



Annual Action Plan

City Fiscal Year 2023, HUD Program Year 2022
For CDBG, HOME, and ESG Programs

July 2022

Prepared by:

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Fiscal Year 2023 Annual Action Plan

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1. Introduction

The Fiscal Year 2023 Annual Action Plan (Action Plan) represents the fourth year of the City of San Diego Consolidated Plan for the Fiscal Years 2020-2024 (Consolidated Plan) as ratified by the City Council and approved by the U.S. Department of Housing and Urban Development (HUD). The Action Plan is the City's application for (HUD) entitlement grants which identifies the proposed programs and projects to be funded during the City's Fiscal Year (FY) 2023, which begins July 1, 2022. The three* primary HUD entitlement grants that are covered in the Action Plan:

- Community Development Block Grant (CDBG): The primary objective of the CDBG program is the development of viable urban communities through the provision of improved living environments, expansion of economic opportunity, and providing suitable housing. Funds are intended to serve low- and moderate-income residents and areas.
- HOME Investment Partnerships Program (HOME): The HOME program is intended to increase the availability, quality, and access to affordable and decent housing for low-income households.
- Emergency Solutions Grant (ESG): The purpose of the ESG program is to aid individuals, and families in regaining both temporary and permanent housing after they experience a housing crisis or homelessness.

**Please note, in Fiscal Year 2021, the County of San Diego was officially designated as the Alternative Grantee for the Housing Opportunities for Persons with AIDS (HOPWA) program, therefore removing the City's responsibility for tracking allocations and outcome numbers for the HOPWA grant. For information about the HOPWA allocations, goals, and outcomes, please visit the County of San Diego's Annual Action Plan.*

The City also administers CARES Act CDBG-CV and ESG-CV funding. Funds were allocated and projects identified in the First and Second Substantial Amendments to the FY 2020- FY 2024 Consolidated Plan and, when applicable, FY 2023 CV-funded projects are identified in this Action Plan.

On behalf of the City, the San Diego Housing Commission (Housing Commission) administers both the HOME and ESG programs on behalf of the City. The Action Plan has been prepared by the City's Economic Development Department in partnership with Housing Commission.



The Annual Action Plan identifies how the City, working in partnership with the Housing Commission, proposes to utilize these funds in the upcoming fiscal year to address its community development, housing, and public services goals and priorities described in the Consolidated Plan. The Annual Action Plan also outlines other projects and programs that leverage CDBG, HOME, and ESG program funds to further support the City’s efforts to address its goals and priorities as identified in the Consolidated Plan.

The Annual Action Plan also includes activities to remediate impediments to Fair Housing as identified in the San Diego Regional Analysis of Impediments to Fair Housing Choice (FY 2021 – FY 2025). The Fair Housing Center at the Legal Aid Society of San Diego, Inc. was selected using a competitive Request for Proposal (RFP) process as the service provider to provide Fair Housing outreach and education, investigate cases and assist with enforcement. The City continues to sponsor free, public educational workshops and produce multilingual informational resources for the public.

Consolidated Plan Goals

It is important to note that the Consolidated Plan sets goals and strategies intended to be accomplished over the FY 2020 – 2024 period. It identifies a list of funding priorities. The seven Consolidated Plan Goals represent the City’s high-priority needs and serve as the basis for FY 2023 programs and activities identified in the Action Plan. The Consolidated Plan goals are listed below in no particular order:

- Enhance the City’s economic stability by investing in inclusive economic growth initiatives that develop and strengthen small businesses and support local entrepreneurs.
- Support the development of vibrant, equitable, and adaptable neighborhoods by investing in public facilities and critical infrastructure.
- Increase and preserve affordable rental and homeowner housing to improve access to housing opportunities that reflect community needs, including but not limited to, opportunities in close proximity to transit, employment, and community services.
- Foster individual and household resiliency by investing in employment and workforce development programs and improving access to job opportunities



- Assist individuals and families to gain stable housing after experiencing homelessness or a housing crisis by providing appropriate housing and service solutions grounded in best practices.
- Invest in community services that promote equity and serve vulnerable populations including, but not limited to, refugees and recent immigrants, previously incarcerated individuals, veterans, youth, seniors, and food insecure households.
- Finance impactful nonprofit facility improvements to provide new or increased access to programs that serve vulnerable populations or implement sustainability measures.

2. Summarize the objectives and outcomes identified in the Plan

The objectives and outcomes targeted in the Consolidated Plan and this Annual Action Plan in relation to each of the seven goals listed above are detailed in Sections AP-15 and AP-35.

3. Evaluation of past performance

In partnership with numerous nonprofit organizations and the San Diego Housing Commission, the City continues to monitor and evaluate the performance of its HUD entitlement programs while ensuring regulatory compliance.

The City recognizes that the evaluation of past performance is critical to ensuring that the City and its subrecipients are implementing funded activities efficiently and that those activities align with the City's overall strategies and goals. The City considers certain Performance Indicators in its evaluation of project proposals and tracks the performance history of subrecipients. In addition, the City has completed implementation of ED Grants, an online portal that leverages customer relationship management technology to streamline the grants process and is utilized by City staff, Consolidated Plan Advisory Board (CPAB) reviewers, and subrecipients. The portal supports improved subrecipient performance, program compliance management, from the initial phases of Request for Qualifications and Proposals, award processes, and project management to the benefit of all involved

4. Summary of Citizen Participation Process and consultation process

Please note, due to the COVID-19 pandemic, HUD released a series of waivers for Citizen Participation, prompting the City to include virtual and online meetings to replace in person meetings. The City held virtual meetings and released this Annual



Action Plan for a 30-day comment period. Notices, public meetings, and comments received are available in [Attachment A](#). *(Please note that a survey was released to capture comments about the Annual Action Plan and the survey link can be found [here](#).)*

5. Summary of public comments

Notices, public meetings, and all relevant comments received will be included in [Attachment A](#) in the final version of the Annual Action Plan submitted to HUD.

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

A summary of comments not accepted and the reasons for not accepting them will be included in the final version of the Annual Action Plan submitted to HUD. Please note, all comments submitted were accepted in [Attachment A](#).

7. Summary

Not applicable



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

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

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

Agency Role		Name	Department/Agency
CDBG Administrator	SAN DIEGO	Economic Development	
HOME Administrator	SAN DIEGO	SDHC-Economic Development	
ESG Administrator	SAN DIEGO	SDHC-Economic Development	

Table 1 – Responsible Agencies

Narrative (optional)

The City established a Memorandum of Understanding (MOU) with the San Diego Housing Commission to administer the City’s HOME and ESG program for the Fiscal Years 2020-2024 Consolidated Plan period. The Housing Commission works closely with the City to develop the Annual Action Plan. Beginning in FY 2021, the County of San Diego was designated as the Alternative Grantee to administer the HOPWA program. The Housing Commission acts as a subrecipient of the City, while the County receives the HOPWA grant directly from HUD and is responsible for the implementation, operations and administrative functions associated with the HOPWA program. The City’s Economic Development Department Community Development Division administers the CDBG program and is also responsible for the overall oversight and coordination of the City’s HUD entitlement programs.

Consolidated Plan Public Contact Information

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

1. Introduction

See below

Provide a concise summary of the jurisdiction’s activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies (91.215(l))

For the Fiscal Years 2020–2024 Consolidated Plan, the City conducted engaged stakeholders and key partners as part of an extensive citizen community participation effort. The City received input from elected officials, City departments, local nonprofit organizations, community stakeholders, and entitlement program beneficiaries. 344 participants provided input on the Consolidated Plan’s goals and priorities through a total of 16 meetings held throughout San Diego. In addition to the community and stakeholder consultation meetings, 1,186 respondents to an online Community Needs Survey posted on the City’s website. Input received informed the development of the priorities and strategies contained within the five-year Consolidated Plan.

The City’s public engagement strategies included forming community outreach partnerships with public and assisted housing, service agencies, and mental health providers; workforce and business developers; and community advocates. Of the 16 total meetings held, eight meetings were Consolidated Plan Community Forums targeted to the public at large with the remaining eight conducted as stakeholder sessions with specific needs.

Through these efforts, the City was able to solicit input from the community at large and to encourage further collaboration in determining present and future needs.

Results of the input received from community forums and surveys were published on <http://www.sandiego.gov/cdbg> and reported publicly to the CPAB and the San Diego City Council. Each segment of the community outreach and planning process was transparent to ensure members of the public knew their inputs were being collected, reviewed, and considered as part of the planning process.

The City collaborates with the San Diego Housing Commission staff to implement the policies, programs, and projects identified in the Consolidated Plan. The discussions further inform locally driven approaches for delivering services and housing options



to homeless individuals and families within San Diego to ensure meaningful outcomes.

The City's Economic Development Department (EDD) will continue to collaborate with all partners, including the San Diego Housing Commission, to enhance inclusive economic development efforts and better meet the needs of low-and-moderate income residents.

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

Under HUD's authorization, the Regional Task Force on Homelessness (RTFH) serves as the infrastructure organization and lead agency for the Regional Continuum of Care (CoC). As the lead agency, RTFH annually submits a collaborative application for HUD funding for our region to support local efforts and programs designed to serve an array of homeless person, with a focus that is rare, brief, and non-recurring. Programs serve the holistic needs of the population through the provision of supportive services, housing solutions, and referrals to resources geared towards housing stability and self-reliance. Coordinating efforts to prioritize the most vulnerable for limited resources is critical to the homeless response system.

The RTFH's jurisdiction includes all geographies within the County of San Diego, including 18 incorporated areas and all unincorporated areas. The synergy and informed coordination occurring within this structure benefits homeless persons and those at risk of homeless by ensuring existing resources are leveraged to maximum potential, thus providing increased opportunities to serve greater numbers of persons.

The RTFH is the regional planning body and the Homeless Management Information System (HMIS) data system administer. Providing annual reports and data to drive decisions, prioritization, and performance of the homeless crisis response system.

The RTFH Governance Advisory Board (GAC) evaluates and recommends change to improve the structure and ensure it is meeting the mission. The GAC also provides the strategic focus for ending homelessness by establishing funding policies and priorities, determining best practices, pursuing a holistic system approach to addressing homelessness, and reviewing outputs and outcomes to inform future



programming strategies. Additionally, the GAC reviews Advisory Board member nominations and provides recommendations to the Advisory Board. The City has been represented by the San Diego Housing Commission and actively participates in the Opening Doors leadership group, and other CoC Advisory Board committees such as the Ad Hoc Committee to Address Homelessness Among Black San Diegans. The City utilizes these partnerships to develop cooperative plans and strategies to effectively leverage resources for the provision of emergency shelters and repaid re-housing services.

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

The RTFH coordinates the prioritization and use of ESG funds to meet the local needs of San Diegans experiencing homelessness. Funds are allocated to the San Diego Housing Commission, on behalf of the City, in order to design programs consistent with federal and local requirements while efficiently distributing funds. Effective administration of the ESG funds is ensured via an ESG Policy and Operations Guide, CoC written standards and CoC policies such as the Rapid Rehousing policies, created by the RTFH, which serves as a practical guide to applying local standards and procedures for the utilization and distribution of ESG funds. Further, the guide includes federal, state, and local ESG policies and regulations to inform the administration of the funds.

