

County of San Bernardino Final 2012-2013 Action Plan

Consolidated Submission for HUD Housing and Community Development Grants Economic Development Agency

May 1, 2012



COUNTY OF
SAN BERNARDINO



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COUNTY OF SAN BERNARDINO

FINAL 2012-2013 ANNUAL ACTION PLAN OF THE 2010-2015 CONSOLIDATED PLAN

Consolidated Submission of the HUD
Housing and Community Development Grant
Programs

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County of San Bernardino

**FINAL ANNUAL ACTION PLAN
PROGRAM YEAR 2012-2013**

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FINAL 2012-2013 ANNUAL ACTION PLAN OF THE 2010-2015 CONSOLIDATED PLAN

Annual Action Plan Application for Federal Assistance

The Annual Action Plan includes the SF 424 and is due every year no less than 45 days prior to the start of the grantee's program year start date. HUD does not accept plans between August 15 and November 15.

The Standard Form 424 (Application for Federal Assistance) for each of the three formula grant programs and the Support of Applications by Other Entities Report can be found in Appendix A.

Executive Summary 91.220(b)

1. The Executive Summary is required. Include the objectives and outcomes identified in the plan and an evaluation of past performance.

Each year as an Urban County the County of San Bernardino (County) receives grant funds under the Community Development Block Grant (CDBG), HOME Investment Partnership Act (HOME) and Emergency Solutions Grant (ESG – formerly Emergency Shelter Grant) programs. The Economic Development Agency (EDA) of the County is responsible for implementing these programs. As part of the grant application, the County is required to submit a Consolidated Plan document that addresses the priority needs and strategies for utilizing the three grants over a five-year period. On April 13, 2010, the County adopted the Fiscal Year (FY) 2010-11 through FY 2014-15 Consolidated Plan, which contains a five-year strategic plan that provides guidance to the allocation of CDBG, HOME and ESG funds. Program goals and objectives identified in the strategic plan include improving the safety and livability of neighborhoods, providing for decent and affordable housing, increasing access to quality public facilities and services, and expanding employment opportunities, all principally to benefit individuals who have low and moderate incomes. Each year, the County is also required to submit an Annual Action Plan.

This 2012-13 Annual Action Plan provides a one-year strategy to accomplish the goals and objectives of the County's five-year Consolidated Plan. The Annual Action Plan contains descriptions of the programs and projects to be undertaken by the County of San Bernardino during the 2012-13 program year using CDBG, HOME, and ESG formula grant funds and program income. The Annual Action Plan identifies anticipated levels of funding for the program year, describes the geographic areas in which assistance will be directed and provides the rationale used. This Annual Action Plan covers the third year increment of the 2010-2015 Consolidated Plan.

The FY 2012-13 Annual Action Plan addresses the priority needs identified in the Consolidated Plan and proposes projects, which are consistent with the objectives of creating a suitable living environment, providing decent housing, or creating economic opportunities primarily for individuals with low and moderate incomes and with the outcomes of availability/accessibility, affordability, or sustainability.

The County of San Bernardino has developed a strategic plan to address the key issues raised in the course of this analysis, and which meets the U.S. Department of Housing and Urban Development (HUD) requirements for elements to be addressed by this plan.

The three over-arching goals intended to benefit very low-, low- and moderate-income persons are:

- To provide decent housing
- To provide a suitable living environment
- To expand economic opportunities

The outcomes that are being sought are:

- Availability
- Accessibility
- Sustainability

It is the County's intent to use the identified resources to assist various unincorporated communities within the five Supervisorial Districts, and the 12 cooperating cities. These cities are Adelanto, Barstow, Big Bear Lake, Colton, Grand Terrace, Highland, Loma Linda, Montclair, Needles, Twentynine Palms, Yucaipa and the Town of Yucca Valley. These areas are considered the County Consortium. HOME funds will be available for use in these 12 cities and in the cities of Chino Hills, Rancho Cucamonga, and Rialto. This expanded list is considered the HOME Consortium.

The County's 2012-13 Consolidated Grants allocation is \$8,692,640. This amount is the sum of \$5,812,663 for CDBG, \$2,324,502 for the HOME Program, and \$555,475 for ESG. The estimated program income to be generated during the 2012-13 FY is \$500,000 and would not be available for programming until a later date. The County also received a 2nd allocation of ESG funds for FY 2011-12 in the amount of \$176,153 of which \$170,893 will be utilized for FY 2012-13 projects and administration.

Citizen Participation 91.220(b)

2. Provide a summary of the citizen participation and consultation process (including efforts to broaden public participation in the development of the plan.

A Citizen Participation Plan (CPP) approved by the County Board of Supervisors on February 23, 2010, has guided development of this document. Under the CPP, the County advertised a request for project proposals to be considered for CDBG funding. Proposals for the CDBG program were accepted during the months of October and November 2011. Proposals found eligible according to HUD Program Regulations were forwarded to the appropriate cities for prioritization during the month of February 2012.

In addition to the CPP the Board of Supervisors approved the County's 2010-2015 Needs Identification Report on February 23, 2010. This presents a summary of Housing and Non-Housing Development Needs for 2010-2015 as expressed by individuals, public and private organizations and social service providers. It has served as a basis for establishing priority needs and funding decisions.

HUD Program Regulations encourage a broad base of citizen participation in the identification of housing, community development, and economic development needs. To accommodate this requirement, the County has engaged in a three-pronged approach to obtaining community input, as well as assessing statistical data available from HUD and the Census Bureau. This included conducting public forums in the 12 cooperating cities, and in unincorporated communities; distributing surveys to members of the public at community meetings and via the County website; sending surveys to County departments, adjoining jurisdictions, community-based organizations; and seeking input from service providers at the mandatory application training seminars.

In November, 2009, CDH requested that each cooperating city conduct at least one community forum to obtain input from its citizens regarding the housing and community development needs of its very low- and low-income residents. Concurrent with this request, CDH staff conducted similar forums in eight unincorporated communities within the County. To ensure consistency with HUD requirements, CDH staff developed standard language for all newspaper notices, fliers, and questionnaires, identified minimum posting locations, and attended the needs identification forums. Where necessary, the fliers and notices were printed in Spanish. In total, 20 Needs Identification Forums were conducted from October 20, 2009 to December 14, 2009, throughout the communities covered by the County's CDBG program. Overall attendance exceeded 250 citizens.

In addition, CDH sent needs surveys to County departments and divisions; to organizations providing homeless shelter or economic development opportunities within San Bernardino County, and to the 12 cooperating cities.

A public hearing to present the Proposed 2012-13 Annual Action Plan was scheduled for April 24, 2012. Hearing notices were published in newspapers throughout the County. A 30-day public review period occurred between March 26, 2012, and April 24, 2012. A draft Proposed 2012-13 Annual Action Plan was posted on the department website for public viewing and a copy was made available at the Department of Community Development and Housing (CDH). The Proposed 2012-13 Annual Action Plan was presented to the Board of Supervisors on April 24, 2012 (Item #71). At that hearing, public testimony was received. It is anticipated that the Board of Supervisors will approve the Final 2012-13 Annual Action Plan on May 1, 2012, and direct staff to prepare the final plans for submittal to HUD.

Public comments were reviewed and considered by staff. The public comments are summarized in Appendix I.

3. Provide a summary of citizen comments or views on the plan.
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A 30-day public review period was scheduled between March 26, 2012, and April 24, 2012. One public comment was received from Mr. Rogers as detailed in Appendix I.

4. Provide a written explanation of comments not accepted and the reasons why these comments were not accepted.

None.

Resources 91.220(c)(1)) and (c)(2)

5. Identify the federal, state, and local resources (including program income) the jurisdiction expects to receive to address the needs identified in the plan. Federal resources should include Section 8 funds made available to the jurisdiction, Low-Income Housing Tax Credits, and competitive McKinney-Vento Homeless Assistance Act funds expected to be available to address priority needs and specific objectives identified in the strategic plan.

The HUD Funding Source Report in Appendix B identifies the anticipated federal resources (grant funds and program income) expected to be available to the County. The County received a total of \$8,692,640 with \$5,812,663 in CDBG funds, \$2,324,502 in HOME funds, and \$555,475 in ESG funds. The County also received a 2nd allocation of ESG funds for FY 2011-12 in the amount of \$176,153 of which \$170,893 will be utilized for FY 2012-13 projects and administration. These funds will be used to address the priority needs and specific objectives as described in the Strategic Plan, and to execute the programs and projects called for in the 2012-13 Annual Action Plan.

6. Explain how federal funds will leverage resources from private and non-federal public sources.

In the face of shrinking resources, leveraging public and private funds is critical to affordable housing projects because a single funding source will simply not provide sufficient funding. The County of San Bernardino continues to provide technical assistance to prospective affordable housing developers and, where possible, commit local funds to finance projects.

In order to meet the affordable housing needs in San Bernardino County, a large amount of public funds and technical assistance is needed. The programs listed below are anticipated to be used in addressing priority needs. However, competition for these resources is keen, particularly in recent years, as budget cuts have eliminated or reduced a number of federal and state programs. Fiscal limitations at the local level further limit the range of resources available to implement the Strategic Plan.

The County encourages its agencies, cooperating cities, and community-based organizations to collaborate, coordinate, and leverage funds and programs wherever possible. Other private and non-federal public funding resources, expected to be available to address needs, are identified below.

Coordination of Administering Agencies

Given the geographic size of the County (over 20,000 square miles), the number and diversity of communities and the variety of priority needs, a high degree of coordination is necessary in order to deliver housing and community development programs and resources in a timely, efficient and cost-effective manner. Through implementation of the action of the Consolidated Plan, the County will benefit from previously developed strong

partnerships and working relationships with a number of different public and assisted-housing providers, service agencies, nonprofit organizations and governmental entities. To enhance coordination, the County will endeavor to strengthen and expand these relationships.

