



**FISCAL YEAR 2025**

# **Annual Action Plan**

**June 2024**

The City of



# Annual Action Plan

## Expected Resources

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

#### Introduction

The City of San Diego is anticipating an additional \$15 million in FY 2025 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. As of the release of this report for public comment, HUD has not published its Program Year 2024 (City Fiscal Year 2025) entitlement program grant amounts. Therefore, the FY 2025 expected resources are estimates based on the FY 2024 amounts and will be adjusted upon the release of the actual entitlement amounts from HUD, prior to submittal of the final version to HUD.

#### Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$	
CDBG	Public Federal	Supportive services Homebuyer assistance Homeowner rehabilitation Multifamily rental rehabilitation Homeless support Public Services Nonprofit facilities Public improvements Public facilities Public infrastructure	\$11,273,192	\$15,000,000	\$1,756,607	\$28,029,799	\$73,627,440
HOME	Public Federal	Acquisition Homebuyer Assistance Multifamily rental new construction Multifamily rental rehab	\$4,933,182	\$1,154,120	\$20,120,591	\$26,207,893	\$17,386,414

ESG	Public-Federal	Financial Assistance Overnight Shelter Rapid Rehousing (rental assistance) Rental Assistance Services Transitional Housing	\$1,023,627	\$0	\$0	\$1,023,627	\$3,607,652
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**Table 51 - 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**

Leverage, in the context of the City’s HUD entitlement programs, means bringing other local, state, and federal financial resources to maximize the reach and impact of these programs. HUD, like many other federal agencies, encourages the recipients of federal monies to demonstrate that efforts are being made to strategically leverage additional funds in order to achieve greater results. Leverage is also a way to increase project efficiencies and benefit from economies of scale that often come with combining sources of funding for similar or expanded scopes. Funds will be considered leveraged if financial commitments toward the costs of a project from a source, other than the originating federal source, are documented. The City, through its Consolidated Plan Advisory Board, has incentivized the use of leveraged funds in certain Requests for Proposals by offering additional evaluation points based upon the percentage of the project budget reimbursed with non-entitlement federal sources. City staff will continue to explore additional leveraging opportunities, other federal resources, and local private investments.

SDHC uses CDBG funding set aside in Council Policy 700-02 and Housing Commission Housing Trust Funds. The Rapid Rehousing 100% match comes from Continuum of Care funding, and 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 2025, the City expects to commit an estimated \$85 million, from all funding sources, towards homelessness services.

**Homeless Continuum of Care (CoC) Program of the Emergency Assistance and Rapid Transition to Housing Act (HEARTH)**

In FY 2023, HUD awarded San Diego CoC \$37,066,178 in CoC funds to homeless programs in San Diego, including permanent supportive housing and rapid rehousing services. Housing Choice Voucher Section 8 funds: SDHC administers the Section 8 program within the City of San Diego and will provide subsidies to approximately 17,000 San Diego households. In fiscal year 2022, SDHC assisted 19,687 low-income households through the rental assistance programs. This figure includes turnover vouchers, households whose participation in the program concluded.

Fiscal Year 2024 (as of March 7, 2024):

HUD VASH: In Fiscal Year 2024, SDHC 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 75 VASH vouchers. The agency has a VASH allocation of 1,385, which includes 1,265 tenant-based and 120 Project-Based (included in Project-Based numbers below)

Low-Income Housing Tax Credits (LIHTC): The federal 4% and 9% LIHTC is the principal source of funding for the construction and rehabilitation of affordable rental homes. They are a dollar-for-dollar credit against federal tax liability. In FY 2024, SDHC projects 767 units utilizing these federal sources will be constructed.

**HOME-25% MATCH REQUIREMENT**

SDHC 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**

For the City-funded interim shelters, SDHC uses the CDBG set-aside funding per Council Policy 700-02 and the Affordable Housing Fund authorized by San Diego Municipal Code §98.0502. The Rapid Rehousing 100% match comes from VASH vouchers, subrecipient monetary leverage and in-kind match from subrecipients in the form of case management and supportive services. The match for prevention activities will be met with City general fund and other sources, as needed.

**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 and Capital Improvement Projects (like parks, libraries and recreation centers) will be carried out within City-owned real property and/or public right of way. Additionally, City-owned land may be utilized for emergency shelter programs. Refer to section AP-35 (Projects) for further information.

**Discussion**

In 2010, the City and the former Redevelopment Agency of the City (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. After the FY 2025 payment is received, there is a remaining balance of \$32,993,522 in the Long-Term Miscellaneous Debt Agreement.

# Annual Goals and Objectives

## AP-20 ANNUAL GOALS AND OBJECTIVES

### Goals Summary Information

Sort Order	Goal Name	Fiscal Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Affordable Housing	2025	Affordable Housing Public Housing Homeless Non-Homeless Special Needs	Citywide	Affordable Housing  Affordable Housing and Public Services	HOME: \$26,207,893  CDBG: \$10,424,476	Financial assistance to homebuyers/homeowners: 6 Households (HOME)  Construction of new rental units: # of units = 26 HOME-Assisted Units, 151 total Affordable Units  Homeowner Housing Rehabbed: # of homes = 0
2	Economic Development	2025	Non-Housing Community Development Economic Development	Citywide	Economic Development  Workforce Development	CDBG: \$2,273,791	Businesses Assisted: 353  Persons Assisted: 643

3	Infrastructure Improvements	2025	Non-Homeless Special Needs City Infrastructure	Citywide	Public Improvements and Infrastructure  Nonprofit Facility Improvements	CDBG: \$5,521,104	Facilities Improved: 9  Persons Assisted: 17,587
4	Homelessness	2025	Homeless	Citywide	Homelessness and Supportive Services Public Services	CDBG: 1,000,000  ESG: \$1,023,627	Homeless Person Overnight Shelter: Persons Assisted CDBG: 2,500, ESG: 1,600; Total: 4,100. Tenant-based rental assistance/Rapid rehousing: Households Assisted: ESG: 30.  Public service activities other than LMI Housing Benefit: Persons Assisted, CDBG: 10,000 Facilities (other): CDBG: 1.
5	Community Services	2025	Non-Homeless Special Needs Non-Housing Community Development	Citywide	Public Services	CDBG: \$3,204,469	Persons assisted: 5,568

**Table 52  
- Goals  
Summary**

**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 households. (32 for Year 1 (2025) with HOME dollars households in total-breakdown pending).

## **Goal Descriptions**

In developing the goals and outcomes of the Consolidated Plan, the City completed a “goals crosswalk” exercise to identify how goals in other, relevant City plans relate to the goals and needs in the Consolidated Plan. City departments discussed the shared goals and aligned actions at a goal setting workshop. This exercise ensured that the Consolidated Plan goals are in alignment with and complement the City’s overall Strategic Plan as well as department level goals.