The San Diego Housing Commission consults with the RTFH to establish standard outcomes for the homeless programs funded with ESG. Open and informative dialogue memorialize minimum performance thresholds, meaningful measures to achieve the region's broader goals, and the anticipated outcomes. The RTFH advises the San Diego Housing Commission on the expectations and responsibilities of administering the ESG funds. The San Diego Housing Commission in-turn translates the information into best practices, programmatic requirements, and goals as subrecipient contract elements.

Setting Performance Outcomes

The San Diego Housing Commission sets performance outcomes for subrecipient contracts according to national best practices, RTFH community standards, and methodologies that incorporate regional factors. Although inputs are important to determining compliance on a contractual level, meaningful outcomes detailing the impact on the client's journey towards overarching self-sufficiency, such as increased housing stability and the self-motivated utilization of community resources to



maintain stability, provide a meaningful context for quantifying the impact of the programs on an individual and aggregate level.

Operating and Administrating Homeless Management Information System (HMIS)

The Homeless Management Information System (HMIS) is an effective relational database for coordinating client services, and aggregate data collected is used to inform community planning and public policy, and increasing collaboration across agencies. Multiple data reports from HMIS are produced by RTFH to assist with targeting services and housing solutions appropriately to the client and the community needs. These reports include an annual point in time count (PITC), housing inventory chart (HIC), annual Longitudinal System Analysis (LSA), individual program’s annual performance reports (APR) and the 7 HUD system performance measures. HMIS data is available on the RTFH website and custom reporting is supported. This data is used by government office, service providers, as well as used to inform advocacy efforts, create innovative and strategic approaches, apply uniform reporting standards, and analyzing the overall programmatic impact on reducing homelessness in the City.

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



Table 2 – Agencies, groups, organizations who participated

1	Agency/Group/Organization	City of San Diego
	Agency/Group/Organization Type	Other government - Local Civic Leaders
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs HOPWA Strategy Market Analysis Economic Development Anti-poverty Strategy Lead-based Paint Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The City’s General Plan is its constitution for development. It is comprised of ten elements that provide a comprehensive slate of citywide policies and further the City of Villages smart growth strategy for growth and development.
2	Agency/Group/Organization	City of San Diego City Council
	Agency/Group/Organization Type	Other government - Local



	<p>What section of the Plan was addressed by Consultation?</p>	<p>Housing Need Assessment Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs Market Analysis Economic Development Anti-poverty Strategy Lead-based Paint Strategy</p>
	<p>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</p>	<p>The legislative branch of government for the City of San Diego.</p>
3	<p>Agency/Group/Organization</p>	<p>City of San Diego City Council Infrastructure Committee</p>
	<p>Agency/Group/Organization Type</p>	<p>Other government - Local</p>
	<p>What section of the Plan was addressed by Consultation?</p>	<p>Housing Need Assessment</p>



	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The Infrastructure Committees responsibility includes individual infrastructure projects related to water, wastewater, stormwater, and parks.
4	Agency/Group/Organization	City of San Diego City Council Public Safety and Livable Neighborhoods Committee
	Agency/Group/Organization Type	Other government - Local
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs Market Analysis Economic Development Lead-based Paint Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The Public Safety and Livable Neighborhoods Committees scope includes Police, Fire, Neighborhood Parks, Community Development Block Grants, Code Enforcement, Libraries, and so forth.



5	Agency/Group/Organization	Consolidated Plan Advisory Board (CPAB)
	Agency/Group/Organization Type	Other government - Local Business and Civic Leaders
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs Market Analysis Economic Development Lead-based Paint Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The CPAB was established by the City Council via Ordinance No. O-19963 (codified in Sections 26.210-26.2113 of the Municipal Code) to provide advice and recommendations on all policy issues relating to the federal entitlement grant programs discussed in the City's Consolidated Plan and Annual Action Plan.
6	Agency/Group/Organization	City of San Diego Community Planners Committee
	Agency/Group/Organization Type	Planning organization Business and Civic Leaders
	What section of the Plan was addressed by Consultation?	Housing Need Assessment



	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The Community Planners Committee (CPC) was instituted to ensure communication and to solicit citizen input on citywide issues among the various planning groups in the City under the direction of Council Policy 600-09.
7	Agency/Group/Organization	City of San Diego Park and Recreation Board
	Agency/Group/Organization Type	Other government - Local Business and Civic Leaders
	What section of the Plan was addressed by Consultation?	Housing Need Assessment
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The Park and Recreation Board were chartered by the City to serve as an advisory board on matters relating to the acquisition, development, maintenance, and operation of parks beaches and recreation properties and facilities.
8	Agency/Group/Organization	Capital Improvements Program Review and Advisory Committee (CIPRAC)
	Agency/Group/Organization Type	Other government - Local
	What section of the Plan was addressed by Consultation?	Housing Need Assessment



	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	This advisory committee reviews proposed Capital Improvements Program (CIP) projects from a citywide perspective, providing the Mayor with proposed CIP budget recommendations and CIP project prioritization recommendations.
9	Agency/Group/Organization	Joint City/County HIV/AIDS Housing Committee
	Agency/Group/Organization Type	Services-Persons with HIV/AIDS Services-Health Other government - County
	What section of the Plan was addressed by Consultation?	HOPWA Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The Joint City-County HIV/AIDS Housing Committee serves as an advisory body to the County of San Diego Housing and Community Development Services (HCDS). The Committee is the primary means of community participation in the planning and decisions-making process of the Housing Opportunities for Person with AIDS (HOPWA) program.
10	Agency/Group/Organization	San Diego Regional Alliance for Fair Housing
	Agency/Group/Organization Type	Service-Fair Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs



	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The San Diego Regional Alliance for Fair Housing is a dedicated group of professionals working together to ensure that all residents in San Diego County have equal access to housing. It is comprised of members of the fair housing community, government entities, enforcement agencies and housing providers.
11	Agency/Group/Organization	San Diego HIV Health Services Planning Council
	Agency/Group/Organization Type	Services-Persons with HIV/AIDS
	What section of the Plan was addressed by Consultation?	HOPWA Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The HIV Health Services Planning Council makes the final decisions that affect Ryan White HIV/AIDS Treatment Extension Act of 2009 (RWTEA) services throughout San Diego County including which services to fund, by service category (not specific providers of care); how much funding to allocate to each service category; and how the services should be delivered and how shall receive the services.
12	Agency/Group/Organization	COUNTY OF SAN DIEGO HOUSING AUTHORITY
	Agency/Group/Organization Type	Services - Housing Other government - County
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homelessness Strategy



	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The County Department of Housing and Community Development Services improves neighborhoods by assisting low-income residents, increasing the supply of affordable, safe housing and rehabilitating residential properties in San Diego County.
13	Agency/Group/Organization	211 San Diego
	Agency/Group/Organization Type	Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-Victims of Domestic Violence Services-homeless Services-Health Services-Education Services-Employment Service-Fair Housing Services - Victims Services - Broadband Internet Service Providers Services - Narrowing the Digital Divide
	What section of the Plan was addressed by Consultation?	Geographic Targeting



	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	211 San Diego is a local nonprofit organization connecting people with more than 6000 community, health and disaster support resources and services 24 hours per day under fee for service contracts with the government, nonprofit and corporate partners.
14	Agency/Group/Organization	United Way of San Diego County
	Agency/Group/Organization Type	Services-Health
	What section of the Plan was addressed by Consultation?	Geographic Targeting
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The United Way of San Diego County is a charitable fundraising organization addressing health and human service needs in the county.
15	Agency/Group/Organization	San Diego Regional Economic Development Corporation
	Agency/Group/Organization Type	Business and Civic Leaders
	What section of the Plan was addressed by Consultation?	Economic Development Geographic Targeting
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The San Diego Regional Economic Development Corporation serves local companies by assisting with expansion plans, programs to help retain business, and advocating for policies that enhance the region’s economic competitiveness.



16	Agency/Group/Organization	San Diego Workforce Partnership
	Agency/Group/Organization Type	Services-Employment Business and Civic Leaders
	What section of the Plan was addressed by Consultation?	Economic Development Geographic Targeting
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The San Diego Workforce Partnership funds job training programs that empower job seekers to meet the current and future workforce needs of employers in San Diego County. SDWP is the local Workforce Investment Board, designated by the City and County of San Diego.
17	Agency/Group/Organization	San Diego Association of Governments (SANDAG)
	Agency/Group/Organization Type	Regional organization Planning organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Economic Development Geographic Targeting
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	San Diego Association of Governments (SANDAG) is an association of local San Diego County governments. It is the metropolitan planning organization for the County, with policymakers consisting of mayors, council members, and County Supervisors from each of the regions 19 local governments.



18	Agency/Group/Organization	SAN DIEGO HOUSING COMMISSION
	Agency/Group/Organization Type	Housing PHA Services - Housing Services-Homeless
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homelessness Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	As an independent overseer of the Housing Commission the Board reviews proposed changes to housing policy, property acquisitions, and other financial commitments. The Board offers policy guidance to Housing Commission staff through its communications with the agencies actions are advisory to the Housing Authority of the City of San Diego, which is composed of the nine members of the City Council.
19	Agency/Group/Organization	San Diego Housing Federation
	Agency/Group/Organization Type	Housing Services – Housing Planning Organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment



	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The San Diego Housing Federation creates affordable housing opportunities for low-income people by expanding the knowledge, capacity and influence of the affordable housing development community.
20	Agency/Group/Organization	Legal Aid Society of San Diego
	Agency/Group/Organization Type	Housing Services – Fair Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The Fair Housing Center provides fair housing services in the City of San Diego. The mission is to stop housing discrimination and to be sure there is equal housing opportunity for all those in the San Diego region.

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

Not applicable



Other local/regional/state/federal planning efforts considered when preparing the Plan

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	Governance Board of San Diego Regional Continuum of Care	The Continuum of Care, now called the Regional Task Force on the Homeless (RTFH), works to alleviate the impact of homelessness in the community through the cooperation and collaboration of social service providers. This effort aligns with the Strategic Plans goal to provide client-appropriate housing and supportive service solutions for homeless individuals and families.
City of San Diego General Plan	City of San Diego	The City's General Plan is its constitution for development. It is comprised of ten elements that provide a comprehensive slate of citywide policies and further the City of Villages smart growth strategy for growth and development.
City of San Diego Housing Element	City of San Diego	The General Plan Housing Element serves as a policy guide to help the City of San Diego meet existing and future housing needs. Both plans have the goal of creating and preserving affordable housing stock within the City.
City of San Diego Climate Action Plan	City of San Diego	The Climate Action Plan is a package of policies that will benefit San Diego's environment and economy. It helps create new jobs in the renewable energy industry, improve public health and air quality with the goal of creating a cleaner San Diego. The plan aligns with the Strategic Plan's aims of benefit LMI individuals by encouraging nonprofits to more efficiently use resources while reinvesting savings into programs.



City of San Diego

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
San Diego Regional AI for 2020-2025	City of San Diego	The San Diego Regional Analysis of Impediments to Fair Housing Choice 2020-2025 (AI) presents a demographic profile of San Diego County, assesses the extent of housing needs among specific income groups, and evaluates the availability of a range of housing choices for residents.
City of San Diego Strategic Plan	City of San Diego	The Strategic Plan outlines the specific outcomes, expected results, and related strategies on which City leaders and employees will work collaboratively to deliver community needs.



