# Fiscal Year 2024-2025 Consolidated Annual Performance and Evaluation Report

**Public Review Draft** 

Prepared by the Sonoma County Community Development Commission

#### **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.

During Fiscal Year (FY) 2024-2025, the final year of the 2020 Consolidated Plan, the Sonoma County Community Development Commission (Commission) made significant progress toward identified goals, with many activities and projects initiated and underway, with several on track to be completed in FY 2025-2026.

For the Affordable Housing goal, the Commission is continuing to leverage activities and projects funded with CDBG and HOME to increase the production of affordable rental housing and create accessible public amenities by engaging developers and cities, collaborating with other County departments, updating funding policies, and leveraging County-owned property. The Commission has awarded HOME and HOME-ARP funds to three housing developments in the cities of Sebastopol and Windsor. These developments will add 105 affordable units to the county when complete. Also, more than 3,000 households received housing assistance in the form of Section 8 tenant-based rental assistance during the program year.

In the area of Homelessness, the administration ESG, and certain local and state funds for homeless services are guided by funding policies set annually by the Community Development Committee. Coordinated Entry (CE) is a streamlined system designed to efficiently match people experiencing homelessness to available housing, emergency shelter, and services. CE prioritizes those who are most in need of assistance and provides crucial information that helps communities strategically allocate resources and identify gaps in service. In FY 2024-2025, 3,903 households were assisted through CE, and of those that exited, almost 45% or 590 individuals exited to permanent housing.

Across all Commission-funded homeless service programs during FY 2024-2025, 128 persons entered emergency shelters. Rapid rehousing assistance ended homeless episodes for one household out of ten households served (10%). A total of 4,401 households were assisted using a combination of CE, street outreach, and day services; 800 of them accessed temporary or permanent housing through those services.

In the area of Non-Housing Community Development, the Commission staff worked closely with community development staff in Urban County member jurisdictions over the past year providing guidance for selecting projects that needed predevelopment funds, and projects that could proceed quickly with an investment of CDBG funds, asking cities to prioritize projects that could spend money first. Four architectural barrier removal projects were completed in Sebastopol and the unincorporated county in FY 2024-2025 that will benefit low and moderate-income households by improving accessibility that encompass census tracts in which more than 51% of residents are low to moderate-income. One microenterprise project was completed which assisted 102 low and moderate-income daycare operators to retain and expand their businesses.

The Commission also funded two fair housing programs in FY 2024-2025. Fair Housing Advocates of Northern California and Legal Aid of Sonoma County assisted a combined total of 510 Sonoma County individuals supported by CDBG funds. These organizations and activities helped to address fair housing complaints and unlawful detainers, helping to prevent homelessness.

# 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	Affordable Housing	CDBG: \$ / HOME: \$ / Section 8: \$	Rental units constructed	Household Housing Unit	100	0	0.00	149	0	0.00%
Affordable Housing	Affordable Housing	CDBG: \$ / HOME: \$ / Section 8: \$	Rental units rehabilitated	Household Housing Unit	100	1	1.00%	0	1	1.00%

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	Affordable Housing	CDBG: \$ / HOME: \$ / Section 8: \$	Homeowner Housing Added	Household Housing Unit	10	0	0.00%	0	0	0.00%
Affordable Housing	Affordable Housing	CDBG: \$ / HOME: \$ / Section 8: \$	Homeowner Housing Rehabilitated	Household Housing Unit	50	29	58.00%	61	29	47.54%
Affordable Housing	Affordable Housing	CDBG: \$ / HOME: \$ / Section 8: \$	Tenant-based rental assistance / Rapid Rehousing	Households Assisted	3000	220	7.33	2988	3,555	118.98%
Affordable Housing	Affordable Housing	CDBG: \$ / HOME: \$ / Section 8: \$	Housing for Homeless added	Household Housing Unit	10	0	0.00	0	0	0.00%
Homelessness	Homeless	ESG: \$ / Competitive McKinney- Vento Homeless Assistance Act: \$	Tenant-based rental assistance / Rapid Rehousing	Households Assisted	160	0	0.00%	213	0	0.00%

Goal	Category	Source / Amount	Indicator	Unit of Measure	Expected  - Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected - Program Year	Actual – Program Year	Percent Complete
Homelessness	Homeless	ESG: \$ / Competitive McKinney- Vento Homeless Assistance Act: \$	Homeless Person Overnight Shelter	Persons Assisted	2000	0	0.00	0	0	0.00%
Homelessness	Homeless	ESG: \$ / Competitive McKinney- Vento Homeless Assistance Act: \$	Homelessness Prevention	Persons Assisted	50	0	0	296	549	185.47%
Non-Housing Community Development	Non-Homeless Special Needs Non-Housing Community Development	CDBG: \$	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	50000	1019	2.04	4370	1019	23.32%

Goal	Category	Source / Amount	Indicator	Unit of Measure	Expected  - Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected - Program Year	Actual – Program Year	Percent Complete
Non-Housing Community Development	Non- Homeless Special Needs Non-Housing Community Development	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	3400	510	15.00	45	510	1,133.33%
Non-Housing Community Development	Non- Homeless Special Needs Non-Housing Community Development	CDBG: \$	Jobs created/retained	Jobs	13	0	0.00%	2	0	0.0%0
Non-Housing Community Development	Non- Homeless Special Needs Non-Housing Community Development	CDBG: \$	Businesses assisted	Businesses Assisted	53	102	192.45%	12	102	850.00%

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.

At the time the draft CAPER tables were extracted from IDIS, several Action Plans (substantial amendments) remained open. As a result, the tables do not fully reflect accomplishments. HUD staff were unavailable to review and close the Action Plans due to the federal government shutdown. Once HUD approval is obtained, the tables will be updated. A more concise summary of accomplishments is provided below.

### **Affordable Housing Goals**

#### 1. Rental Units Constructed

Several rental housing projects are currently under construction, including Summer Oaks (72 units), Heritage Park (33 units), and Dry Creek (58 units), totaling 163 units. This exceeds both the one-year and five-year goals, achieving 163% of the target.

