANCE	LENGTH OF ASSISTANCE
Short Term Rental Assistance	Up to 3 months
Medium Term Rental Assistance	4 to 24 months
Payment of Rental Arrears	One-time payment for up to 6 months of arrears including late fees.

Lease Requirements

Each ESG participant receiving rental assistance must have a legally binding, written lease for the rental unit, unless financial assistance is solely for rental arrears. The lease must be between the property owner and the program participant. Where the financial assistance is solely for rental arrears, an agreement that gives the program participant an enforceable leasehold interest under state law showing that rent owed is sufficiently documented by the property owner's financial records, rent ledgers or canceled checks.

Tenant-Based Rental Assistance (TBRA)

For tenant-based rental assistance, a program participant may select a housing unit in which to live and may move to another unit and continue to receive rental assistance, as long as program requirements are met. The recipient may require that all program participants live within a particular area for the period in which rental assistance is provided. The rental assistance agreement with the property owner must terminate and no further rental assistance payments should be made under the following conditions:

- The program participant moves out of the housing unit;
- The lease terminates and is not renewed; or
- The program participant becomes ineligible to receive ESG rental assistance.

Project-Based Rental Assistance (PBRA)

If the subrecipient identifies a permanent housing unit that meets ESG requirements and becomes available before a program participant is identified to lease the unit, the subrecipient my enter into a rental assistance agreement with the owner to reserve the unit and subsidize its rent in accordance with the following requirements:

- The rental assistance agreement may cover one or more permanent housing units in the same building and may only be occupied by eligible program participants.
- The subrecipient may pay up to 100 percent of the first month's rent, provided that a program
 participant signs a lease and moves into the unit before the end of the month for which the first month's
 rent is paid. The rent paid before a program participant moves into the unit must not exceed the rent
 charged under the participant's lease and must be included when determining the participant's total
 rental assistance.
- The subrecipient may make monthly rental assistance payments only for each whole or partial month
 an assisted unit is leased to a program participant. When a participant moves out of an assisted unit,
 the subrecipient may pay the next month's rent as the first month's rent for a new eligible program
 participant in accordance with PBRA policies.
- The program participant's lease must not condition the term of occupancy to the provision of rental assistance payments. If the program participant is determined ineligible or reaches the maximum number of months over which rental assistance can be provided, the subrecipient must suspend or

terminate the rental assistance payments for the unit. If the payments are suspended, the individual or family may remain in the assisted unit as permitted under the lease, and the subrecipient may resume payments if the individual or family again becomes eligible and needs further rental assistance. If the payments are terminated, the rental assistance may be transferred to another available unit in the same building provided that the other unit meets all ESG requirements.

• The rental assistance agreement must have an initial term of one year. When a new program participant moves into an assisted unit, the term of the rental assistance agreement may be extended to cover the initial term of the program participant's lease. If the program participant's lease is renewed, the rental assistance agreement may be renewed or extended, as needed, up to the maximum number of months for which the program participant remains eligible. However, under no circumstances may the recipient or subrecipient commit ESG funds to be expended beyond the expenditure deadline in § 576.203 or commit funds for a future ESG grant before the grant is awarded.

In compliance with HUD requirements, in order to be in permanent housing, the program participant must be the tenant on a lease for a term of at least one year that is renewable and can only be terminated for cause. The lease must be renewable for terms that are a minimum of one month long. HUD has determined that requiring a lease for a term of at least one year that is renewable and terminable only for cause can assist program participants in obtaining stability in housing, even when the rental assistance is temporary.

ESG funded agencies may divide (bifurcate) a lease in order to evict the individual or terminate the assistance of the individual who has engaged in criminal activity (the abuser or perpetrator) directly relating to domestic violence, dating violence, sexual assault, or stalking. When a family receiving Tenant Based Rental Assistance (TBRA) separates under the lease bifurcation clause of 24 CFR 5.2009(a), their TBRA and their utility assistance (if any) must continue for the family members who are not evicted/removed. When a family living in a PBRA unit separates under the lease bifurcation clause of 24 CRF 5.2009(a), the family members who are not evicted or removed can remain in the PBRA unit without interruption to the unit's rental assistance or utility assistance.

ESG funded agencies are required to ensure that the VAWA lease language requirements under 24 CRF Part 5, Subpart L, are included in all ESG rental assistance agreements and leases. If a landlord-provided lease does not include all relevant protections, ESG funded agencies must attach a lease addendum including the necessary language using once of the following options:

- HUD's sample "Lease Addendum" (Form HUD-91067)
- CA HCD's VAWA Lease Addendum, which is based on Form HUD-91067
- An ESG funded agency developed lease addendum based on Form HUD-91067

PERFORMANCE STANDARDS

The ESG grantee must describe the performance standards for evaluating ESG activities which must be developed in consultation with the Orange County CoC.

Based on standards and goals of the Orange County CoC, the Orange County ESG Collaborative is proposing the following performance standards for the ESG:

Performance Measures for Homelessness Prevention

- A reduction in the number of homeless individuals and families seeking emergency shelter services.
- Expected Outcomes:
 - At least 30% of participants will move into transitional housing at the project exit.
 - At least 40% of participants will move into permanent housing at the project exit.

- At least 25% of adult participants will obtain earned income at project exit.
- At least 25% of adult participants will obtain cash/non-cash benefits at project exit.
- At least 90% of participants assisted will remain in transitional housing or permanent housing three
 (3) months after the last assistance was provided under ESG.

Performance Measures for Homeless Rapid Rehousing

- A reduction in the reoccurrence of homelessness for individuals and families who exit the shelter system.
- Expected Outcomes:
 - At least 75% of participants enrolled will move into a permanent housing destination within 90 days of enrollment.
 - At least 90% of participants will achieve permanent housing at the project exit.
 - At least 42% of participants will obtain earned income at project exit.
 - At least 30% of participants will obtain cash/non-cash benefits at project exit.
 - At least 80% of participants assisted will remain in permanent housing six (6) months after the last assistance provided under ESG.

EVALUATION OF ELIGIBILITY

Standard Policies and Procedures for evaluating individual and family eligibility for assistance under ESG.

