

2023

Consolidated Annual Performance Evaluation Report



Building, buying, and/or rehabilitating **affordable housing**. Developing viable urban communities. Improving the number and quality of **emergency shelters** for homeless individuals and families.



CITY OF SANTA ANA
Community Development Agency

CR-05 - Goals and Outcomes

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

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

The 2023 Consolidated Annual Performance and Evaluation Report (CAPER) covers the period of July 1, 2023 through June 30, 2024 and reports on completed projects in the 2023 program year. This CAPER is the fourth of the 2020-2024 Consolidated Plan. For the 2023 program year, the City followed its allocation strategy by funding public services, public facilities, affordable housing projects, homeless related projects, and fair housing services to address unmet community needs. As part of this CAPER process, the City conducted a 15-day public review and comment period from August 19 to September 6, 2024 and held a public hearing on September 17, 2024 to obtain further public comment on this report. Accomplishments in addressing the priority needs include:

Affordable Housing Development, Maintenance & Preservation- Efforts to increase affordable housing include committing HOME, CDBG, Project-Based Vouchers, Inclusionary Housing, and Housing Successor Agency funds for acquisition, construction, rehabilitation and provision of affordable rental and ownership housing.

Code Enforcement - Community preservation efforts continue in deteriorated and deteriorating areas to preserve the City's aging housing stock. In FY 2023 Code Enforcement funds were used to respond to complaints covering residential properties within the CDBG eligible deteriorating and deteriorated areas. During the program year, the City issued a total of 10,971 violations to single and multi-family units. Code Enforcement staff also issued 199 Notices of Violation, 103 Notice and Orders, and 7240 Administrative Citations involving residential housing. As a result of these efforts, property owners have made approximately \$4,465,280 in repairs and upgrades encompassing 635 permits.

Public Facilities & Infrastructure - A total of two capital improvement projects were completed which included one residential street improvement.

Public Service Programs - Public Services funded by the City during the report period were aimed at assisting low to moderate-income households. A total of 22 activities were funded to assist homeless, seniors, youth and families through a variety of programs. A total of 39118 persons were served.

Economic Development – CDBG funds were allocated to support workforce training and development and business assistance via training,

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technical assistance and general support. A total of 12 micro enterprise businesses were served.

Fair Housing Services - To affirmatively further Fair Housing, the City continues to provide CDBG funds to Orange County Fair Housing Council.

HOME Program– In the 2023-2024 fiscal year, the City of Santa Ana advanced its efforts to promote homeownership and maintain compliance with the HOME Investment Partnerships Program. In December 2023, the City issued a Request for Proposals (RFP) to enhance access to affordable housing, resulting in three submissions currently under review for potential funding as of June 30, 2024.

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

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

Goal	Category	Source / Amount	Indicator	Unit of Measure	Expected – Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected – Program Year	Actual – Program Year	Percent Complete
Affordable Housing Development & Maintenance	Affordable Housing	CDBG: \$ / HOME: \$	Rental units constructed	Household Housing Unit	40	0	0.00%			
Affordable Housing Development & Maintenance	Affordable Housing	CDBG: \$ / HOME: \$	Rental units rehabilitated	Household Housing Unit	60	0	0.00%	5	0	0.00%