AP-12 Participation – 91.105, 91.200(c)

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

City staff continues to work with the Consolidated Plan Advisory Board (CPAB) to increase citizen participation and improve the FY 2023 CDBG grant funding application and evaluation process. Established in 2010, the CPAB serves in an advisory capacity to the Mayor and City Council on policy issues related to the Consolidated Plan, Annual Action Plans, the year-end Consolidated Annual Performance and Evaluation Reports (CAPER) reporting, Analysis of Impediments to Fair Housing, and the allocation of CDBG, HOME, and ESG funds.

All the CPAB meetings are open to the public and agendas are distributed via e-mail, internet posting, and hard copy posting. Meeting notes summarizing the discussion items and actions taken are posted online and made available at subsequent meetings to keep interested parties informed. The CPAB meetings provide a regular forum for citizens to participate in matters related to the City of San Diego's HUD Programs as well as provide staff an opportunity to review policy issues and obtain public feedback. During the COVID-19 state of emergency, the CPAB met virtually using the Zoom software platform, and livestreamed the meetings on YouTube. In the winter of 2021, Zoom meetings were upgraded with the webinar feature to capture live comments from the public during the meeting. Public comments were also shared during the CPAB meeting, provided the comment was received by 4pm the day prior to the meeting.

In addition to the CPAB process, City staff along with partner agencies, such as the Housing Commission, regularly receive feedback from the public and other community stakeholders regarding the implementation of its HUD funded programs. Feedback occurs through presentations and attendance at various public meetings including the Regional Continuum of Care Council, the City Council's Public Safety and Livable Neighborhoods Committee (PS&LN), the City's Park and Recreation Board, and the Board of the San Diego Housing Commission. The City also distributes a survey to applicants, CPAB members and City staff to evaluate the application process and solicit suggestions for improving future application cycles. The processes involved in the allocation of each entitlement grant are based on goals and strategies outlined in the City's FY 2020-2024 Consolidated Plan.



Citizen Participation Outreach

Mode of Outreach	Target of Outreach	Summary of Response attendance	Summary of comments received	URL (If applicable)
Public Meeting	Non-targeted/ broad community	10-20 members of the public attend	The public comments on policies and procedures summarized in meetings notes, available on the City's website.	www.sandiego.gov/cdbg/cpab https://www.youtube.com/channel/UC-4gY2k1D1ikzb25QM-03eg
CDBG Interest/RFQ Workshop	Non-targeted/ broad community	80-100 members of the public attend	The workshop provides information to potential applicants on the City's CDBG program.	https://us02web.zoom.us/j/61234567890 Passcode: Dg8.K#TA
CDD Email distribution	Non-targeted/ broad community	Approximately 1300 recipients	The CDD sends out regular electronic emails advising subscribers of any actions related to the Consolidated Plan, its implementation, and pertinent public hearings.	CDBG@SANDIEGO.GOV , or mailchimp direct sign-up link: https://sandiego.us17.list-manage.com/subscribe?u=d345747571010af7c3b1bbafa&id=fabd106855



City of San Diego

Mode of Outreach	Target of Outreach	Summary of Response attendance	Summary of comments received	URL (If applicable)
Public Hearing	Non-targeted/ broad community	City Council and Committee hearings give the public an opportunity to comment on all issues related to the City.	Vary	www.sandiego.gov

Table 3 – Citizen Participation Outreach



Expected Resources

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

Introduction

Please note, on May 13, 2022, the City of San Diego received the program allocations for Fiscal Year 2023. For planning purposes, the City used the FY 2022 Allocation of \$12,478,662 for budgeting the Draft version of the FY 2023 Annual Action Plan, but the actual allocation of \$11,894,158 showed a \$584,504 difference. The budgets have been adjusted accordingly in the final version of the Action Plan and details can be found in sections AP-20 and AP-35.

The City of San Diego is anticipating an additional \$15 million in FY 2022 CDBG Program Income. The \$15 million is the result of an agreement negotiated between the former Redevelopment Agency and HUD to repay the City's CDBG Program over the course of several years with escalating payments.



Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 4				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	\$11,894,158	\$15,000,000	\$119,637	\$27,3013,795	\$32,753,713	



City of San Diego

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 4				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	\$6,250,980	\$1,021,984	EN: \$12,923,303 PI: \$2,210,463 TOTAL: \$15,133,766	\$22,406,730	\$9,976,777	



City of San Diego

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 4				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
ESG	public - federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing	\$1,048,961	\$0	\$0	\$1,048,961	\$1,036,001	
Other	public - federal	Other	0	0	0	0	0	

Table 4 - Expected Resources – Priority Table

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



HOME-25% Match Requirement:

The Housing Commission uses local Inclusionary Funds, Housing Trust Funds, coastal funds, state funds, and multi-family bond proceeds as contributions to housing pursuant to the matching requirements.

ESG-100% Match Requirement

The San Diego Housing Commission uses Housing Commission Housing Trust Funds for some of its ESG matching requirements. The Rapid Re-housing program's 100 % match comes from CoC funding, and an in-kind match from subrecipients (case management and services). Also, the City commits General Fund dollars to the provision of homeless services to better leverage the federal funds received. In FY 2023, the City expects to commit approximately \$3,430,717 (\$2,381,756 CDBG + \$1,048,961 ESG) towards homeless public services.

Non-Entitlement Federal Resources include:

Successor Agency Repayments:

In 2010, the City and the former Redevelopment Agency of the City of San Diego (RDA) entered into a CDBG Repayment Agreement to address findings from the HUD Office of the Inspector General (OIG) about the City's CDBG Program. With the dissolution of redevelopment in California in 2012, the State of California Department of Finance (DOF) suspended approval of the payments to the City under the CDBG Repayment Agreement. Senate Bill 107, enacted in September 2015, permitted the Successor Agency to the former RDA to resume including repayments under the CDBG Repayment Agreement on its annual Recognized Obligation Payment Schedule (ROPS). In addition to reinstating the CDBG Repayment Agreement payments, Senate Bill 107 resulted in the DOF authorizing the repayment of an additional \$151 million in CDBG Program Income from the Successor Agency under a separate Long-Term Miscellaneous CDBG Debt Agreement between the City and former RDA.

The final payment under the Repayment Agreement to address findings from the OIG was made in FY 2020. The Successor Agency Long-Term Miscellaneous CDBG Debt repayments continue and are subject to approval by the DOF as part of each annual Successor Agency ROPS process. The funds repaid are CDBG Program Income.



Homeless Continuum of Care (CoC) Program of the Emergency Assistance and Rapid Transition to Housing Act (HEARTH): Historically, the RTFH received approximately \$19 million annually to prevent and alleviate homelessness throughout the region. In 2018, the region received \$19.3 for homeless programs through CoC funding considerations and expects this to continue in FY 2023.

Housing Choice Voucher Section 8 funds:

The San Diego Housing Commission administers the Section 8 program within the City of San Diego and will provide subsidies to approximately 16,000 San Diego households.

Low-Income Housing Tax Credits (LIHTC): The federal 4% and 9% LIHTC are the principal sources of funding for the construction and rehabilitation of affordable rental homes. They are a dollar-for-dollar credit against federal tax liability.

HUD VASH: In Fiscal Year 2022 the San Diego Housing Commission worked to house homeless veterans in the City of San Diego through the U.S. Department of Housing and Urban Development-Veterans Affairs Supportive Housing (HUD-VASH) Program. SDHC was awarded an additional allocation of 50 VASH vouchers. The agency has a VASH allocation of 1,285.

Affordable Housing Notice of Funding Availability (NOFA): Using a combination of CDBG funds, Permanent Local Housing Allocations (PLHA) from the California Department of Housing and Community Development, and Low-Mod Income Housing Asset Fund (LMIHAF) from the City of San Diego as housing successor to the former Redevelopment Agency; funds have been invested to increase the City’s current housing stock with a qualified list of housing development teams. Additionally, these housing developers are bringing funding streams, such as private financing and tax credits, to the referenced affordable housing projects.

If appropriate, describe publicly owned land or property located within the jurisdiction that may be used to



address the needs identified in the plan

City Neighborhood Infrastructure Projects are being carried out within City-owned real property and/or public right of way. Refer to section AP-35 (Projects) for further information.

Discussion



Annual Goals and Objectives

A visual graphic of the allocations by Consolidated Plan Goal can be found in [Attachment B, Appendix 2](#) in the Final version of the Annual Action Plan.

AP-20 Annual Goals and Objectives: Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Economic Development	2020	2024	Non-Housing Community Development Economic Development	Citywide	Economic Development	CDBG: \$1,083,147	Businesses assisted: 217
2	Workforce Development	2020	2024	Non-Housing Community Development	Citywide	Public Services Workforce Development	CDBG: \$500,560	Public service activities: 204 persons
3	Public facilities and Infrastructure	2020	2024	Non-Homeless Special Needs City Infrastructure	Citywide	Public Improvements and Infrastructure	CDBG: \$5,900,000	Public Facility or Infrastructure Activities Persons Assisted Other: 3 Improvements (Other)



City of San Diego

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
4	Affordable Housing	2020	2024	Affordable Housing	Citywide	Development of Affordable Housing Maintenance of Owner-Occupied Housing Affordable Housing Access and Stability	CDBG: \$8,306,675 HOME: \$22,406,729	Rental units constructed: 57 Household Housing Units (385 total affordable housing units) Rental units rehabilitated: 27 Household Housing Units (175 total affordable housing units) Direct Financial Assistance to Homebuyers: 6 Households Assisted



City of San Diego

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
5	Homelessness	2020	2024	Homeless	Citywide	Homelessness and Supportive Services	CDBG: \$2,381,756 ESG: \$1,048,961	Public service activities: 4,650 Persons Assisted Tenant-based rental assistance / Rapid Rehousing: 80 Households Assisted Homeless Person Overnight Shelter: 1975 Persons Assisted
6	Nonprofit Facility Improvements	2020	2024	Non-Housing Community Development	Citywide	Nonprofit Facility Improvements	CDBG: \$2,230,136	Public Facility or Infrastructure Activities: 44,537 Persons Assisted Other: 3 Facility Improvements (Other)
7	Public and Community Services	2020	2024	Non-Homeless Special Needs Non-Housing Community Development	Citywide	Public Services	CDBG: \$1,208,701	Public service Activities: 4,839 Persons Assisted

Table 5 – Goals Summary

Goal Descriptions



1	Goal Name	Economic Development
	Goal Description	Enhance the City's economic stability by investing in inclusive economic growth initiatives that develop and strengthen small businesses and support local entrepreneurs.
2	Goal Name	Workforce Development
	Goal Description	Foster individual and household resiliency by investing in employment and workforce development programs and in providing access to job opportunities.
3	Goal Name	Public facilities and Infrastructure
	Goal Description	Support the development of vibrant, equitable, and adaptable neighborhoods by investing in public facilities and critical infrastructure.
4	Goal Name	Affordable Housing
	Goal Description	Increase and preserve affordable rental and homeowner housing to improve access to housing opportunities that reflect community needs., including but not limited to, opportunities in close proximity to transit, employment, and community services.
5	Goal Name	Homelessness
	Goal Description	Assist individuals and families to gain stable housing after experiencing homelessness or a housing crisis by providing appropriate housing and service solutions grounded in best practices.
6	Goal Name	Nonprofit Facility Improvements
	Goal Description	Finance impactful nonprofit facility improvements to provide new or increased access to programs that serve vulnerable populations or implement sustainability measures.