#### 2. Rental Units Rehabilitated

No applications for rental housing rehabilitation funding were submitted during the five-year plan. This provides an opportunity to enhance outreach and encourage participation in future funding opportunities.

#### 3. Homeowner Housing Added

Sonoma County does not use CDBG or HOME funds for homeowner housing activities; this goal was added to the strategic plan in error. Once entered, the strategic plan goal could not be revised.

# 4. Homeowner Housing Rehabilitated

A total of 29 homeowners were served, representing approximately 58% of the five-year goal. Housing rehabilitation targets were not fully met because local funds were used to complete multiple projects in the Earthquake Retrofit Bracing Program, rather than the originally planned use of CDBG funds.

## 5. Tenant-Based Rental Assistance / Rapid Rehousing (TBRA/RRH)

Based on a goal of serving 2,988 households, a total of 3,555 households were assisted, achieving 118.98% of the target and exceeding the goal.

#### 6. Housing for Homeless Added

With a five-year goal of adding 10 units, 29 units were added at Elderberry Commons, exceeding the goal by 290%.

#### **Homelessness Goals**

#### 1. Tenant-Based Rental Assistance / Rapid Rehousing

These accomplishments were reported under Goal 5 of the Affordable Housing goals. For clarity and consistency, this activity would be more accurately reflected if tied to a single goal.

#### 2. Homeless Person Overnight Shelter

The five-year goal of 2,000 households listed in the strategic plan was incorrect; the intended goal was 500 households. The goal could not be updated once entered into the plan. No shelters were funded during the five-year plan, as funding was administered through alternative sources reassigned to another County department. Limited ESG funding was targeted to Homeless Prevention (see below).

#### 3. Homelessness Prevention

A total of 549 individuals were assisted through Homelessness Prevention activities, exceeding the goal of 296 and achieving 185.47% of the target.

## **Non-Housing Community Development Goals**

# 1. Public Facility or Infrastructure Activities (other than Low/Moderate Income Housing Benefit)

Three projects were completed during the year—Gualala Point, Steelhead Beach, and the Sebastopol Youth Annex—serving a combined total of 2,039 households, achieving 46.65% of the targeted annual goal.

# 2. Public Service Activities (other than Low/Moderate Income Housing Benefit)

A total of 510 households were served through Legal Aid and Fair Housing Advocates of Northern California, representing 15% of

the five-year goal. The initial goal of 3,400 households was entered in error and could not be revised; the correct goal should have been 500.

# 3. Jobs Created/Retained

Seventeen jobs were created or retained, exceeding the goal of 13 and achieving 130% of the target.

# 4. Businesses Assisted

A total of 102 businesses were assisted, exceeding the goal of 12 and achieving 850% of the target.

# 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)

Race or Ethnicity	CDBG	HOME
White	4,026	87
Black or African American	82	10
Asian	63	1
American Indian or American Native	62	5
Native Hawaiian or Other Pacific Islander	19	0
Total	4,261	103
Hispanic	450	22
Not Hispanic	3,811	81

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

Race or Ethnicity	ESG
American Indian, Alaska Native, or	
Indigenous	10
Asian or Asian American	1
Black, African American, or African	8
Hispanic/Latina/e/o	31
Middle Eastern or North African	0
Native Hawaiian or Pacific Islander	3
White	166
Multiracial	24
Client doesn't know	0
Client prefers not to answer	0
Data not collected	0
Total	243

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

## Narrative

The Community Development Committee and the Cities and Towns Advisory Committee requested in their concurrent September 21, 2022 public meeting that in subsequent years, the Commission provide a comparative analysis of the Race and Ethnicity for each year of the 5-year Consolidated Plan, to evaluate and address any racial equity issues and potential solutions or investments.

# CR-15 - Resources and Investments 91.520(a)

## Identify the resources made available

Source of Funds	Source	Resources Made	Amount
		Available	<b>Expended During</b>
			Program Year
CDBG	public - federal	2,586,723.14	2,364,170.97
HOME	public - federal	751,286.42	2,305,796.02
ESG	public - federal	149,972	149,672
Competitive McKinney-Vento			
Homeless Assistance Act	public - federal	4,592,448	3,606,413
Section 8	public - federal	46,669,288	46,669,288

Table 3 - Resources Made Available

#### Narrative

For CDBG, Table 3 – "Resources Made Available" matches the PR-26 Report, which included the FY 2024-2025 CDBG award from HUD (\$ 1,657,887) and CDBG program income (\$342,993.84) and the previously awarded project Hewitt Street that was found to be ineligible and the funds in the amount of (\$585,842.30) were returned to the line of credit. CDBG "Amount Expended During Program Year" matches the PR-26 report.

For HOME, "Amount Expended During Program Year" is the sum of \$396,483.96. in Tenant-Based Rental Assistance (TBRA), IDIS activities 1187, 1197 and 1222. \$1,834,184.70 in HOME and HOME CHDO was drawn down for the Summer Oaks affordable housing project in Sonoma using activities 1224, 1225, 1226 and, 1227, and \$75,127.34 was expended on HOME Administration, IDIS activity 1217.

For ESG, "Amount Expended during Program Year" reflects the amount expended in FY 2024-2025 for Homeless Prevention and Outreach activities 1218 and 1219, which was \$149,672.

Final expenditures for the 2024–2025 CoC Competitive McKinney-Vento Homeless Assistance Act funds cannot yet be fully reported. The amounts in Table 3 reflect estimates of funds spent to date. Three awards remain active with contract end dates still pending, and one award is in the process of being transferred to another agency, with no funds spent to date. In addition, agencies have up to 90 days after their contract end date to complete final draws, meaning some projects may still submit expenditures. As a result, the figures in Table 3 represent preliminary estimates, not the final amounts expended for 2024–2025, since contract start and end dates vary across awards.

During FY 2024-2025, 69 project-based voucher units came into service; 60 of these are serving extremely low-income households who are coming out of homelessness. At the end of calendar year 2025, it is expected that the Sonoma County Housing Authority will have spent all available rental assistance dollars. Any remaining funding will be used in calendar year 2026.