Building on Established Homelessness Prevention or Rapid Rehousing Policies and Procedures

ESG Policies and Procedures were originally established based on the provisions of Homelessness Prevention and Rapid Rehousing assistance. The policies and procedures have been modified based upon the checklist of required elements set forth in 24 CFR 576.400 (e)(1) and (e)(3), (91.220 (l)(4)(vi)) and in collaboration with CoC standards will be adopted.

Waivers for Established Homelessness Prevention or Rapid Rehousing Policies and Procedures

ESG Policies and Procedures may be subject to waivers allowed by federal and state funding agencies. Waivers provide targeted flexibility for certain activities due to disaster and public health emergency responses or for special requests related to local needs or circumstances. All waivers require an official written request for and approval from the funding agency detailing the scope and the period for which the waiver is in effect. In some cases, waivers must be coordinated with efforts involving other programs.

Centralized Pre-Screening and Assessment Available at Multiple Locations

The Orange County CoC through the Coordinated Entry System (CES) establishes the list of prioritized households and available units. Participating agencies are responsible for engaging homeless individuals and families through the use of outreach/in-reach and a standardized assessment and intake process that provides referrals to the CES. CES places priority on those who are at highest risk with the most appropriate intervention **rather than** a "first come, first served" approach.

Throughout Orange County, an array of homeless service providers serves as CES access points. Individuals and families applying for ESG assistance must complete the standardized assessment as described in the Universal Assessment section with a CES access point. The intake and assessment may be completed via phone, online, or in person, including emergency shelter locations and through street outreach. CES Access points are distributed

geographically throughout Orange County.

Basic Eligibility Requirements

- Initial Consultation & Eligibility Determination: The applicant(s) must receive at least an initial consultation and eligibility assessment with a case manager or other authorized representative who can determine eligibility and appropriate type of assistance.
- ESG program participants must meet one of the following definitions of homelessness:
 - Literally homeless
 - At imminent risk of homelessness
 - Homeless under Federal Statutes
 - Fleeing/attempting to flee domestic violence
- Income for Homelessness Prevention: Households must meet the criteria under the "at risk of homelessness" definition and have a total annual income below 30 percent of the median family income for the area (AMI).
- Income for Rapid Rehousing: There is no income requirement for Rapid Rehousing eligibility at intake. However, there is a requirement to conduct an annual re-evaluation for review and determination that the household's total annual income must be below 30 percent of the median family income for the area (AMI) to qualify for continued assistance.
- Housing Status: Case files must document the current housing status of the household at application. Housing status will be verified through third party verification whenever possible. Self- certification of housing status will be considered on a case-by-case basis.
- Orange County Residency: All households receiving Homeless Prevention or Rapid Rehousing assistance under ESG must be residents of Orange County at time of application.
- Unidentifiable financial resources and/or support networks: In order to receive ESG rental financial assistance, applicants must also demonstrate the following:
 - No appropriate subsequent housing options have been identified;
 - The household lacks the financial resources to obtain immediate housing or remain in its existing housing; and
 - The household lacks support networks needed to obtain immediate housing or remain in its existing housing.

POLICIES AND PROCEDURES FOR PROGRAM COORDINATION

Policies and Procedures for coordination among emergency shelter providers, essential service providers, Homelessness Prevention and Rapid Rehousing assistance providers, other homeless assistance providers, and mainstream service and housing providers.

The ESG program requires coordination among participating agencies. All ESG subrecipients in Orange County are experienced homeless service providers with a demonstrated track record in fiscal management and the provision of housing and supportive services targeted to homeless households. Additionally, the project administration agreement with ESG subrecipients will require coordination among agencies receiving ESG funds to administer Emergency Shelter, essential services, Homelessness Prevention, Rapid Rehousing services, and related assistance, and access to mainstream services and housing providers for participants.

Participation in the Continuum of Care

ESG funded agencies have access to membership in the CoC. The CoC has member organizations including

homeless service providers, veteran service representatives, churches, and government organizations. The CoC meets on a regular basis and shares information about services among participating agencies. For meeting information, you may access the CoC Master Calendar at https://www.ochealthinfo.com/about-hca/directors-office/office-care-coordination/homeless-services.

Required Participant Information and Referrals

To further facilitate collaboration and information sharing, ESG funded agencies will be required to provide the following information and referrals to ESG program participants:

- 2-1-1 hotline for social services
- Social Security Administration benefits
- CalWORKS, General Relief and other income security programs provided by the Orange County Social Service Agency (SSA)
- CalFresh, federally known as Supplemental Nutritional Assistance Program (SNAP)
- Low Income Energy Assistance Programs
- Affordable housing information
- Employment assistance and job training programs
- Health care and mental health services
- Services for victims of domestic violence
- Veteran services
- Specialized services such as legal services and credit counseling

The Violence Against Women Act (VAWA) Protections and Emergency Transfer Plan (ETP)

VAWA protections apply to all ESG participants. The law protects survivors who are victims of domestic violence, dating violence, stalking or sexual assault, as well as their affiliated persons from being evicted or being denied housing assistance if an incident of violence is reported or if the victim suffers economic and criminal circumstances as a result of the abuse. The law also creates emergency transfer options for victims and their affiliates, allowing survivors to transfer to a different unit if they are in fear for their life or safety, and provides for bifurcation of the lease to allow for an abuser to be removed and the victim and other household members to remain in the unit even if for a period of time.

An applicant or participant's status as a victim of domestic violence cannot be a basis for denial of admission or removal from an emergency shelter if they would otherwise qualify for admission or occupancy. Participants receiving Homeless Prevention or Rapid Rehousing assistance cannot be denied admission, evicted from their housing, or have their housing terminated solely because they are a victim of domestic violence if they otherwise qualify for assistance and admission.