Affordable Housing Development & Maintenance	Affordable Housing	CDBG: \$ / HOME: \$	Homeowner Housing Added	Household Housing Unit	10	0	0.00%	0	0.00%	20	0	0.00%
Affordable Housing Development & Maintenance	Affordable Housing	CDBG: \$ / HOME: \$	Homeowner Housing Rehabilitated	Household Housing Unit	40	0	0.00%	0	0.00%	20	0	0.00%
Affordable Housing Development & Maintenance	Affordable Housing	CDBG: \$ / HOME: \$	Direct Financial Assistance to Homebuyers	Households Assisted	12	0	0.00%	0	0.00%	3	0	0.00%
Code Enforcement	Affordable Housing	CDBG: \$	Housing Code Enforcement/Foreclosed Property Care	Household Housing Unit	15000	22996	153.31%	2500	7240	289.60%		
Economic Development Programs	Non-Housing Community Development	CDBG: \$	Businesses assisted	Businesses Assisted	25	12	48.00%	0				
Economic Development Programs	Non-Housing Community Development	CDBG: \$	Other	Other	0	0		16	12	75.00%		
Homeless Services and Facilities	Homeless	ESG: \$	Tenant-based rental assistance / Rapid Rehousing	Households Assisted	150	8	5.33%	25	8	32.00%		
Homeless Services and Facilities	Homeless	ESG: \$	Homeless Person Overnight Shelter	Persons Assisted	1000	387	38.70%	150	387	258.00%		

CAPER

Public Service Programs	Non-Homeless Special Needs Non-Housing Community Development	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	10000	73556	735.56%	2500	39118	1,564.72%
Public Service Programs	Non-Homeless Special Needs Non-Housing Community Development	CDBG: \$	Homeless Person Overnight Shelter	Persons Assisted	0	0		0	0	

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

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

CR-10 - Racial and Ethnic composition of families assisted

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

91.520(a)

	CDBG	HOME
White	843	0
Black or African American	28	0
Asian	65	0
American Indian or American Native	16	0
Native Hawaiian or Other Pacific Islander	5	0
Total	957	0
Hispanic	802	0
Not Hispanic	155	0

Describe the clients assisted (including the racial and/or ethnicity of clients assisted with ESG)

	HESG
American Indian, Alaska Native, or Indigenous	47
Asian or Asian American	26
Black, African American, or African	84
Hispanic/Latina/e/o	275
Middle Eastern or North African	5
Native Hawaiian or Pacific Islander	12
White	622
Multiracial	20
Client doesn't know	0
Client prefers not to answer	0
Data not collected	0
Total	1,091

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

In FY2023, CDBG, HOME and ESG resources provided assistance to residents through an array of programs. The race and ethnicity of these individuals are summarized above.

CR-15 - Resources and Investments 91.520(a)**Identify the resources made available**

Source of Funds	Source	Resources Made Available	Amount Expended During Program Year
CDBG	public - federal	4,808,057	
HOME	public - federal	7,785,790	
ESG	public - federal	447,249	

Table 3 - Resources Made Available**Narrative****Identify the geographic distribution and location of investments**

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description
Citywide	100		Citywide

Table 4 – Identify the geographic distribution and location of investments**Narrative**

Leveraging

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

Fiscal Year Summary – HOME Match	
1. Excess match from prior Federal fiscal year	0
2. Match contributed during current Federal fiscal year	0
3. Total match available for current Federal fiscal year (Line 1 plus Line 2)	0
4. Match liability for current Federal fiscal year	0
5. Excess match carried over to next Federal fiscal year (Line 3 minus Line 4)	0

Table 5 – Fiscal Year Summary - HOME Match Report

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

Table 6 – Match Contribution for the Federal Fiscal Year

HOME MBE/WBE report

Program Income – Enter the program amounts for the reporting period			
Balance on hand at beginning of reporting period \$	Amount received during reporting period \$	Total amount expended during reporting period \$	Amount expended for TBRA \$
0	0	0	0
			Balance on hand at end of reporting period \$
			0

Table 7 – Program Income

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

Table 8 - Minority Business and Women Business Enterprises

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

Table 9 – Minority Owners of Rental Property

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

Table 10 – Relocation and Real Property Acquisition

CR-20 - Affordable Housing 91.520(b)

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

	One-Year Goal	Actual
Number of Homeless households to be provided affordable housing units	0	0
Number of Non-Homeless households to be provided affordable housing units	30	0
Number of Special-Needs households to be provided affordable housing units	0	0
Total	30	0

Table 11 – Number of Households

	One-Year Goal	Actual
Number of households supported through Rental Assistance	25	0
Number of households supported through The Production of New Units	0	0
Number of households supported through Rehab of Existing Units	25	0
Number of households supported through Acquisition of Existing Units	0	0
Total	50	0

Table 12 – Number of Households Supported

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

Discuss how these outcomes will impact future annual action plans.