7	Goal Name	Public and Community Services
	Goal Description	Invest in community services that promote equity and serve vulnerable populations including, but not limited to, refugees and recent immigrants, previously incarcerated individuals, veterans, youth, seniors, and food insecure households.

Estimate the number of extremely low-income, low-income, and moderate-income families to whom the jurisdiction will provide affordable housing as defined by HOME 91.215(b):

All assistance will be provided to low-income and moderate-income households. (90 households for Year 4 [2023] with HOME dollars in total-breakdown pending).



Projects

AP-35 Projects – 91.220(d)

Introduction

The City of San Diego anticipates an additional \$15 million in FY 2023 CDBG Program Income. This additional amount is the result of an agreement negotiated between the former Redevelopment Agency and HUD to repay the City's CDBG program over the course of several years with escalating payments.

The Consolidated Plan (Consolidated Plan) sets goals and strategies to be achieved over the FY 2020-2024 period and identifies a list of funding priorities. The seven Consolidated Plan goals represent high priority needs for the City and serve as the basis for FY 2023 programs and activities identified in the Annual Action Plan. The Consolidated Plan goals are listed below in no particular order:

- Increase and preserve affordable rental and homeowner housing to improve access to housing opportunities that reflect community needs, including but not limited to, opportunities in close proximity to transit, employment, and community services.
- Enhance the City's economic stability by investing in inclusive economic growth initiatives that develop and strengthen small businesses and support local entrepreneurs.
- Foster individual and household resiliency by investing in employment and workforce development programs and improving access to job opportunities.
- Support the development of vibrant, equitable, and adaptable neighborhoods by investing in public facilities and critical infrastructure.
- Assist individuals and families to gain stable housing after experiencing homelessness or a housing crisis by providing appropriate housing and service solutions grounded in best practices.
- Invest in community services that promote equity and serve vulnerable populations including, but not limited to, refugees and recent immigrants, previously incarcerated individuals, veterans, youth, seniors, and food insecure households.
- Finance impactful nonprofit facility improvements to provided new or increased access to programs that serve vulnerable populations or implement sustainability measures.

Based on these goals, the table below summarizes the priorities and specific objectives



that the City of San Diego aims to achieve during the Consolidated Plan five-year period (accomplishments sought in order to address the goals are expressed in terms on quantitative outcomes). Please view [Attachment B, Appendix 1](#) in the final version of the Annual Action Plan for complete list of activities.

Projects

#	Project Name
1	CDBG Administration
2	Workforce Development
3	Community and Public Services
4	Economic Development
5	Public Infrastructure Improvements
6	Affordable Housing
7	Nonprofit Facility Improvements
8	Homelessness
9	SDHC-HOME-HOMEOWNERSHIP
10	SDHC-HOME-RENTAL HOUSING
11	SDHC-HOME-ADMINISTRATION
12	SDHC-ESG ALL (includes admin)

Table 6 - Project Information

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

Not applicable



AP-38 Project Summary

Project Summary Information

1	Project Name	CDBG Administration
	Target Area	Citywide
	Goals Supported	Economic Development Workforce Development Public facilities and Infrastructure Affordable Housing Homelessness Nonprofit Facility Improvements Public and Community Services
	Needs Addressed	Development of Affordable Housing Maintenance of Owner-Occupied Housing Affordable Housing Access and Stability Homelessness and Supportive Services Public Services Public Improvements and Infrastructure Economic Development Workforce Development Nonprofit Facility Improvements
	Funding	CDBG: \$5,402,759
	Description	Administration costs for the CDBG program
	Target Date	6/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	Not applicable
	Location Description	



	Planned Activities	City of San Diego administrative costs directly related to administering the CDBG program to ensure compliance with all HUD planning and community development activities provided to City residents and businesses, as well as Fair Housing services. The Fair Housing Education and Legal Aid programs are also funded through administration.
2	Project Name	Workforce Development
	Target Area	Citywide
	Goals Supported	Workforce Development Public and Community Services
	Needs Addressed	Public Services Workforce Development
	Funding	CDBG: \$500,560
	Description	Foster individual and household resiliency by investing in employment and workforce development programs and improving access to job opportunities.
	Target Date	6/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	204 persons assisted.
	Location Description	
	Planned Activities	Kitchens for Good - Project Launch: \$120,000 San Diego Continuing Education Foundation: \$120,560 Workshops for Warriors: \$260,000
3	Project Name	COMMUNITY AND PUBLIC SERVICES
	Target Area	Citywide
	Goals Supported	Public and Community Services
	Needs Addressed	Public Services
	Funding	CDBG: \$1,208,701



	Description	Invest in community service that promote equity and serve vulnerable populations including, but not limited to, refugees and recent immigrants, previously incarcerated individuals, veterans, youth, seniors, and food insecure households.
	Target Date	6/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	4,839 persons assisted
	Location Description	N/A
	Planned Activities	Family Health Centers-Safe Point San Diego: \$150,000 Reality Changers: \$102,600 Interfaith Shelter Network: \$110,664 Bayside Community Center: \$118,422 Voices for Children: \$60,304 Ocean Discovery Institute: \$50,000 Home Start, Inc.: \$112,023 Access Youth Academy: \$100,000 San Diego LGBT Community Center: \$150,000 La Maestra Family Clinic: \$197,600 Wesley House: \$87,148
4	Project Name	ECONOMIC DEVELOPMENT
	Target Area	Citywide
	Goals Supported	Economic Development
	Needs Addressed	Economic Development
	Funding	CDBG: \$1,083,147
	Description	Enhance the City's economic stability by investing inclusive economic growth initiatives that develop and strengthen small businesses and support local entrepreneurs.



	Target Date	6/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	217 businesses
	Location Description	n/a
	Planned Activities	Accessity-Microlending Program: \$219,132 Horn of Africa-SD Microenterprise Project: \$219,555 Karen Organization-Refugee Microenterprise Support Project: \$86,918 Mission Edge-City SAIL: \$194,850 Somali Family Service of SD-Microenterprise Program: \$200,871 University of San Diego: \$161,821
5	Project Name	PUBLIC INFRASTRUCTURE IMPROVEMENTS
	Target Area	Citywide
	Goals Supported	Public facilities and Infrastructure
	Needs Addressed	Public Improvements and Infrastructure
	Funding	CDBG: \$5,900,000
	Description	Support the development of vibrant, equitable, and adaptable neighborhoods by investing in public facilities and critical infrastructure.
	Target Date	6/30/2024
	Estimate the number and type of families that will benefit from the proposed activities	TBD persons; 3 improvements
	Location Description	Citywide



	Planned Activities	Beyer Park: \$2,500,000 Eggers Park: \$2,900,000 City Infrastructure Project to Promote Economic Development: \$500,000
6	Project Name	AFFORDABLE HOUSING
	Target Area	Citywide
	Goals Supported	Affordable Housing
	Needs Addressed	Development of Affordable Housing Maintenance of Owner-Occupied Housing Affordable Housing Access and Stability
	Funding	CDBG: \$8,373,699
	Description	Increase and preserve affordable rental and homeowner housing to improve access to housing opportunities that reflect community needs, including but not limited to, opportunities in close proximity to transit, employment, and community services.
	Target Date	6/30/2024
	Estimate the number and type of families that will benefit from the proposed activities	TBD
	Location Description	Not applicable
	Planned Activities	City SD: Affordable Housing NOFA-\$8,306,675
7	Project Name	NONPROFIT FACILITY IMPROVEMENTS
	Target Area	Citywide
	Goals Supported	Nonprofit Facility Improvements
	Needs Addressed	Nonprofit Facility Improvements
	Funding	CDBG: \$2,230,136
	Description	Finance impactful nonprofit facility improvements to provide new or increased access to programs that serve vulnerable populations or implement sustainability measures.



	Target Date	6/30/2024
	Estimate the number and type of families that will benefit from the proposed activities	44,537 persons assisted 3 facility improvements
	Location Description	Citywide
	Planned Activities	La Maestra Family Clinic: \$686,221 Neighborhood House Association: \$715,394 Centro de Salud de la Comunidad de San Ysidro: \$828,521
8	Project Name	HOMELESSNESS
	Target Area	Citywide
	Goals Supported	Homelessness
	Needs Addressed	Homelessness and Supportive Services Public Services
	Funding	CDBG: \$2,381,756
	Description	Assist individuals and families to gain stable housing after experiencing homelessness or a housing crisis by providing appropriate housing and service solutions grounded in best practices.
	Target Date	6/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	2,675 persons assisted; 1,975 persons assisted with overnight shelter
	Location Description	N/A



	Planned Activities	Paul Mirabile Interim Shelter (Interim Housing for Adults Experiencing Homelessness): \$245,477 Day Center for Adults Experiencing Homelessness: \$541,250 City of San Diego Family Shelter Program: \$530,029 Homelessness Response Center: \$1,000,000 Serving Seniors: \$65,000
9	Project Name	SDHC-HOME-HOMEOWNERSHIP
	Target Area	Citywide
	Goals Supported	Affordable Housing
	Needs Addressed	Affordable Housing Access and Stability
	Funding	HOME: \$1,000,000
	Description	Provision of financial assistance towards homeownership in the form of assistance towards down payment and closing costs.
	Target Date	6/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	6 households assisted
	Location Description	N/A
	Planned Activities	Direct financial assistance to homebuyers
10	Project Name	SDHC-HOME-RENTAL HOUSING
	Target Area	Citywide
	Goals Supported	Affordable Housing
	Needs Addressed	Development of Affordable Housing Maintenance of Owner-Occupied Housing Affordable Housing Access and Stability
	Funding	HOME: \$19,187,233
	Description	Rental units constructed and rehabilitated



	Target Date	6/30/2024
	Estimate the number and type of families that will benefit from the proposed activities	84 households (HOME designated units only); contributing in projects creating a total of 560 affordable housing units 27 Rental units rehabilitated 57 Rental units constructed
	Location Description	Citywide
	Planned Activities	Rental units constructed
11	Project Name	SDHC-HOME-ADMINISTRATION
	Target Area	Citywide
	Goals Supported	Affordable Housing
	Needs Addressed	Development of Affordable Housing Maintenance of Owner-Occupied Housing Affordable Housing Access and Stability
	Funding	HOME: \$2,219,497
	Description	Administration costs of HOME program for City of San Diego and San Diego Housing Commission.
	Target Date	6/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	N/A
	Location Description	n/a
	Planned Activities	N/A
12	Project Name	SDHC-ESG ALL (includes admin)
	Target Area	Citywide
	Goals Supported	Homelessness
	Needs Addressed	Homelessness and Supportive Services Public Services
	Funding	ESG: \$1,048,961



<p>Description</p>	<p>Federal Fiscal Year 2023 ESG funds for the City of San Diego have been allocated to the San Diego Housing Commission (SDHC) to operate shelters for the homeless, provide rapid re-housing strategies and program administration and data collection through HMIS.</p>
<p>Target Date</p>	<p>6/30/2022</p>
<p>Location Description</p>	<p>Citywide</p>
<p>Planned Activities</p>	<p>See below</p>
<p>Estimate the number and type of families that will benefit from the proposed activities</p>	<p>ESG funds support the operation of two interim shelter programs which serve single adults experiencing homelessness in the City of San Diego.</p>
<p>Planned Activities</p>	<p>Supports three distinct programs and the administration of these programs: Connections Interim Shelter Program: \$401,465 Paul Mirabile Center Interim Shelter (Interim Housing for Adults Experiencing Homelessness): \$227,911; Rapid Rehousing: \$340,912 to support 80 households; Administration: \$78,672. While operating under COVID-19 emergency response activities, the target population, number of beds, number of persons served, and process for intakes may be modified, as directed by the City, in order to adhere to any public health guidance or directives issued by the County of San Diego or State of California</p>



AP-50 Geographic Distribution – 91.220(f)

Description of the geographic areas of the entitlement (including areas of low-income and minority concentration) where assistance will be directed

The City's previous FY 2015-2019 Consolidated Plan outlined a strategy to incorporate a Geographic Targeting Initiative as a way to help stabilize and improve neighborhoods by directing the investment of HUD resources to geographic areas with the highest need. The initiative was originally defined in FY 2016. After consultation with local subject matter experts and analysis of local data for a variety of indicators (e.g. poverty, rent burden, violent crime and unemployment), the Geographic Targeting Initiative identified (which can be viewed on the City of San Diego's [CDBG website](#)) six high need Community Planning Areas (CPAs). The six CPAs currently include Barrio Logan, City Heights, Encanto, Linda Vista, San Ysidro, and Southeastern San Diego. As part of the FY 2020-2024 Consolidated Plan, the City intends to review these designations by reviewing available data to ensure areas with the current highest need are included.