In order to respond to increasing demands for affordable housing and related services for lower income persons, the County will continue its dialogue with the Housing Authority of San Bernardino County, the Community Action Partnership of San Bernardino County (CAPSBC) and the County of San Bernardino Office of Homeless Services in an effort to maximize the effectiveness of existing programs, to identify new funding opportunities, and to explore potential cooperative ventures. The County will expand its commitment to the creation and capacity of local nonprofit housing corporations by providing support services, identifying additional resources and assisting in capacity building. In addition, the County will coordinate efforts with the participating cities and with assisted-housing providers to augment its countywide affordable housing strategy. The County will also continue its cooperative relationship with the Children's Network and the Human Services Group in their effort to develop a five year plan to improve the coordination of local resources for, and reduce the fragmentation of, services to children throughout the County.

As the County has grown in population and attraction of businesses, so has the need for support services. The County works closely with local and regional agencies to implement services and assistance. To bear fruit and expand opportunities for its citizens, the ongoing participation and increased coordination with a wide range of independent organizations is encouraged. The primary agencies are:

County Departments: Economic Development Agency and Workforce Development.

City Economic Development Departments: 24 cities, including the participating cities and entitlement cities. For business and economic development projects, coordination on projects is encouraged.

Regional Groups: Inland Empire Economic Partnership, High Desert Regional Economic Development Authority, Economic Council of Pass Area Communities, Morongo Basin Economic Development Consortium, Inland Valley Development Authority, Chambers of Commerce, State Trade and Commerce Agency.

Educational Organizations: Colleges and universities, K-12, regional occupational programs, college extension programs and private trade schools.

Finally, the County will increase efforts to improve coordination with entitlement cities within the County in the early identification and notification of overlapping priority needs and mutual benefit proposals, to ensure adequate and concurrent funding commitments for proposed cooperative ventures.

RESOURCES

In addition to CDBG, HOME and ESG funds, the following federal, state, local and private programs and services represent potential resources anticipated to be available in implementing the Strategic Plan.

FEDERAL RESOURCES ¹

Small Business Administration 504 Loan Program: The SBA Program is designed to assist successful, established, growth-oriented companies or new firms with exceptional management teams and equity positions. Loans are processed by Enterprise Funding Corporation and local lending institutions. The program provides long-term, fixed-rate, second mortgage financing for acquisition of property, construction of buildings and purchase of capital equipment.

Economic Development Administration: The Economic Development Administration was established to generate jobs, help retain existing jobs, and stimulate industrial and commercial growth in economically distressed areas of the United States. Economic Development Administration assistance is available to rural and urban areas of the nation experiencing high unemployment, low income, or other severe economic distress. Under their Public Works and Development Facilities Program, the types of projects funded are water and wastewater facilities primarily serving industry and commerce; access roads to industrial parks or sites; port improvements; business incubator facilities; technology projects; sustainable development activities; export programs; Brownfields redevelopment and other infrastructure projects.

Supportive Housing Program: This program is designed to promote the development of supportive housing and supportive services, including innovative approaches to assist homeless persons in their transition from homelessness, and to promote the provision of supportive housing to homeless persons to enable them to live independently.

Shelter Plus Care: The Shelter Plus Care Program (S+C) is authorized by Title IV of the Stewart B. McKinney Homeless Assistance Act. S+C is designed to link rental assistance to supportive services for hard-to-serve homeless persons with disabilities (primarily those who are seriously mentally ill; have chronic problems with alcohol, drugs or both; or have acquired immune deficiency syndrome (AIDS) and related diseases) and their families. The program provides grants to be used for rental assistance for permanent housing for homeless persons with disabilities. Rental assistance grants are matched in the aggregate by supportive services that are equal in value to the amount of rental assistance and appropriate to the needs of the population to be served. The County's Department of Behavioral Health administers the Shelter Plus Care Program and contracts with various entities that provide supportive services to participants. The rental assistance is provided through the Housing Authority to participants referred by the Department of Behavioral Health.

Section 202: HUD makes direct long-term, low-interest loans to eligible nonprofit sponsors for the purpose of rental construction. The loans can be used only to provide housing that serves elderly, aged 62 or over, and/or disabled households. HUD negotiates directly with private developers in providing this assistance. Section 202

¹ Availability of Resources subject to change.

projects may be tied to the Section 8 Rental Assistance Program, although this is not a prerequisite for receiving a 202 direct loan.

Family Self-Sufficiency (FSS) Program: The FSS is a program enacted by Section 554 of the National Affordable Housing Act. It directs Public Housing Agencies (PHAs) and Indian Housing Authorities (IHAs) to use Section 8 assistance under the rental certificate and rental voucher programs, together with public and private resources to provide supportive services, enabling participating families to achieve economic independence and self-sufficiency.

Section 203K Insured Loans: Through this program, HUD insures lenders against loss on rehabilitation loans. The three eligible activities under this program are: rehabilitate an existing one to four unit residential dwelling; refinance indebtedness on the above type of rehabilitation loan; or purchase and rehabilitate a one to four unit residential dwelling. HUD insures rehabilitation loans up to approximately 98 percent of the lesser of appraised value before rehabilitation plus rehabilitation costs or 110 percent appraised value after rehabilitation. The loans can be used to (1) finance rehabilitation of an existing property; (2) finance rehabilitation and refinancing of the outstanding indebtedness of a property; and (3) finance purchase and rehabilitation of a property. An eligible rehabilitation loan must involve a principal obligation not exceeding the amount allowed under Section 203(b) home mortgage insurance.

STATE RESOURCES ¹

State Housing Rehabilitation Program: The State Department of Housing and Community Development (HCD) provides loans and rebates to income-qualified households to correct Health and Safety Code violations and make essential repairs. The maximum loan limit is \$50,000 with a minimum equity requirement of 10 percent. The Housing Rehabilitation Program is available to lower-income households (<80 percent AMI).

Emergency Solutions Program: HCD provides grants to help increase both the number and quality of emergency shelters for homeless individuals and families, to operate these facilities and provide essential supportive services, and to help prevent homelessness.

Eligible activities include renovation, major rehabilitation, or conversion of buildings for use as emergency shelters for homeless.

With certain limits, grantees may spend funds on essential social services for the homeless and for homeless prevention efforts. Funds may also be spent on operating costs, such as maintenance, insurance, utilities, and furnishings.

State's First-Time Homebuyer Program: The California Housing Finance Agency (CalHFA) administers a below-market interest rate first mortgage program for low- to moderate-income homebuyers who have not owned a home in the past three years. CalHFA also offer a number of down-payment assistance programs.

LOCAL RESOURCES ²

¹ Availability of Resources subject to change.

² Availability of Resources subject to change.

“Tax-Exempt” Industrial Development Bond Financing: Tax-Exempt Industrial Development Bonds provide manufacturers and processors with below-market financing at tax-exempt interest rates in the County of San Bernardino. Interest on these bonds is exempt from federal and state income tax. This form of financing is restricted to manufacturing, assembly, processing and energy-related projects. Use of bond proceeds is limited to property acquisition, construction and capital equipment. Projects are limited to \$10 million in total capital spending and require an acceptable letter of credit as security to guarantee repayment of the bonds.

“Taxable” Development Bond Program: The program provides businesses and developers direct access to long-term, competitive financing at below-market interest rates. This joint public/private partnership has developed a \$200 million pool to finance eligible projects that create new employment opportunities and/or strengthen the local economic base. The financing provides single-source funding for construction and permanent loan requirements. Bond proceeds can be utilized to finance acquisition of property, construction and capital equipment. Projects are not limited in size, but do require an acceptable letter of credit as security to guarantee repayment of the bonds.

Equipment Only Purchase Program: The Equipment Only Purchase Program (EOPP) a State of California operated program, provides manufacturers and processors in San Bernardino County with tax-exempt bond financing for new capital equipment purchases. Interest on the bonds is exempt from federal and state income taxes. Companies utilizing this program may significantly reduce out-of-pocket expense and access tax-exempt, fixed-rate financing without a letter of credit requirement. Up to 100 percent of the new equipment purchases and installation may be financed.

Multifamily Mortgage Revenue Bond Program: Multifamily mortgage revenue bonds are used to finance construction, acquisition and mortgage loans, as well as capital improvements for multifamily housing. Federal and state laws require that a significant portion of the units in bond-funded projects be set aside for persons or families whose income does not exceed 60 percent of the median household income for the area, with the provision that at least half of the set-aside units will be occupied by a person or families whose income does not exceed 50 percent of the area median household income.

OTHER RESOURCES

The County of San Bernardino anticipates that it will have the following private support of affordable housing activities from several quasi-public entities including the Federal Home Loan Bank and California Housing Finance Agency.

Affordable Housing Program (AHP): The AHP is a competitive grant program that serves as the largest source of private sector grants for housing and community development in the county. It provides the Federal Home Loan Banks’ (FHLBanks) member institutions the opportunity to partner with local developers and community organizations seeking to build and renovate housing for low- to moderate-income American households.

AHP grants can subsidize construction, purchase and/or rehabilitation of owner-occupied and rental housing for very low-, low- and moderate-income households.

Each FHLBank funds its own AHP with 10 percent of its annual earnings

LOAN POOLS: ¹

SAMCO: The Savings Association Mortgage Company (SAMCO) has created a loan pool for use in affordable housing development and rehabilitation. Through the pool, 30-year permanent loans for affordable housing, serving persons earning up to 120 percent of the area median income, are available. The interest rate is based on the 11th District cost of funds plus a margin for administrative expenses. ²

California Community Reinvestment Corporation (CCRC) Loans: CCRC is a multifamily affordable housing lender, for new construction, acquisition and rehabilitation. CCRC specializes in programs for families and senior citizens with special needs and mixed-use developments. The program is administered through lending institutions participating in the pool.

Meeting Match Requirements: There is a 25 percent match requirement relative to HOME Program funds. The match requirement is applicable only to those HOME funds expended for eligible activities associated with specific projects. (HOME funds used for administrative and planning costs, Community Housing Development Organization (CHDO) operating expenses, and capacity building of CHDOs are exempt from the match requirement.)