Include the number of extremely low-income, low-income, and moderate-income persons

served by each activity where information on income by family size is required to determine the eligibility of the activity.

Number of Households Served	CDBG Actual	HOME Actual
Extremely Low-income	0	0
Low-income	4	0
Moderate-income	0	0
Total	4	0

Table 13 – Number of Households Served

Narrative Information

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

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

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

Santa Ana prioritizes effective, targeted, and safe outreach to individuals experiencing homelessness to support these individuals in identifying resources and establishing pathways to safe and sustainable housing. The City has outreach staff regularly working and interfacing with individuals experiencing homelessness to provide assistance and support in enrolling in shelter and/ or seeking other services. During the 2023-2024 Program Year, the City of Santa Ana worked towards the following objectives:

1. Prioritized street outreach through Quality of Life Teams
2. Preserved existing and increase the supply of permanent supportive housing
3. Preserved existing and increase the supply of affordable housing
4. Provided housing services and assistance to special needs populations
5. Improved critical services to low-income and special needs populations
6. Coordinated services within the City as well as regionally in collaboration with the Continuum of Care
7. Collaborated with all communities in Orange County to address homelessness with coordinated, regional approaches

Addressing the emergency shelter and transitional housing needs of homeless persons

The ESG funded programs provided Homelessness Prevention, Rapid Re-Housing, Emergency Shelter, and Street Outreach services. The City targeted actions to address the needs of individuals who are homeless that includes unaccompanied women, victims of domestic violence, chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth. The range of services include emergency shelter, transitional housing and permanent supportive housing. ESG funds provided assistance for street outreach services, homeless prevention and rapid re-housing.

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

Through the objective summarized above in the Outreach section, the City strives to help individuals and families from becoming homeless. The ESG program funds Homelessness Prevention, Rapid Re-Housing, Emergency Shelter, and Street Outreach services. Additionally, the County of Orange is equipped to serve people discharged from publicly funded institutions or systems of care such as health care facilities or correction programs.

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

The City supported a number of programs to assist low-income individuals and families to avoid becoming homeless, including Section 8 Housing Choice vouchers. Other support services, such as job and training assistance, food assistance, and counseling are also available to help individuals recover from homelessness and to avoid becoming homeless. The City worked closely with the Continuum of Care who provided oversight for the Vulnerability Index - Service Prioritization Decision Assistance Tool (VI-SPDAT) to prioritize the most vulnerable chronically homeless individuals. Case management services were offered in all programs to help prevent individuals from falling back into homelessness.

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

Actions taken to address the needs of public housing

N/A – The City does not have any public housing.

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

N/A – The City does not have any public housing.

Actions taken to provide assistance to troubled PHAs

N/A – The City does not have any public housing.

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

Actions taken to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment. 91.220 (j); 91.320 (i)

The 2020–2024 Consolidated Plan identified several barriers to the development of affordable housing including the following:

- Limited funding sources, financial costs, and the costs of development.
- Market constraints primarily the availability, cost, and competition for land.
- Available land in the City mostly consists of small parcels that must be assembled for significant new construction projects. Relocation costs and housing replacement requirements for redeveloping improved properties also presents barriers to the development of affordable housing.
- The region’s rents have continued to increase. Higher rents limited the ability of some lower income households to obtain decent and affordable housing. Households with no or poor credit history are severely impacted.

In an effort to mitigate these barriers, Santa Ana undertook the following actions during the report period:

- Construction of new rental and homeownership units
- Rehabilitation and/ or preservation of existing rental units
- Homeowner rehabilitation programs for low- and moderate-income households

Through the City’s compliance with AB 1486 (Surplus Lands Act) as well as a constant monitoring of state land made available through Executive Order N-06-19, the City will look to identify potential parcels of underutilized land that can be leveraged for potential affordable housing development.