Any ESG funded agency providing rental assistance is required to provide the following two forms to each ESG applicant and each ESG participant:

- Notice of Occupancy Rights Under VAWA (Form HUD-5380)
- Certification of Domestic Violence, Dating Violence, Sexual Assault, or Stalking, and Alternative Documentation (Form HUD-5382)

These forms are required to be provided at each of the following times:

- When an applicant is denied ESG rental assistance
- When an applicant's application for a unit receiving Project Based Rental Assistance (PBRA) is denied
- When a participant begins receiving ESG assistance

- When a participant is notified of termination of ESG rental assistance
- When a participant receives notice of eviction

ESG funded agencies providing rental assistance must implement an Emergency Transfer Plan (ETP) with the purpose of enabling participants who are victims of domestic violence to transfer from an existing unit to another safe unit without an interruption in their ESG assistance. The ETP takes effect when a qualifying participant certifies that they meet the following criteria:

- The participant is a victim of domestic violence, dating violence, sexual assault or stalking.
- The participant expressly requests the emergency transfer.
- The participant reasonably believes they are threatened with imminent harm from further violence if they remain in their current unit OR the participant is a victim of sexual assault and the assault occurred on the premises during the 90-calendar-day period before the ETP request.

Records of requests for emergency transfer will be kept by the ESG funded agency and remain confidential including the location of any move by victim and their families. The ESG funded agency may request documentation from participants to certify that participants have been a victim of domestic violence, dating violence, sexual assault or stalking. Requests must be made in writing and the ESG funded agency must provide participants at least 14 business days from the day the request is received to provide the documentation. The ESG funded agency must share a copy of the ETP if requested by a participant.

POLICIES AND PROCEDURES FOR DETERMINING ASSISTANCE AND PRIORITIZATION

Policies and Procedures for determining and prioritizing which eligible families and individuals will receive Homelessness Prevention assistance and which eligible families and individuals that will receive Rapid Rehousing assistance are required to operate the ESG program.

Once it is determined that the household meets the basic eligibility guidelines noted above, the household will be assessed for the appropriate form(s), level, and duration of financial assistance. The results of this assessment will be formalized in a Housing/Financial Assistance Plan that is signed by both the applicant and the case manager.

<u>Assistance through Homelessness Prevention</u>

Homelessness Prevention assistance will be targeted to households who are at risk of losing their present housing and becoming homeless. While there are many people who are housed and have a great need for rental assistance, not everyone will become homeless without assistance. A risk assessment will be used to assess the household's level of crisis and prioritize those who are at greatest risk of becoming homeless. The assessment tool will include vulnerability criteria including but not limited to: income, housing history, food security, childcare, health care, life skills, and other special needs. Due to the limited amount of funding, assistance will be provided on a first come, first served basis, if the applicant meets the eligibility and risk assessment criteria.*

Assistance through Rapid Rehousing

Rapid Rehousing assistance is intended for individuals or families who meet the homeless definition described in Section 103, 42 USC 11302 of the McKinney Vento Act, as amended by the HEARTH Act. While there are many homeless individuals and families in Orange County at any given night, the Rapid Rehousing assistance will be prioritized following the prioritization process approved by the CoC Board and implemented through CES.

DETERMINING SHARE OF RENT AND UTILITY COSTS

Standards for determining the share of rent and utilities costs that each program participant must pay, if any, while receiving Homelessness Prevention or Rapid Rehousing assistance.

Limitations on Assistance – Homelessness Prevention

Orange County's ESG rental assistance is intended to stabilize individuals and families who have recently endured difficult financial circumstances that have led them into homelessness or who are at imminent risk of becoming homeless. For Homelessness Prevention assistance, the rental assistance consists of short-term rental assistance (3 months); extended under certain circumstances to medium term rental assistance (for an additional 3 months). Subrecipient must re-evaluate the program participant's eligibility for Homeless Prevention assistance every 90 days. Case management on a monthly basis is **required**.

Not every individual or family in need of rental assistance is a candidate for ESG Homelessness Prevention assistance. ESG rental assistance is not a substitute for Section 8 rental assistance or a permanent rental subsidy, but rather a tool to help stabilize families or individuals who are at imminent risk of becoming homeless and lack any other resources to help them stabilize their housing situation. Rental assistance cannot be provided to a program participant who is already receiving rental assistance, or living in a housing unit receiving rental assistance or operating assistance through other federal, State, or local sources (CFR 576.106).

As a general rule, an individual or household should pay approximately 30% of their income towards rent. This requirement may be waived on a case-by-case basis for extreme circumstances. The ESG assistance will consist of the remaining portion of the rent. When determining the annual income of an individual or family, the subrecipient must use the standard for calculating annual income under 24 CFR 5.609.

Program participants are required to be reassessed at regular monthly intervals to monitor progress and levels of self-sufficiency. If a program participant requires assistance beyond the three-month mark, the ESG rental subsidy will be reduced, and the participant will be required to pay a larger portion of the rent. Homelessness Prevention assistance will be based on number of persons residing in household, Fair Market Rent rate, and income.

<u>Limitations on Assistance - Rapid Rehousing</u>

Under Rapid Rehousing assistance, a program participant's share of rent should be based on the participant's ability to pay during their path to housing stabilization. Subrecipients must re-evaluate participants receiving Rapid Rehousing assistance at a minimum of every 12 months, and review participant progress during weekly or monthly case management meetings. The assistance should not exceed the Fair Market Rent amount based on participant household, except for the first month of assistance if participant requires assistance with other rehousing expenses such as rental security deposits or utility deposits. Security deposits should not exceed two times the rent. Standards for determining the share of rent and utilities costs that each program participant must pay, if any, will be based on the following guidelines:

- 100 percent of the cost of rent in rental assistance may be provided to program participants. However, to maximize the number of households that can be served with Rapid Rehousing resources, it is expected that the level of need will be based on the goal of providing only what is necessary for each household to be stably housed for the long-term;
- Rental assistance cannot be provided for a unit unless the rent for that unit is at or below the Fair Market Rent limit, established by HUD;
- The rent charged for a unit must be reasonable in relation to rents currently being charged for

comparable units in the private unassisted market and must not be in excess of rents currently being charged by the owner for comparable unassisted units.

Note: Grant funds may be used for rental assistance for homeless individuals and families. Rental assistance cannot be provided to a program participant who is already receiving rental assistance, or living in a housing unit receiving rental assistance or operating assistance through other federal, State, or local sources (CFR 576.106).

For additional guidance on Rapid Rehousing program limitations refer to the Rapid Rehousing Written Standards (Appendix A).