HOME Program Regulations allow a dollar-for-dollar match credit for cash contributions to HOME projects from non-federal sources. HOME Regulations also provide for match credit to be applied on the basis of certain other cash and non-cash contributions that enhance the affordability of HOME rental projects and homebuyer mortgage payments.

The County intends to satisfy the 25 percent HOME match requirement through various means including the following:

- The County will also continue to contact various entities with the ability to waive, forego, or defer taxes, fees, and other charges in order to determine their ability and/or willingness to help the County meet match requirements. As the Land Use Services Department identifies potential new construction projects that qualify as affordable housing, related infrastructure requirements will also be analyzed for possible match credit.
- The County will encourage contributions from various entities with non-federal funds that are earmarked for affordable housing activities.
- The County will endeavor to identify applicable match credit sources resulting from project reserves for replacements, reserves for unanticipated increases in operating costs, or operating subsidies.

There is a 100 percent match requirement for ESG Program funds which can be provided through matching funds (cash) and/or in-kind contributions. The County intends to satisfy

¹ Availability of Resources subject to change.

² The Federal Home Loan Bank 11th District encompasses all of California.

the 100 percent match requirement in the form of staff time, volunteer time (at a rate of \$5/hr.), donated materials and other expenses of the subrecipient related to service delivery not paid for with ESG funds.

Annual Objectives 91.220(c)(3)

<p><i>*If not using the CPMP Tool:</i> Complete and submit Table 3A. <i>*If using the CPMP Tool:</i> Complete and submit the Summary of Specific Annual Objectives Worksheets or Summaries.xls.</p>

Table 2 in Appendix C summarizes the recommended 2012-13 program allocation categories. Appendix D contains HUD Table 3A, which provides a summary of specific annual objectives and Appendix G contains a detailed list of the 2012-13 projects or program funding. The following table also summarizes the goals and objectives to be carried out during FY 2012-13.

Goals and objectives to be carried out during the Annual Action Plan period are indicated by placing a check in the following boxes.

<input checked="" type="checkbox"/>	Objective Category: Decent Housing Which includes:	<input checked="" type="checkbox"/>	Objective Category: Suitable Living Environments Which includes:	<input checked="" type="checkbox"/>	Objective Category: Expanded Economic Opportunities Which includes:
<input checked="" type="checkbox"/>	assisting homeless persons in obtaining affordable housing	<input checked="" type="checkbox"/>	improving the safety and livability of neighborhoods	<input type="checkbox"/>	job creation and retention
<input checked="" type="checkbox"/>	assisting persons at risk of becoming homeless	<input checked="" type="checkbox"/>	eliminating blighting influences and the deterioration of property and facilities	<input type="checkbox"/>	establishment, stabilization and expansion of small business (including micro-businesses)
<input checked="" type="checkbox"/>	maintaining and preserving affordable housing stock	<input checked="" type="checkbox"/>	increasing the access to quality public and private facilities	<input type="checkbox"/>	the provision of public services concerned with employment
<input checked="" type="checkbox"/>	increasing the availability of affordable permanent housing in standard condition to low-income and moderate-income families, particularly to members of disadvantaged minorities without discrimination on the basis of Race, Color, Religion, Sex, National Origin, Familial Status, or Disability	<input type="checkbox"/>	reducing the isolation of income groups within areas through spatial deconcentration of housing opportunities for low-income persons and the revitalization of deteriorating neighborhoods	<input checked="" type="checkbox"/>	the provision of jobs to low-income persons living in areas affected by those programs and activities covered by the plan
<input checked="" type="checkbox"/>	increasing the supply of supportive housing which includes structural features and services to enable persons with special needs (including persons with HIV/AIDS) to live in dignity and independence	<input checked="" type="checkbox"/>	restoring and preserving properties of special historic, architectural, or aesthetic value	<input type="checkbox"/>	availability of mortgage financing for low-income persons at reasonable rates using non-discriminatory lending practices
<input checked="" type="checkbox"/>	providing affordable housing that is accessible to job opportunities	<input type="checkbox"/>	conserving energy resources and use of renewable energy sources	<input type="checkbox"/>	access to capital and credit for development activities that promote the long-term economic social viability of the community

7. Provide a summary of specific objectives that will be addressed during the program year.

Below is a summary table of the planned 2012-13 Community Development Activities by HUD Activity code.

Table 1 Summary of Community Development Activities				
HUD Code	Program	Geographic Locations	Funding	# of Projects
Construction				
03	Public Facilities and Improvements (General)	Montclair, Muscoy	\$1,867,954	2
03A	Senior Centers			
03E	Neighborhood Facilities			
03F	Parks, Recreational Facilities	Barstow, Needles, Twentynine Palms, Yucca Valley	\$386,536	4
03J	Water/Sewer Improvements	Loma Linda	\$106,042	1
03K	Street Improvements	Colton, Highland, Yucaipa	\$666,907	4
03L	Sidewalks	Colton	\$104,330	1
03O	Fire Station/Equipment	Adelanto, Needles	\$346,441	2
15	Code Enforcement	Adelanto, Big Bear Lake, Highland, Grand Terrace, Montclair	\$387,654	5
04	Clearance and Demolition			
Public Service				
03T	Oper. Costs of Homeless/AIDS Patients Programs	Barstow, Loma Linda	\$21,550	2
05	Public Services (General)	Adelanto, Colton, Grand Terrace, Highland, Loma Linda, Montclair, Twentynine Palms, Yucaipa	\$129,150	9
05A	Senior Services	Highland, Montclair, Needles	\$41,624	3
05B	Disabled Services			
05C	Legal Services			
05D	Youth Services	Colton, Highland, Yucaipa	\$66,143	5
05E	Transportation Services	Twentynine Palms	\$22,000	2
05G	Battered and Abused Spouses			
05I	Crime Awareness	Yucaipa	\$15,000	1
05L	Child Care Services	Barstow	\$12,850	1
05M	Health Services	Adelanto	\$10,000	1
05N	Abused and Neglected Children			
05Q	Subsistence Payments			

Description of Activities 91.220(d) and (e)

****If not using the CPMP Tool:*** Complete and submit Table 3C.
****If using the CPMP Tool:*** Complete and submit the Projects Worksheets and the Summaries Table.

8. Provide a summary of the eligible programs or activities that will take place during the program year to address the priority needs and specific objectives identified in the strategic plan.

The County of San Bernardino has developed a strategic plan to address the key issues raised in the course of previous analysis, and which meets the HUD requirements for elements to be addressed by this plan.

The three over-arching goals intended to benefit very low-, low- and moderate-income persons are:

- To provide decent housing
- To provide a suitable living environment
- To expand economic opportunities

The outcomes that are being sought are:

- Availability
- Accessibility
- Sustainability

HUD Table 3A in Appendix D summarizes the specific annual objectives and designates the outcome/objective category for each activity. A unique identification number has been assigned to each specific object. This identification consists of the HUD performance measure outcome and objective categories as defined in the table below and a CDH-assigned strategy number.

HUD Performance Measures Objective/Outcome Identification Categories

	Availability/Accessibility	Affordability	Sustainability
Decent Housing	DH-1	DH-2	DH-3
Suitable Living Environment	SL-1	SL-2	SL-3
Economic Opportunity	EO-1	EO-2	EO-3

Annual Affordable Housing Goals 91.220(g)

****If not using the CPMP Tool:*** Complete and submit Table 3B Annual Housing Completion Goals.
****If using the CPMP Tool:*** Complete and submit the Table 3B Annual Housing Completion Goals.

9. Describe the one-year goals for the number of homeless, non-homeless, and special needs households to be provided affordable housing using funds made available to the jurisdiction and one-year goals for the number of households to be provided affordable housing through activities that provide rental assistance, production of new units, rehabilitation of existing units, or acquisition of existing units using funds made available to the jurisdiction. The term affordable housing shall be defined in 24 CFR 92.252 for rental housing and 24 CFR 92.254 for homeownership.

Affordable Housing Priorities

Strategy 1: Expand the Supply of Affordable Housing

This strategy will be implemented primarily through two mechanisms. First, the County will continue to support activities of qualified housing developers and the Housing Authority in their efforts to provide affordable housing. Second, the County will continue to provide incentives including bond financing, density bonuses, and priority processing to developers in order to stimulate production and/or remove obstacles to the provisions of additional affordable units.

Implementation Programs

- 1) Affordable Housing Development Loan Program
 - New Construction
 - Acquisition Rehabilitation
- 2) Neighborhood Stabilization Program

The area of focus will be low- and moderate-income areas in the County with a preference for extremely low-income renters, with particular attention to large families. Funds will be disbursed through qualified for-profit and not-for-profit development organizations as well as direct funding to eligible homebuyers.

Strategy 2: Assist in Reducing Housing Costs to Extremely Low- and Low-Income Households

Supply factors cannot wholly address the housing needs of extremely low- and low-income residents whose incomes are insufficient to support housing costs, even when priced at below-market rates. A strategy to narrow the gap between housing costs and income is critical. Specific demand-based assistance can be provided including reduced rent, housing vouchers and energy efficient units that effectively increase the income of lower income households by reducing out-of-pocket housing and utility costs.

Implementation Programs

- 1) Affordable Housing Development Loan Program

The area of focus will be low- and moderate-income areas in the County with a preference for extremely low-income renters, with particular attention to large families. Funds will be disbursed for the Affordable Housing Development Loan Program through the HOME program.

Strategy 3: Preserve Existing Stock and Affordable Units

The retention of the affordable housing stock is an important element in the overall goal of providing housing that meets the needs of existing and future residents. Federal legislation addresses the issue of prepayment of federally-assisted units and due to current market conditions there is not expected to be much prepayment activity in the plan period. Another aspect of preservation is maintaining the quality of the existing housing inventory. The Housing Authority addresses the maintenance needs of its housing stock and the County supports these activities. HOME funding can be utilized for rehabilitation of existing multi-family projects retained as affordable units.