- Continued to enforce the City’s inclusionary housing ordinance in which new residential projects that meet the specified criteria must provide: 1) if the new residential project consists of units for sale, then a minimum of 10% of the total number of units in the project shall be sold to moderate income households; 2) If the new residential project consist of rental units, a minimum of 15% of the units shall be rented to low income households, or 10% rented to very low income households; or 3) the developer may elect to satisfy these requirements for the project by payment of a fee in lieu of constructing some or all of the affordable units.

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

Based on the 2024 Point in Time Count and Survey, there are 1,428 individuals experiencing

homelessness in the County, with **278** in the City of Santa Ana. This is a decrease of 19.28% in unsheltered and sheltered homeless population in Santa Ana since 2019. One challenge for Santa Ana is that many individuals experiencing homelessness gravitate to specific cities, one of which is Santa Ana. A goal of the City is to work closely with community and faithbased groups, other municipalities and the County to provide a coordinated and regional effort to address homelessness throughout the County. In addition, several programs were funded by HOME, CDBG and ESG to assist underserved individuals. The number of persons assisted during the report period is highlighted throughout this report.

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

Lead-paint hazards are typically found in buildings constructed prior to 1978; the year lead based paint was banned in the United States. Until 2012, children were identified as having a blood lead “level of concern” if blood tests resulted in 10 or more micrograms of lead per deciliter. Experts now use a reference level of 5 micrograms per deciliter to identify children with blood levels that are much higher than most children’s levels. Although many children remain at risk exposure to harmful lead levels (i.e., blood lead levels greater than the CDC recommended level of 5 micrograms of lead per deciliter of blood), the CDC reported a decline in blood levels in children age five and younger, largely a result of the phase-out of leaded gasoline and efforts by federal, state, and local agencies to limit lead paint hazards in housing. In all housing activities, the City complies with requirements to examine for the potential risk of lead exposure. If and when lead is identified, the City works with the property owner and/ or subrecipient to remediate the lead-based paint.

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

Santa Ana’s anti-poverty strategy includes expanding housing opportunities and support services for low-income residents, and coordinating public and private resources to address their specific needs. Services and activities supported by the City included:

- Economic development program to stimulate the local economy and further increase job opportunities for low- and moderate-income individuals.
- Provide housing assistance through the City’s ESG and ESG-CV programs offering services including: Homelessness Prevention, Rapid Re-Housing, Emergency Shelter, and Street Outreach services to reduce the number of poverty-level families that may have their housing status negatively impacted by the COVID-19 pandemic.
- Partner with and leverage local job training programs focused on supporting residents prepare for and access living wage job opportunities.
- Through the City’s housing programs, it will reduce the number of cost burdened households living in the City, allowing them to allocate personal resources to other critical household needs.
- Public services will be targeted to address critical needs of low-income and vulnerable residents through the provision of programming, transportation, education, childcare and other key needs that are identified by the City and its stakeholders. Services such as these are components to

assist individuals to be better suited to secure and retain living wage employment.

- Homeless assistance, including prevention, will provide critical services to extremely low-income households in need of immediate assistance and support to be better suited and able to take steps to identify sustainable housing and employment options.

Improving public facilities eliminates existing facilities and infrastructure that negatively impacts residential neighborhoods.

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

The institutional delivery system in Santa Ana is high-functioning and collaborative, particularly the relationship between city departments and the nonprofit sector comprised of a network of capable nonprofit organizations operating in Santa Ana and throughout Orange County that are delivering a full range of services to residents. Affordable housing development and preservation activities are carried out by the Housing Department of the Community Development Agency in partnership with housing developers and contractors. The Planning and Building Agency supports code enforcement activities. Public service activities are carried out by nonprofit organizations with support and oversight from the Community Development Agency as necessary to achieve the Strategic Plan goals. The Community Development, Public Works and Planning and Building Agencies work together with contractors to implement public facilities and improvement projects.