In addition to the six Geographic Targeting areas, a section of San Diego was federally designated in 2016 as the [San Diego Promise Zone \(SDPZ\)](#). The place-based initiative unites public and private agencies, community-based organizations, social service providers, nonprofits, and residents in a collective impact framework to attract federal funding and address critical need areas in the City's most disadvantaged neighborhoods (more information available on the City's SDPZ website). The SDPZ stretches from East Village and Barrio Logan in the West to Encanto and Emerald Hills in the East. It has an estimated population of more than 80,000 residents. To better support development in the Promise Zone and Geographic Targeted areas, the CDBG Request for Proposals now considers whether projects are located within the targeted areas and their residents.

In 2018, 35 census tracts in the City were designated as federal [Opportunity Zones](#). Opportunity Zones are economically distressed communities where new investments, under specific conditions, are eligible for preferential tax treatment. Although the Opportunity Zone has a similar boundary to the Promise Zone, the Opportunity Zone provides opportunities for organizations to provide services and critical resources to residents in the areas. The six geographic areas, Promise Zone, and Opportunity Zone are factors in the application process and organizations located or providing services



in these areas awarded preference points during the evaluation process.

Geographic Distribution

Target Area	Percentage of Funds
Citywide	0

Table 7 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

Not applicable

Discussion

Not applicable



Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

It is not possible to delineate annual affordable housing goals by population type as requested in the tables below. Per HUD requirements, the totals for the two following tables must match, yet the second table may not capture all relevant activities identified in the first table. For example, homeless population housing needs are supported through overnight shelters, but that program type is not listed as an option in the second table.

Additionally, the population types are not mutually exclusive. Project outcomes by funding source used to support affordable housing needs within the City of San Diego has been provided in AP-20 above, with the number of households and individuals assisted itemized by funding source.

One Year Goals for the Number of Households to be Supported	
Homeless	15
Non-Homeless	75
Special-Needs	0
Total	90

Table 8 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through	
Rental Assistance	0
The Production of New Units	57
Rehab of Existing Units	27
Acquisition of Existing Units	6
Total	90

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

Discussion

The tables above capture units assisted in part with HOME funds. In FY 2023 it is anticipated that funding will support the construction of new affordable rental



housing and promote homeownership through the HOME program.

HOME program regulations at 24 CFR 92.254(a)(2)(iii) provide guidance for the use of the City of San Diego's determined 95% of median area purchase price to determine eligibility for the HOME program rather than the Federal Housing Administration (FHA) single family program data for the San Diego area. The data supported the following 95% of median value calculations:

- Existing Single-Family Residences (Detached Residences): \$783,750
- Existing Condominiums (Attached Residences): \$489,250



AP-60 Public Housing – 91.220(h)

Introduction

The San Diego Housing Commission owns and manages the public housing inventory, affordable housing units, and ground leases within the City. The majority of the units are restricted to low-income renters with incomes at 80% Area Median Income (AMI) or less. The number of units in the San Diego Housing Commission’s Real Estate portfolio, including its nonprofit affiliate Housing Development Partners (HDP), is over 4,100 units across 173 residential properties, eight of those being Public Housing properties totaling 189 units. In addition to the units owned and operated, the San Diego Housing Commission is the ground lessor on thirteen properties that provide over 960 affordable units.

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

During FY 2023, the San Diego Housing Commission does not anticipate any new Public Housing acquisitions. In FY 2023, the San Diego Housing Commission may expand its portfolio of affordable and permanent supportive housing units, subject to funding availability and final selection of properties to be identified. Furthermore, in FY 2023, the San Diego Housing Commission will continue to conduct rehabilitation work on a number of properties as part of its multi-year capital renovation plan.

In addition, in FY 2023, HDP may also expand its portfolio of affordable and permanent supportive housing units, with final selection of properties to be identified. HDP anticipates continuing predevelopment activities for a comprehensive renovation of Casa Colina, a 75-unit property, as well as preparing for a second phase of ADU construction.

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

In order for a Family Self Sufficiency (FSS) program participant to successfully complete the program, the head of household is solely responsible for completing his/her Individual Training and Services Plan (ITSP) and must be employed by contract expiration. In its 2015 Moving to Work Plan, the Housing Commission requested the authority to provide FSS enrollment to “all adult family members by waiving the requirement for the head of household to join the program. Non-head of households who enter into a contract will be responsible for the completion of the ITSP and must be employed by the end of participation in order for the FSS family to successfully complete the program.” This will result in “increased recruitment and



enrollment into the FSS Program, thus providing incentives to families to become economically self-sufficient. The initiative will allow families to enroll into FSS in the event the head of household is unable or unwilling to participate in the program."

In its 2015 Moving to Work Plan, the Housing Commission also requested authority to modify the Family Self-Sufficiency (FSS) program by revising the contract term and the escrow calculation method to coincide with the Path to Success initiative. Changes to the program include a \$10,000 maximum on total escrow accumulation, escrow deposits based on outcomes achieved, and a two-year contract term with the option to extend the contract an additional three years if additional time is needed to attain goals.

SDHC was awarded a Resident Opportunities and Self Sufficiency-Service Coordinator (ROSS-SC) (three-year grant) to promote jobs development, financial stability, and self-sufficiency for public housing residents. The Resident Services Coordinator became a Certified Credit Counselor in 2020 and is now able to provide direct financial coaching and homeownership counseling to public housing residents. Similar to FSS, ROSS Service Coordinators work directly with public housing residents to assess their needs and connect them with education, job training and placement programs, and/or computer and financial literacy services available in their community to promote self-sufficiency.

In 2018, HUD designated the SDHC Achievement Academy as one of eighteen EnVision Centers in 17 communities across the country. The EnVision Center demonstration program focuses on empowering individuals and families to leave HUD-assisted housing through self-sufficiency to become responsible homeowners and renters in the private market, so that HUD will be able to help more individuals and families in need. Through the EnVision Center program, federal agencies, state and local governments, nonprofit and faith-based organizations, and private businesses will come together in a centralized location to provide comprehensive resources for low-income families that receive federal rental assistance. Achievement Academy partners include:



- AmeriMed
- Biocom Introductory Life Sciences Experience
- Center for Employment Training
- Citi Bank
- City Heights Community Development Corporation
- Community HousingWorks
- Connect 2 Careers
- Copley-Price Family YMCA
- Food & Beverage Association of San Diego
- Housing Opportunities Collaborative
- International Rescue Committee
- Job Corps
- Juma Ventures
- Landeros & Associates
- La Maestra Community Health Centers
- Local Initiatives Support Corporation
- Microsoft
- Rady's Children Hospital
- San Diego Futures Foundation
- San Diego Public Library
- San Diego Workforce Partnership
- San Diego Zoo
- Self-Help Federal Credit Union
- South Bay Community Services
- The Campaign for Grade-Level Reading
- TransUnion
- Urban Corps of San Diego County
- US Bank
- Union Bank
- Wells Fargo
- Western Medical Training Center
- YMCA of San Diego County

If the PHA is designated as troubled, describe the manner in which financial



assistance will be provided or other assistance

Not applicable

Discussion

Not applicable



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

Introduction

The U.S. Department of Housing and Urban Development (HUD) charges communities that receive funds under the Homeless CoC Program of the Homeless Emergency Assistance and Rapid Transition to Housing Act (HEARTH) with specific responsibilities. The RTFH is the coordinating body recognized by HUD and, in its 20-year history, the RTFH has brought over \$287 million in resources to the region. The RTFH is the collaborative applicant and submits an annual application to HUD, for funding to support programs and services for San Diegans experiencing homelessness. RTFH has been successful with the annual federal award, receiving an increasing in funding each year to the San Diego region. HUD announced funding awards for HUD FY2021 on March 14, 2022, and the region has been awarded \$29.2 million.

The RTFH includes all of the geographies within the County of San Diego, including 18 incorporated cities and all unincorporated areas. This area also includes Veteran Administration service areas, several Public Housing Authorities, and an array of agencies administering the ESG, CDBG, HOPWA, HOME programs.

In October 2021, the RTFH bifurcated the board in order to best serve the needs and expectations and requirements of a 501(c)(3) nonprofit while also meeting the HEARTH Act requirements of a CoC. The Regional CoC Council, also known as “The CoC Advisory Board” has a Memorandum of Agreement with RTFH, which identifies RTFH as the designated lead agency of the CoC and includes a scope of work. The CoC Advisory Board is a 31-member board that meets on a bi-monthly basis to identify gaps in homeless services, establish funding priorities, and to pursue a systematic approach to addressing homelessness. The meetings are open to the public and the community of providers and stakeholders are welcome to attend and provide comment. The City is represented on the CoC Advisory Board and holds a “funder seat”. The City is also represented at the monthly RTFH general membership meeting by staff of the City’s Economic Development Department. The CoC Advisory Board has established several committees including a committee to address homelessness among black San Diegans; the intersections of homelessness and older adults; health and homelessness; and to address veteran and youth homelessness. The City participates in the Ad Hoc Committee to *Address Homelessness Among Black San Diegans*. Through regular attendance and participation in the RTFH meetings, the City is informed of changes in local goals, objectives and performance measures. The City consults with the RTFH to develop cooperative plans and strategies to leverage resources for the provision of emergency shelter and rapid re-housing services.