During FY 2024-2025, the Commission disbursed \$571,852.75 in HOME-ARP funding to one supportive service activity and one affordable housing activity, and \$100,919.39 expended on HOME-ARP general administration costs.

## Identify the geographic distribution and location of investments

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description
N/A	N/A	N/A	N/A

Table 4 – Identify the geographic distribution and location of investments

#### **Narrative**

The FY 2024-2025 One-Year Action Plan encompassed activities undertaken by the County of Sonoma, as well as the seven municipalities comprising the HUD entitlement Urban County: Cloverdale, Cotati, Healdsburg, Rohnert Park, Sebastopol, Sonoma, and Windsor. Sonoma County does not dedicate funds to target areas. One hundred percent of funds are used in the Urban County.

The Urban County jurisdictions share CDBG funds for capital projects in similar proportion to the number of low and moderate-income populations in each area. Historically and in FY 2024-2025, beyond an initial allocation of available CDBG funds intended to assist capital projects, the jurisdictions did not pre-determine the locations where CDBG, HOME, and ESG funding are to be used in Sonoma County. However, the Urban County has begun tracking where investments are made and provides the Cities and Towns Advisory Committee updates as to how much has been allocated and expended over the five-year strategic plan based on their respective proportions of low- and moderate-income populations. This information helps inform the Cities and Towns Advisory Committee where investments have been made and helps ensure funds are invested in a way that promotes equitable geographic investments.

## 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.

The Commission utilized CDBG, CDBG-CV, HOME, HOME-ARP, ESG, ESG-CV, County General Fund, Low- and Moderate-Income Housing Asset Fund, County Fund for Housing, State of California funding (Partnership HealthPlan of California, Emergency Rental Assistance Program, Permanent Local Housing Allocation, and Homekey) and funds from other public and private sources.

The County of Sonoma has invested millions of local dollars into affordable housing production over the past five years. These resources provide gap financing in permanent soft and hard debt for affordable rental development projects that often use federal Low-Income Housing Tax Credits, and a standard combination of other private debt and equity sources.

Continuum of Care (CoC) funds were used for CoC Planning activities, administering the Countywide Homeless Management Information System (HMIS) and HMIS vendor software expenses, the Countywide CE program, and for nine CoC permanent supportive housing projects and an expiring award for a domestic violence dedicated rapid rehousing project that is currently in process for transfer.

The Commission currently owns several properties that include the following:

8190-8194 Arthur Street, Cotati – Permanent Supportive Housing

866 Sonoma Avenue, Santa Rosa – Jail Diversion Program

Tierra de Rosas, Sebastopol Road, Santa Rosa – This project is under development and will include 75 units of affordable housing

7991 Covert Lane, Sebastopol – Affordable rental housing

6855 Walker Avenue, Sebastopol – Affordable rental housing

Fiscal Year Summary – HOME Match	Amount
1. Excess match from prior Federal fiscal year	3,230,522
2. Match contributed during current Federal fiscal year	0
3. Total match available for current Federal fiscal year (Line 1 plus Line 2)	3,230,522
4. Match liability for current Federal fiscal year	103,903
5. Excess match carried over to next Federal fiscal year (Line 3 minus Line 4)	3,099,619

Table 5 – Fiscal Year Summary - HOME Match Report

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

Table 6 – Match Contribution for the Federal Fiscal Year

Balance on hand at begin-ning of reporting period \$	Amount received during reporting period \$	Total amount expended during reporting period \$	Amount expended for TBRA \$	Balance on hand at end of reporting period \$
19,431.66	90,593.45	110,251.11	81,535.45	28,489.66

Table 7 – Program Income

# **Table 8 - Minority Business and Women Business Enterprises**

Nothing to report

# **Table 9 – Minority Owners of Rental Property**

Nothing to report

# Table 10 – Relocation and Real Property Acquisition

Nothing to report

# **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.

Household Type	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	3,137	3,555
Number of Special-Needs households to		
be provided affordable housing units	61	30
Total	3,198	3,835

Table 11 - Number of Households

Household Type	One-Year Goal	Actual
Number of households supported		
through Rental Assistance	2,988	3,555
Number of households supported		
through The Production of New Units	149	0
Number of households supported		
through Rehab of Existing Units	61	30
Number of households supported		
through Acquisition of Existing Units	0	0
Total	3,198	3,835

Table 12 – Number of Households Supported

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

**Goals:** There are four Affordable Housing goals, including households supported through rental assistance, production of new units, rehabilitation of existing units, and acquisition of existing units, each with a quantitative one-year goal.

**Outcomes:** Eight households were supported with rental assistance, 212 households were provided security deposit assistance, no new units were produced, 30 existing units were rehabilitated, and no existing units were acquired. Twenty-five non-homeless homeowners were assisted through the Sonoma County Housing Rehabilitation Program. Five housing accessibility modification projects were completed for low-income homeowners using CDBG funds through the Disability Services Legal Center's (DSLC) Housing Access Modification Grant Program. The Sonoma County Housing Authority (SCHA) provided rental assistance through the TBRA program to eight households.

Problems Encountered in Meeting Goals: The quantitative goals were identified in the 2020-2025 Consolidated Plan, which was developed before the COVID-19 pandemic, and multiple local disasters were experienced. Some of the one-year quantitative goals were not achievable due to these impacts, however, many affordable housing activities are funded and making progress to help support these quantitative goals. The affordable housing production goals were delayed due to an unanticipated, lengthy NEPA Section 106 Tribal Consultation process for several affordable housing projects that were awarded CDBG and HOME funds. Fortunately, those Tribal Consultations were completed, and the environmental reviews were submitted to HUD along with a request for release of funds. Three projects are currently under construction with an anticipated completion in 2026. The housing rehabilitation goals were not met due to the use of local funds being used to complete multiple projects in the Earthquake Retrofit Bracing Program, rather than the planned use of CDBG funds. This was addressed internally and CDBG funds are now being actively utilized for these rehabilitation projects.

The implementation of the Buy America Build America (BABA) regulations imposed new domestic requirements for materials used in federally funded infrastructure projects. Compliance with these regulations necessitated a reassessment of procurement processes, resulting in significant delays, and in some cases, a decline of the CDBG or HOME award by developers.