Implementation Programs

- 1) Public Housing Improvements
- 2) HOME Affordable Housing Development Loan Program

The area of focus will be low- and moderate-income areas in the County with a preference for extremely low-income renters with particular attention to large families. Funds will be disbursed primarily through CDBG and the HOME Program.

Homeless and Special Needs 91.220(i)

10. Describe, briefly, the jurisdiction's plan for the investment and use of available resources and describe the specific planned action steps it will take over the next year aimed at eliminating chronic homelessness.

11. Describe specific action steps to address the needs of persons that are not homeless identified in accordance with 91.215(e).

12. Homelessness Prevention—Describe planned action steps over the next year to address the individual and families with children at imminent risk of becoming homeless.

Homelessness Priorities

Strategy 1: Increase Availability/Accessibility of Decent Housing by Implementing a Continuum of Care System

The County of San Bernardino's Continuum of Care (CoC) is a community plan to organize and deliver housing and services to meet the specific needs of the people who are homeless as they move to stable housing and maximize self-sufficiency. The County's CoC system provides a community-based process that offers a comprehensive response to the different needs of homeless individuals and families and those at risk of becoming homeless.

The County has developed a 10-Year Strategy to End Homelessness to better address the diverse needs of the homeless population and provide a framework to create solutions to help end chronic homelessness. The four components of the County's CoC are: 1) Outreach and assessment so we may identify service and housing needs and provide a contact to the appropriate level of services; 2) Emergency shelter provides immediate and safe alternatives to living and sleeping on the streets; 3) Transitional housing with

supportive services and the development of skills that will be needed once an individual or family are permanently housed; and 4) Permanent housing and permanent supportive housing to provide individuals and families with an affordable place to live with services, if needed.

The County of San Bernardino has modified its Emergency Shelter Grant program to comply with the Emergency Solutions Grant program as required by the HEARTH Act. These program changes are addressed in sections 37 through 42.

Special Needs Priorities

Strategy 1: Facilitate Development/Rehabilitation of Special Needs Housing

In the County of San Bernardino, there exists an overlap between housing affordability and the housing requirements of special needs groups. The strategies and programs identified in the Affordable Housing Plan also apply to households with special housing requirements.

Implementation Programs

Repair Service Program: Due to severe reduction of available funding and a change in direction of activities, this program will be discontinued.

Family Unification Program: The purpose of this program is to promote family unification by providing housing assistance to families for whom the lack of adequate housing is a primary factor in the separation, or imminent separation, of children from their families. The Housing Authority integrates the Housing Choice Voucher program with the County of San Bernardino Department of Children's Services to provide a service that will allow children to make an early return or continued placement in the home.

Mainstream Program: This program is designed to provide assisted housing to persons with disabilities enabling them to rent suitable and accessible housing on the private market. Mainstream applicants are taken from the Mainstream waiting list and offered a Housing Choice Voucher as allocations become available. Participants must be participating in programs of rehabilitation and/or support services within the community.

Welfare-to-Work Program: The Housing Authority, in conjunction with Workforce Development Department (WDD) and the Transitional Assistance Department (TAD), is promoting a Welfare-to-Work Program. Applicants must meet criteria set by all three agencies and are issued a Housing Choice Voucher. Participants must agree to join the Family Supportive Services (FSS) Program and be a part of the Welfare-to-Work Program. Individuals are expected to further their education and training to improve their marketable job skills and leave the welfare system.

Veterans Affairs Supportive Housing Program (VASH): This program is designed for homeless veterans with severe psychiatric or substance abuse disorders. The Housing Authority integrates the Housing Choice Voucher Program with the Veterans Administrative Medical Center to provide housing and supportive services to eligible homeless veterans.

Shelter Plus Care Program: This program is designated to contribute to the countywide public/private partnerships system to strengthen services available to homeless families

and individuals. Eligible participants must meet HUD's definition of homeless and be diagnosed with a mental illness or dually diagnosed with mental/substance abuse disorders. Families are referred to the Housing Authority by the County of San Bernardino Behavioral Health Department and must comply with supportive services requirements.

Priority in Special Needs Housing: Multifamily developments are given priority if the projects are specifically designed to assist persons with special needs such as being disabled, having an illness, elderly and persons with HIV/AIDS. The EDA has entered into an agreement with the County Department of Behavioral Health to provide technical assistance as well as being an additional financial resource for a housing project that will serve persons with mental illness.

Strategy 2: Increase Availability/Accessibility of Decent Housing by Affirmatively Furthering Fair Housing to Ensure Equal Access to Housing for Special Needs Groups

Funding to support fair housing services will continue to be approximately one percent of the County's CDBG allocation. Fair housing services will address the effects of any impediments identified in the County's "Analysis of Impediments to Fair Housing." These services will be made available in the unincorporated communities and the 12 participating cities.

The general activities considered in support of fair housing and landlord/tenant mediation are described in the 2010-15 Consolidated Plan under the "Fair Housing" and "Landlord/Tenant Mediation" subheadings. Services to support landlord/tenant counseling and dispute resolution will be provided on an individual basis and in response to inquiries or formal complaints. Funding for landlord/tenant services will be approximately 0.5 percent of the County's allocation.

Implementation Programs

- 1) Fair Housing Program
- 2) Landlord/Tenant Mediation Services

Strategy 3: Goals and Actions to Overcome the Effects of Identified Impediments

Special needs groups may experience any or all of the identified impediments to fair housing choice. This strategy contains goals and specific actions that assist in overcoming these effects. As stated above, these actions pertain to County programs within the areas covered by the Consolidated Plan.

Implementation Goals

- 1) Identifying and Eliminating Discriminatory Lending Practices
- 2) Expanding Housing Availability and Pattern of Occupancy
- 3) Expanding Public Policy and Programs
- 4) Increase Outreach and Education

Community Development Priorities

Strategy 1: Public Facilities

Short-Term Objective

Provide funding for the acquisition, construction, reconstruction or installation (including design services with respect to such construction, reconstruction or installation) of eligible public facilities in response to the specific priority facility needs of varying communities. These may include senior centers, youth centers, neighborhood facilities, childcare centers, parks and/or recreation facilities, health facilities and parking facilities.

Proposed Accomplishments

During the next one to three years, the County intends to accomplish the following activities to benefit residents of cooperating cities and unincorporated County areas. Some of these are ongoing projects that may have been initiated during prior Action Plans.

- 1) Senior Centers
- 2) Community Centers
- 3) Child Care Centers
- 4) Youth Centers
- 5) Park and Recreation Facilities
- 6) Fire Stations
- 7) Centers for the Disabled
- 8) Homeless Shelters
- 9) Health Facilities

Strategy 2: Infrastructure Improvements

Short-Term Objective

Stimulate private investment and neighborhood revitalization by providing funds to construct eligible public infrastructure improvements in response to the priority infrastructure needs of varying communities, which may include solid waste disposal sites, flood drains, water improvements, streets, sidewalks, and sewer improvements.

Proposed Accomplishments

During the next one to three years, the County intends to accomplish the following activities to benefit residents of cooperating cities and unincorporated County areas. Some of these are ongoing projects, which may have been initiated during prior Action Plans.

- 1) Street Improvements
- 2) Sidewalk Improvements
- 3) Flood Drainage Improvements
- 4) Water System Improvements
- 5) Solid Waste Disposal Improvements

Strategy 3: Public Services

Short-Term Objective

Improve and augment the County's extensive and diverse range of human services in response to the priority health and social service needs of low- and moderate-income persons and persons with special needs. The County will accomplish this by funding public services, which may include senior, disabled, and youth services, transportation services, substance abuse services, employment training, crime awareness, fair housing counseling, tenant/landlord counseling, childcare and health services and other eligible services as needed. CDBG funding will not be used to supplant other funds that are categorically targeted to the public services listed. Where possible the County will use CDBG funds to expand services to the County-identified desired level.

Proposed Accomplishments

During the next one to three years, the County intends to augment and enhance the human service delivery system by assisting the following public services to benefit residents of cooperating cities and unincorporated areas:

- 1) Senior Citizen Services
- 2) Youth Services
- 3) Services for Disabled Persons
- 4) Child Care Services
- 5) Social Services
- 6) Health Services
- 7) Legal Services
- 8) Transportation Services
- 9) Domestic Violence Services
- 10) Crime Awareness and Prevention Services
- 11) Education, Training and Referral Services

Strategy 4: Economic Development

Short-Term Objective

The County does not currently provide financing. However, loan inquiries are directed to local agencies which the County has developed working relationships with for the purpose of providing financing solutions to businesses located within the County. The County will continue to develop even stronger relationships with local agencies that foster the business-financing environment. The County has reorganized its operating structure to better utilize resources for meeting financing objectives.

The County will continue to provide program management and outreach/recruitment activities along with its current loan servicing functions to further our commitment in meeting program hiring objectives.

It should be noted that a number of these economic development programs are under review and may not be continued due to financial constraints, pressing needs in other areas, and the work being done by the Economic Development Agency and the Workforce Investment Board, among other entities. Under the County's new 2010-2015 Consolidated Plan, the County will no longer participate in the HUD Section 108 program.

Proposed Accomplishments

The County no longer funds the Micro-Enterprise Technical Assistance Program.

Strategy 5: Accessibility

Short-Term Objective

Provide funding of special projects directed to the removal of material and architectural barriers within public facilities.

Proposed Accomplishments

During the next one to three years, the County intends to accomplish the following activity to benefit residents of cooperating cities and unincorporated areas:

- 1) Removal of Architectural Barriers

Strategy 6: Historic Preservation

Short-Term Objective

Provide for the funding of special projects directed toward the rehabilitation, preservation and restoration of historic properties.

Proposed Accomplishments

During the 2010-2015 Consolidated Plan, the County intends to accomplish the following activity to benefit residents of cooperating cities and unincorporated areas:

- 1) Building Preservation

Strategy 7: Code Enforcement

Short-Term Objective

Provide funding for code enforcement activities in deteriorated and deteriorating areas, as well as in areas with blighting influences, in conjunction with funding for abatement activities. These activities may include clearance, demolition, removal, and rehabilitation (including rehabilitation which promotes energy efficiency) of buildings and improvements (including interim assistance; financing public or private acquisition for rehabilitation; and the rehabilitation of privately owned properties).