<u>Limitations on Assistance – All Participants</u>

Due to the limited amount of funds available, the ESG assistance will not exceed Fair Market Rent per participant per month in combined ESG assistance, including eligible rent and utility payments. Generally, participants should be responsible for paying their own utility costs while receiving ESG rental assistance, unless they are experiencing acute financial hardship or are at risk of losing their housing due to utility shut off. Participants seeking help with utilities only may be eligible for ESG assistance if it can be documented that they will lose their housing and become literally homeless if utility assistance is not provided; however, the household still must meet other ESG eligibility requirements.

DETERMINING LENGTH AND ONGOING NEED FOR RENTAL ASSISTANCE

Standards for determining how long a particular participant will be provided with rental assistance and whether the amount of that assistance will be adjusted over time.

ESG assistance consists of short term (up to 3 months), medium term (up to 6 months), and maximum term (up to 24 months) rental assistance to allow individuals or families who have recently encountered a financial crisis that has led them into homelessness or at imminent risk of homelessness, to gain housing stabilization. Since the ESG program consists of temporary assistance for the purpose of rapidly stabilizing households, participants are required to contribute a portion of their income towards rent. Participants with no potential to earn income may not be suitable candidates for this type of assistance, unless other subsidies can be accessed after the ESG assistance expires.

Participants assisted under ESG Rapid Rehousing Assistance are eligible to receive rental and utility assistance for up to 24 months if they meet income eligibility at the re-evaluation period. Rapid Rehousing participants **must** receive monthly case management, be evaluated for participant progress of individualized housing stability plan and income assessment at minimum every 90 days and be formally re-evaluated at minimum annually during the ESG assistance period. The Subrecipient case manager should comply with and document the housing stability case management requirements of HUD regulation 24 CFR 576.401(e). At minimum, each annual re-evaluation of eligibility must establish that:

- The program participant does not have an annual income that exceeds 30 percent of AMI, as determined by HUD; and
- The program participant lacks sufficient resources and support networks necessary to retain housing without ESG assistance.

The ESG rental assistance should be reduced gradually, and the participant's portion of rent increased during the months of assistance. The total period for which any ESG program participant may receive Rapid Rehousing services and assistance must not exceed 24 months during any 3-year period.

If a participant is receiving rental assistance and meets the conditions for an emergency transfer, ESG funds may be used to pay amounts owed for breaking a lease to effect an emergency transfer. These costs are not subject to the 24-month limit on rental assistance.

DETERMINING NEED FOR HOUSING STABILIZATION AND RELOCATION SERVICES

Standards for determining the type, amount, and duration of housing stabilization and /or relocation services to provide a program participant, including the limits, if any, on Homelessness Prevention or Rapid Rehousing assistance that each program participant may receive, such as the maximum amount of assistance; maximum number of months the program participant receives assistance; or the maximum number of times the program participant may receive assistance.

Transitional Housing and Rapid Rehousing

While transitional housing is technically eligible, HUD cautions recipients against using ESG Rapid Rehousing funds as a way of regularly exiting a person from transitional housing to permanent housing. It is recommended that Rapid Rehousing be used as a model for helping people move from the streets or shelter to permanent housing, not for people exiting transitional housing. Additionally, transitional housing providers should have programs designed to successfully exit people and should not use Rapid Rehousing, another form of temporary assistance, as a regular part their program design. HUD recommends this be done on a case-by-case basis, so that it is not common practice, but is provided only when necessary to prevent the program participant from going back to the streets or emergency shelter.

Program participants would need to be assessed for and determined to be eligible for ESG Rapid Rehousing assistance, in accordance with the ESG eligibility and documentation requirements (homeless definition in 24 CFR 576.2). This includes a requirement that the assistance be necessary to help the program participant move as quickly as possible into permanent housing and achieve stability in housing. The household would have to be exited from the transitional housing program in HMIS and entered into the ESG program in HMIS.

Consultation Process

The ESG subrecipients will continuously consult with the Continuum of Care to discuss the County's ESG allocation in ways that:

- Coordinate across regional entitlement jurisdictions by developing and utilizing standardized eligibility and assessment tools;
- Support federal, state and local goals for priority populations;
- Allow for variations in the program design that responds to the needs and resources of the jurisdiction;
- Compliance with eligibility and verification requirements (HMIS, housing status, homeless definitions, etc.)

The ESG program requires coordination among participating agencies. All ESG subrecipients in Orange County are experienced homeless service providers with a demonstrated track record in fiscal management and the provision of housing and supportive services targeted to homeless households.

The County of Orange also consulted with the Orange County Continuum of Care to ensure the alignment of proposed ESG activities as they relate to the goals and strategies outlined in their strategies to address homelessness in Orange County. This joint effort has worked successfully in the past.

ESG Homeless Definitions

Reference information is located at the following:

https://files.hudexchange.info/resources/documents/Defining-Chronically-Homeless-Final-Rule.pdf

APPENDIX A

Written Standards for Rapid Rehousing

A. Background information

In regard to Rapid Rehousing, § 578.7 Responsibilities of the Continuum of Care (CoC) (a) (9) of the Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act Interim Rule notes that:

"In consultation with recipients of Emergency Solutions Grants (ESG) program funds within the geographic area, establish and consistently follow written standards for providing Continuum of Care assistance. At a minimum, these written standards must include:

- Policies and procedures for evaluating individuals' and families' eligibility for assistance under this part;
- Policies and procedures for determining and prioritizing which eligible individuals and families will receive rapid rehousing assistance; and
- Standards for determining what percentage or amount of rent each program participant must pay while receiving rapid rehousing assistance."

Rapid Rehousing is considered permanent housing. The United States Department of Housing and Urban Development (HUD) regulatory definition of "permanent housing" states:

"The term 'permanent housing' means community-based housing without a designated length of stay and includes both Permanent Supportive Housing and Rapid Rehousing."

HUD also states:

"Additionally, in the regulatory definition of 'permanent housing,' HUD clarifies that to be permanent housing, the program participant must be the tenant on a lease for a term of at least one year that is renewable and is terminable only for cause. The lease must be renewable for terms that are a minimum of one month long. HUD has determined that requiring a lease for a term of at least one year that is renewable and terminable only for cause, assists program participants in obtaining stability in housing, even when the rental assistance is temporary. These requirements are consistent with Section 8 requirements."