**Circumstances beyond the County's control:** The BABA regulations were enacted at the federal level with limited transitional provisions. Sonoma County was required to ensure subrecipients procured compliant building materials, a process that required substantial County staff time to implement. HUD terminated the contract with the BABA technical assistance contractors, and the County was unable to get responses to technical BABA implementation questions from HUD.

**Impact on CDBG fund expenditure:** The need to modify contracts and bids in accordance with BABA requirements delayed project initiation and procurement, thus impeding the timely

expenditure of grant funds. This caused some subrecipients to decline the CDBG funds several months after the award was committed, which resulted in the County needing to reprogram the CDBG funds, which required several months to publish a Notice of Funding Availability and process an Action Plan amendment.

Additionally, a policy change was made to the TBRA program by the SCHA and it was determined they would not be using HOME funds for rental assistance under TBRA, as they have been working to wean households off rental assistance, and instead are providing security deposits under the HOME TBRA program. In FY 2024-2025, 202 households received security deposit assistance.

#### Discuss how these outcomes will impact future annual action plans.

It is anticipated that future action plans will continue to reflect the affordable housing goal set in the Consolidated Plan, which emphasizes the construction and preservation of affordable rental housing as a high priority. Construction of new affordable rental housing is accomplished over several years, however, the Urban County has prioritized investments in projects that are "shovel ready".

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.

Household Income Category	CDBG Actual	HOME Actual		
Extremely Low-income	11	95		
Low-income	10	4		
Moderate-income	9	4		
Total	30	103		

Table 13 – Number of Households Served

#### Narrative Information

The extremely low-income households reported include 95 recipients of HOME TBRA (IDIS activities 1187, 1197 & 1222) and 11 recipients of the CDBG Funded Housing Rehabilitation (IDIS activities 1188 and 1205). The low-income households reported include 10 recipients of CDBG-funded DSLC Housing Accessibility Modifications (IDIS activity 1184 and 1229) four HOME TBRA recipients (IDIS Activity 1179) The moderate-income households reported include nine

recipients of CDBG-funded DSLC Housing Accessibility Modifications (IDIS activity 1184 and 1229) and four moderate-income recipients of HOME TBRA.

The Commission works with private rental property owners and non-profit organizations to identify suitable rental properties that can be acquired and/or rehabilitated to provide housing. The Commission also implements a continuum of care approach to help families and individuals by funding programs and activities that provide supportive services, transitional housing, and permanent supportive housing.

The Commission administered over 35 million dollars in Emergency Rental Assistance Funds to support housing stability throughout the COVID-19 pandemic.

# 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

In 2024-2025, the CoC redesigned its outreach approach with a subregional model. This new approach allowed for outreach workers to focus on specific regions in the CoC's geography and adjusted services to be housing focused. This new approach is paired with regional By Names Lists of unsheltered individuals and the Coordinated Entry (CE) Operator to ensure those who are the hardest to reach are served and the CoC has a better understanding of who is unsheltered in their specific region. Through this strategic effort, duplication of services is eliminated, caseloads are assigned to outreach workers, and outreach is now focused on preparing individuals for housing and referring them into other services (such as emergency shelter and CE). While this model is still early in implementation, the CoC saw an increase of 5.6% successful street outreach placements in 2024 SPMs when compared to 2023.

During this time, the local CoC also worked on a complete redesign of the CE prioritization and assessment, to be more trauma-informed and less invasive, moving away from the VI-SPADT. The new assessment and prioritization will be implemented in 2025-2026. Individuals already enrolled will not require a new assessment.

#### Addressing the emergency shelter and transitional housing needs of homeless persons

Sonoma County's emergency shelter and transitional housing programs focus on establishing safety through trauma-informed care to stabilize and quickly house participants. In FY 2024-2025, ESG funds supported 751 individuals with Street Outreach and Homeless Prevention Services.

Sonoma County's emergency shelter programs focus on establishing safety through trauma-informed care, stabilizing, and moving participants toward permanent supportive housing. In addition, State and local funds supported emergency shelters throughout the Urban County, including Guerneville, Petaluma, and Santa Rosa, which serve the entire region.

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

The County, cities, and local nonprofit agencies offer a range of programs that provide financial and other assistance to those who are at risk of becoming homeless due to financial emergencies, loss of existing dwelling units through inaccessibility by persons with mobility impairments, natural disasters, or unabated deterioration.

In FY 2024-2025, the Commission allocated ESG and local funds to two homelessness prevention and diversion programs. These were operated by The Living Room Center and West County Community Services and cumulatively assisted 549 households in avoiding homelessness through connection with resources aimed at improving housing stability.

The CoC launched the Keep People Housed–Sonoma pilot program, the county's first regional initiative focused solely on preventing homelessness. Starting December 16, 2024, this effort provides targeted support to low-income households at risk of losing housing, with a goal of serving 350–400 households within two years of operation. The program is supported by \$3.9 million in funding—including \$2.6 million from All Home and \$1.3 million from the County of Sonoma and the cities of Santa Rosa and Petaluma. Led by COTS, the initiative unites service providers across the county, with Legal Aid of Sonoma County delivering legal support to stabilize households.

The local nonprofit, Individual and Family Support Network, serves as a community CE assessor, providing access to enrollment and has strong partnerships with probation services. The organization also specializes in transitional and rapid rehousing programs tailored to individuals who are formerly incarcerated and to foster youth to help prevent individuals from exiting to homelessness.

Sonoma County Behavioral Health and Homelessness Services staff, via the Interdepartmental Multidisciplinary Team (IMDT) and Accessing Coordinated Care and Empowering Self-Sufficiency (ACCESS) initiatives, link with homelessness prevention and housing services for individuals being discharged from local hospitals, mental health and youth facilities, and Sonoma County Child Welfare provides linkage for foster-age youth.

In February of 2025, the Sonoma County Department of Health Services opened the Behavioral

Health Bridge Housing program, which provides 80 new emergency shelter beds for those who are experiencing homelessness with behavioral health conditions who are Medi-Cal/Medi-Cal eligible. This new program is referral-based only and provides beds dedicated to those who may be exiting an institution (e.g., pending discharge from a correctional facility, long-term care facility, and residential treatment) and experiencing homelessness.