The five-year goals established to address housing and community development needs in San Diego include:

**Goal 1:** Increase, protect and preserve affordable rental and homeownership housing opportunities by improving access to a diverse set of affordable housing, accessible in design and energy efficient, with proximity to job centers, schools, parks, and services.

**Goal 2:** Invest in inclusive economic growth initiatives that develop and strengthen small businesses, support local entrepreneurs, expand employment and/or workforce development programs, and improve access to job opportunities.

**Goal 3:** Develop vibrant and equitable neighborhoods by investing in public facilities, critical infrastructure, and/or nonprofit facilities that provide increased accessibility, resiliency, and sustainability.

**Goal 4:** Improve housing stability for individuals and households with critical needs, including persons experiencing or at-risk of homelessness by providing appropriate housing and service solutions grounded in best practices.

**Goal 5:** Improve community services by addressing critical needs and promoting equity through improved or increased access to community programming.

# Projects

## AP-35 PROJECTS – 91.220(D)

### Introduction

Based on the Consolidated Plan goals described above, the table below describes the projects that will be funded in FY 2025.

### Projects

#	Project Name
1	CDBG Administration
2	Affordable Housing
3	Economic Development
4	Infrastructure Improvements
5	Homelessness
6	Community Services
7	SDHC-HOME-Homeownership
8	SDHC-HOME-Rental Housing
9	HOME Administration
10	SDHC-ESG ALL

**Table 53 – Project Information**

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

**CDBG:** Declared disaster or emergency events may require additional funding that can be used for immediate solutions. For example, homeowners and renters whose housing stability has been disrupted by disasters may encounter obstacles to housing stability in insurance payment delays or in being under-insured and/or in obtaining financing for needed improvements. Businesses impacted by emergencies may suffer lost income, lost equipment or the ability to pay employee wages. When necessitated, the City intends to make CDBG available to address emergency needs that do not overlap with other federal funding sources (e.g., FEMA).

The City may determine to divert and utilize CDBG for disaster response and recovery should funds be available through reprogramming or unobligated (and not yet awarded to a subrecipient). The City may request waivers to certain CDBG regulations, if they are made available. If not, the City must evaluate all available resources before utilizing CDBG. Short-term disaster response activities may include but are not limited to site clearance, security of property, neighborhood clean-ups, and emergency rental or utility payments. More long-term disaster recovery activities for residents and businesses that may not have

the resources to fully recover without assistance may include housing or rental rehabilitation/reconstruction, home buyer assistance, acquisition, parks and neighborhood facilities, and small business grants and loans. A process for the reallocation decision(s) to utilize CDBG for a disaster is identified in the City's HUD-approved Citizen Participation Plan (CPP). Additionally, in the case that the City must divert CDBG funds for a Disaster during this 2025 – 2029 Consolidated Plan period, the City will utilize a 3-year calculation to ensure 70% of CDBG funds allocated benefit low and moderate-income persons.

**HOME:** HOME funds are dedicated to housing activities that meet local housing needs and typically preserve or create affordable housing. Uses include tenant-based rental assistance, rehabilitation, homebuyer assistance and new construction. It is anticipated that funding will be allocated solely to the creation or preservation of affordable housing along with funding for homebuyer assistance.

**ESG:** The ESG program provides funding to (1) engage homeless individuals and families living on the street, (2) rapidly rehouse homeless individuals and families, (3) help operate and provide essential services in emergency shelters for homeless individuals and families, and (4) prevent individuals and families from becoming homeless.

## **AP-38 PROJECT SUMMARY**

### **Project Summary Information**

<b>1</b>	<b>Project Name</b>	<b>CDBG Administration</b>
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	Creating and preserving affordable housing Homelessness Services/facilities serving vulnerable population Public infrastructure needs Job readiness and economic development
	<b>Needs Addressed</b>	Affordable Housing and Public Services Affordable Housing Homelessness and Public Services Public Services and Public Facilities Public Improvements and Infrastructure Public Services and Economic Development
	<b>Funding</b>	CDBG: \$5,605,959
	<b>Description</b>	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 Nonprofit Accelerator and Fair Housing Education and Legal Aid programs are also funded through administration.
	<b>Target Date</b>	6/30/2025
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	n/a
	<b>Location Description</b>	n/a
	<b>Planned Activities</b>	Includes: \$5,605,959 in administration.
<b>2</b>	<b>Project Name</b>	<b>Affordable Housing</b>
	<b>Target Area</b>	Citywide

	<b>Goals Supported</b>	Affordable Housing
	<b>Needs Addressed</b>	Development of Affordable Housing Affordable Housing Access and Stability
	<b>Funding</b>	CDBG: \$10,619,847
	<b>Description</b>	Increase, protect and preserve affordable rental and homeownership housing opportunities by improving access to a diverse set of affordable housing, accessible in design and energy efficient, with proximity to job centers, schools, parks, and services.
	<b>Target Date</b>	6/30/2025
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	TBD – Upon Council approval
	<b>Location Description</b>	Citywide
	<b>Planned Activities</b>	Kettner and Vine Shelter: \$10,424,476  In the event City Council does not approve the Kettner and Vine project, \$6,000,000 will be allocated to the San Diego Housing Commission for its Affordable Housing NOFA and the remainder will be allocated to the Economic Development Department for its Bridge to Home NOFA.  Bridge to Home NOFA: \$189,371
<b>3</b>	<b>Project Name</b>	<b>Economic Development</b>
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	Economic Development
	<b>Needs Addressed</b>	Economic Development
	<b>Funding</b>	CDBG: \$2,273,791
	<b>Description</b>	Invest in inclusive economic growth initiatives that develop and strengthen small businesses, support local entrepreneurs, expand employment and/or workforce development programs, and improve access to job opportunities

	<b>Target Date</b>	6/30/2025
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	643 Individuals assisted, 353 businesses assisted
	<b>Location Description</b>	Citywide
	<b>Planned Activities</b>	<p>Accessity: \$219,314</p> <p>City Heights CDC: \$215,000</p> <p>Southwestern Community College: \$520,759.88</p> <p>Mission Edge: \$271,500</p> <p>Somali Family Service of San Diego: \$262,018.19</p> <p>Karen Organization of San Diego: \$140,823</p> <p>International Rescue Committee: \$183,387</p> <p>Kitchens for Good: \$250,000</p> <p>Horn of Africa Community: \$210,988</p>
4	<b>Project Name</b>	<b>Infrastructure Improvements</b>
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	Public facilities and Infrastructure, Nonprofit Facility Improvements
	<b>Needs Addressed</b>	Public Improvements and Infrastructure, Nonprofit Facility Improvements
	<b>Funding</b>	CDBG: \$5,521,104
	<b>Description</b>	Develop vibrant and equitable neighborhoods by investing in public facilities, critical infrastructure, and/or nonprofit facilities that provide increased accessibility, resiliency, and sustainability.
	<b>Target Date</b>	6/30/2025
	<b>Estimate the number and type of</b>	6,940 people assisted