Proposed Accomplishments

During the next one to three years, the County hopes to accomplish the following activities to benefit residents of cooperating cities and unincorporated areas:

- 1) Code Enforcement
- 2) Demolition and Clearance of Hazardous Structures
- 3) Blight Abatement

Geographic Distribution/Allocation Priorities 91.220(d) and (f)

13. Describe the geographic areas of the jurisdiction (including areas of low-income families and/or racial/minority concentration) in which assistance will be directed during the next year. Where appropriate, the jurisdiction should estimate the percentage of funds the jurisdiction plans to dedicate to target areas.

It is the County's intent to use the identified resources to assist various unincorporated communities within the five Supervisorial Districts, and the 12 cooperating cities. These cities are Adelanto, Barstow, Big Bear Lake, Colton, Grand Terrace, Highland, Loma Linda, Montclair, Needles, Twentynine Palms, Yucaipa and the Town of Yucca Valley. HOME funds will be available for use in these 12 cities and in the cities of Chino Hills, Rancho Cucamonga, and Rialto.

14. Describe the reasons for the allocation priorities, the rationale for allocating investments geographically within the jurisdiction (or within the EMSA for HOPWA) during the next year, and identify any obstacles to addressing underserved needs.

The rationale used to prioritize funding differs for each of the three formula grants. As indicated in the Consolidated Plan, the prioritization rationale for geographically allocating CDBG funding is rooted in a formula based on population, the extent of poverty and the extent of housing overcrowding. Thus, in simple terms, the relative priority of each geographic area, and subsequently its allocation of CDBG funds, is based on its proportionate share of the County's population, poverty and overcrowded housing. HOME funds are not allocated geographically. HOME-funded programs are available through an RFP process throughout the unincorporated areas and in the cooperating cities without priority area distinction. ESG funds are allocated geographically based on the county's intent to provide funds for programs to the population centers within each of the six major areas of the county: East, West and Central Valleys; Mountain communities; the High Desert and the Morongo Basin.

Public Housing 91.220(h)

15. Describe the manner in which the plan of the jurisdiction will help address the needs of public housing and activities it will undertake during the next year to encourage public housing residents to become more involved in management and participate in homeownership.

The Housing Authority of the County of San Bernardino (HACSB) was created in 1941 to provide housing assistance to low-income individuals and families, including senior citizens and disabled individuals. HACSB has been very proactive in addressing the needs of the eligible population in San Bernardino County and at this time, the HACSB serves over 30,000 low-income individuals and families in the County through various housing programs.

The Housing Authority of the County of San Bernardino (HACSB) was created in 1941 to provide housing assistance to low-income individuals and families, including senior citizens and disabled individuals. HACSB has been very proactive in addressing the needs of the eligible population in San Bernardino County and at this time, the HACSB serves nearly 30,000 low-income individuals and families in the County through various housing programs.

HACSB provides affordable housing assistance and services to families through the following programs –

Affordable Housing Program:

The Affordable Housing Program is comprised of 1,306 units located in 16 cities throughout the County of San Bernardino that are managed by the Housing Authority. These units were developed with Department of Housing and Urban Development (HUD) funding and as HACSB manages the units it continues to receive an operating subsidy from HUD. The program provides affordable housing assistance for low-income families, disabled individuals and seniors. Persons earning 80% of the area median income or less are eligible to participate in the program.

Housing Choice Voucher Program (HCV)

This federally funded program provides rental assistance in the form of a Housing Choice Voucher (HCV), to low-income individuals. In the HCV Program, residents have the flexibility of where to live within the County of San Bernardino, including the option of portability throughout the United States because they rent from private landlords. This program provides assistance low-income families, seniors, and disabled individuals. Persons earning 80% of the area median income or less are eligible to participate in the program.

Authority Owned Housing Units

The Housing Authority also owns 1,355 housing units and 4 commercial units in 16 cities/communities throughout the County, which are units acquired and/or developed through a variety of partnerships with the State of California, the County of San Bernardino Department of Community Development and Housing, various cities throughout the county and Housing Partners I, Inc., a non-profit public housing corporation. With the cooperation of these partners, the Housing Authority has acquired and developed various affordable rental units including senior housing in Fontana, Montclair, San Bernardino, Twin Peaks, Victorville and Yucaipa. The Housing Authority contracts with a private property management company to oversee the management of these units.

Homeownership Assistance Program

The Homeownership Assistance Program assists eligible participants with finding an appropriate mortgage lender and available down payment assistance programs. Some participants may also qualify to receive a housing voucher to offset their mortgage payment. All Affordable Housing and HCV Program participants that meet the eligibility criteria have the option of purchasing a home through the Homeownership Assistance Program. A partial list of the eligibility qualifications for the participant include: receiving rental assistance from HACSB for more than a year; no previous homeownership history for the past three years; credit worthy to obtain mortgage financing; currently employed full time for at least two years, except for individuals receiving social security and/or

disability payments; among others. Since 2009, the Homeownership Assistance Program continues to receive statewide recognition as it ranks one of the top in creating new homeowners each year.

In March 2008, HACSB became one of only one percent of housing authorities nationwide to be designated a Moving to Work (MTW) demonstration site by the U.S. Department of Housing and Urban Development (HUD). MTW is a demonstration program that allows housing authorities to design and test ways to:

- 1) promote self-sufficiency among assisted families
- 2) achieve programmatic efficiency and reduce costs
- 3) increase housing choices for low-income households

As a MTW agency, HACSB has the opportunity to implement new policies outside the usual scope of HUD policies and regulations. This will allow HACSB to achieve its mission and program goals by leveraging the unique needs and concerns of the various communities and residents of San Bernardino County. HACSB currently has 21 approved activities – 11 save tax payers dollars through administrative efficiencies, 7 help families achieve economic independence and 3 ensure freedom of housing choice. In 2011 we established a new department - Community Development Initiatives Department (CDI) that now serves as a catalyst for coordinating services, resources and partnerships to promote economic independence, family strengthening, and enhanced quality of life. These synergies will help families achieve true economic independence and transition off our programs, thus enabling us to serve the nearly 50,000 applicants on our waiting lists.

The majority of HACSB's public housing portfolio was constructed in the 1940s and 50s. Because of this, HACSB envisions implementing over \$100 million in public housing mixed-finance redevelopment projects over the next decade, with the majority of these funds necessarily coming from sources outside of HACSB/HUD. In FY 2011, HACSB submitted a demolition application for 115 units in Redlands, CA, commonly referred to as the Lugonia Avenue Public Housing site. The demolition will be completed in two phases – 60 units in the first phase and 55 units in the next phase. The mixed finance new development will include bond proceeds, tax credits and a one for one replacement of the public housing units with project based vouchers. The development will be redeveloped as a mixed use/mixed income community consisting of 189 rental units and will also include 39 single family homes, which will be available for purchase.

The Waterman Gardens development in San Bernardino has also been high on the redevelopment priority list due to its physical conditions as well as its strategic location within the City of San Bernardino. The site, due to its age and insufficient funding, is severely lacking in terms of modern amenity, and tenants have endured ongoing disruption of short-term repairs without the benefit of a long-term plan. Master Planning has been completed for the Waterman Gardens site, where the 252 units are expected to be replaced with over 400 new mixed-income units. The plans include a new club house to provide self-sufficiency activities for the entire community, an onsite Head Start Preschool and incorporating green features and technology. The total investment at the site is expected to be in excess of \$100 million dollars over three to six years.

HACSB is making a concerted effort to utilize green building technologies within its capital improvement program. While the current shortfall in Capital Fund generally prevents

substantial “green” investment, HACSB is utilizing whatever avenues are available to implement energy conservation and sustainable building practices. In July 2010, Southern California Edison (SCE) awarded the Housing Authority of the County of San Bernardino (HACSB) with \$1.84 million as part of SCE’s Multi-family Affordable Solar Housing Program. HACSB has been aggressively implementing energy efficiency programs, upgrades and practices at its various housing complexes, and this grant helped contribute to upgrades at the Maplewood Homes Community, an affordable housing development, in San Bernardino.

The Housing Authority partnered with HelioPower an expert in developing and operating solar power systems, to fulfill this solar project. Solar panels were installed atop 96 units and three community buildings of the total 297 units. The total cost of the installation was \$2.4 million, and the Housing Authority leveraged American Reinvestment and Recovery Act (ARRA) stimulus monies along with Public Housing Capital Funds to complete the project marking the first Multifamily Affordable Solar Housing (MASH) Track 2 grant funded solar installation at a public housing site in Southern California. Helio group also provided community workshops to increase tenant awareness of the benefits of solar and energy efficiency as well onsite job training.

Through the ongoing renovation program, HACSB envisions continuing the focus on energy conservation and sustainability not only to improve the environment, but also to help grow the “green-collar” job-sector of the economy, which will be a key area for job creation, especially in the building industry in the coming years.

The County works closely with HACSB. The goals and objectives of the County and HACSB are closely related and coordinated through strategies and programs. HACSB, through Housing Partners 1 Inc. is eligible to apply for multifamily HOME funding as a CHDO. The following strategies are implemented through various programs described in the Consolidated Plan.

Strategy – Expand the supply of assisted housing.

- Objectives:
- Apply for additional rental vouchers.
 - Reduce public housing vacancies.
 - Leverage private or other public funds to create
 - Additional housing opportunities.
 - Acquire or build units or developments.

Strategy – Improve the quality of assisted housing.

- Objectives:
- Improve public housing management.
 - Improve voucher management.
 - Increase customer satisfaction.
 - Concentrate on efforts to improve management functions
 - Renovate or modernize public housing units.
 - Provide replacement vouchers.

Strategy – Increase assisted housing choices.

- Objectives:
- Provide voucher mobility counseling.
 - Conduct outreach efforts to potential voucher landlords.
 - Increase voucher payment standards.
 - Implement voucher homeownership program.