The Health Care for the Homeless Collaborative includes representatives from all major local clinics for linkage to homelessness prevention. For youth and transition-age youth needs, TLC operates homelessness prevention countywide for Transitional Aged Youth (TAY) and links to educational needs. For seniors and older adults, SHARE Sonoma County is a primary linkage for home shares as well as linkages to homelessness prevention.

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

In FY 2024–2025, the Sonoma County CoC delivered a range of system-wide trainings to strengthen local service providers' capacity to support individuals and families transitioning from homelessness to permanent housing and independent living. Topics included domestic violence and sexual assault services and prevention, CalFresh (Medicaid) and SonomaWorks (TANF) enrollment, Social Security benefits, veteran wellness and suicide prevention, WIC, substance use treatment and overdose prevention, and resources from the Department of Rehabilitation.

Additionally, all Coordinated Entry (CE) access providers are required to complete a series of annual trainings designed to reduce the length of time people experience homelessness and improve access to housing. These trainings incorporate evidence-based practices and cover areas such as housing provider engagement, crisis intervention, housing diversion, personcentered services, housing problem-solving, housing mediation, mainstream resources, chronic homelessness, tenants' rights, and an overview of the CE process.

The CoC has advanced efforts to help people transition to permanent housing, shorten their time homeless, and prevent returns to homelessness—reflected in the annual 2025 Point-in-Time Count, which shows a 23% reduction since the last count in 2024. Returns to homelessness within a 24-month period were reduced from 18.3% in 2023 HUD System Performance Measures to 17.4% in 2024. These efforts are continually strengthened through

feedback from people with lived experience, who participate on the CoC's Lived Experience Advisory Board as well as every CoC committee and governance board.

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

# Actions taken to address the needs of public housing

The Commission does not own or operate any public housing.

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

Not applicable, as the Commission does not own or operate public housing units.

# Actions taken to provide assistance to troubled PHAs

Not applicable. The Sonoma County Housing Authority has been designated as a High Performing Agency for twenty-three consecutive years.

# 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 Commission ensures compliance with the Federal Fair Housing Act and Section 504 of the Rehabilitation Act of 1973 for all new housing construction projects. This strategy includes, at a minimum, five percent of the total dwelling units or at least one unit in a multifamily housing project, whichever is greater, shall be made accessible for persons with mobility impairments. A unit that is on an accessible route and is adaptable and otherwise in compliance with the standards outlined in §8.32 is accessible for purposes of this section. An additional two percent of the units (but not less than one unit) in such a project shall be accessible for persons with hearing or vision impairments.

In addition, the Commission requires all projects receiving HOME funds to adhere to the requirements of 24 CFR 92.351 and to follow its affirmative marketing procedures and requirements for rental projects containing five or more HOME-assisted housing units.

After offering all applicants on its waitlist an opportunity for service, the Housing Choice Voucher waitlist was reopened in October 2023, and 750 applicants were selected at random to be placed on the new waitlist.

The County of Sonoma and the City of Santa Rosa formed the Renewal Enterprise District (RED) as a Joint Powers Authority (JPA) to coordinate around planning, entitling, and assembling public financing to make it as easy and cost-effective as possible for builders and developers to produce housing stock that aligns with community needs. This JPA model of housing and community development takes a regional approach to housing planning and production; pooling and leveraging financing tools and funding sources; sharing the risks and benefits of development; and streamlining environmental review.

The Urban County and Cities of Santa Rosa and Petaluma completed the preparation of a Countywide Assessment of Fair Housing (AFH) intended to identify and resolve barriers to affordable housing, especially those barriers experienced by minorities and people in protected classes. In 2019, an extensive community outreach and development of an Equity Report was initiated, and the final report was completed in January of 2021. The report focused on the culturally responsive efforts that aim to remove barriers to participation for some of the populations covered under AB686's protected classes including but not limited to race, gender,

sexual orientation, familial status, and disability. Coupled with the engagement report, the Urban County and cities used this information in the preparation of their Housing Elements. Additionally, the Commission continues to work with the Bay Area Council Economic Institute to collect data on disparities in housing and economic security among minorities. This work, coupled with community engagement, highlight barriers that still exist and opportunities to reverse the *de facto* discrimination that has come about as a result of earlier public policy decisions.

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

Some of the obstacles identified as preventing access to housing include the lack of housing supply necessary to meet the demand, low vacancy rates for rental housing, high homeownership costs, a higher-than-normal percentage of homeless residents needing housing in the jurisdiction, and the post-fire and pandemic recovery needs impacting the community. In response to these, the Commission is specifically targeting programs to meet the needs of those who are underserved in our community.

All of the projects funded in the FY 2024-2025 Action Plan addressed one or more of the obstacles to meeting underserved needs delineated in the 2020 Consolidated Plan. In addition, the Commission committed local Low-Moderate Income Housing Asset Funds to rapid rehousing and homelessness prevention programs, and the County of Sonoma committed funds to support programs that serve the needs of the most vulnerable in the community and underserved regions in the County with County general funds, Reinvestment and Revitalization funds (R&R) Transit Occupancy Tax funds (TOT) Permanent Local Housing Asset Funds (PLHA) and the County Fund for Housing (CFH). Funded affordable housing projects were based on readiness to proceed and innovative approaches to overcoming regulatory barriers to accelerate the creation of new units. Funded emergency rental assistance and family self-sufficiency activities enabled lower-income individuals and families to obtain and retain rental housing in the high-priced market in Sonoma County.

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

Making housing lead-safe is the most effective strategy to protect children from lead poisoning. The Commission addresses this by proactively disseminating printed information concerning lead-based paint hazards to all residents of housing rehabilitation and rental assistance programs. The Commission's Housing Quality Standards (HQS) Inspectors have received training in visual assessment of lead-based paint hazards and are observant of the existence of this hazard during their property inspections, thereby preventing exposure to lead hazards by

identifying the risks before families with children under six years of age move into rental units that are assisted by the SCHA.