	<b>families that will benefit from the proposed activities</b>	5 facility improvements (other)
	<b>Location Description</b>	n/a
	<b>Planned Activities</b>	Center for Community Solutions: \$154,571 Stepping Stone: \$884,358 Family Health Centers: \$451,000 Alliance for African Assistance: \$415,175 Old Logan Heights Library Renovation: \$3,616,000
5	<b>Project Name</b>	<b>Assisting Persons Experiencing Homelessness</b>
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	Homelessness
	<b>Needs Addressed</b>	Homelessness and Supportive Services
	<b>Funding</b>	\$1,100,355.62 CDBG \$2,700,000 CDBG-CV (reprogrammed from prior fiscal years)
	<b>Description</b>	Improve housing stability for individuals and households with critical needs, including persons experiencing or at-risk of homelessness by providing appropriate housing and service solutions grounded in best practices.
	<b>Target Date</b>	6/30/2025
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	532 people assisted 1 facility improved (with the CDBG-CV funds)
	<b>Location Description</b>	n/a



	<b>Planned Activities</b>	City of San Diego Family Shelter Program: \$1,000,000 Serving Seniors: \$100,355.62  Kettner and Vine Shelter \$2,700,000 (facility improvements, not operational funds)
6	<b>Project Name</b>	<b>Community Services</b>
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	Public and Community Services
	<b>Needs Addressed</b>	Public Services
	<b>Funding</b>	CDBG: \$3,104,113.38
	<b>Description</b>	Improve community services by addressing critical needs and promoting equity through improved or increased access to community programming.
	<b>Target Date</b>	6/30/2025
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	5,568 individuals
	<b>Location Description</b>	n/a
<b>Planned Activities</b>	Reality Changers: \$165,000  Voices for Children: \$106,300.33  Kitchens for Good: \$250,000  Rise Up Industries: \$300,000  San Diego LGBT Center: \$260,831  Access Youth Academy: \$162,750  Travelers Aid of San Diego: \$117,240	

		<p>Family Health Centers: \$100,000</p> <p>Wesley House Student Residence: \$77,714</p> <p>Support the Enlisted Project: \$100,000</p> <p>Junior Achievement of San Diego County: \$201,281</p> <p>Urban Life Ministries: \$181,000</p> <p>Mama's Kitchen: \$100,000</p> <p>Chicano Federation of San Diego County: \$130,000</p> <p>Interfaith Shelter Network of San Diego: \$117,000</p> <p>Bayside Community Center: \$153,797</p> <p>Jewish Family Service of San Diego: \$124,325</p> <p>BRIDGE Housing Corporation: \$84,774</p> <p>Home Start, Inc.: \$132,730</p> <p>Ocean Discovery Institute: \$50,000</p>
7	<b>Project Name</b>	<b>SDHC-HOME-HOMEOWNERSHIP</b>
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	Affordable Housing
	<b>Needs Addressed</b>	Development of Affordable Housing Affordable Housing Access and Stability
	<b>Funding</b>	HOME: \$1,000,000
	<b>Description</b>	Provision of financial assistance towards homeownership in the form of assistance towards down payment and closing costs.
	<b>Target Date</b>	6/30/2025
	<b>Estimate the number and type of families that will benefit from the</b>	6 households

	<b>proposed activities</b>	
	<b>Location Description</b>	n/a
	<b>Planned Activities</b>	Direct financial assistance to homebuyers
8	<b>Project Name</b>	<b>SDHC-HOME-RENTAL HOUSING</b>
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	Affordable Housing
	<b>Needs Addressed</b>	Development of Affordable Housing Maintenance of Owner-Occupied Housing Affordable Housing Access and Stability
	<b>Funding</b>	HOME: \$23,534,298
	<b>Description</b>	Rental units constructed
	<b>Target Date</b>	6/30/2025
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	26 HOME designated units for homeless and non-homeless individuals, contributing in multifamily rental projects creating a total of 151 affordable units.
	<b>Location Description</b>	n/a
	<b>Planned Activities</b>	Rental units constructed
9	<b>Project Name</b>	<b>SDHC-HOME-ADMINISTRATION</b>
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	Affordable Housing
	<b>Needs Addressed</b>	Development of Affordable Housing Maintenance of Owner-Occupied Housing Affordable Housing Access and Stability

	<b>Funding</b>	HOME: \$2,673,594.66
	<b>Description</b>	Administration costs of HOME program for City of San Diego and SDHC.
	<b>Target Date</b>	6/30/2025
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	n/a
	<b>Location Description</b>	n/a
	<b>Planned Activities</b>	n/a
10	<b>Project Name</b>	<b>SDHC-ESG-ALL</b>
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	Homelessness
	<b>Needs Addressed</b>	Homelessness and Supportive Services
	<b>Funding</b>	\$1,023,627
	<b>Description</b>	Federal Fiscal Year 2025 ESG funds for the City of San Diego have been allocated to SDHC to operate shelters for the homeless, provide rapid rehousing or homelessness prevention strategies and program administration and data collection through HMIS.
	<b>Target Date</b>	6/30/2025
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	<p>Emergency Solution Grant funds support the operation of two interim shelter programs that serve single adults experiencing homelessness in the City of San Diego.</p> <p>Family Shelter Program: \$1,023,627 Persons Served: 450 (this number may be adjusted in the final version of the Action Plan, based upon FY 2024 year-to-date actuals).</p> <p>Emergency Solutions Grant funds will also support the operation of a</p>

		rapid rehousing program for persons experiencing homelessness for up to 16 households.
	<b>Location Description</b>	
	<b>Planned Activities</b>	n/a

### 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

In 2016, a section of San Diego was federally designated 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 under-resourced 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, the annual CDBG Request for Proposals considers whether projects are located within the Promise Zone and serves the Promise Zone 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 Promise Zone and Opportunity Zone are factors in the application process and organizations located or providing services in these areas are awarded preference points during the evaluation process.

#### Geographic Distribution

Target Area	Percentage of Funds
Citywide	100%

**Table 54 - Geographic Distribution**

#### Rationale for the priorities for allocating investments geographically

n/a

## Discussion

n/a

# 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 have 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: 11
Non-Homeless: 21
Special-Needs
Total: 32

**Table 55 - One Year Goals for Affordable Housing by Support Requirement**

One Year Goals for the Number of Households Supported Through
Rental Assistance
The Production of New Units: 26
Rehab of Existing Units
Acquisition of Existing Units: 6
Total: 32

**Table 56 - One Year Goals for Affordable Housing by Support Type**

### Discussion

The tables above capture units assisted in part with HOME funds. In FY 2024 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): \$1,116,250

Existing Condominiums (Attached Residences): \$617,500

## **AP-60 PUBLIC HOUSING – 91.220(H)**

### **Introduction**

SDHC owns and manages the public housing inventory, affordable housing units, and ground leases within the city. Most of the units are restricted to low-income renters with incomes at 80% Area Median Income (AMI) or less. The number of units in SDHC’s real estate portfolio, including its nonprofit affiliate Housing Development Partners (HDP), is 4,182 units across 176 residential properties, eight of those being Public Housing properties totaling 189 units. In addition to the units owned and operated, SDHC is the ground lessor on twenty properties that provide over 1,750 affordable units.