Strategy – Provide an improved living environment.

- Objectives:
- Implement measures to de-concentrate poverty by bringing higher income public households into lower income developments.
 - Implement measures to promote income mixing in public housing by assuring access for lower income families into higher income developments.
 - Implement public housing security improvements.
 - Improve overall appearance of developments.

Strategy – Promote self-sufficiency and asset development of assisted households.

- Objectives:
- Increase the number and percentage of employed persons in assisted families.
 - Provide or attract supportive services to improve assisted recipients' employability.
 - Provide or attract supportive services to increase independence for the elderly or families with disabilities.
 - Provide on-site computer training to residents.

Strategy – Ensure equal opportunity and affirmatively further fair housing.

- Objectives:
- Undertake affirmative measures to ensure access to assisted housing regardless of race, color, religion, national origin, sex, familial status, and disability.
 - Undertake affirmative measures to provide a suitable living environment for families living in assisted housing, regardless of race, color, religion, national origin, sex, familial status, and disability.
 - Undertake affirmative measures to ensure accessible housing to persons with all varieties of disabilities regardless of unit size required.

16. If the public housing agency is designated as "troubled" by HUD or otherwise is performing poorly, the jurisdiction shall describe the manner in which it will provide financial or other assistance in improving its operations to remove such designation during the next year.

HASBC is not designated as "troubled" by HUD, and in fact is, as noted, one of only one percent of housing authorities nationwide to be designated a Moving to Work (MTW) demonstration site by HUD.

Barriers to Affordable Housing 91.220(j)

17. Describe the actions that will take place during the next year to remove barriers to affordable housing.

A complete description of the goals and actions to overcome the effects of the identified impediments are presented in the Analysis of Impediments to Fair Housing Choice document (AI) which is listed online at www.sbcountyadvantage.com

There are five impediments identified in the AI for the County. The following is a list of impediments and the actions to eliminate impediments to fair housing choice in San Bernardino County. This information is by no means comprehensive, and there undoubtedly remain a number of additional remedies to these and other problems faced

by home seekers.

IMPEDIMENT ONE – DISCRIMINATION IN THE HOUSING MARKET

The recommended actions are intended to equalize the opportunities in all aspects of the housing market.

Actions

- 1) Continue to educate households and housing related organizations by disseminating Fair Housing law literature, conducting Fair Housing law seminars and training, and focusing public awareness campaigns about Fair Housing law in ethnic and minority neighborhoods, and among civic, social, religious, and special interest groups.
- 2) Continue to provide Fair Housing materials and educational programs in Spanish, especially in neighborhoods and communities with high percentages of Spanish-speaking persons.
- 3) Continue to conduct training sessions and information campaigns especially among rental property owners and managers, as well as apartment owner associations, and management companies.
- 4) Continue to inform renters and home buyers of their rights and recourse, if they feel they have been discriminated against.
- 5) Increase housing choice alternatives for the disabled and families with children by encouraging the construction of affordable, and especially rental, housing (See affordability below).
- 6) Continue to fund Fair Housing testing and auditing program, focusing upon rental properties at this time. Currently testing is conducted usually on a “for cause” basis.

IMPEDIMENT TWO – LIMITED SUPPLY OF AFFORDABLE HOUSING

The recommended actions are intended to increase the availability of affordable housing within the jurisdiction of the County.

Actions

- 1) Continue to use all available federal, state and local funding resources and programs to address high priority housing needs for rehabilitation, preservation, and development of affordable units.
- 2) Continue to work with community-based organizations, affordable housing developers, and housing advocacy groups to increase the supply of larger and disability accessible housing units, leveraging resources to the extent possible.
- 3) Take advantage of the Neighborhood Stabilization Program resources to acquire housing units and make them affordable.
- 4) Encourage the development of affordable housing by stressing to each of the HOME Consortium cities the importance of development fee waivers and/or deferrals, streamlined permit processing, flexible design standards, and achievable density bonuses. Though many of the County HOME Consortium cities have some, or even all of these in their codes, some do not.
- 5) Provide County HOME Consortium cities a copy of the AI.

IMPEDIMENT THREE – ZONING, PLANNING, AND LAND USE ISSUES

The recommended actions are intended to remove barriers presented through local policies.

Actions

- 1) Encourage higher density zoning near public transportation, commercial and retail development and to the extent possible employment centers.
- 2) Encourage mixed-use development.
- 3) Ensure that reasonable accommodation and disabled access issues are properly addressed.
- 4) Though the topic of licensed community care facilities has been addressed municipalities should address the requirements for larger, unlicensed group homes (seven or more persons). (See NIMBYism below.)
- 5) Encourage each city to keep its Housing Element current, and in compliance with state law.
- 6) As noted above, communities should do as much as possible to reduce review and approval process times for both new construction and home modification applications.
- 7) Cities should develop incentives for the construction of affordable housing. An examination of linkage fees and inclusionary zoning may be warranted in some communities.
- 8) Encourage the use of universal design principles in new housing developments to create greater accessibility for disabled persons.
- 9) Direct County HOME Consortium cities to the CDH website for a copy of the AI.

IMPEDIMENT FOUR – LOCAL OPPOSITION (NIMBY)

The recommended actions are intended to remove opposition to affordable housing developments, known as “NIMBYism”, by established neighborhoods.

Actions

- 1) Encourage that local zoning ordinances and building codes properly address issues of concern with respect to higher density housing, persons with disabilities, and group homes/congregate living/community care.
- 2) Encourage developers, housing advocacy groups, and other interested parties to conduct neighborhood outreach and information campaigns before submitting projects for review and approval. These efforts will not lay all misconceptions to rest, a broader understanding of the nature of fair housing and the types of persons and families involved will mitigate at least some opposition.
- 3) Refer to AI and its goals in Requests for Proposals for housing projects and require applicants to explain how their proposals will meet the AI’s goals.

IMPEDIMENT FIVE – LENDING PRACTICES

The recommended actions are intended to encourage fair lending practices.

Actions

- 1) Provide the 10 most active lenders, as identified in the report, a copy of the AI.
- 2) Expand financial literacy and credit counseling programs, especially in minority and lower-income neighborhoods.
- 3) Provide approved homebuyer assistance lenders a copy of the AI.

IMPEDIMENT SIX - FAIR HOUSING COORDINATION

The recommended actions are intended to improve fair housing coordination among housing industry partners.

Actions

- 1) Encourage coordination between advocacy groups, community-based organizations, real estate industry professionals, lenders, property owners, and government agency officials to provide guidance and coordination for Fair Housing matters.
- 2) Provide known housing partners a copy of the AI.

Other Actions 91.220(k)

18. Describe the actions that will take place during the next year to address obstacles to meeting underserved needs, foster and maintain affordable housing, evaluate and reduce the number of housing units containing lead-based paint hazards, reduce the number of poverty-level families, develop institutional structure, enhance coordination between public and private agencies (see 91.215(a), (b), (i), (j), (k), and (l)).

Several areas of specific need emerged from analyses, documentation and other resources. Each of these needs fit within the stated goals. These needs, translated into tangible objectives are:

- the provision of affordable housing to extremely low-, very low-, and low-income households of all types in order to prevent homelessness;
- the creation of affordable rental housing opportunities for the very low- and low-income elderly;
- the reduction of reports of problems with housing, focusing on very low- and low-income renters in this category;
- the provision of quality public services to extremely low-, very low-, and low-income residents;
- the provision of quality public facilities for the needs of extremely low-, very low-, and low-income residents;
- infrastructure improvements throughout the County, but especially in the extremely low-, very low-, and low-income areas;
- economic development initiatives in coordination with state programs for business retention and expansion; and
- anti-poverty efforts that integrate job training and placement, welfare to work

initiatives, and other programs aimed at improving opportunities for economic self-sufficiency.

The County Consortium has observed a number of significant obstacles to meeting underserved needs. These include:

- loss of Redevelopment funding;
- limited funds from both public and private sources;
- a weak economy that has created additional needs, restricts government agency capacity and private sector ability to invest or assist;
- the geographic distances involved in delivering services and programs; and
- high unemployment, which creates additional needs in both numbers of persons requiring assistance and the range of assistance needed.

The resources needed to meet the numerous and diverse social, housing, economic and community needs of a county as large as San Bernardino are simply not available. The County encourages its agencies, cooperating cities, and community-based organizations to collaborate, to coordinate, and to leverage funds and programs wherever possible. Focus, efficiency, and collaboration are crucial to providing the necessary services and to obtaining the desired outcomes for the County's residents.

According to the Response and Surveillance System for Childhood Lead Exposures database (RASSCLE), in 2011, there were 55 newly identified cases of childhood lead poisoning; that is children and youth under the age of 21 years with an elevated blood lead level (BLL) of 10mcg/dL and above.

According to the Response and Surveillance System for Childhood Lead Exposures database (RASSCLE), in 2011, there were 55 newly identified cases of childhood lead poisoning; that is children and youth under the age of 21 years with an elevated blood lead level (BLL) of 10mcg/dL and above.

In the San Bernardino County Department of Public Health Childhood Lead Poisoning Prevention Program Work Plan for Fiscal Year 2011-2014, the environmental investigation services and enforcement activities were expanded, to address lead based paint (LBP) hazards in housing units built prior to 1978, where children have been identified with an elevated BLL of 10mcg/dL and above (venous sample). Before this contract period, these environmental investigation services were limited to housing units where children were identified with a single venous BLL \geq 20mcg/dl or a persistent BLL \geq 15mcg/dl. If a LBP hazard is identified by the Registered Environmental Health Specialist, he/she will work with the property owner to correct the LBP hazards.

The current resources at hand do not match the present need for lead-safe housing in San Bernardino County; therefore, it is imperative that moving forward every renovation, weatherization, and abatement project be done using lead-safe work practices. For example, one of the few agencies that provide lead-safe weatherization services for the entire County is Community Action Partnership of San Bernardino County (CAPSBC); which serves low-income families living within County boundaries. Currently the County does not have a dedicated Lead Hazard Control program.