The recognition of homelessness as a social and economic issue is uniting service providers, the business community, and the public and private sectors in achieving compliance with the HEARTH Act, adopting best practices to end Veterans and chronic homelessness, and improving the system to rapidly re-house individuals and families. The RTFH has become HEARTH Act compliant by creating a new governance structure, implementing a coordinated entry system (CES) with an assessment tool used County-wide, reporting results, and aligning itself with the national efforts of the United States Interagency Council on the Homeless (USICH) 2010 plan, *Opening Doors: Federal Strategic Plan to Prevent and End Homelessness. Home, Together*, the new strategic plan introduced by USICH, covers fiscal years 2018–2022 and contains the following key goals and objectives to:

1.Ensure homelessness is a rare experience

Objective 1.1: Collaboratively Build Lasting Systems that End Homelessness

Objective 1.2: Increase Capacity and Strengthen Practices to Prevent Housing Crises and Homelessness

2.Ensure homelessness is a brief experience

Objective 2.1: Identify and Engage All People Experiencing Homelessness as Quickly as Possible

Objective 2.2: Provide Immediate Access to Low-Barrier Emergency Shelter or other Temporary Accommodations to All Who Need it

Objective 2.3: Implement Coordinated Entry to Standardize Assessment and Prioritization Processes and Streamline Connections to Housing and Services

Objective

2.4: Assist People to Move Swiftly into Permanent Housing with Appropriate and Person-Centered Services

3. Ensure homelessness is a one-time experience

Objective 3.1: Prevent Returns to Homelessness through Connections to Adequate Services and Opportunities

4.Sustain an end to homelessness

Objective 4.1: Sustain Practices and Systems at a Scale Necessary to Respond to Future Needs

RTFH is also finalizing the Regional Community Action Plan to Prevent and End Homelessness in San Diego. The Regional Plan informs and guides regional policy, funding, and action identifies shared measures to evaluate performance, and identifies



where additional infrastructure is needed to implement Plan goals. The Regional Plan was crafted and informed by existing plans and frameworks at federal and state levels, and particularly all of the local plans and frameworks. The Regional Plan is essentially a “plan of plans” and builds on the commitments, direction, and action already taking place in San Diego.

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

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

As noted, one of the Consolidated Plan goals calls for "assisting individuals and families to stabilize in permanent housing after experiencing a housing crisis or homelessness, by providing client-appropriate housing and support services." Actions undertaken to achieve this goal include the allocation of ESG and CDBG funds totaling \$3,430,353 to assist homeless households via the Paul Mirabile Center Interim Shelter, the Day Center for Adults Experiencing Homelessness, Connections Interim Shelter Program, a City of San Diego Family Shelter Program, the Homelessness Response Center, and the Rapid Re-housing programs.

In addition to the 1-year goals specified in the AP-20 Homelessness Goal, the City continues to participate as a member in the RTFH and its Coordinated Entry System which has become an umbrella for local efforts like, the Campaign to End Homelessness in Downtown San Diego and 25 Cities: a national initiative to end Veteran homelessness. The RTFH built a regional system for coordinated assessment. The RTFH received guidance from HUD Technical Assistance and established the Coordinated Entry System (CES), a region-wide system to assess and place homeless individuals and families in housing, which ensures compliance with the HEARTH Act. CES uses a coordinated assessment tool, developed and piloted within the City of San Diego that is designed to determine a homeless person’s level and type of need, and match the person to an appropriate housing resource. The CES was successfully introduced as a pilot program and is currently utilized throughout the San Diego region by Homeless Service providers.

The Downtown San Diego Partnership’s Clean & Safe Program instituted an Integrated Outreach Team (IOT) consisting of Clean & Safe, the San Diego Police Department’s Homeless Outreach Team (HOT), Alpha Project, Connections Housing, and the San Diego City Attorney’s Office. The IOT is leading a coordinated effort to place people in beds, provide access to resources, and create a path to obtaining



permanent supportive housing. As a result, outreach is strategically conducted in targeted hot-spots throughout the City and Downtown area.

In December 2017, the first of the Cities three Bridge Shelters were opened for single adults and families experiencing homelessness with the initial capacity to serve over 700 individuals on a daily basis. The shelters provide not only a safe, and stable shelter environment, but also a direct connection to housing navigation staff whose main focus is to rapidly rehouse shelter residents into permanent or other long-term housing options. Service provider staff work with clients to develop a housing plan unique to the households needs, circumstance and resources.

More information can be found in the Discussion section below.

Addressing the emergency shelter and transitional housing needs of homeless persons

As per the Mayor’s proposed budget, Council Policy 700-02, and SDHCs Move to Work Plan, the City is committed to increasing resources to help homeless persons. While many efforts are focused on the USICH Housing First Model, helping homeless individuals and families quickly and easily access and sustain permanent housing, emergency and transitional housing programs are also receiving benefit from these resources too.

San Diego is implementing system wide changes in the provision of homeless services. Community resources have been reassessed and redeployed to promote efficiencies in the delivery of services without duplicating efforts. In addition to the Day Center for Adults Experiencing Homelessness (formerly the Neil Good Day Center) and three Bridge Shelter programs (Single Adult, Families with minor children and transitional age youth, and a Flexible Population) that provide basic services, case management, and housing navigator services to connect clients to appropriate housing, new interventions have been implemented. The new Homelessness Response Center and Coordinated Street Outreach will further assist efforts to navigate persons experiencing homelessness through the pathway to obtain appropriate permanent housing solutions.

The Bridge Shelters provide clients a stable environment and facilitate access to a multitude of resources such as obtaining housing documentation, meeting medical and mental health needs, and social benefit eligibility. Each Bridge Shelter also includes a team of Outreach Specialists that function as part of the City’s Coordinated Street Outreach Program, to ensure that outreach is occurring in targeted areas



throughout the City. Outreach staff provide street-based case management services, connections to supportive services and emergency shelters while assisting clients meet their basic needs and improving their sense of safety.

In FY 2021, the Homelessness Response Center (HRC) was implemented to provide access to system navigation services to identify and meet the needs of individuals experiencing homelessness during each stage in their pathway towards housing while providing client-centered services that also increase the efficiency of the overall system of care by identifying and resolving barriers. The HRC also co-locates a full spectrum of homelessness services providers onsite to provide services directly to people experiencing homelessness. works in conjunction with service providers to assess individuals' needs and preferences and coordinates services to move someone from homelessness to housing.

In FY 2021, the City implemented a Coordinated Street Outreach program to provide coordinated street outreach services that employs two distinct yet complementary functions. The Mobile Homelessness Response Team facilitates ongoing intensive engagement and connections to supportive services for unsheltered individuals identified on the CES By-Name-List. This team provides street-based case management services for prioritized clients with an emphasis on fostering positive exits from homelessness. The Rapid Response Team works closely with program staff, Housing Commission staff, and City staff to focus outreach activities in areas with high concentrations of individuals experiencing unsheltered homelessness as well as coordinating timely responses to various stakeholder referrals. This immediate response is orientated towards brief engagements and rapid housing focused problem solving, improving the client's sense of safety and assisting in meeting basic needs.

The City of San Diego and the Housing Commission also support an inclement weather program that provides homeless individuals and families with night shelter from the cold and/or wet winter nights.

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

Provisions at 42 U.S.C. 12755 and HOME Program regulations at 24 CFR 92.253(d) require that persons assisted in housing funded through the HOME Program be selected from a waiting list in chronological order; however, the waiting list process for HOME-funded units may defer to the process allowed by other federal regulations. Under the CoC Program, CoCs are required to create written standards, which include policies and procedures for determining and prioritizing which eligible individuals and families will receive Permanent Supportive Housing assistance funded with CoC Program funds (24 CFR 578.7(a)(9)(v)). The HOME Program requirement for selecting persons from a wait list in chronological order defers to this CoC Program requirement and allows for the establishment of a limited preference such as one for persons experiencing chronic homelessness with the longest histories of homelessness and the most severe service needs.

The HOME Program requirement for affirmatively marketing units can be satisfied by the CoC Coordinated Entry System (CES) if the CES includes all homeless providers in its system and provides a method for persons who decline assessment through the coordinated entry system to be placed on a HOME Program-funded project waiting list.

The goal of the Housing Commission's Rapid Re-Housing program is to help clients move quickly from homelessness to stable housing. On behalf of the City, the SDHC subcontracts with local providers to assist families and individuals in short-term housing programs to move to permanent housing via the Rapid Re-Housing intervention. The goals of the program are to help clients to move quickly from homelessness to stably housed. This program provides households with security and utility deposits, and short- or medium-term rental assistance. Clients receive case management targeted to housing stability.

All City permanent supportive housing programs utilize the RTFH's Coordinated Entry System. The System prioritizes housing placements to those that have been identified as most vulnerable and meet the region's priorities as outlined in the Regional Task Force on the Homeless Community Standards.

The City of San Diego currently funds the operations of ten interim or bridge shelters. Each providing a safe, and stable shelter environment, direct connection to housing navigation staff and staff and supportive services with the primary goal being to rapidly rehouse shelter guests into permanent housing or other long-term housing.

The Housing Commission operates direct services programs through its HOUSING FIRST – SAN DIEGO initiative including programs that serve people who are at risk of



or experiencing homelessness. Programs include the Homelessness Prevention Program that focuses on assisting individuals and families in the City of San Diego who are at risk of homelessness through providing financial assistance and case management services to remain stably housed. Other programs specifically work with people who are experiencing homelessness like the Diversion Program, moving Home Rapid Rehousing and permanent supportive housing developments and voucher programs. These programs serve more than 1,000 people who are at risk of or experiencing homelessness annually.

In FY 2018 the Commission in partnership with the City, released an RFP for a second Transitional Storage Center services for persons experiencing homelessness. The Center keeps homeless San Diegans' belongings off of downtown streets, sidewalks and storefronts by providing a safe place for homeless individuals to keep their belongings as they look for work, attend classes, or meet with a service provider or doctor. The new Center is operated by Mental Health Systems and provides for up to 500 individual bins. In FY 2020, the City released an RFP for a third Transitional Storage Center and awarded the contract to Mental Health Systems. This program provides up to 500 individual bins for storage to persons experiencing homelessness. Mental health Systems is a provider experienced in working with homeless populations as well as providing storage center services. Both storage centers are in addition to the first storage center operated by Think Dignity on behalf of the City, which provides for up to 400 bins for individual storage and serves a minimum of 550 individuals.

The Safe Parking Program contract was competitively awarded to Jewish Family Service in FY 2019. The Safe Parking Program provides a safe place to park and sleep for individuals and families experiencing homelessness, while offering a variety of services. These services include, but are not limited to, access to bathroom facilities, community resource linkages, and housing search assistance. The Program is intended to be a short-term solution to assist individuals and families in transitioning to the most appropriate permanent housing resource available in the community. The Safe Parking Program operates at three locations within the City and provides up to a total of 206 parking spaces.

Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); or, receiving assistance



from public or private agencies that address housing, health, social services, employment, education, or youth needs.

The Housing Commission expanded its Project-Based Voucher (PBV) program by acquiring two former hotel properties and transforming them into Permanent Supportive Housing for disabled households experiencing homelessness by committing 332 project-based vouchers with supportive services from People Assisting the Homeless and Father Joe's Villages. The properties began leasing in December 2020. SDHC also committed an additional 87 vouchers for people experiencing homelessness and 214 vouchers for low-income families during the most recent Notice of Availability (NOFA). SDHC now has 2,191 Project Based Vouchers dedicated to homelessness and 607 Project Based Vouchers to low-income families for a total of 2,978.

Sponsor-based subsidies assist individuals identified as homeless through the provision of permanent supportive housing while supportive services are provided by the sponsor organizations. Additionally, a transitional subsidy program provides a flat subsidy to partnering agencies to ensure homeless individuals are housed while appropriate housing solutions are identified. The coordinated assessment referral system is utilized in these programs. In FY 21, SDHC awarded an additional 80 sponsor-based subsidies reaching a total of 1,031 subsidies available. There are 47 transitional subsidies available.