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

It is anticipated that in FY 2025, SDHC may expand its portfolio of affordable and permanent supportive housing units utilizing the HomeKey program, subject to funding availability and final selection of properties to be identified. In addition, SDHC will conduct a review of its portfolio to identify sites that can accommodate additional density for future redevelopment opportunities. Furthermore, in FY 2025, SDHC will continue to conduct rehabilitation work on a number of properties as a part of its multi-year capital renovation plan.

In FY 2025, HDP does not anticipate expansion of its portfolio of affordable and permanent supportive housing units. HDP anticipates continuing predevelopment activities for a comprehensive renovation of Casa Colina, a 75-unit property.

### **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, SDHC 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."

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. Our Resident Services Coordinator became a Certified Credit Counselor in 2020 and she 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.

**If the PHA is designated as troubled, describe the manner in which financial assistance will be provided or other assistance.**

n/a.

**Discussion**

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:

- |                                                |                                          |
|------------------------------------------------|------------------------------------------|
| AccentCare                                     | Connect 2 Careers                        |
| Amazon                                         | County of San Diego                      |
| AmeriMed                                       | First 5 San Diego                        |
| Biocom Introductory Life Sciences Experience   | Copley-Price Family YMCA                 |
| Business Training Works                        | Food & Beverage Association of San Diego |
| Center for Employment Training                 | Hotel del Coronado                       |
| Chula Vista Elite Athlete Training Center      | Housing Opportunities Collaborative      |
| Citi Bank                                      | International Rescue Committee           |
| City Heights Community Development Corporation | Job Corps                                |
| Community HousingWorks                         | La Maestra Community Health Centers      |
|                                                | Local Initiatives Support Corporation    |

Manchester Grand Hyatt  
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

## **AP-65 HOMELESS AND OTHER SPECIAL NEEDS ACTIVITIES – 91.220(I)**

### **Introduction**

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

The Community Action Plan on Homelessness for the City of San Diego is a comprehensive, 10-year plan that lays out short-term achievable goals and serves as a guide for long-term success in addressing homelessness. The Action Plan includes short-term goals within reach, key strategies, guiding principles, and crisis response and housing needs. In 2023, the Action Plan was updated to reflect an updated crisis response and housing needs assessment and financial modeling for the remaining six years of the Action Plan, based on the changing homelessness landscape in San Diego. Over the next year, the Implementation Team will begin engaging and receiving feedback on updated short-term goals and strategizing ways to enhance performance of the homelessness assistance system.

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

As part of the City's ongoing efforts to foster a system-level approach to meeting the needs of individuals experiencing homelessness, the City accepted the Community Action Plan on Homelessness in October 2019. The Action Plan provided a series of recommendations and identified three short term goals:

Decrease unsheltered homelessness by 50%;

Finish the job of ending Veteran Homelessness; and

Prevent and end youth homelessness as outlined in the San Diego County Coordinated Plan to End Youth Homelessness.

On November 14, 2023, the Action Plan was presented to City Council as an informational item to provide updates on progress toward achieving Action Plan goals and present an updated analysis, including a revised needs assessment and updated financial modeling based on the changing homelessness landscape in San Diego. With the increased inflow of persons into the crisis response system and persons experiencing homelessness for the first time, the City, SDHC, and RTFH will begin next steps to update the Action Plan, which will include presenting the updated analysis to community groups and engaging and receiving feedback on short-term goals from stakeholders. A phase two analysis will also be presented to discuss ways to enhance and strengthen performance of the homelessness assistance system.

Since October 2020, People Assisting the Homeless (PATH) has contracted with the City to provide Coordinated Street Outreach services, which leverage all City-funded outreach activities to foster a holistic approach for engaging individuals experiencing unsheltered homelessness. The primary role of the program is to strategically engage individuals prioritized for housing through the regional Coordinated Entry System and to facilitate permanent housing placements as well as to provide housing-focused case management. A secondary function focuses outreach resources in identified concentrations of unsheltered individuals with an emphasis on diverting individuals from the homelessness response system and/or meeting basic needs, providing connections to bridge housing, emergency shelters and supportive services.

Two distinct yet complementary teams were created as part of the program, each with a specific focus, set of duties, and outcomes:

*Mobile Homelessness Response Team:* Facilitates ongoing intensive engagement and connections to supportive services for unsheltered individuals identified as being prioritized for permanent housing resources. Staff provide street-based case management services for prioritized clients with an emphasis on fostering positive exits from homelessness to permanent and longer-term housing opportunities. Outreach services employ problem-solving practices, leveraging internal and external resources, to quickly resolve prioritized clients' instance of homelessness as well as to lead system navigation efforts, on an as-needed basis, to address any barriers clients may be experiencing in obtaining housing.

*Rapid Response Team:* Works closely with 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 toward brief engagements and rapid housing-focused problem solving, improving the client's sense of safety and assisting in meeting basic needs.

The City's Coordinated Street Outreach Program also supports regional efforts to employ best practices by taking action on the practices outlined in the "Policy Guidelines for Regional Response for Addressing Unsheltered Homelessness and Encampments," adopted by the Regional Task Force on the Homelessness (RTFH). Multidisciplinary teams consisting of peer-support specialists, outreach specialists trained in street-based case management, and clinical-level staff are leveraged to address clients' needs, emphasizing transitions from homelessness directly to safe, stable housing opportunities. Staff also actively engage community stakeholders to foster trusting relations and open lines of communication while being proactive in addressing any potential or realized community concerns. Participating partners include eight service providers and the San Diego Police Department-Homeless Outreach Team (HOT).

Downtown businesses fund the Downtown San Diego Partnership's (Downtown Partnership) Clean & Safe Program and Integrated Outreach Team. This team engages with homeless persons on the streets of downtown San Diego, refers them to services and beds,

or helps them return to their homes in other areas of the country via the Downtown Partnership's Family Reunification Program. In addition, Connections Housing San Diego (a year-round, one-stop, interim residential and service center designed to reduce street homelessness by providing permanent housing to San Diegans experiencing homelessness in the surrounding downtown neighborhoods) has an outreach team that coordinates with the Downtown Partnership and other community outreach in the downtown area. Other agencies (St. Vincent de Paul Village and Alpha Project) have their own outreach teams that engage homeless individuals sleeping on the street with the goal of connecting them with shelter and services.