The greatest challenge behind COVID-19, in the City's institutional delivery system is the breadth and diversity of need and exceeds the amount of available funding to completely address all needs within the community. Consequently, even high priority needs cannot be fully funded. Further, due to the scale of need within the community – nonprofit service providers are also operating at maximum capacity. As a result, non-profit leadership has less time to dedicate to coordination and alignment with other partner agencies and organizations to strategically target needs. In PY21 the Community Development Agency worked to increase the efficiency of collaboration and coordination among different providers operating in the City and throughout the region.

The City also supported programs aimed at enhancing. Examples of actions undertaken during the report period to overcome gaps and enhance coordination included the following:

- The City's Workforce Development Board played a key role in developing employment opportunities for lower income Santa Ana residents. The WDB is comprised of various community leaders representing private employment, education, social services and government. This diversity in the board's representation ensures that the community's workforce needs are identified and addressed through a variety of public and private resources. This advisory board also brings key community contacts together resulting in enhanced coordination of program delivery and resource utilization.
- The City participated in several homeless forums and committees. Specifically, the City served on the Orange County Continuum of Care Board and participated in several committees including

the Housing Opportunity Committee, the Emergency Shelter Committee and the Data and Performance Committee. The City also served on the Leadership Council for the United to End Homelessness campaign empowered by the United Way and participated on the Executive Committee. Through this participation, the City can ensure that barriers to housing and the needs of the homeless are identified and addressed through the coordinated regional implementation of limited funding and resources.

- The City sought to encourage home ownership opportunities to promote neighborhood stability. With a high median purchase price of homes, homeownership remains a challenge for households earning less than 80% of county median income. Recent increases in housing costs have exacerbated this situation.
- Neighborhood residents were encouraged to participate in the preparation and implementation of neighborhood assessments and plans, and were kept informed on homelessness issues. Santa Ana's Neighborhood Initiatives Program provided the means to facilitate this participation. This coordination included working with a variety of city departments, public utilities, property owners, tenants, nonprofit agencies and the school district.

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

As in past years, Santa Ana made an effort to leverage private and federal funds with local and state funds to increase and preserve the City's supply of affordable rental housing. The greatest barrier to affordable housing in the City is a limited supply of resources and available land to support the development and preservation of affordable housing within the City. The City works closely with non-governmental, state and federal agencies to identify potential funding streams and resources.

Several affordable housing projects are moving forward currently in the City and two projects for individuals/veterans experiencing homelessness are in the pipeline. These are examples of how the City is coordinating with private developers and social service agencies to create affordable housing opportunities in Santa Ana.

The City's owner-occupied housing rehabilitation programs have been instrumental in preserving housing units occupied by lower income households. Furthermore, homeownership opportunities for low- and moderate-income homebuyers were available via the City's participation in the City's Down Payment Assistance Program. The City worked closely with Habitat for Humanity in completing the last phase of the scattered site project where single family homes were developed to be sold at affordable price and to restrict to income qualified households for a period of at least 45 years. Additionally, the Santa Ana Housing Authority provided rental assistance vouchers to very-low income households. Participants in the Housing Authority's Family Self-Sufficiency (FSS) program were also referred to classes (available in English, Spanish and Vietnamese) on how to prepare for homeownership.

City staff met regularly with public and private organizations to coordinate various efforts. The City's relationship with nonprofit organizations in the community allowed for an integrated approach for

funding requests from local, state and federal agencies. The City worked with nonprofits as they applied for funds for activities consistent with the objectives in the Consolidated Plan. The City also communicated with various institutions to facilitate the exchange of information and to develop strategies to provide benefits and housing services.

Homeless needs and priorities continue to be identified through the County's CoC system. The City consults with the County and local ESG entitlement grantees in regard to the use of ESG funds. On-going meetings are held to coordinate the development of eligibility criteria, performance standards and outcome measurements, as well as to establish funding, policies, and procedures for the operation and administration of the Homeless Management Information System (HMIS).