Rapid Rehousing assistance may include:

- Rental assistance;
- Case management;
- Supportive services; and
- Security deposit.

Fair Housing Rights and Obligations:

It is illegal to discriminate in the sale or rental of housing, including against individuals seeking a mortgage or housing assistance, or in other housing-related activities. The Fair Housing Act prohibits this discrimination because of race, color, national origin, religion, sex, familial status, and disability. A variety of other federal civil rights laws, including Title VI of the Civil Rights Act, Section 504 of the Rehabilitation

Act, and the Americans with Disabilities Act, prohibit discrimination in housing and community development programs and activities, particularly those that are assisted with HUD funding. These civil rights laws include obligations such as taking reasonable steps to ensure meaningful access to their programs and activities for persons with Limited English Proficiency (LEP) and taking appropriate steps to ensure effective communication with individuals with disabilities through the provision of appropriate auxiliary aids and services. Various federal fair housing and civil rights laws require HUD and its program participants to affirmatively further the purposes of the Fair Housing Act. Further information can be located at the following web address: https://www.hud.gov/program offices/fair housing equal opp

B. Eligible Participants

Individuals and families defined as Homeless under the following categories are eligible for rapid re housing assistance:

Category 1 – Literally Homeless

An individual or family who lacks a fixed, regular, and adequate nighttime residence, which includes a primary nighttime residence of:

- Place not designed for or ordinarily used as a regular sleeping accommodation (including a car, park, abandoned building, bus/train station, airport, or camping ground);
- A supervised publicly or privately-operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state, or local government programs); or
- Is exiting an institution where he or she has been a resident for 90 days or less and who resided in an emergency shelter (but not transitional housing) or place not meant for human habitation immediately prior to entering that institution.

Category 4 – Fleeing Domestic Violence

Any individual or family who:

- Is fleeing, or is attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions that relate to violence against the individual or a family member that has either taken place within the individual's or family's primary nighttime residence or has made the individual or family afraid to return to their primary nighttime residence;
- Has no other residence; and
- Lacks the resources or support networks to obtain other permanent housing.

For information on HUD's other homeless categories, eligible for other CoC funds, visit: https://files.hudexchange.info/resources/documents/Defining-Chronically-Homeless-Final-Rule.pdf

Eligible participants must also meet eligibility criteria as defined in the Notice of Funding Availability (NOFA) or Request For Proposal (RFP) under which the Rapid Rehousing program was funded.

C. Prioritizing Rapid Rehousing

HUD provides guidance for Rapid Rehousing in terms of prioritizing subpopulations. HUD noted in a presentation titled SNAPS In Focus: Rapid Rehousing As a Model and Best Practice, August 6, 2014, that:

"Rapid Rehousing should prioritize people with more challenges, including those with no income, poor

employment prospects, troubled rental histories, and criminal records. Providers should link participants with community resources that will help them achieve longer-term stability and well- being."

HUD also noted on the Rapid Rehousing Brief that:

"Rapid Rehousing is an effective intervention for many different types of households experiencing homelessness, including those with no income, with disabilities, and with poor rental history. The majority of households experiencing homelessness are good candidates for Rapid Rehousing. The only exceptions are households that can exit homelessness with little or no assistance, those who experience chronic homelessness and who need permanent supportive housing, and households who are seeking a therapeutic residential environment, including those recovering from addiction."

Thus, the Orange County CoC will prioritize the following subpopulations that would not be able to get out of homelessness without the assistance:

- Families with children;
- Youth aging out of foster care;
- Domestic violence survivors;
- Single adults;
- Veterans; and
- Chronically homeless individuals and families;

Each individual and family will be entered into the Orange County Coordinated Entry System (CES) will which help identify:

- Eligibility of each individual or family seeking assistance based on the individual's or family's current living situation; and
- The amount and type of assistance needed for the individual or family to gain or regain stability in permanent housing.

D. Written Standards

Written Standard #1: Lease Agreement – The program participant must be the tenant on a lease for a term of at least one year that is renewable and is terminable only for cause. The lease must be renewable for terms that are a minimum of one month long.

On page 12 of the Preamble of the HEARTH Act Interim Rule, it states that:

"HUD clarifies that to be permanent housing, "the program participant must be the tenant on a lease for a term of at least one year that is renewable and is terminable only for cause. The lease must be renewable for terms that are a minimum of one month long. HUD has determined that requiring a lease for a term of at least one year that is renewable and terminable only for cause, assists program participants in obtaining stability in housing, even when the rental assistance is temporary. These requirements are consistent with Section 8 requirements."

Written Standard #2: Rental Assistance and Duration of Assistance – Program participants may receive short-term (up to 3 months) and/or medium-term (for 3 to 24 months) tenant-based rental assistance. However, it is expected that program participants will only receive the level of assistance necessary to be stably housed for thelong-term.

§ 578.37 Program components and uses of assistance (a) (1) (ii) states that:

"Continuum of Care funds may provide supportive services, as set forth in § 578.53, and/or short- term (up to 3 months) and/or medium-term (for 3 to 24 months) tenant-based rental assistance, as set forth in § 578.51(c), as necessary to help a homeless individual or family, with or without disabilities, move as quickly as possible into permanent housing and achieve stability in that housing."

Program providers will target program participants to receive short-term rental assistance but upon need will transition to medium-term assistance.

Written Standard #3: Amount of Rental Assistance – Standards for determining the share of rent and utilities costs that each program participant must pay, if any, will be based on the following guidelines:

- The maximum amount of rent that a participant will pay can be up to 100 percent of the rental amount.
- In general, the goal will be that participants pay generally no more than 50% of their income in rent
 at program completion; however, in certain circumstances, on a case-by-case basis, there may be
 participants whose rental share may exceed 50% of the rent based on their financial circumstances
 and current rental market.
- 100 percent of the cost of rent in rental assistance may be provided to program participants.
 However, to maximize the number of households that can be served with Rapid Rehousing resources,
 it is expected that the level of need will be based on the goal of providing only what is necessary for
 each household to be stably housed for the long term.
- The maximum length of time that a program participant may receive rental assistance is 24 months
 during any three-year period. Participants may be eligible for Rapid Rehousing assistance for multiple
 episodes of literal homelessness based on their need. To ensure the efficient use of resources,
 recipients may establish a maximum amount or number of times that a program participant may
 receive Rapid Rehousing assistance.
- Rental assistance cannot be provided for a unit unless the rent for that unit is at or below the
- Fair Market Rent limit, established by HUD.
- The rent charged for a unit must be reasonable in relation to rents currently being charged for comparable units in the private unassisted market and must not be in excess of rents currently being charged by the owner for comparable unassisted units.