As mentioned earlier, another resource is the San Diego Police Department's Homeless Outreach Team (HOT), which reaches out daily to persons experiencing unsheltered homelessness. In FY 2022, Father Joe's Village continued to receive funding for a triage bed program, which allows the HOT team to refer a individuals experiencing homelessness from the street and place the individual in a dedicated bed operated by Father Joe's Villages. Once assigned a triage bed, the individual receives intensive case management to assist with immediate needs (such as health, substance abuse treatment, and income) and housing placement support.

The Coordinated Street Outreach Program leverages all City-funded outreach activities (including the outreach teams funded through the Bridge Shelters) and is a critical component of the City's comprehensive approach to addressing homelessness. This innovative program aligns with national best practices and focuses outreach resources on a neighborhood-based approach, identifying concentrations of unsheltered individuals with an emphasis on diverting individuals from the homelessness response system, and fostering connections to permanent housing placements while meeting basic needs and providing connections to bridge housing, emergency shelter and other supportive services.

The program marks a new approach to conducting homelessness outreach in the City of San Diego by addressing gaps in the existing system and deploying outreach resources in alignment with the goals of the Action Plan.

The Homelessness Response Center has created better access for those experiencing homelessness by providing a wide array of co-located service providers to assist someone on their path from homelessness to housing. Staff assess each individual's needs and refer to appropriate resources, including street-based case management, coordinated shelter intake and basic needs services like those provided through the day center.

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

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

The City and SDHC subcontract with local service providers and operate internal programs to assist persons experiencing homelessness with moving into permanent housing as quickly as possible. Within the City of San Diego, SDHC and the City administer and operate a variety of engagement, crisis response, and housing interventions to meet the needs of persons either entering the homelessness system or who are at risk of homelessness. Interventions operated in the City include, but are not limited to, Prevention and Diversion; Emergency Shelters and Interim Housing; Transitional Housing; Rapid Rehousing; Permanent Supportive Housing; and an array Homelessness Services such as Day Programs, Safe Parking and Safe Sleeping Programs, and Transitional Storage Centers. Within each intervention, appropriate supportive services and/or case management are provided and delivered in a housing-focused and person-centered manner and use Housing First principles and national best practices in the service delivery models. The section below illustrates the approach used in San Diego's homelessness service system to support the efficient and effective transition from homelessness to housing or to prevent homelessness from occurring at all.

### **Engagement Services**

Persons experiencing homelessness are initially engaged through street outreach, housing navigation, day services, CES access points, and community-based services. Programs such as the Homelessness Response Center (HRC) centralize and streamline access to a spectrum of services and resources focused on assisting persons experiencing homelessness through all steps of the process from homelessness to housing. This includes providing system navigation services and co-locating partnering service providers on-site at the HRC. The Service Coordination team, staffed by SDHC employees, focuses on identifying and resolving system-level barriers to access housing for people experiencing homelessness. The Service Coordination team takes a data-informed approach to evaluate how the system is operating, identifies barriers that clients encounter and collaborates with crisis response agencies and housing providers to resolve barriers and to streamline the process from homelessness to housing. In addition to the Service Coordination team, there is an on-site lead service provider to provide system navigation services and case management to individuals experiencing homelessness to identify and meet their needs during each stage in their pathway toward housing. Additional system navigation activities



include community collaboration efforts such as holding permanent supportive housing leasing fairs on-site that co-locate the service provider, property management, the RTFH, and SDHC to streamline the process for households referred to this resource.

Programs such as the Day Center are designed to meet the basic needs of persons experiencing homelessness. The Day Center is a drop-in center where adult men and women experiencing homelessness can access resources to meet basic needs and receive referrals to services and shelter. The Day Center is open daily, and services include laundry, restrooms, showers nearby, mail, phones, messages, computer access, and limited storage space. The Day Center serves as a critical access point to sanitation and hygiene resources, such as access to educational materials, personal protective equipment, masks and hand sanitizer, access to handwashing stations, restrooms, and laundry.

Both the Day Center and the HRC are access points for the Coordinated Entry System.

### **Crisis Response and Stabilization**

Access and placement into emergency shelters and interim housing are critical resources within the crisis response system to transition from places not meant for human habitation into shelter. Once enrolled, programs can begin to address the barriers preventing program participants from moving into permanent housing and independent living.

The Coordinated Shelter Intake Program, operated by SDHC staff, facilitates access to the portfolio of shelter resources administered by SDHC, totaling 1,711 beds. Intake Coordinators, employed by SDHC, review referrals from more than a dozen approved referring partners, including social service providers, homelessness outreach teams, county departments and law enforcement. They then coordinate with shelter operators to facilitate the placement of clients into the most appropriate and available shelter accommodation. The program operates seven days a week, excluding recognized city holidays.

Case conferencing is another tool by which the RTFH facilitates targeted discussion with homelessness service providers to work together in meeting the needs of the most vulnerable households experiencing homelessness across the San Diego CoC geographic region.

### **Housing and Services**

Matches to available permanent housing resources are facilitated through the Coordinated Entry System (CES), administered by the Regional Task Force on Homelessness (RTFH). CES considers the household's acuity and vulnerability while prioritizing resources for households with the longest history of experiencing homelessness and greatest need, particularly mental illness or substance use disorder.

Housing resources matched within CES include Rapid Rehousing and Permanent Supportive Housing:

**Rapid Rehousing** programs provide households with security and utility deposits and short- to medium-term rental assistance. Program participants receive case management targeted to gaining employment and budgeting, and financial competency.

**Permanent Supportive Housing** programs provide long-term rental assistance. Program participants receive ongoing case management and supportive services to maintain housing stability.

The City of San Diego and the SDHC operate a variety of housing programs outside of the Coordinated Entry System to meet the needs of the community.

SDHC's Diversion program offers assistance to individuals and families who are newly homeless within the City of San Diego. Diversion services for newly homeless individuals and families include case management, housing search assistance, temporary rental assistance, financial assistance, conflict mediation, and connection to services and/or public assistance benefits. Assistance is individualized to each household's unique needs and may include short-term case management to resolve the immediate housing instability.

SDHC's flexible spending and shallow subsidy programs provide financial assistance to help residents in the City's shelters to move into permanent housing and maintain housing stability. The Shallow Subsidy Program serves individuals who are currently in the City's interim and bridge shelters, are 55 years of age or older, and are on a fixed income. The program provides light-touch case management to obtain and maintain housing with shallow subsidy rental assistance. The Flexible Funding Pool (FLEX) serves as an innovative resource to expedite and increase opportunities and services for individuals and families experiencing homelessness. These two programs provide general financial assistance to individuals and families residing in the City's Bridge or Interim shelters to remove immediate barriers to obtaining and sustaining permanent housing. Eligible financial assistance expenses include application fees, moving fees, security deposits, rental assistance, basic move-in items, and other expenses related to removing barriers to obtain housing.