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

The City evaluated barriers and constraints to the development of affordable housing as a critical component of the Housing Element. **The California Department of Housing and Community has received Santa Ana's Adopted Housing Element for certification.** The element includes actions to affirmatively further fair housing.

The City participated in the update to the County's Regional Analysis of Impediments to Fair Housing Choice for the period of 2020 - 2024. Through this process, the City has identified a set of city-specific and regional goals and approaches to address barriers to affordable housing and affirmatively further fair housing in the City.

CR-40 - Monitoring 91.220 and 91.230

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

To ensure that HUD funds are used efficiently and in compliance with applicable regulations, the City provides technical assistance to all subrecipients at the beginning of each program year and monitors subrecipients throughout the program year. The City of Santa Ana applied the same monitoring standards to its CDBG-CV and ESG-CV programs.

Technical Assistance

To enhance compliance with federal program regulations, the City provides an annual Notice of Funding Availability (NOFA) workshop to review the Plan goals, program requirements and available resources with potential applicants. Subsequent to the approval of the Annual Action Plan, a mandatory subrecipient workshop is held to review program regulations in detail, to provide useful forms and resources for documenting compliance and to review the City's compliance procedures and requirements. Additionally, individualized technical assistance is provided on an as-needed basis throughout a program year.

Activity Monitoring

All activities are monitored, beginning with a detailed review upon receipt of an application to determine eligibility, conformance with a National Objective and conformance with a Plan goal. This review also examines the proposed use of funds, eligibility of the service area, eligibility of the intended beneficiaries and likelihood of compliance with other federal requirements such as the National Environmental Policy Act, the System for Award Management (SAM) debarment list, prevailing wage, Minority and Women Business Enterprise, Section 3 and federal acquisition and relocation regulations, as applicable.

Subrecipients are required to submit an audit and other documentation to establish their capacity, and any findings noted in the audit are reviewed with the applicant. Eligible applications are then considered for funding. Once funded, desk monitoring includes ongoing review of required quarterly performance reports. For CDBG public service activities, an on-site monitoring is conducted once every two (2) years, or more frequently as needed to ensure compliance. These reviews include both a fiscal and programmatic review of the subrecipient's activities. The reviews determine if the subrecipient is complying with the program regulations and City contract. Areas routinely reviewed include overall

administration, financial systems, appropriateness of program expenditures, program delivery, client eligibility determination and documentation, reporting systems, and achievement toward achieving contractual goals. Following the monitoring visit, a written report is provided delineating the results of the review and any findings of non-compliance and the required corrective action. Subrecipients normally have 30 days to provide the City with corrective actions taken to address any noted findings. Individualized technical assistance is provided, as noted above, as soon as compliance concerns are identified. For CDBG capital projects, monitoring also includes compliance with regulatory agreement requirements

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

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

The City published a notice in the general circulation of papers in English, Spanish and Vietnamese that its CAPER was available for review for public comment. The CAPER was made available for review at the Office of the Clerk of the Council, Community Development Agency 6th Floor Reception Area, Main Library, and on the City's website. There was a 15-day public comment period prior to the submission of the CAPER to HUD. In addition, a public hearing was held by the Community Redevelopment and Housing Commission and at the City Council meeting to obtain public comments, with the City Council authorizing the submission of the report to HUD.

Despite efforts to solicit public feedback, no comments were received during the 15-day public comment period, nor at the public hearing held by the Community Redevelopment and Housing Commission or the City Council meeting. The City acknowledges the importance of community engagement and remains committed to transparency in its reporting processes.

CR-45 - CDBG 91.520(c)

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

The 2023-2024 Program Year was the fourth year of the 2020-2024 Consolidated Plan. The City made progress towards its five-year and one-year goals for this reporting period and did not change its program objectives or the projects & activities that utilized CDBG, ESG, and HOME funds.