The Commission's Rehabilitation Specialists are trained in the identification of lead hazards, proper methods of paint stabilization, interim control, abatement procedures, and testing/clearance reports to ensure compliance with all lead hazard reduction requirements during rehabilitation activities. Any dwellings not exempt from HUD's lead hazard reduction requirements (single-room occupancy, dedicated senior housing, and housing constructed after 1978) renovated under the Housing Rehabilitation Program undergo a lead hazard risk assessment by a state-certified Risk Assessor before the formulation of the project's scope of work. Any identified lead hazards are addressed in the scope of work and a certified clearance is obtained before the project is considered complete.

The Commission also ensures compliance with lead hazard reduction requirements through subrecipients of CDBG, HOME, and ESG funding used to acquire and/or renovate existing buildings for housing or to undertake residential and re-housing service activities through regular monitoring of those activities.

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

The Urban County works to reduce the number of poverty-level families by targeting CDBG, HOME, ESG, State, and local funds to projects that provide services to foster self-sufficiency, in conjunction with the provision of housing, shelter, and other public facilities. The SCHA implements the Section 8 Housing Choice Voucher Program and numerous CoC Rental Assistance Programs. Rental assistance enables lower-income individuals and families to obtain and retain rental housing in the high-priced market in Sonoma County. These households face severe obstacles to obtaining safe, affordable, local housing and cannot afford market-rate rental housing in Sonoma County. The payment standards for Housing Choice Vouchers are now set to 110% of the Fair Market Rent for studio, one-, two-, and three-bedroom dwellings. This aids applicants and participants in being able to afford the higher rents that have occurred in Sonoma County since the fires of October 2017 and 2019, and better compete for available units in a tight market. The Commission made CDBG and ESG funding available to some nonprofit agencies to operate programs that work to reduce the number of persons living below the poverty level through various services for low-income and homeless residents, including shelter and rapid re-housing programs.

The County's involvement in the CoC process, Section 3 implementation, Sonoma WORKS, Job Link, Upstream Investments, Health Action, and the actions of the Local Workforce Investment

Board all foster greater economic opportunities for the lower-income residents of Sonoma County.

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

At the beginning of this 5 Year Consolidated Plan, the Commission experienced a substantial staff transition as a result of local disasters and COVID-19, resulting in the temporary loss of institutional knowledge and capacity. During the past four years, the Commission has successfully stabilized staffing by hiring experienced leadership, hiring and training new staff, and promoting existing staff. Staff have been attending various HUD trainings and utilizing the HUD Exchange resources to improve knowledge and have a standing monthly check-in meeting with the HUD CPD Representative. A substantial amount of progress has been achieved to help implement programs to achieve the 5-year Consolidated Plan goals.

The County encourages collaboration between housing and service providers to foster the development of more supportive housing options. The County's leading nonprofit housing developers successfully collaborate with other local nonprofit agencies to develop and operate affordable housing projects with specific set-asides of permanent supportive housing units for persons with disabilities.

The Commission established the CoC, which was transferred to the Sonoma County Department of Health Services (DHS) along with the former Ending Homelessness Division of the Commission in 2023. The Commission works in consultation with the CoC on matters related to housing, homelessness and homelessness prevention, and also serves on the CoC Board. The CoC provides structure to the homeless system of care to make policy decisions and measure results for ending homelessness throughout the County. The seventeen-member governing board was seated in November 2020 and includes elected officials from the three HUD entitlement jurisdictions (City of Santa Rosa, City of Petaluma, and the Urban County), representatives from other jurisdictions, individuals, and youth with lived experience of homelessness and homeless and healthcare providers. The CoC endeavors to achieve functional zero in homelessness under a Housing First approach with aligned funding streams and overall policy/planning.

The Commission also collaborated with other safety net agencies to create the Accessing Coordinated Care and Empowering Self-Sufficiency (ACCESS), which has the goal of identifying the most vulnerable residents in the community and holistically supports clients with complex needs. The safety net departments, including the Commission, assembled a multidisciplinary team to develop a data-sharing support system and compile information about shared clients.

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

The Commission has ongoing interaction with many public and private entities to further the objectives outlined in the 2020 Consolidated Plan and the FY 2024-2025 Action Plan. The Commission is an agency of county government and is charged by the Board of Supervisors with closely collaborating with other relevant county government departments including, but not limited to, the Department of Health Services and the Human Services Department. With these two agencies and other county departments, the Commission is engaged in a comprehensive Safety Net Initiative to improve service delivery to county residents who are shared clients.

The Commission has regular contact with the County of Sonoma's planning and land use department, Permit Sonoma, to enhance affordable housing program coordination.

Along with working in conjunction with multiple other County departments, the Commission has coordinated with the seven Urban County municipalities, and various nonprofit agencies receiving CDBG, HOME, and ESG funding to carry out the activities during the FY 2024-2025 year. The Commission also worked closely with Santa Rosa and Petaluma, cities not a part of the Urban County, but which operate similar programs. The SCHA maintains service provider agreements with local supportive service agencies, such as local credit unions, Santa Rosa Junior College and Sonoma State University, Joblink Sonoma County, and more, to provide services to its Family Self-Sufficiency participants.

The Commission embarked on a comprehensive Data Management and Technology Infrastructure upgrade project to identify and implement modern, secure, collaborative, responsive, and efficient data and technology solutions in direct support of housing delivery services. This project encompasses cloud-based data platforms fully integrated with other county systems. This work will foster increased collaboration with other county departments and improves resiliency during disasters such as COVID.

The SCHA has grown its housing navigation program to include three housing navigators, one housing locator, and one housing navigation supervisor. This team assists unhoused clients in gaining housing and works to recruit new landlords to accept housing vouchers. The navigation program has successfully leveraged American Rescue Plan Act funding and administrative fees to pay for landlord incentives, deposit assistance, and provide basic furniture and other items to assist clients to stabilize in housing. During FY 2024-2025, 243 new landlords began working with the Housing Authority, and 123 households (198 persons) who were homeless at entry were housed using a rental assistance voucher issued by the Sonoma County Housing Authority.