A resource available to service providers operating housing programs within the City of San Diego is SDHC's Landlord Engagement and Assistance Program (LEAP), which aims to increase access to the existing market of available units for individuals and families experiencing homelessness. LEAP is aligned with the Housing First model of addressing homelessness, an approach to quickly, and successfully connect households experiencing homelessness to services, programs, and housing options without preconditions and barriers to entry. LEAP works directly with landlords and property management companies within the City of San Diego to help move individuals and families into housing quickly.



LEAP offers incentives to landlords as well as a Landlord Contingency Fund and landlord liaison services. Flexible funding used toward LEAP services help to fund an SDHC staff landlord liaison, support to individuals and families to identify housing units, and financial assistance for them to pay move-in costs like security deposits including holding fees, application fees, utility assistance, rent arrears and vacancy loss.

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 CES if the CES includes all homelessness services providers in its system and provides a method for persons who decline assessment through the CES to be placed on a HOME Program-funded project waiting list.

**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**

SDHC's Prevention program provides assistance to households who may have had a temporary lapse in income to maintain their housing, while alternate or new sources of income can be pursued and obtained. Assistance may include case management services, housing search assistance, temporary rental assistance, financial assistance for move-in costs, landlord conflict mediation, and connection to services and/or public assistance benefits.

The Housing Instability Prevention Program (HIPP) helps pay rent and other housing-related expenses for families in the City of San Diego with low income, experiencing a housing crisis and at risk of homelessness. HIPP also provides light-touch case management. Enrolled households receive assistance for up to 24 months. HIPP focuses on connecting clients to senior/affordable housing wait lists with the aim of transitioning

from the rental assistance to long-term affordable units. HIPP focuses on connecting clients to senior/affordable housing wait lists with the aim of transitioning from the rental assistance to long-term affordable units.

## **Discussion**

SDHC's Prevention program provides assistance to households who may have had a temporary lapse in income to maintain their housing, while alternate or new sources of income can be pursued and obtained. Assistance may include case management services, housing search assistance, temporary rental assistance, financial assistance for move-in costs, landlord conflict mediation, and connection to services and/or public assistance benefits.

The Housing Instability Prevention Program (HIPP) provides financial assistance to households to maintain stable housing amid high rents and low and/or stagnant income in the San Diego rental housing market. HIPP pays rent and other housing-related expenses such as rental and utility arrears for low-income households who are experiencing a housing crisis and at risk of homelessness. HIPP includes three tiers of financial assistance for individuals and families, depending on their level of need and are eligible for assistance for up to 24 months. HIPP focuses on connecting clients to senior/affordable housing wait lists with the aim of transitioning from the rental assistance to long term affordable units.

SDHC expanded its Project-Based Voucher (PBV) program. SDHC's leasing of newly constructed developments with project-based units will continue throughout FY24. Ninety-eight PBVs have opened at Nestor senior Village (73 formerly homeless seniors) and ShoreLINE (25 low-income families). Puesta del Sol (53 low income seniors and 6 formerly homeless seniors), Levant Senior Cottages (70 low income seniors), Tranquility at the Post 310 (20 formerly homeless veterans) and Southwest Village (34 low income and 16 formerly homeless individuals) are expected to open and begin leasing by June 2024. During the most recent Notice of Funding availability, SDHC committed an additional 100 Project Based VASH Vouchers. SDHC also awarded 311 PBVs for HomeKey projects. SDHC now has 3,056 Project Based Vouchers dedicated to homelessness and 826 Project Based Vouchers to low-income families for a total of 3,882.

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. In FY24, SDHC has committed a total of 1,018 subsidies to sponsors. One hundred and eighty-two of these are attached to specific units and are included in the PBV numbers above. 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 SDHC), nonprofits, health clinics, and housing developers to provide stability to homeless persons with mental illness. POFA participants receive either a Project Based Voucher or Sponsor Based Subsidy depending on the program. Currently 624 individuals are housed and connected with services under POFA and an additional 30 are approved searching for units.

## **AP-75 BARRIERS TO AFFORDABLE HOUSING - 91.220(J)**

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 evidenced need.
3. Homeownership is out of reach for most 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. Development barriers in some communities, including permit processing times, height restrictions, outdated community plans, environmental review, and community opposition (“NIMBYism”).
6. Lack of knowledge of availability, understanding of requirements of, or access to resources available to persons in need that may qualify for programs.
7. Backlog of infrastructure and public facilities investment needs.
8. Impediments to Fair Housing.

**Actions 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’s 2021–2029 Housing Element outlines the following broad objectives to address the barriers to affordable housing by:

Implementing permitting process improvements,

Improving infrastructure systems to support infill development and promote affordable housing,

Set and evaluate annual housing capacity targets,

Support and engage in innovative methods for financing housing development,

Preventing displacement,

Support practices and programs that aim to reduce energy/resource consumption in existing homes,

Foster citywide discussion on housing needs, resources, and ideas, and

Make information more easily available.

Other specific Housing Element policies to address the barriers to housing include:

Update community plans regularly to provide certainty in the development process.

Through these updates, the City—working with a broad coalition of community stakeholders—should:

- Identify areas appropriate for increased infill, residential, and mixed-use development.
- Designate land for a variety of residential densities to meet housing needs for a variety of household sizes.
- Encourage location- and resource-efficient development whereby housing is located near employment, shopping, schools, recreation, transit, and walking / bicycling infrastructure.
- Allow for more floor area ratio (FAR).
- Adopt Programmatic Environmental Impact Reports (EIRs) to allow EIR tiering for individual projects consistent with the updated plan(s).

Community plan updates provide the City with opportunities to add housing capacity in Transit Priority Areas (TPAs).

Require new development to meet applicable zone and land use designation density minimums to ensure efficient use of remaining land available for residential development and redevelopment.

Allow residential densities that exceed the ranges defined in the General Plan and community plans for projects using State density bonus provisions (including senior housing and affordable housing) and City housing incentive programs.

Identify and evaluate options to increase housing opportunities in areas planned and zoned for single-family residential densities.

Encourage affordable housing on publicly-owned sites suitable (in terms of geology, topography, proximity to commercial areas) for development and not needed for public use by re-designating such properties with mixed-use land use designations and zoning.

Evaluate the benefit of implementing regulatory mechanisms that deter landowners from holding land off the market (i.e., vacant) by taxing it at a higher rate until housing is built.

Support developing a method that ensures an equitable distribution of supportive housing and facilities for people experiencing homelessness throughout the city, especially sites that are co-located with support services for health, mental health, and workforce development and that are located near transit.

Following the RHNA adoption process, identify housing production goals by Community Planning Area based on an analysis of feasible site suitability.

Develop and maintain policies and programs that identify obstacles to building affordable housing, infill housing, and smart growth housing development, and provide regulatory strategies and tools that will streamline the development process.

Pre-clear potentially historic sites or structures in exchange for a commitment to build housing that includes onsite affordable units.