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

No

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

CR-50 - HOME 24 CFR 91.520(d)**Include the results of on-site inspections of affordable rental housing assisted under the program to determine compliance with housing codes and other applicable regulations**

Please list those projects that should have been inspected on-site this program year based upon the schedule in 24 CFR §92.504(d). Indicate which of these were inspected and a summary of issues that were detected during the inspection. For those that were not inspected, please indicate the reason and how you will remedy the situation.

Please list those projects that should have been inspected on-site this program year based upon the schedule in 24 CFR §92.504(d). Indicate which of these were inspected and a summary of issues that were detected during the inspection. For those that were not inspected, please indicate the reason and how you will remedy the situation.

Please list those projects that should have been inspected on-site this program year based upon the schedule in 24 CFR §92.504(d). Indicate which of these were inspected and a summary of issues that were detected during the inspection. For those that were not inspected, please indicate the reason and how you will remedy the situation.

The City of Santa Ana conducts onsite inspections of HOME-assisted rental units during the required affordability period to determine compliance with HUD property standards in accordance with 24 CFR 92.251. HOME-assisted rental projects with one to four units are inspected every three years, projects with five to 25 units are inspected every two years, and projects with 26 or more units are inspected annually. The City of Santa Ana received COVID-19 waivers regarding on-site inspections of rental housing and for housing units of recipients of TBRA funding. Inspection schedule dates have been shifted accordingly as per HUD regulations.

During Fiscal Year 2023 (July 1, 2023, to June 30, 2024), the City administered assistance to 717 rental units through the HOME program. Among these, 1,025 units underwent inspection, with 717 units successfully passing the initial scrutiny while 308 units failed. Following re-inspection, all 308 previously failed units were reviewed, resulting in all passing the re-inspection.

HOME:

In the 2023-2024 fiscal year, the City of Santa Ana advanced its efforts to promote homeownership and maintain compliance with the HOME Investment Partnerships Program. In December 2023, the City issued a Request for Proposals (RFP) to enhance access to affordable housing, resulting in three submissions currently under review for potential funding as of June 30, 2024.

Additionally, between January and June 2024, City staff conducted compliance monitoring for 37 HOME-

assisted properties, covering 362 units, which represent approximately 17% of the City's total affordable housing units. In line with HOME program requirements and City regulations, staff reviewed 20% of the units at each property through on-site tenant file inspections. Notably, none of the HOME units were found to be out of compliance with established standards.

Compliance Monitoring:

Between January and June 2024, City staff conducted compliance monitoring for 57 affordable properties, covering approximately 2,000 units. In accordance with each property's program requirements and City regulations, staff reviewed 20% of the units at each property through on-site tenant file inspections. While none of the HOME units were found to be out of compliance, one property, Nineteen 01, which includes 10 inclusionary housing units, was identified as out of compliance. City staff is actively working with the management team to bring these units into compliance with the required standards..

Provide an assessment of the jurisdiction's affirmative marketing actions for HOME units. 24 CFR 91.520(e) and 24 CFR 92.351(a)

The City's affirmative marketing procedures and requirements apply to rental and homebuyer projects containing 5 or more HOME or CDBG-assisted housing. These procedures and requirements do not apply to families with Section 8 tenant-based rental housing assistance or families with tenant-based rental assistance provided with HOME funds. The procedures include:

Methods to inform the public about Federal fair housing laws:

- The City displays the Equal Housing logo or slogan in housing-related press releases and solicitations for owners, and on the website page for the City's Housing and Neighborhood Development Division.
- The City requests the County of Orange to include information on the City's HOME and CDBG-assisted rental units in its countywide Affordable Housing List maintained by the County.

Requirements and practices owners must adhere to:

- Owners must display the Equal Housing Opportunity logo or slogan in all correspondence with current or potential tenants, on lease agreements, and display the fair housing poster in their leasing offices, and develop written procedures for selecting tenants.
- The City required owners of City HOME- and CDBG-assisted rental units to continuously review the demographic makeup of their tenants. If and when such review indicated that their tenants

no longer reflected the City's minority population, they were required to inform the City of that fact and request City review and approval for the steps they took to correct that deficiency.