§ 578.37 Program components and uses of assistance (a) (1) (ii) (F) states that a CoC

"May set a maximum amount or percentage of rental assistance that a program participant may receive, a maximum number of months that a program participant may receive rental assistance, and/or a maximum number of times that a program participant may receive rental assistance.

The recipient or subrecipient may also require program participants to share in the costs of rent. For the purposes of calculating rent for rapid rehousing, the rent shall equal the sum of the total monthly rent for the unit and, if the tenant pays separately for utilities, the monthly allowance for utilities (excluding telephone) established by the public housing authority for the area in which the housing is located."

Written Standard #5: Security Deposits including Last Month's Rent – Program participants may receive funds for security deposits in an amount not to exceed 2 months of rent.

§ 578.51 Rental assistance (a) (2) states that:

"Grant funds may be used for security deposits in an amount not to exceed 2 months of rent. An advance payment of the last month's rent may be provided to the landlord, in addition to the security deposit and payment of first month's rent."

Written Standard #6: Receiving Rental Assistance through Other Sources – Rental assistance cannot be provided to a program participant who is already receiving rental assistance or living in a housing unit receiving rental assistance or operating assistance through other federal, State, or local sources.

§ 578.51 Rental assistance (a) Use states that:

"Grant funds may be used for rental assistance for homeless individuals and families. Rental assistance cannot be provided to a program participant who is already receiving rental assistance or living in a housing unit receiving rental assistance or operating assistance through other federal, State, or local sources."

If the individual or family is already living in a housing unit receiving rental assistance, then the individual or family are not eligible for Rapid Rehousing as they do not meet Category 1 or Category 4 of Homelessness as defined by HUD.

Written Standard #7: Case Management – Program participants must meet with a case manager not less than once per month to assist the program participant in ensuring long-term housing stability.

§ 578.37 Program components and uses of assistance (a) (1) (ii) (F) states the following requirement:

"Require the program participant to meet with a case manager not less than once per month to assist the program participant in ensuring long-term housing stability. The project is exempt from this requirement if the Violence Against Women Act of 1994 (42 U.S.C. 13925 *et seq.*) or the Family Violence Prevention and Services Act (42 U.S.C. 10401 *et seq.*) prohibits the recipient carrying out the project from making its housing conditional on the participant's acceptance of services."

Part of § 578.53 includes the following:

- Providing ongoing risk assessment and safety planning with victims of domestic violence; dating violence, sexual assault, and stalking;
- Using the centralized or coordinated assessment system;
- Counseling;
- Developing, securing, and coordinating services;
- Obtaining Federal, State, and local benefits;
- Monitoring and evaluating program participant progress;
- Providing information and referrals to other providers;
- Developing an individualized housing and service plan, including planning a path to permanent housing stability; and
- Conducting required annual assessment of service needs (re-evaluation).

Written Standard #8: Supportive Services – Program participants may receive supportive services as set forth in §578.53.

§ 578.37 Program components and uses of assistance (a) (1) (ii) states that:

"Continuum of Care funds may provide supportive services, as set forth in § 578.53, and/or short- term (up to 3 months) and/or medium-term (for 3 to 24 months) tenant-based rental assistance, as set forth in § 578.51(c), as necessary to help a homeless individual or family, with or without disabilities, move as program participant needs to retain housing.

§ 578.37 Program components and uses of assistance (a) (1) (ii) (E) states that the Continuum of Care

"Must re-evaluate, not less than once annually, that the program participant lacks sufficient resources and support networks necessary to retain housing without Continuum of Care assistance and the types and amounts of assistance that the program participant needs to retain housing. The recipient or sub-recipient may require each program participant receiving assistance to notify the recipient or sub-recipient of changes in the program participant's income or other circumstances (e.g., changes in household composition) that affect the program participant's need for assistance. When notified of a relevant change, the recipient or subrecipient must reevaluate the program participant's eligibility and the amount and types of assistance that the program participant needs."

Written Standard #9: Duration of Supportive Services – Program participants may receive supportive services for no longer than 6 months after rental assistance stops, unless supportive services are provided through another funding source.

§ 578.37 Program components and uses of assistance (a) (1) (ii) (F) states that the CoC, "May provide supportive services for no longer than 6 months after rental assistance stops."

Written Standard #10: Re-evaluation – Program participants must be re-evaluated, not less than once annually, in order to determine whether program participants lack sufficient resources and support networks necessary to retain housing without Continuum of Care assistance and the types and amounts of assistance that the quickly as possible into permanent housing and achieve stability in that housing."

APPENDIX B

Written Standards for Emergency Shelter

A. Background information

In regard to Emergency Shelter, § 578.7 Responsibilities of the Continuum of Care (CoC) (a) (9) and (c)(1) of the Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act Interim Rule notes that:

"In consultation with recipients of Emergency Solutions Grants (ESG) program funds within the geographic area, establish and consistently follow written standards for providing Continuum of Care assistance. At a minimum, these written standards must include policies and procedures for evaluating individuals' and families' eligibility for assistance under this part.

The Continuum must develop a plan that includes coordinating the implementation of a housing and service system within its geographic area that meets the needs of the homeless individuals (including unaccompanied youth) and families. At a minimum, such system encompasses shelter, housing, and supportive services."