Take affirmative actions to further fair housing choice in the city, and implement the solutions developed in the Regional Analysis of Impediments to Fair Housing Choice to mitigate and / or remove fair housing impediments.

Evaluate the impact on housing affordability of all proposed regulatory, fee, and policy changes, as well as any means of mitigating adverse impacts that are identified.

Expand local, and support efforts to expand Federal and State, legal protections for lower-income renters who could be displaced by condominium conversions.

Utilize the City's regulatory powers (e.g., land use and fees) to increase affordable and accessible housing.

Apply, interpret, and enforce regulations equitably for building and housing permits and housing quality to protect public health and safety.

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

1. Strategic Priority 1: Increasing and Preserving Housing Solutions.

2. Strategic Priority 2: Helping Families Increase Opportunities for Self-Sufficiency and Quality of Life.
3. Strategic Priority 3: Investing in Our Team.
4. Strategic Priority 4: Advancing Homelessness Solutions – Supporting the City of San Diego Community Action Plan on Homelessness.
5. Strategic Priority 5: Advocacy, Communication, Public Engagement.

More details related to SDHC's strategic priorities can be found in its [FY22-FY24 Strategic Plan](#).

## **Discussion**

## AP-85 OTHER ACTIONS – 91.220(K)

### Introduction

This section discusses the supplemental policies, programs, and initiatives that will support the housing and community development actions.

In addition to the efforts with the County, SDHC, the Regional Task Force on Homelessness and the Continuum of Care, as well as the Regional Alliance for Fair Housing, the City of San Diego will continue those activities to both help public and private housing and social service agencies to better serve San Diegans and to fully use their federal housing funds. This includes maintaining its current robust network of jurisdictional- and region-wide public and nonprofit services providers. Additionally, this includes understanding and assistance together with the Consolidated Plan Goals and Strategies, the City's competitive application processes and forms, requirements for grant implementation and reporting, and grant close-out and success.

### Actions planned to address obstacles to meeting underserved needs

In an effort to direct critical HUD resources and make demonstrable progress toward achieving the Consolidated Plan Goals, the City has outlined the following distribution of CDBG funds for Fiscal Years 2025 – 2029. The City anticipates a minimal reduction from FY 2024 to FY 2025 in entitlement funding. As such, the following budgetary priorities were established based on stakeholder input through virtual forums and one-on-one interviews; eight public forums attended by residents; a community survey available in 14 languages; and input from members of 10 City committees, advisory boards, coalitions, and workgroups:

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 public services funding for services to assist the homeless population. Pursuant to San Diego City Council No. R-310812, adopted December 16, 2016 up to \$1,318,078 in CDBG public service funds are dedicated to assisting with the costs of homeless programs and services. Concurrent with the presentation of this Annual Action Plan, the City Council will be asked to consider an amendment to Council Policy 700-02 establishing the set-aside to be no more than \$1,000,000. .

Economic Development [up to 10%]: Activities funded through this program are intended to promote economic opportunities including job readiness and business/microenterprise development. The new Consolidated Plan goal has a **greater focus on small businesses and supporting local entrepreneurs.**

Community Development (City Capital Improvement Projects/ Infrastructure / Nonprofit Facility Projects [up to 25%]). Funds here are dedicated to the 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. Activities funded through this program are intended to improve the communities in which low- and moderate-income individuals or families reside. This includes, but is not limited to: street improvements, park enhancements, public facility expansions/remodels, improvements or creation of facilities for nonprofit organizations that support the low- and moderate-income community, and ADA enhancements to make public facilities more accessible.

**Affordable Housing Projects [up to 30%].** 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.

**Administration and Planning [up to 20%].** It is important to note that, in addition to supporting staff salaries, office space and supplies, the City's administration budget supports the critical Fair Housing efforts on an annual basis, including a 24/7 hotline, education and enforcement. This budget will also support the renewal of the City's award-winning Nonprofit Academy to increase the capacity of smaller, neighborhood-serving nonprofit organizations.

### **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 City of San Diego's Environmental Services Department, Lead Safety and Healthy Homes Program (LSHHP), serves as the City's primary liaison for connecting the community with resources to prevent lead poisoning since 2002.

In June 2002, the City of San Diego adopted Ordinance No. 19063 ("Abatement of Lead Hazards"). In April 2008, the City renamed and incorporated the previous ordinance into the San Diego Municipal Code Chapter 5 (Public Safety, Morals, and Welfare), Article 4 (Public Hazards and Public Nuisances), in Division 10, titling it as the "Lead Hazard Prevention and Control Ordinance" - Section 54.1001 et seq.) Two other sections were added at the time of the incorporation into the Municipal Code. This ordinance is one of the most comprehensive local lead poisoning prevention ordinances in the nation.

Division 10 makes it unlawful for a property owner to maintain or cause a lead hazard. The purpose of Division 10 is to:

Prevent, identify, and remedy lead hazards in housing before children are poisoned;

Protect occupants and the public from exposures to lead hazards;

Provide standards to implement lead hazard control requirements;



Strengthen the authority of local agencies responding to lead paint poisoning cases; and

Establish and promote lead-safe work practice standards for owners, maintenance workers, and all persons involved in lead hazard control and activities such as remodeling, renovation, rehabilitation, and repair that disturb lead paint, in order to protect occupants and the public from exposure to lead hazards.

In addition to requiring property owners maintain their properties, the amended ordinance requires:

Contractors conduct renovation in a lead-safe manner and conduct visual verification and lead dust clearance testing.

Landlords to conduct a visual assessment and correction of potential lead hazards at unit turnover.

Home improvement and water pressure equipment rental stores required to make available lead education material to customers.

Childcare facilities to obtain proof of blood lead testing at enrollment.

The LSHHP has and will continue to respond to all tips and complaints related to violations of the Lead Hazard Prevention and Control Ordinance. In the most recent fiscal year end (FY2023), there were 115 active lead code enforcement cases. Specific activities conducted by LSHHP Code Enforcement Officers included responding to or issuing:

19 complaints related to substandard housing including 5 with lead poisoned children,

13 complaints related to unsafe work practices,

12 Notice of Violations for unsafe work practices in response to 490 unannounced visits to permitted construction job sites,

52 Notice to Comply letters (Voluntary compliance for deteriorated paint),

16 Abatement Notice and Orders related housing conditions, and

26 Notice of Violations related to housing conditions.

### **Public Education**

The LHHSP, through the City's website, has extensive information about not only the Division 10 ordinance, but also:

A pamphlet related to planning or "do it yourself" home renovations, how to do the work correctly so as for avoid self- and household lead contamination "Don't Spread Lead" available in English, Spanish, and Vietnamese,

Links to Blood Lead Testing Clinics,  
Information to learn about lead and its dangers,  
Preventing childhood lead poisoning, and  
Other resources.

It also provides access to a listing of “Lead Safe Housing Registry” that resulted from the Lead Safety Collaborative grant provided to the City by HUD. All work from the grant was completed in December 2017, but the Registry still provides a valuable resource for persons looking for lead-safe housing.