# 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 Commission completed a Countywide Community Engagement for the Assessment of Fair Housing report in early 2021 to help Sonoma County address longstanding disparities in access to jobs, transportation, education, community amenities, and housing. This report was used with the Affirmatively Furthering Fair Housing (AFFH) Element of the Housing Element that the county recently completed to assist the Urban County in identifying programs and policies to further fair housing in the county. While the AFFH is a required federal mandate and new State mandate, the overarching equity agenda is an agency-led effort to ensure that all Commission actions are approached with an equity-based lens – a comprehensive approach to modifying agency policies and programs that will put the Commission at the forefront of equity efforts. Additionally, in August 2021, the Commission completed a new ADA Section 504 Self-Evaluation Report and Transition Plan that identified opportunities and goals to ensure compliance with state and federal accessibility requirements. In September 2024, the Commission relocated its offices, addressing the majority of the goals outlined in the Transition Plan, which primarily related to accessibility improvements. Finally, the Commission continues to use its CDBG and HOME funding to support projects that increase the supply and improve the conditions of affordable housing for lower-income persons. The Commission annually allocates funds for a fair housing programs and services.

# 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

All subrecipients receiving CDBG Public Services and ESG funds (HOME is addressed in CR-50) are regularly monitored through the submittal of quarterly reports to the Commission. Each report provides statistics on program participant outcomes and a narrative on the activities undertaken during the reporting period. Each subrecipient also submits an annual report at the end of the contract term summarizing their accomplishments for the year. The information that is provided to the Commission is entered into HUD's Integrated Disbursement and Information System. At least quarterly, subrecipients submit reimbursement requests, including proof of payment for all eligible expenses, which are reviewed by staff. Commission staff reviews the financials and program records of each subrecipient annually; a selection of these reviews are conducted on-site, and the remainder are desktop reviews.

Both CDBG Public Services and ESG-funded projects are subject to annual on-site monitoring visits. Before the on-site monitoring, subrecipients complete questionnaires and submit current policies required for review. Commission staff conducts a review of the current agreement, quarterly reports, reimbursement requests, and financial audits. The overall focus of monitoring visits is to ensure compliance with federal regulations and provide technical assistance for quality improvement. Commission staff work to help subrecipients understand regulations and avoid compliance issues. During the visit and exit conference, the Commission review preliminary findings and concerns, and after the visit staff sends a letter to the subrecipient describing any findings and concerns, including corrective actions to be taken. Once the organization has responded to the corrective actions, Commission staff evaluate the responses and follow up as required through correction and close out.

For housing rehabilitation projects, the Commission collects income/asset verifications, demographic data, verification of insurance, and ownership verification, as applicable. Projects are inspected during construction to ensure all work is within the original scope. Projects must obtain National Environmental Policy Act clearance before incurring costs, executing agreements, or expending any funds on the project. Commission staff determines the appropriate level of environmental review required when project proposals are received. Finally, for all projects subject to Davis-Bacon Labor Standards, the Commission staff locks in the wage rate applicable to the project, verifies the contractor is eligible and not debarred from

federal contracts, conducts in-house desk reviews of Certified Payroll Reports, and performs on-site interviews to ensure wage compliance of all contractors.

For all Commission projects, including HOME and CDBG housing projects, long-term affordability regulatory agreements are executed. Commission staff conduct compliance reviews as required by regulations. Additionally, the Commission amended its affordable housing monitoring policy in 2023 and implemented onsite monitoring for all affordable housing projects no less than once every 3 years. This is in addition to annual "desk monitoring" of all affordable housing units. In addition, subrecipients are subject to federal audit requirements. The Commission has monitoring and compliance procedures in place to ensure that any deficiencies or findings are handled consistently. For all Commission rental projects, including HOME and CDBG-funded rental projects, Commission staff conducts regular reporting and compliance monitoring. For all Commission-regulated projects, reporting includes household size, household income, whether the household receives rental assistance, unit size, the rent charged, maximum rent, and the household's recertification date. All of the Commission's units, including HOME and CDBG are subject to regular on-site monitoring per regulations.

On an annual basis, the Commission submits the CDBG and HOME Minority Owned and Women Owned Business Report to HUD. The Commission encourages participation from minority and women business enterprises by providing bid solicitation notices, newspaper advertisements, and contract clauses requiring contractors, to the greatest extent feasible, to provide opportunities for training and employment for minority- and women-owned business enterprises. The Commission staff also attended HUD-provided trainings on the new Build America, Buy America Act 2023, to ensure that these new requirements are implemented.

## 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.

To ensure that all residents, public agencies, and other interested parties have the opportunity to review and comment on performance reports on housing and community development activities and the use of CDBG, HOME, and ESG funds, the Commission ensures that the public is provided with reasonable and timely access to meetings, information, and records. A draft of the Consolidated Annual Performance and Evaluation Report (CAPER) is made available for public review for fifteen days prior to submission to HUD and a notice of availability is published

in the local newspapers. The public comment period is November 3, 2025 through November 19, 2025. Public comments will be included with the CAPER submission to HUD. Public announcements, describing the CAPER's contents and its availability for comment are distributed to local English- and Spanish-language social media platforms. The draft is posted on the Commission's website in a format accessible to persons with disabilities, and links are made available through email distribution lists and multiple social media websites in both English and Spanish. Hard copies are available at the main library and by request. The draft CAPER is also distributed via email to interested parties, and no-cost copies of the documents are provided to interested persons that do not have Internet access, upon request. A concurrent public hearing to review the CAPER is held during the public comment period by the Community Development Committee and Cities and Towns Advisory Committee, and a public notice of the concurrent public hearings is published at least two weeks before the hearing date in English and Spanish on the Commission website. Written comments will be accepted at cdc@sonomacounty.gov. Oral comments are received during the Community Development Committee and Cities and Towns Advisory Committee concurrent public hearings in person and through remote participation (Zoom meeting). Members of the public who join the meeting remotely, either through their web browser or by calling in, are able to provide public comments during the concurrent public hearings.

Special accommodations for persons with visual or hearing impairments are made upon request. In cases where a significant number of non-English speaking residents are expected to participate in the public hearing, the Commission provides an interpreter. The Commission also has Spanish-speaking staff in attendance at each meeting in case interpretation services are needed but not requested in advance.