Emergency Shelter assistance may include:

- Essential services
- Renovation
- Shelter operations
- Assistance required under the Uniform Relocation and Real Property Acquisition Act of 1970 (URA)

Fair Housing Rights and Obligations:

It is illegal to discriminate in the sale or rental of housing, including against individuals seeking a mortgage or housing assistance, or in other housing-related activities. The Fair Housing Act prohibits this discrimination because of race, color, national origin, religion, sex, familial status, and disability. A variety of other federal civil rights laws, including Title VI of the Civil Rights Act, Section 504 of the Rehabilitation

Act, and the Americans with Disabilities Act, prohibit discrimination in housing and community development programs and activities, particularly those that are assisted with HUD funding. These civil rights laws include obligations such as taking reasonable steps to ensure meaningful access to their programs and activities for persons with Limited English Proficiency (LEP) and taking appropriate steps to ensure effective communication with individuals with disabilities through the provision of appropriate auxiliary aids and services. Various federal fair housing and civil rights laws require HUD and its program participants to affirmatively further the purposes of the Fair Housing Act. Further information can be located at the following web address: https://www.hud.gov/program offices/fair housing equal opp

B. Eligible Participants

Individuals and families defined as Homeless under the following categories are eligible for emergency shelter assistance:

Category 1 - Literally Homeless

An individual or family who lacks a fixed, regular, and adequate nighttime residence, which includes a primary nighttime residence of:

- Place not designed for or ordinarily used as a regular sleeping accommodation (including a car, park, abandoned building, bus/train station, airport, or camping ground);
- A supervised publicly or privately-operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state, or local government programs); or
- Is exiting an institution where he or she has been a resident for 90 days or less and who resided in an emergency shelter (but not transitional housing) or place not meant for human habitation immediately prior to entering that institution.

Category 4 - Fleeing Domestic Violence

Any individual or family who:

- Is fleeing, or is attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other
 dangerous or life-threatening conditions that relate to violence against the individual or a family
 member that has either taken place within the individual's or family's primary nighttime residence or
 has made the individual or family afraid to return to their primary nighttime residence;
- Has no other residence; and
- Lacks the resources or support networks to obtain other permanent housing.

For information on HUD's other homeless categories, eligible for other CoC funds, visit: https://files.hudexchange.info/resources/documents/Defining-Chronically-Homeless-Final-Rule.pdf

Eligible participants must also meet eligibility criteria as defined in the Notice of Funding Availability (NOFA) or Request For Proposal (RFP) under which the Emergency Shelter program was funded.

C.

C. Written Standards

Written Standard #1: Diversion, Referral, and Discharge by Emergency Shelters

ESG-funded emergency shelter programs serve households that meet the definition of "homeless" as defined by HUD at <u>24 CFR § 576.2</u>. Households served by ESG-funded emergency shelters lack a fixed, regular, and adequate nighttime residence; cannot be served by other programs or resources; and have no other options for overnight shelter. Households are referred to ESG- funded emergency shelters after exhausting all available options for diversion.

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

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

Discharges from the emergency shelter will be coordinated through the CES for matching to permanent housing opportunity, or to other programs for emergency services using a client-centered approach.

Written Standard #2: Assessing, Prioritizing, and Reassessing Household Needs for Essential Services

Due to limited length of stay in emergency shelter, households will be assessed for essential services on a regular basis. Households will also be reassessed to determine progress on goals pertaining to increasing income and linkages to mainstream and homeless services resources. Eligible Essential Services include case management; childcare; educational services; employment assistance and job training; outpatient health services, but only to the extent that other appropriate health services are unavailable in the community; legal services, but only to the extent that other appropriate legal services are unavailable or inaccessible in the community; life skills training; mental health services, but only to the extent that other appropriate mental

Written Standard #3: Coordination Among Emergency Shelter Providers and Other Providers

Coordination among the emergency shelters, homelessness prevention, rapid re-housing, homeless assistance, and mainstream service providers will be facilitated via the CES. As available, representatives from mainstream benefits and employment services are located onsite to increase income and earning capacity for those served by the Orange County CoC.

health services are unavailable or inaccessible in the community; substance abuse treatment services, but only to the extent that other appropriate substance abuse treatment services are unavailable or inaccessible within the community; and transportation.

APPENDIX C

Written Standards for Homelessness Prevention

A. Background information

In regard to Homelessness Prevention, § 578.37 (a)(5), the ESG Program Interim Rule defines Homelessness Prevention as providing short-term or medium-term rental assistance and housing relocation and stabilization services. Use of Continuum of Care (CoC) Funds awarded under this component must be administered in accordance with the ESG Program Requirements at Section § 576.

Homelessness Prevention assistance may include:

- Housing Relocation and Stabilization services
- Financial Assistance
- Short-Term and Medium-Term Rental Assistance

Fair Housing Rights and Obligations:

It is illegal to discriminate in the sale or rental of housing, including against individuals seeking a mortgage or housing assistance, or in other housing-related activities. The Fair Housing Act prohibits this discrimination because of race, color, national origin, religion, sex, familial status, and disability. A variety of other federal civil rights laws, including Title VI of the Civil Rights Act, Section 504 of the Rehabilitation

Act, and the Americans with Disabilities Act, prohibit discrimination in housing and community development programs and activities, particularly those that are assisted with HUD funding. These civil rights laws include obligations such as taking reasonable steps to ensure meaningful access to their programs and activities for persons with Limited English Proficiency (LEP) and taking appropriate steps to ensure effective communication with individuals with disabilities through the provision of appropriate auxiliary aids and services. Various federal fair housing and civil rights laws require HUD and its program participants to affirmatively further the purposes of the Fair Housing Act. Further information can be located at the following web address: https://www.hud.gov/program offices/fair housing equal opp

B. Eligible Participants

Individuals and families defined as at risk of experiencing literal homelessness under the following categories are eligible for homelessness prevention assistance:

Category 2 – Imminent Risk of Homeless

- The household will lose their primary nighttime residence within 14 days of the date of application for assistance, and
- No subsequent residence has been identified, and
- The Household lacks the resources or support networks (e.g., family, friends, faith-based or other social networks) needed to obtain other permanent housing, and
- The household's annual income is below 30% of the median family income for the area (AMI)

Category 4 – Fleeing Domestic Violence

- The household is fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions that relate to violence against a household member, including a child, that has either taken place within the household's primary nighttime residence or has made the household afraid to return to its primary nighttime residence, and
- The household has no other residence, and
- The household lacks the resources or support networks to obtain other permanent housing, and
- The household's annual income is below 30% AMI