- Compliance with the City's affirmative marketing requirements and procedures will be made an obligation of all rental property owners receiving HOME or CDBG assistance from the City of Santa Ana, and will be enforceable by means of appropriate actions described in loan documents recorded through the County of Orange.

Record keeping:

- The City will require owners of its HOME- and CDBG- assisted rental units covered under this marketing plan to make an annual report to the City detailing the steps they have taken to comply with this Program. They will also be required to report on the ethnicity of their tenants, as well as rents, income levels, and other household characteristics. Reports will be made on a form that is acceptable to the City of Santa Ana, and that will enable the City to capture the data it needs to evaluate owner compliance with this Program.
- The City will maintain records on owner reports and its evaluation of those reports for a period of not less than ten years after expiration of the affordability period required by applicable HUD regulations.

Annual assessment:

Upon receipt of owner reports, the City will evaluate the ethnic and racial characteristics of tenants being served to determine if they reflect the City's housing market. If they do not, the City will direct the owner to take further affirmative marketing steps to correct the imbalance. The City will track and evaluate the steps taken to insure they have the desired effect.

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

Not applicable. The City receipted \$XXX,XXX in program income during FY2023. The City did not expend any program income during the FY2023 program year, but anticipates that such funds will be included in forthcoming RFPs during program year 2024.

Describe other actions taken to foster and maintain affordable housing. 24 CFR 91.220(k) (STATES ONLY: Including the coordination of LIHTC with the development of affordable housing). 24 CFR 91.320(j)

The City coordinates HOME funding and activities with other federal, state, and local affordable housing resources to maximize the assistance provided in the City and construct and/ or rehabilitate affordable housing throughout the City.

CR-58 – Section 3

Identify the number of individuals assisted and the types of assistance provided

Total Labor Hours	CDBG	HOME	ESG	HOPWA	HTF
Total Number of Activities	0	0	0	0	0
Total Labor Hours					
Total Section 3 Worker Hours					
Total Targeted Section 3 Worker Hours					

Table 14 – Total Labor Hours

Qualitative Efforts - Number of Activities by Program	CDBG	HOME	ESG	HOPWA	HTF
Outreach efforts to generate job applicants who are Public Housing Targeted Workers					
Outreach efforts to generate job applicants who are Other Funding Targeted Workers.					
Direct, on-the job training (including apprenticeships).					
Indirect training such as arranging for, contracting for, or paying tuition for, off-site training.					
Technical assistance to help Section 3 workers compete for jobs (e.g., resume assistance, coaching).					
Outreach efforts to identify and secure bids from Section 3 business concerns.					
Technical assistance to help Section 3 business concerns understand and bid on contracts.					
Division of contracts into smaller jobs to facilitate participation by Section 3 business concerns.					
Provided or connected residents with assistance in seeking employment including: drafting resumes,preparing for interviews, finding job opportunities, connecting residents to job placement services.					
Held one or more job fairs.					
Provided or connected residents with supportive services that can provide direct services or referrals.					
Provided or connected residents with supportive services that provide one or more of the following: work readiness health screenings, interview clothing, uniforms, test fees, transportation.					
Assisted residents with finding child care.					
Assisted residents to apply for, or attend community college or a four year educational institution.					
Assisted residents to apply for, or attend vocational/technical training.					
Assisted residents to obtain financial literacy training and/or coaching.					
Bonding assistance, guaranties, or other efforts to support viable bids from Section 3 business concerns.					
Provided or connected residents with training on computer use or online technologies.					
Promoting the use of a business registry designed to create opportunities for disadvantaged and small businesses.					
Outreach, engagement, or referrals with the state one-stop system, as designed in Section 121(e)(2) of the Workforce Innovation and Opportunity Act.					

Other.					
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Table 15 – Qualitative Efforts - Number of Activities by Program

Narrative