# 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.

No changes in the Urban County program objectives were made for FY 2024-2025.

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.

During FY 2024-2025, the Commission's compliance staff visited the following HOME-assisted rental housing developments that were due to be inspected. These included:

- Winter Creek Apartments (11 HOME units)
- Lavell Village (11 HOME units)
- Petaluma Avenue Homes (11 HOME units)
- Windsor Redwoods (10 HOME units)
- Sea Ranch 1 (8 HOME units)
- Fife Creek (5 HOME units)
- Valley Oak Homes (5 HOME units)
- Sonoma Gardens (11 HOME units)
- Springs Village (11 HOME units)
- Parkland Senior Apartments (11 HOME units)
- Kings Valley (11 HOME units)
- Fetters Apartments (11 HOME units)
- Mill Street (8 HOME units)
- Harolds Home (11 HOME units)
- Vida Nueva (8 HOME units)
- Alta Madrone Family Apartments (1 HOME unit)
- West Hearn (8 HOME units)
- Crossroads Apartments (11 HOME units)
- Bodega Hills Apartments (11 HOME units)
- Gravenstein North 1 (11 HOME units)
- Victory Studios (2 HOME units)
- Riverfield Homes (10 HOME units)
- Sanctuary House (4 HOME units)

Each HOME site visit included an interview with the resident manager, a review of the files for

all HOME-assisted units, inspections of several HOME-assisted units pursuant to the regulatory requirements, and an inspection of the common areas and grounds. All HOME-assisted developments were found to be well managed. All findings or significant concerns that were primarily related to physical deterioration revealed during the visit were addressed and corrected by the development.

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

All recipients of HOME and CDBG funds are required to submit Minority Business Enterprise/Woman Owned Business Enterprise (MBE/WBE) outreach, affirmative marketing, and Section 3 Plans as applicable to their projects, and Commission staff monitors subrecipients on an ongoing basis to ensure that they implement such plans and are in compliance with all related laws and regulations.

The Commission requires all projects receiving HOME funds to adhere to the requirements of 24 CFR 92.351 and to follow its affirmative marketing procedures and requirements for rental projects. Affirmative marketing steps consist of actions to provide information and otherwise attract eligible persons in the housing market area to the available housing without regard to race, color, national origin, sex, religion, familial status, or disability.

Projects receiving HOME funds must annually assess the success of affirmative marketing at balancing applicants and residents with the demographics of the jurisdiction at large. Commission staff review this annual assessment and determine if corrective actions are needed.

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

\$103,581.85 of program income was used for Tenant-Based Rental Assistance and \$11,507.61 was used for administration.

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 Commission continues to support and fund the housing rehabilitation program, which is mostly dedicated to rehabilitating low-income senior housing. The Commission continues to support first-time homebuyer programs through non-HOME funds with our community

partners by providing financial assistance for new housing developments and low-income housing resales. The Commission also provides funding to projects with the highest leveraging points to maximize its investment to foster and maintain affordable housing.

# CR-58 — Section 3 Identify the number of individuals assisted and the types of assistance provided

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

**Table 14 – Total Labor Hours** 

Qualitative Efforts - Number of Activities by	CDB	HOME	ESG	HOPW	HTF
Program	G			Α	
Outreach efforts to generate job applicants who are	0	0	0 0	0 0	0
Public Housing Targeted Workers		U			
Outreach efforts to generate job applicants who are	0	0	0 0	0	0
Other Funding Targeted Workers.		U			
Direct, on-the job training (including	0	0	0	0	0
apprenticeships).	U	U	U		
Indirect training such as arranging for, contracting	0	0	0	0	0
for, or paying tuition for, off-site training.	U				
Technical assistance to help Section 3 workers				0	0
compete for jobs (e.g., resume assistance,	0	0	0		
coaching).					
Outreach efforts to identify and secure bids from	0	0	0	0	0
Section 3 business concerns.			U	0	
Technical assistance to help Section 3 business	0	0	0 0	0	0
concerns understand and bid on contracts.	U				
Division of contracts into smaller jobs to facilitate	0	0	0	0	0
participation by Section 3 business concerns.	U	U			
Provided or connected residents with assistance in					
seeking employment including: drafting resumes,	0	0	0	0	0
preparing for interviews, finding job opportunities,		0	U	0	U
connecting residents to job placement services.					
Held one or more job fairs.	0	0	0	0	0

Qualitative Efforts - Number of Activities by	CDB	HOME	ESG	HOPW	HTF
Program  Described as a second social acts with a second action.	G			Α	
Provided or connected residents with supportive	0	0	0	0	0
services that can provide direct services or referrals.					
Provided or connected residents with supportive		0 0		0	
services that provide one or more of the following:	0		0		0
work readiness health screenings, interview					
clothing, uniforms, test fees, transportation.					
Assisted residents with finding child care.	0	0	0	0	0
Assisted residents to apply for or attend community	0	0	0	0	0
college or a four-year educational institution.	U	U			
Assisted residents to apply for or attend	0	0	0	0	0
vocational/technical training.	0	0			
Assisted residents to obtain financial literacy	0	0	0	0	0
training and/or coaching.	0	0			
Bonding assistance, guaranties, or other efforts to					
support viable bids from Section 3 business	0	0	0	0	0
concerns.					
Provided or connected residents with training on	0	0	0	0	0
computer use or online technologies.	U	U	U		
Promoting the use of a business registry designed to					
create opportunities for disadvantaged and small	0	0	0	0	0
businesses.					
Outreach, engagement, or referrals with the state					
one-stop system, as designed in Section 121(e)(2) of	0	0	0	0	0
the Workforce Innovation and Opportunity Act.					
Other.	0	0	0	0	0

Table 15 – Qualitative Efforts - Number of Activities by Program

## Narrative

The Commission includes Section 3 materials in all bid documentation, preconstruction meetings, and technical assistance sessions. Section 3 guidelines are also included in all funding agreements. Several housing activities began development in FY 2025-2026, which will result in Section 3 reporting in the FY 2025-2026 CAPER.