At Risk Definition of Homelessness (ESG Program Interim Rule)

- The household's annual income is below 30% AMI, and
- The Household does not have sufficient resources or support networks immediately available to prevent them from experiencing literal homelessness, and
- The household meets at least one of the following criteria:
 - Has moved because of economic reasons two or more times during the 60 days immediately preceding the application for homelessness prevention assistance
 - Is living in the home of another because of economic hardship
 - Has been notified in writing that their right to occupy their current housing or living situation will be terminated within 21 days after their date of application for assistance
 - Lives in a hotel or motel and the cost is not paid for by charitable organizations or by Federal, State, or local government programs for low-income individuals
 - Lives in a single-room occupancy or efficiency apartment unit in which there reside more than

- two people or lives in a larger housing unit in which there reside more than 1.5 people per room as defined by the US Census Bureau
- Is exiting a publicly funded institution or system of care such as a health care facility, a
 behavioral health facility, a foster care or other youth facility, or a correction program or
 institution

For information on HUD's other homeless categories, eligible for other CoC funds, visit: https://files.hudexchange.info/resources/documents/Defining-Chronically-Homeless-Final-Rule.pdf

Eligible participants must also meet eligibility criteria as defined in the Notice of Funding Availability (NOFA) or Request For Proposal (RFP) under which the Homelessness Prevention program was funded.

c. Written Standards

Written Standard #1: Rental Assistance and Duration of Assistance – Program participants may receive short-term (up to 3 months) and/or medium-term (for 3 to 24 months) tenant-based rental assistance. However, it is expected that program participants will only receive the level of assistance necessary to be stably housed for the long-term.

§ 578.37 Program components and uses of assistance (a) (1) (ii) states that:

"Continuum of Care funds may provide supportive services, as set forth in § 578.53, and/or short- term (up to 3 months) and/or medium-term (for 3 to 24 months) tenant-based rental assistance, as set forth in § 578.51(c), as necessary to help a homeless individual or family, with or without disabilities, move as quickly as possible into permanent housing and achieve stability in that housing."

Program providers will target program participants to receive short-term rental assistance but upon need will transition to medium-term assistance.

Written Standard #2: Amount of Rental Assistance – Standards for determining the share of rent and utilities costs that each program participant must pay, if any, will be based on the following guidelines:

- a. The maximum amount of rent that a participant will pay can be up to 100 percent of the rental amount.
- b. In general, the goal will be that participants pay generally no more than 50% of their income in rent at program completion; however, in certain circumstances, on a case-by-case basis, there may be participants whose rental share may exceed 50% of the rent based on their financial circumstances and current rental market.
- c. 100 percent of the cost of rent in rental assistance may be provided to program participants. However, to maximize the number of households that can be served with Rapid Rehousing resources, it is expected that the level of need will be based on the goal of providing only what is necessary for each household to be stably housed for the long term.
- d. The maximum length of time that a program participant may receive rental assistance is 24 months during any three-year period. Participants may be eligible for Rapid Rehousing assistance for multiple episodes of literal homelessness based on their need. To ensure the efficient use of resources, recipients may establish a maximum amount or number of times that a program participant may receive Rapid Rehousing assistance.
- e. Rental assistance cannot be provided for a unit unless the rent for that unit is at or below the
- f. Fair Market Rent limit, established by HUD.

g. The rent charged for a unit must be reasonable in relation to rents currently being charged for comparable units in the private unassisted market and must not be in excess of rents currently being charged by the owner for comparable unassisted units.

§ 578.37 Program components and uses of assistance (a) (1) (ii) (F) states that a CoC

"May set a maximum amount or percentage of rental assistance that a program participant may receive, a maximum number of months that a program participant may receive rental assistance, and/or a maximum number of times that a program participant may receive rental assistance.

The recipient or subrecipient may also require program participants to share in the costs of rent. For the purposes of calculating rent for rapid rehousing, the rent shall equal the sum of the total monthly rent for the unit and, if the tenant pays separately for utilities, the monthly allowance for utilities (excluding telephone) established by the public housing authority for the area in which the housing is located."

Written Standard #3: Security Deposits including Last Month's Rent — Program participants may receive funds for security deposits in an amount not to exceed 2 months of rent.

§ 578.51 Rental assistance (a) (2) states that:

"Grant funds may be used for security deposits in an amount not to exceed 2 months of rent. An advance payment of the last month's rent may be provided to the landlord, in addition to the security deposit and payment of first month's rent."

Written Standard #4: Receiving Rental Assistance through Other Sources – Rental assistance cannot be provided to a program participant who is already receiving rental assistance or living in a housing unit receiving rental assistance or operating assistance through other federal, State, or local sources.

§ 578.51 Rental assistance (a) Use states that:

"Grant funds may be used for rental assistance for homeless individuals and families. Rental assistance cannot be provided to a program participant who is already receiving rental assistance or living in a housing unit receiving rental assistance or operating assistance through other federal, State, or local sources."

If the individual or family is already living in a housing unit receiving rental assistance, then the individual or family are not eligible for Rapid Rehousing as they do not meet Category 1 or Category 4 of Homelessness as defined by HUD.

Written Standard #5: Supportive Services – Program participants may receive supportive services as set forth in § 578.53.

§ 578.37 Program components and uses of assistance (a) (1) (ii) states that:

"Continuum of Care funds may provide supportive services, as set forth in § 578.53, and/or short-term (up to 3 months) and/or medium-term (for 3 to 24 months) tenant-based rental assistance, as set forth in § 578.51(c), as necessary to help a homeless individual or family, with or without disabilities, move as program participant needs to retain housing.

Participants must be assessed for individual strengths and housing barriers, and participant in the development of an individualized case management plan that incorporates those strengths and housing barriers to quickly return the participant to safe, stable permanent housing.

Written Standard #6: Participant Triage – A triage process must exist that ensures the project serves only those who will experience literal homelessness if not for homelessness prevention assistance.

A triage process must be clearly defined and include an assessment and analysis of participants factors leading to a determination that program participant is eligible for assistance. The determination should ensure that the program participant has no other resources or supports available and will experience literal homelessness if not for the assistance provided by the homelessness prevention program.