Project One for All (POFA) is a county initiative that provides full wrap-around services for homeless persons with serious mental illness, including individuals who are exiting from mental health facilities. The County of San Diego partners with Housing Authorities (including San Diego Housing Commission), nonprofits, health clinics, and housing developers to provide stability to homeless persons with mental illness. The program is on track to far exceed their goal of housing 250 individuals with wraparound services. POFA participants receive either a Project Based Voucher or Sponsor Based Subsidy depending on the program. Currently 395 individuals are housed and connected with services under POFA and an additional 76 are approved searching for units. There are 110 POFA vouchers and subsidies that are currently under construction. It is anticipated that all POFA units will be available for leasing by April 2022 when construction on the final project is anticipated to be completed.

In Fiscal Year 21, SDHC received two additional allocations of **Mainstream Vouchers** from HUD. SDHC's Mainstream Voucher program provides rental assistance to families that include a non-elderly person with a disability between the ages of 18 -



61. The non-elderly person with a disability can be any household member. SDHC currently has 208 Mainstream vouchers.

Discussion

None.

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

Introduction:

A variety of barriers exist which make increasing the affordable housing stock in San Diego difficult:

1. Income and wages are not keeping pace with rising housing costs and the overall cost of living.
2. Federal resources for programs, such as the federal Section 8 Program, do not match the need experienced.
3. Homeownership is out of reach for the majority of residents.
4. Low housing vacancy rates are contributing to higher rents.
5. The cost of land is high and there is a lack of vacant land for future growth.
6. Development barriers in some communities, including permit processing times, height restrictions, outdated community plans, environmental review, and community opposition (“NIMBYism”).
7. Backlog of infrastructure and public facilities investment needs.
8. Impediments to Fair Housing.

Actions it planned to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment

The City is addressing the barriers to affordable housing through:

- Implementing a place-based, geographically targeted allocation process that prioritizes the lowest income areas needing the most investment.
- Enforcing the Inclusionary Housing Ordinance, which requires all new residential developments of two units or more to provide 10% affordable housing or pay an Inclusionary Affordable Housing fee.
- Maintaining the housing impact fee, which is meant to offset the cost of affordable housing for low-wage workers and mitigate some of the need for increased affordable housing due to employment growth.
- Offering a Density Bonus “to provide increased residential density to developers who guarantee that a portion of their residential development will be available to moderate- income, low-income, very low-income, or senior households.”
- Allowing additional incentives to developers who provide affordable housing;

including an expedited permit process, reduced water and sewer fees, and multifamily bond financing

Implementing recommendations from the San Diego Regional Analysis of Impediments to Fair Housing Choice.

- Continuing to update Community Plans, which are components of the City’s General Plan & which specify the location & intensity of proposed residential development. The updates are intended to implement General Plan smart growth strategies at the neighborhood level and identify housing opportunities for a variety of household sizes.
- Identifying Transit Priority Areas and Infill Opportunity Zones pursuant to Senate Bill (SB) 743. This legislation seeks to support transit-oriented residential and mixed-use development through CEQA streamlining and reform. The goal is to reduce vehicle miles traveled and contribute to reductions in greenhouse gas emissions. The City is also in the process of updating CEQA significance thresholds to address current best legal practices and reflect the SB-743 streamlined review process for transit priority areas.
- A “Homes for All of Us” initiative, a comprehensive approach to creating more housing that includes:
 - Senate Bill 9 implementation allowing the split of a single-family lot into two lots, and permitting up to two new homes on each lot
 - Housing at City facilities, which streamlines the process for building affordable and middle-income homes on City-owned sites.
 - Affordable housing in all communities that encourages affordable housing construction in communities with little to no affordable housing.
 - An Employee Housing Incentive Program, which provides incentives for non-residential development to pay into a San Diego Housing Commission fund that will be used to develop affordable homes.
 - Live/work units that function as both a home and place of business.
 - Housing Accessibility Program to provide incentives to include more accessible housing for people with disabilities, with adequate space in kitchens and bathroom and accessible routes throughout the building.
 - Housing for families to provide incentives for multifamily housing developments to build homes with three or more bedrooms to ensure that families of all sizes have opportunities for housing.
- Creating an Affordable Housing Notice of Funding Availability (NOFA) using a combination of CDBG, Permanent Local Housing Allocations (PLHA) from the California Department of Housing and Community Development, and Low-Mod Income Housing Asset Fund (LMIHAF) to create a qualified pool of

housing development teams with the following goals and objectives:

- Increase and preserve affordable housing stock (less than 80% Area Median Income (AMI));
- Assist persons experiencing or at risk of homelessness;
- Maximize quality unit production with limited resources;
- Leverage City resources with other funding sources;
- Revitalize neighborhoods and catalyze neighborhood improvement;
- Invest in neighborhood amenities and provide positive economic impact; and
- Continue to implement current incentive programs.

Discussion:

As a subrecipient of the City, the Housing Commission is addressing the barriers that hinder affordable housing and residential investment with the following strategies:

- Increasing wage earning for Section 8 participants by enhancing Achievement Academy services.
- Providing Low Income Housing Tax Credits (LIHTC) as an indirect federal subsidy to finance the construction and rehabilitation of low-income affordable rental housing. This is an incentive for private developers and investors to provide more low-income housing that provides a dollar-for-dollar reduction in their federal tax liability in exchange for financing to develop affordable rental housing. Project rents must remain restricted for at least 30 years after project completion. The LIHTC subsidizes either 30 % (4 % tax credit) or 70 % (9 % tax credit) of the low-income unit costs in a project.
- Providing loans, closing cost assistance grants and mortgage credit certificates for first-time low/moderate-income homebuyers.
- Maintaining over 3,000 affordable housing units and preparing to purchase additional multi-family properties.
- Offering incentives to affordable housing developers which include:
 - Permanent financing in the form of low-interest loans, tax-exempt bonds and land-use incentives;
 - Technical assistance, such as help with securing tax credits; and,
 - Predevelopment assistance loans and grants to help nonprofit developers during the preconstruction phase.

In response to the ongoing COVID-19 pandemic, the federal Coronavirus Response and Relief Supplemental Appropriations Act of 2021 (CRRSAA), signed into law on December 27, 2020, includes \$25 billion for emergency rental assistance program



funds for state, local and tribal governments throughout the United States. These funds include \$2.6 billion for the State of California, of which \$42,333,563 was allocated directly to the City of San Diego through the Coronavirus Relief Fund from the U.S. Department of Treasury; \$45,561,171 was allocated to the City of San Diego through the State of California’s Coronavirus Relief Fund, as approved in State Senate Bill 91 (SB-91) (with the State retaining \$683,417.57 for administrative expenses making the total as \$44,877,753.57) signed into law on January 29, 2021; and \$5,000,000 from federal Coronavirus Aid, Relief, and Economic Security (CARES) Act Community Development Block Grant (CDBG-CV) funds. These funds provide the City of San Diego with \$ 92,211,316.75 to assist low-income households in the City of San Diego that have experienced financial hardship due to COVID-19. Currently, City of San Diego renters cannot be evicted for nonpayment of rent due to COVID-19. The State of California’s temporary ban on evictions was signed into law on January 29, 2021, and remains in effect until June 30, 2021. The City of San Diego’s temporary ban on evictions, proposed by Mayor Todd Gloria and approved by the City Council on January 26, 2021, will take effect on July 1, 2021, and remain in effect until 60 days after the City of San Diego’s COVID-19 State of Emergency ends.

The City’s Housing Stability Assistance Program (HSAP), managed and operated through the San Diego Housing Commission (SDHC), helps pay rent and utilities for households with low income (up to 80 % of San Diego’s Area Median Income [AMI]). Under the State’s requirement for funds to be administered in at least three State-defined categories, the program would prioritize: (1) below 50 % of AMI or unemployed for 90 days; 2) below 80 % of AMI and in a community disproportionately impacted by COVID-19; and 3) below 80 % of AMI and not addressed by State-defined categories 1 and 2. Rental arrears must be prioritized.



AP-85 Other Actions – 91.220(k)

Introduction:

This section discusses the City’s efforts in addressing the needs of the underserved, expanding and preserving affordable housing, reducing lead-based paint hazards, and developing institutional structure for delivering housing and community development activities.

Actions planned to address obstacles to meeting underserved needs

Strategic actions (as listed below) were identified in the Consolidated Plan (Consolidated Plan) in order to advance these goals:

Inclusive Economic Growth, Economic Resiliency and Sustainability, and Catalytic Neighborhood Investments: In an effort to direct critical HUD resources and make demonstrable progress toward achieving the seven Consolidated Plan Goals, the City has outlined the following distribution of CDBG funds for FY 2020-2024. The City planned for consistent funding from FY 2021 to FY 2024, so the following budgetary priorities were established:

- Community Services (Public Services) [up to 15% annually] This portion of the funds allow for public services to be delivered to the City’s most vulnerable populations. Council Policy 700-02 establishes a portion of Community Services funding for services to assist the homeless population. Pursuant to San Diego City Council Resolution No. R-310812, adopted Dec. 16, 2016 up to \$1,318,078 in CDBG Public Service funds are dedicated to assisting with the costs of homeless programs and services.
- Community/Economic Development [10% for FY 21-24] Activities funded through this program are intended to promote economic opportunities including job readiness and business/microenterprise development. The Consolidated Plan goal has a greater focus on small businesses and supporting local entrepreneurs.
- City Capital Improvement Projects/Infrastructure/Nonprofit Facility Projects [25% of the CDBG budget for FY 2021-2024] Funds here are dedicated to (1) investment in the City’s critical public infrastructure needs to support neighborhood safety and improved livability and nonprofit facility projects that improve or expand services to the City’s most vulnerable populations.
- Affordable Housing Projects (30% for FY 2021-2024) Housing remains a pressing issue in the City of San Diego and the City will continue to fund

affordable housing opportunities throughout the Consolidated Plan cycle.

Actions planned to foster and maintain affordable housing

Actions planned to foster and maintain affordable housing include the Strategies to remove or Ameliorate the Barriers to Affordable Housing listed in Section AP-55.

Actions planned to reduce lead-based paint hazards

The Environmental Services Department (ESD), Lead Safety and Healthy Homes Program (LSHHP) has been serving as the City's primary resource for lead poisoning prevention since 2002. In June of 2002, the City enacted San Diego Municipal Code Division 10, (Section 54.1001 et seq.) making it unlawful for a property owner to maintain or cause a lead hazard. In 2008, Division 10 was renamed the "Lead Hazard Prevention and Control Ordinance" and amended to become one of the most comprehensive local lead poisoning prevention ordinances in the nation. In addition to requiring property owners maintain their properties, the amended ordinance requires:

- Contractors conduct renovation in a lead-safe manner and conduct a visual verification and lead dust clearance testing.
- Landlords are required to conduct a visual assessment and correction of potential lead hazards at unit turnover.
- Home improvement and water pressure equipment rental stores are required to make available lead education material to customers.
- Childcare facilities must obtain proof of blood lead testing at enrollment.

The LSHHP is committed to securing funding to meet the program objectives. The specific funding sources, goals and objectives secured for FY 2023 are as follows:

In FY 2021, the LSHHP finalized a four-year State funded Contract with the County of San Diego, Health and Human Services Agency (HHSA). Under this agreement, the LSHHP will protect children from exposure to lead hazards by:

- Issuance of violation notices based on environmental investigation reports conducted by the County in response to a childhood lead poisoning investigation
- Responding to tips and complaints related to lead hazards in housing and unsafe work practices.