19. Describe the actions to coordinate its housing strategy with local and regional transportation planning strategies to ensure to the extent practicable that residents of affordable housing have access to public transportation.

HOME affordable housing projects typically include Low Income Housing Tax Credits (LIHTC) which considers access to a number of neighborhood amenities including main thoroughfares and public transportation. Housing projects funded with Mental Health Services Act funding through the Department of Behavioral Health consider availability of public transportation when evaluating project funding.

In addition, it should also be noted that EDA, the Department of Behavioral Health, the Office of Homeless Services and the Housing Authority of San Bernardino County have a Memorandum of Understanding for collaboration and coordination for programs involving housing and supportive services.

The County does have an established working relationship with the San Bernardino Housing Authority and the housing authorities in Needles and Upland. This permits extensive and frequent consultation on housing activities, coordination of efforts, seeking funding opportunities, and identification of programs of common interest and application. Each operates public housing units and provides Section 8 rental assistance.

The County has worked closely with local nonprofit organizations to actively encourage housing programs for extremely low-, low- and moderate-income persons. Also, the Consortium and the EDA maintain a positive relationship with the builders, developers, and financial institutions in the County and the region. This collaborative approach has assisted in the creation of affordable housing projects throughout the County.

Program Specific Requirements: CDBG 91.220(I)(1)

20. Identify program income expected to be received during the program year, including:

- amount expected to be generated by and deposited to revolving loan funds;
- total amount expected to be received from each new float-funded activity included in this plan; and
- amount expected to be received during the current program year from a float-funded activity described in a prior statement or plan.

The estimated program income for 2012-13 is \$500,000. Activities which generate funds that are paid back to the County are listed under "Estimated Program Income" in Appendix B. Such payments, including interest payments, are considered by HUD to be program income. Some of these county activities are established as revolving fund account programs. The estimated program income will be added to any remaining amounts of prior-year program income for use during FY 2012-13. Additional uses of program income are also listed in Appendix B.

21. Program income received in the preceding program year that has not been included in a statement or plan.

Program income, generated by revolving loan programs and received by the County during the year, is returned to the program account for further use under that program. Such programming of funds does not constitute a substantial change to this Plan.

22. Proceeds from Section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in its strategic plan.

Not applicable

23. Surplus funds from any urban renewal settlement for community development and housing activities.

Not applicable

24. Any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan.

None

25. Income from float-funded activities.

The County Float Loan Program will no longer be offered due to limited funding and a change in direction for the use of CDBG funds.

26. Urgent need activities, only if the jurisdiction certifies.

The rules governing the use of CDBG funds allow up to 30 percent of the County's annual grant to be used to alleviate emergency conditions that pose a serious and immediate threat to the health or welfare of the community. The condition must be of recent origin or recently became urgent (generally within the past 18 months).

None of the activities on the following pages are qualified for, nor are intended to meet an urgent need, as defined by CDBG regulations. However, this plan makes the following provision for emergency utilization of CDBG funds to meet an urgent need that might arise.

In the event of an emergency, CDBG funds may be reprogrammed by action of the County Board of Supervisors to meet an urgent need. In accordance with provisions in Annual Action Plan Step VII(a)(5) of the County's 2010-2015 Citizen Participation Plan, the County will follow procedures for amending the Consolidated Plan and Annual Action Plan to provide CDBG funds to meet an urgent need. However, if time is of the essence, the County may utilize the reprogrammed CDBG funds to meet an urgent need before the end of the 30-day comment period for Plan Amendments.

27. Estimated amount of CDBG funds that will be used for activities that benefit persons of low- and moderate-income.

A majority of all of the 2012-13 allocation will be spent to benefit persons of low-and moderate-income.

Recommended Projects:

Appendix C identifies the CDBG, HOME, and ESG Entitlement Grant funding distribution for the County Consortium program categories. Recommended funding distribution pages follow in Appendix G and describe the individual community improvement activities the County plans to undertake during the 2012-2013 program year to address priority needs in terms of local objectives that were identified in the Strategic Plan. The other CDBG programs listed in Appendix C are not included in the funding distribution pages but will be undertaken during the 2012-2013 program year. Maps depicting the geographic areas of low-income and minority concentrations within the County Consortium are located in Appendix H.

Program Specific Requirements: HOME 91.220(I)(1)

28. Describe other forms of investment. (See Section 92.205)
If grantee (PJ) plans to use HOME funds for homebuyers, did they state the guidelines of resale or recapture, as required in 92.254?

Historically, HOME funded projects included permanent financing, LIHTC and Redevelopment housing funds. With the loss of Redevelopment funding, other funding sources will be explored.

29. If grantee (PJ) plans to use HOME funds to refinance existing debt secured by multifamily housing that is being rehabilitated with HOME funds, state its refinancing guidelines required under 24 CFR 92.206(b).

Not applicable

30. Resale Provisions -- For homeownership activities, describe its resale or recapture guidelines that ensure the affordability of units acquired with HOME funds? See 24 CFR 92.254(a)(4).

Pursuant to the HOME Program Recapture Provision, the County anticipates recapturing an amount equal to or less than its original HOME investment in each loan should the property be sold prior to the end of the affordability period. The "net proceeds" (sale price/value less first mortgage balance and closing costs) could be less than the original HOME investment based on market conditions. However, any portion of the recaptured funds may be used to assist another low-income homebuyer or to develop low-income housing units.

31. HOME Tenant-Based Rental Assistance -- Describe the local market conditions that led to the use of a HOME funds for tenant-based rental assistance program. If the tenant based rental assistance program is targeted to or provides a preference for a special needs group, that group must be identified in the Consolidated Plan as having an unmet need and show the preference is needed to narrow the gap in benefits and services received by this population.

The Tenant Based Rental Assistance Program (TBRA) is no longer offered due to a change in direction of activities. The Housing Authority of San Bernardino County, as the contractor for TBRA, is absorbing the clients served by the program.

32. If a participating jurisdiction intends to use forms of investment other than those described in 24 CFR 92.205(b), describe these forms of investment.

Not applicable

33. Describe the policy and procedures it will follow to affirmatively market housing containing five or more HOME-assisted units.

HOME agreements for multifamily housing projects that have five or more HOME-assisted units, require the owner to have and implement an affirmative marketing policy to ensure all members of the community are made aware of these affordable housing opportunities. As part of our ongoing monitoring, we ensure the owner and/or management company of these projects is adhering to our HOME agreement.

34. Describe actions taken to establish and oversee a minority outreach program within its jurisdiction to ensure inclusion, to the maximum extent possible, of minority and women, and entities owned by minorities and women, including without limitation, real estate firms, construction firms, appraisal firms, management firms, financial institutions, investment banking firms, underwriters, accountants, and providers of legal services, in all contracts, entered into by the participating jurisdiction with such persons or entities, public and private, in order to facilitate the activities of the participating jurisdiction to provide affordable housing under the HOME Program or any other federal housing law applicable to such jurisdiction.

HOME assisted project agreements include affirmative marketing and minority outreach requirements. They are as follows:

Affirmative marketing and minority outreach program - Applicant must adopt affirmative marketing procedures and requirements. These should include:

- Methods for informing the public, owners, and potential tenants about federal fair housing laws and the affirmative marketing policy.
- Requirements and practices that Applicant must adhere to in order to carry out the affirmative marketing procedures and requirements.
- Procedures to be used by Applicant to inform and solicit applications from persons in the housing market areas who are not likely to apply without special outreach.
- Records will be kept describing actions taken by Applicant to affirmatively market units and to assess the results of these actions.

- Applicant should prescribe procedures to establish and oversee a minority outreach program to ensure the inclusion, to the maximum extent possible, of minorities and women, and entities owned by minorities and women, including, without limitation, real estate firms, construction firms, appraisal firms, management firms, financial institutions, investment banking firms, underwriters, accountants, and providers of legal services, in all contracts entered into by Applicant with such persons or entities, public and private, in order to facilitate the activities of the County to provide affordable housing authorized under this Act or any other Federal housing law. Affirmative steps to assure that minority/women business enterprises are used when possible in the procurement of property and services are at 24 CFR 85.36(e).
- Anti-lobbying. The Applicant must comply with restrictions on lobbying required by 24 CFR Part 87.

35. If a jurisdiction intends to use HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds, state its financing guidelines required under 24 CFR 92.206(b).

Not applicable

Program Specific Requirements: HOPWA 91.220(I)(3)

36. One year goals for the number of households to be provided housing through the use of HOPWA activities for: short-term rent, mortgage, and utility assistance to prevent homelessness of the individual or family, tenant-based rental assistance, units provided in housing facilities that are being developed, leased, or operated.

The City of Riverside is the Grantee of the HOPWA formula funding for both Riverside and San Bernardino County. The Housing Authority of the County of Riverside, as the Project Sponsor, administers the HOPWA grant. The goal of the HOPWA program is to prevent homelessness to individuals and/or families that have HIV/AIDS by providing long term rental assistance through the Housing Options Program and Short Term Rental, Mortgage and Utility Assistance through subcontractors in the community that serve this population.

The County of San Bernardino will support the aims and objectives of the Riverside HOPWA Program through its support of the various agencies, programs, and efforts in providing housing and support services to low-income people living with HIV/AIDS and their families.

Program Specific Requirements: ESG 91.220(I)(4)

Homeless Prevention and Rapid Re-Housing

37. Identify the written standards for providing ESG assistance in accordance with 24 CFR 576.400(e)(1) and (e)(3).

- a) Standard policies and procedures for evaluating individuals' and families' eligibility for assistance under the Emergency Solutions Grant (ESG);

- i) Eligible applicants must meet the definition of “homeless” or “at risk of becoming homeless” according to 24 CFR 576.2 and meet the record keeping requirements in 24 CFR 576.500(b),(c),(d), and (e)
 - ii) Gross household income limit: 30% of Area Median Income (AMI).
 - iii) Individuals and families who have insufficient resources immediately available to attain housing stability, who have moved frequently due to economic reasons, or who require short-term leasing and/or utility assistance.
- b) Policies and procedures for coordination among emergency shelter providers, essential service providers, homelessness prevention and rapid re-housing assistance providers; other homeless assistance providers, and mainstream service and housing providers;
- i) Service providers will promote a strategic, community-wide system to prevent and end homelessness through the coordination and integration of program components with available homeless assistance programs (§576.400[b]) and mainstream housing and service programs (§576.400[c].