- Canvassing high risk areas of San Diego which have potential lead hazards (severely deteriorated paint on older housing) and correcting these hazards through code enforcement.
- Provide State Lead Inspector Certification Trainings and offer consultation services to housing enforcement agencies throughout San Diego County.

When the City’s “Lead Hazard Prevention and Control Ordinance” was enacted in 2008, a permit fee was added to those permits that are issued for construction and renovation activities that disturb painted surfaces on structures build prior to 1979. This fee funds education and enforcement of the “Safe Work Practice” requirements of the ordinance (§54.1005 & §54.1005). In FY 2023, as resources allow, the LSHHP will continue to monitor these permitted construction activities to ensure contractors are working in a manner that does not expose residents, themselves, or their employees to lead hazards. This will be accomplished by LSHHP Code Enforcement Officers conducting unannounced site visits to permitted sites to verify compliance with the Ordinance. The Code Enforcement Officer will issue Violation Notices to egregious violators or provide additional education to those renovators who are making a good faith effort to conduct work in a lead safe manner. Prior to conducting these unannounced site visits, the LSHHP will send informational letters to the permit points of contact by mail and e-mail to educate them of the lead-safe work practices requirements of the Ordinance, and how meeting these requirements will help to protect their clients, themselves, and their children from exposure to lead hazards. This process has resulted in 1069 site visits, over 3,600 e-mail notifications, and over 1,300 e-mail notifications to various construction contact persons since its inception in 2019.

In 2019, after nearly 20 years of vigorous litigation, a settlement agreement was reached between the parties involved in the People of the State of California v. Atlantic Richfield Co, et al. after the Santa Clara County Superior Court ruled that certain paint manufactures were liable for damages arising out of the sale of lead-based paint before it was banned in 1978. Ten California jurisdictions were awarded a total \$305 million over an eight-year period, with the City of San Diego’s portion being \$15 million. These funds will be used primarily to eliminate lead hazards in privately owned residential housing built prior to 1960. The funding will also be used to implement an education and outreach campaign and fund lead-hazard remediation work force development. During FY 2023, the LSHHP will work to establish the



contracts needed to implement this new Program.

Actions planned to reduce the number of poverty-level families

Through its CDBG allocations, the City funds a variety of projects under the Consolidated Plan Goal of: Enhancing the City’s economic stability and prosperity by increasing opportunities for job readiness and investing in economic development programs. The majority of these projects are microenterprise activities that provide training in business development, financial literacy, and technical assistance both individually and in a classroom setting.

The City’s Economic Development Strategy contains three overarching Strategic Objectives: Economic Base Growth, Middle-Income Jobs, and Neighborhood Business. The Performance Measures linked to the three Strategic Objectives are:

1. Increase the Gross Regional Product (GRP) of the San Diego Region
2. Increase the percentage of the workforce earning middle-wage incomes
3. Decrease the local unemployment rate
4. Increase the local median income
5. Decrease the percentage of people living in poverty
6. Increase General Fund tax revenues as a percentage of GRP
7. Increase the business activity in the City’s neighborhood business districts

Actions planned to develop institutional structure

The City has shifted from an application-driven process to a goal-driven, outcome-oriented process based on need and best practice. There are three new Strategic Actions proposed in the Consolidated Plan that the City will implement through the Consolidated Plan cycle:

1. Inclusive Economic Growth
2. Economic Resiliency and Sustainability
3. Catalytic Community Investment

The third strategic action assist in developing institutional structure and is consistent with previous reforms, priorities, and opportunities, and budget priorities. The additional program income has added a tremendous amount of opportunities for the City and the Economic Development Department. The CDD introduced and is successfully utilizing a new software platform, ED Grants, to assist in managing the increase in programs and projects. These actions will shift the focus in the prior Consolidated Plan to impactful projects and increase the capacity for the City of San



Diego and the nonprofit organizations to benefit San Diegans.

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

The City benefits from a strong jurisdiction and region-wide network of housing and community development partners, such as the County, the RTFH, the Housing Commission, and many nonprofit partner organizations/subrecipients. The County's Housing and Community Development Department (HCD) improves neighborhoods by assisting low-income residents, increasing the supply of affordable, safe housing, and rehabilitating residential properties in San Diego County. HCD leverages the City's HOPWA program funds with the County's Health and Human Services Agency and its own housing program income. The RTFH has approximately 80 members comprised of a broad spectrum of the community, including providers of services, government agencies, and the private sector.

Discussion:

To further close the digital divide magnified by the COVID-19 pandemic, on April 20, 2021 Mayor Todd Gloria expanded the City's "SD Access 4 All" program (sandiego.gov/sdaccess) with free Wi-Fi at over 300 new locations across the City. The City also purchased hundreds of new laptops and 900 new mobile hotspots that City residents can check out from select libraries.

The website provides an interactive map that San Diego residents can use to find a free Wi-Fi location nearby. Locations include libraries, parks, recreation centers and other neighborhood spots.



Program Specific Requirements

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

Introduction:

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

Community Development Block Grant Program (CDBG)

Reference 24 CFR 91.220(1)(1)

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

1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed	\$15,000,000
2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan.	
3. The amount of surplus funds from urban renewal settlements	0
4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan	0
5. The amount of income from float-funded activities	0
Total Program Income:	\$15,000,000

Other CDBG Requirements

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	95.00%

**HOME Investment Partnership Program (HOME)
Reference 24 CFR 91.220(1)(2)**

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

The City does not use HOME funds in any other manner than those described in Section 92.205. The City will occasionally submit waiver requests to HUD in accordance with applicable regulations to request to adjust the maximum purchase price for single family residences and condominiums.

2. *A description of the guidelines that will be used for resale or recapture of HOME funds when used for homebuyer activities as required in 92.254, is as follows:*

The Housing Commission will recapture that portion of HOME program investment unforgiven by the elapsed affordability period or recapture the maximum net proceeds from sale of property (whether recapture is affected through foreclosure or no foreclosure action). Net proceeds recovered will be used to: (1) Reimburse the HOME program (approved activity) for the outstanding balance of HOME funds not repaid or forgiven during the applicable affordability period at the time of recapture. (2) Reimburse the HOME program (administration) for “holding costs” or other costs associated with the recapture action (legal fees, insurance, taxes, realtor fees, appraisal/BPO costs, etc.) If net proceeds recaptured are less than the outstanding balance of HOME funds invested in the property (for all approved activities and holding costs incurred), the loss will be absorbed by the HOME program and all HOME program requirements would be considered to have been satisfied. If net proceeds recaptured are greater than the outstanding balance of HOME funds invested in the property (for all approved activities and holding costs incurred), the balance of net proceeds would be distributed to the homeowner (or his/her estate). If the recapture of proceeds is effectuated through a completed foreclosure action, and the property is legally owned by the Housing Commission the balance of net proceeds recaptured will inure to the Housing Commission.

3. *A description of the guidelines for resale or recapture that ensures the affordability of units acquired with HOME funds; See 24 CFR 92.254(a)(4) are as follows:*

For those cases where the affordability requirements are violated as a result of the death of the HOME beneficiary and there is an eligible person who qualified and is desirous of assuming the HOME assistance invested in the property, the Housing



Commission will permit sale of the HOME-assisted unit to the qualifying, eligible person, contingent upon the Housing Commission's prior review and approval. The subsequent owner will be required to adhere to all applicable affordability requirements for the unexpired term of the original affordability period.

4. *Plans for using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds along with a description of the refinancing guidelines required that will be used under 24 CFR 92.206(b), are as follows:*

For acquisition/rehabilitation of existing rental units, the Commission provides refinancing with below market-rate, deferred payment junior mortgages. Acquisition/rehabilitation developments must have at least 20 % of the units affordable to households at or below 80 % of median income. Proposals with rents affordable to households with incomes at or below 50 % of median family income will receive preference. Proposed projects from impacted census tracts must demonstrate community support. Proposals may not result in a significant displacement of moderate-income households.

Emergency Solutions Grant (ESG) Reference 91.220(1)(4)

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

The Housing Commission adopted performance standards in line with the CoC. These standards include: Rapidly re-housing clients into permanent housing within 60 days after determination of eligibility (30 days regulatory requirement for ESG-funded Rapid re-housing programs); maintaining or increasing income from program entry to program exit; exiting the program into permanent housing; and remaining stably housed for at least 12 months. The San Diego Housing Commission also requires programs to serve the target population in a solutions-focused environment utilizing Progressive Engagement case management model with clients and a client-centered approach to determine their financial need and receive just enough assistance to maintain housing.

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

The Regional Task Force on Homelessness, the Regional CoC, uses a coordinated



assessment system as directed by HUD, known as the Coordinated Entry System (CES). CES is used throughout the San Diego region and focuses on housing and service coordination designed to link households experiencing homelessness to the most appropriate housing solution based on their needs. The CoC uses a CES Triage Tool, which is a combination of assessment and data elements collected in the Homeless Management Information System (HMIS), to identify the full scope of a household's crisis and vulnerabilities. Information collected from the CES Triage Tool is then used in the scoring of a household's vulnerability level for community prioritization for available housing resources.

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

The Housing Commission conducts an open and competitive Request for Proposal (RFP) process for making sub-awards. RFP's are publicly announced through PlanetBids, the agency's web-based bid management system, used to send announcements of upcoming bids to members of the public.

- 4. If the jurisdiction is unable to meet the homeless participation requirement in 24 CFR 576.405(a), the jurisdiction must specify its plan for reaching out to and consulting with homeless or formerly homeless individuals in considering policies and funding decisions regarding facilities and services funded under ESG.*

Neither the San Diego Housing Commission's Board of Commissioners nor the City Council, which is the final approval authority for the San Diego Housing Commission, have representation of persons currently or formerly experiencing homelessness on the respective boards. However, the San Diego Housing Commission, as the City's administrator of CDBG and ESG-funded homeless programs, does consult with the CoC which has formerly and current persons experiencing homelessness as members. Subcontractors who administer the shelters and the Rapid Rehousing programs have formerly homeless individuals in their organizations who help shape policies and make decisions about services and programs that receive ESG funding. These organizations also provide opportunities and encourage homeless clients to give their input regarding homeless programs. The San Diego Housing Commission regularly interacts with persons with lived experience through various networks to provide updates and gather feedback on the implementation of the Community Action Plan on Homelessness and policies and programs that impact the homelessness services system. The San Diego Housing Commission also implemented an automated client-feedback system in city-



funded shelters and supportive services programs that will collect qualitative and quantitative information that will provide system-level performance feedback. The survey questions were developed through a community engagement process with people with lived experience to ensure the survey has a client-centered approach.

5. *Describe performance standards for evaluating ESG.*

The San Diego Housing Commission generally adopts performance standards for the ESG Rapid Re-housing program that are in line with the CoC best practices and community standards. These standards include: making every effort to rapidly re-house clients into permanent housing within 30 days after determination of eligibility, in alignment with ESG regulations (it is worth noting that, due to the very competitive rental market in our jurisdiction, the CoC standard indicates a goal of within 45 to 90 days); exiting the program into permanent housing and remaining stably housed for 12 months; and maintaining or increasing income from program entry to program exit. The San Diego Housing Commission also requires that programs use (1) a Progressive Engagement case management approach with clients to determine their financial need and receive just enough assistance to maintain housing; and (2) Housing First model to ensure clients attain housing prior to taking steps to address any other significant issues with which they may be struggling (e.g. substance abuse, mental health, gaining or increasing income).