Assistance programs available for coordination and integration may include:

- San Bernardino County Continuum of Care
- Interagency Council on Homelessness Participation
- County Workforce Development Department
- County Workforce Investment Board
- County Transitional Assistance Department
- Shelter Plus Care Program
- Supportive Housing Program
- HUD Veterans Affairs Supportive Housing
- Education for Homeless Children and Youth Grants
- Healthcare for the Homeless
- Programs for Runaway and Homeless Youth
- Emergency Food and Shelter program
- VA Homeless Providers Grant and Per Diem Program

Mainstream Service Programs may include:

- Temporary Assistance for Needy Families (TANF)
- Social Security (SSI, SSDI)
- Medi-Cal
- Food Stamps
- Unemployment Insurance Benefits
- Veterans Benefits
- Head Start
- Mental Health and Substance Abuse Grants

- ii) Continue use of the HMIS tracking system to enable service providers to access client history and for reporting to HUD.
- c) Policies and procedures for determining and prioritizing which eligible families and individuals will receive homelessness prevention assistance and which eligible families and individuals will receive rapid re-housing assistance:
 - i) Intake and case management designed to target and reach as many needy individuals and families as possible by determining those most in need and limiting resources to the minimum necessary for stabilization.
 - 1) Homeless Prevention to: 1) target those closest to becoming homeless and 2) assess wide ranging risk factors to remedy causal characteristics through case management and training.
 - 2) Rapid Re-Housing to: 1) overcome immediate housing obstacles; 2) connect individuals/families with necessary resources; and 3) identify and remedy causal characteristics through case management and training.
- d) Standards for determining the share of rent and utility costs that each program participant must pay, if any, while receiving homelessness prevention and rapid re-housing assistance;
 - i) Rental Assistance Rent Share: client to pay up to 30% of Adjusted Gross Income (based upon "ability to pay").
 - ii) Utility Assistance: client may receive assistance of up to 100% of each eligible utility (based upon "ability to pay"), including up to 6 months in arrears. Utilities are restricted to electricity, gas, and water and include security deposits.
 - iii) Considerations will be made with regard to: 1) the presence, or absence, of other resources available in the community, 2) respective challenges associated with the homelessness, and 3) the presence of exorbitant medical expenses.
- e) Standards for determining how long a particular program participant will be provided with rental assistance and whether and how the amount of that assistance will be adjusted over time;
 - i) To target and reach as many needy individuals and families as possible; rental assistance will be limited to the minimum necessary to stabilize program participants.
 - ii) As self-sufficiency increases, rental assistance will be reduced.
 - iii) Program participants receiving rapid re-housing assistance must be re-evaluated at least every six (6) months.
 - iv) Program participants receiving homelessness prevention assistance must be re-evaluated at least once every 3 months.

- f) Standards for determining the type, amount, and duration of housing stabilization and/or relocation services to provide a program participant, including the limits, if any, on the homelessness prevention or rapid re-housing assistance that each program participant may receive. This includes 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.

Except as provided for housing stability case management, no program participant may receive more than 24 months of assistance in a three-year period

i) Rental Assistance:

- 1) To support as many needy individuals and families as possible, rental assistance is for rents of “reasonable” expense and be limited to a maximum of 3 months for Short Term, and 4 to 18 months for Medium Term. The justification for “reasonable rents” shall be assessed based upon applicable local sub-market rents, but in no circumstance shall it exceed the local area’s Fair Market Rent (FMR) established by HUD.
- 2) Program to pay rent shortfall after client-paid share of up to 30% of Adjusted Gross Income (AGI) is met. Based upon “ability to pay”, the Program may provide up to 100% of first month’s start-up costs (including security deposits).
- 3) Maximum rental assistance is not to exceed \$4,000 (including up to 6 months in rental arrears) per individual or family.
- 4) Program participants cannot receive more than 24 months of assistance within a 3-year period.

ii) Utility Assistance

- 1) Program to pay up to 100% of utility start-up costs, based upon “ability to pay”, (including security deposits) for each eligible utility (electricity, gas, and/or water) to a maximum of \$1,000 or 24 payments (including up to 6 months in arrears.).
- 2) Utility assistance will be limited to a maximum 24 months of assistance in a three-year period.

iii) Motel Vouchers

- 1) Motel vouchers may be used for emergency assistance for up to 30 days if no shelter beds available and rental housing is identified but not immediately available.
- 2) Voucher values are to be “reasonable” and are not to exceed \$65 per night.

iv) Housing Relocation and Stabilization Services

- 1) Case management, counseling, and training will be provided for each program participant to extent needed for the duration of program eligibility.

- g) Emergency Shelter and Street Outreach
 - i) Standards for coordinating, targeting, and providing essential services related to street outreach.
 - 1) To target and reach as many homeless individuals and families as possible;
 - 2) To provide emergency shelter/motel vouchers as needed, while maximizing case management services to provide stable housing to the maximum number of eligible recipients;
 - ii) Policies and procedures for admission, diversion, referral, and discharge by emergency shelters assisted under ESG, including standards regarding length of stay, if any, and safeguards to meet the safety and shelter needs of special populations. Examples of special populations include victims of domestic violence, dating violence, sexual assault, and stalking; and individuals and families who have the highest barriers to housing and are likely to be homeless the longest.
 - 1) Shelters may use screening policies such as substance abuse, criminal activity to restrict its services and provide a safe environment for all clients. As necessary, restricted clients are to be referred to applicable service providers as listed under 37(b) above.
 - 2) Maximum length of stay may be determined by the policies of individual shelter service providers;
 - 3) Victim service providers protect client-level data by reporting only aggregate data in HMIS.
 - iii) Policies and procedures for assessing, prioritizing, and re-assessing individual/family needs for essential services related to shelter.
 - 1) Families will be assessed based on imminent need, and reassessed monthly as case management progresses.

38. If the Continuum of Care for the jurisdiction's area has established a centralized or coordinated assessment system that meets HUD requirements, describe the centralized or coordinated assessment system and the requirements for using the system, including the exception for victim service providers, as set forth under 24 CFR 576.400(d).

The County of San Bernardino coordinates homeless services with both entitlement and non-entitlement cities through its Department of Behavioral Health Office of Homeless Services (OHS). This office is the designated administrative authority, or Lead Agency, over the County's Continuum of Care (CoC) System. The County oversees ESG grant distribution for its Service Area, which encompasses all unincorporated areas along with 12 non-entitlement cities within the county (the County Consortium). County ESG grant sub-recipients are required to coordinate with, and report their homeless services data to the Homeless Management Information System (HMIS) for use by the County's OHS and its CoC. The HMIS maintains exceptions for victim service providers as set forth under 24 CFR 576.400(d).

A “211” Homeless Services 24-hour phone information system is available to assist in referring County residents to service providers within a caller’s geographic region. Due to the widespread and diverse geographic regions of the County Service Area, a centralized intake system is not feasible. However, the County is pursuing the development of a coordinated standardized intake form for use by its ESG grant service providers.

39. Identify the process for making awards and how the jurisdiction intends to make its allocation available to non-profit organizations, and in the case of urban counties, funding to participating units of local government.

For the FY 2011-2012 2nd Allocation and the FY 2012-2013 Allocation, the County will amend the existing seven (7) contracts that were entered into in 2010 and are effective through 2013. These contract amendments will incorporate specific allocations for each service provider, the cumulative total of which is shown in Table 4A in Appendix F, “ESG Combined 2011-2012 2nd Allocation and 2012-2013 Allocation”. Contracted service providers are geographically diverse and strategically located within the County Consortium Service Area.

Beginning in FY 2013-2014, and again for a three-year contract service period, a new RFP will be made available to all interested providers. As part of the RFP process, the County utilizes an Evaluation Committee and a rating/tabulation scoring process to assess and select qualified service providers.

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

The County included a formerly homeless person on the Evaluation Committee for its current contracts entered into in 2010. This Evaluation Committee policy has been in place and will continue to remain in the future. Previously homeless persons are also included in the CoC Housing Provider Network.

41. Describe the performance standards for evaluating ESG activities.

Performance Standards for the ESG grant are included in Table 4A in Appendix F, “ESG Performance Standards”. As previous performance accounting was based upon the Homeless Prevention and Rapid Re-Housing (HPRP) program, which operated under a different set of regulations, these performance standards will be refined as the program progresses.

42. Describe the consultation with each Continuum of Care that serves the jurisdiction in determining how to allocate ESG funds, develop performance standards, evaluate outcomes of activities assisted by ESG funds, and develop funding policies, and procedures for the administration and operation of HMIS.

A meeting was held on February 17, 2012 by County Department of Community Development (CDH), Housing Division staff and key members of the San Bernardino County Office of Homeless Services (OHS), Lead Agency for the Continuum of Care. Also present was a representative of the service provider that oversees management of the County's HMIS system. Draft program standards and policies were discussed and developed. A second meeting was held on February 29, 2012 with CDH Housing Division staff, OHS staff, and the current ESG grant sub-recipient service providers wherein the draft policies were discussed and refined based upon valuable "direct provider" input. The program policies as identified herein are a direct result of these two meetings and the total collaboration among program participants.

In addition, through the RFP provider selection process, the County requires grant sub-recipients to recognize how their services will follow the San Bernardino County Homeless Partnership's 10-Year Strategy to End Homelessness. As such, each applicant specifically identifies which of the 25 recommendations found in the Strategy will be applied.

Other Narratives and Attachments

Include any action plan information that was not covered by a narrative in any other section. If optional tables are not used, provide comparable information that is required by consolidated plan regulations.

Not applicable

COUNTY OF
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