Since FY2019, the LSHHP has utilized a case management system which has tools used to educate contractors on the need to utilize lead safe work practices and make them aware of the related regulatory requirements. This case management system allows LSHHP staff to send educational information to individuals who have registered with the City Construction and Demolition Debris Deposit Program. Registration is required for individuals to obtain permits for construction, demolition, and remodeling projects. Key elements of this educational outreach effort include:

Disturbing lead-based paint can create hazards that are a serious threat to the health of children- and adult-occupants, workers, and their families,

Key elements of the City’s Lead Hazard Prevention and Control Ordinance and the EPA Renovate, Repair and Painting Rule, and

A notification that a City Compliance Officer may visit the project site to determine if lead-safe work practices are being implemented.

In December 2013, the Santa Clara County Superior Court issued a judgment in *The People of the State of California v. Atlantic Richfield Co, et al.*, that three paint manufacturers had actively promoted the use of lead-based paint as safe for the use in the interior of homes. After 16 years of litigation, the court ruled that these defendants were liable for damages arising out of the sale of lead-based paint before it was banned in 1978. As a result, multiple California jurisdictions were awarded a total \$409 million, with the City of San Diego’s portion being \$17.3 million. Per the judge’s decision, these funds will be used primarily to eliminate lead hazards in privately owned residential housing built prior to 1951.

The City utilized the funding to establish the San Diego Residential Lead Abatement Program (SDRLAP) in the Environmental Services Department, that includes an education and outreach campaign, funding for lead-hazard remediation work force development, and lead remediation in privately-owned residences in low- and moderate-income areas. There is not any deadline by which the funds must be expended.

During FY 2024, the LSHHP will work to establish all the contracts needed to implement the program such that the enrollment, inspection, and abatement activities can begin shortly after the funding becomes available. As of the writing of this Plan, the City of San Diego has spent \$162,150.16 to date, with none of the remaining funds encumbered for other uses at this time. The funds to date and the funds moving forward are required to and will be used for the San Diego Residential Lead Abatement Program effort to reduce or eliminate lead hazards in residential homes throughout San Diego.

The City plans to continue to focus its efforts and activities on risk assessments, unsafe work practices, violation enforcement, and similar activities. The LHHSP is also exploring the conversion of the Visual Assessment Database application from the current MS Access platform to a more universally accepted, web-based database that can be used by subcontractors, with the possibility of licensing the database's use to other municipalities. This conversion would assist in any future HUD grant application. The City does anticipate that they would apply for a HUD Lead Hazard Reduction Grant in the Consolidated Plan period.

### **Actions planned to reduce the number of poverty-level families**

Through its CDBG allocations, the City of San Diego funds a variety of projects under eligible economic development efforts.

The City's Economic Development Strategy 2023–20206, which is aligned with the foundational documents of the City's Strategic Plan, Equity Forward, and Climate Action Plan, contains four overarching Goals:

Support families and workers,

Support small and local businesses,

Bolster trade and innovation, and

Strengthen neighborhoods.

The success of economic development initiatives in reducing the number of poverty-level families is monitored through objectives and metrics of:

Support families and workers:

- Number of jobs supported by the expansion, attraction and retention of employers working with the Economic Development Department.
- The number of active childcare and family child licensed providers in San Diego.
- Number of apprenticeship, educational, and training opportunities supported through partnerships with employers, nonprofit partners, educational institutions.
- Number of individuals in under-resourced communities receiving financial and/or

digital literacy training through Economic Development Department Programs.

Support small and local businesses:

- Number of businesses assisted through small and neighborhood business programs.
- Number of active small businesses.
- Number of contacts with small businesses reached by current or new EDD programs, funds, and initiatives.

Strengthen neighborhoods:

- Number of affordable housing and permanent supportive housing units.
- Number of public and private organizations engaged across under-resourced communities.
- Number of persons assisted through public and private neighborhood investments (i.e., local, state, and federal funding).
- Amount of investment committed/leveraged to increase housing affordability and supply.

### **Actions planned to develop institutional structure**

The City creates strategic partnerships to enhance the availability of resources and leverage services provided to low- and moderate-income residents and neighborhoods. For this Consolidated Plan period, the City, along with SDHC and social service partners will actively participate in the Continuum of Care (currently over 80 member organizations) to implement regional efforts and resources to address homelessness. City staff and SDHC participate in the general membership, but also serve on the Board and several committees, including the Governance Advisory Board, Veterans Consortium, and the Health and Homelessness Committee. At a minimum, the City will continue to sponsor training sessions on issues and topics of interest to other members and partner agencies in the areas of compliance with technical federal, state, and local affordable housing regulations.

The City of San Diego is also a participating jurisdiction in the San Diego Regional Alliance for Fair Housing (SDRAFFH). The SDRAFFH 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 government entities, the fair housing service providers and housing providers. As a member of the SDRAFFH, the City of San Diego served as the lead municipality for the development of the 2020–2025 San Diego Regional Analysis of Impediments to Fair Housing Choice (dated August 2020). The communities within San Diego County have established a commitment to providing equal housing opportunities for their existing and future residents. This report, the Analysis of Impediments to Fair Housing Choice (commonly known as the “AI”), presents a demographic profile of San

Diego County, assesses the extent of housing needs among specific income groups, and evaluates the range of available housing choices for residents. The AI also analyzes the conditions in the private market and public sector that may limit the range of housing choices or impede a person's access to housing. More importantly, this AI identifies impediments that may prevent equal housing access and develops solutions to mitigate or remove such impediments. The City of San Diego plans to continue in the monitoring and implementation of recommendations specific to San Diego, along with future updates to the Regional Fair Housing planning documents as a participating jurisdiction and pursuant to federal updates to Fair Housing planning requirements.

### **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, and SDHC. 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.

# Program Specific Requirements

## AP-90 PROGRAM SPECIFIC REQUIREMENTS – 91.220(L)(1,2,4)

### Community Development Block Grant Program (CDBG)

#### Reference 24 CFR 91.220(l)(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	\$16,756,607
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	
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.	
5. The amount of income from float-funded activities	
<b>Total Program Income</b>	<b>\$16,756,607</b>

### 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%

## HOME Investment Partnership Program (HOME)

### Reference 24 CFR 91.220(l)(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.

1. 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:

SDHC 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.)
- (2) 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 SDHC, the balance of net proceeds recaptured will inure to SDHC.

1. 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, SDHC will permit sale of the HOME-assisted unit to the qualifying, eligible person, contingent upon SDHC’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.



1. 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, SDHC provides refinancing with below market-rate, deferred payment junior mortgages. Acquisition/rehabilitation developments must have at least 20 percent of the units affordable to households at or below 80 percent of median income. Proposals with rents affordable to households with incomes at or below 50 percent 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.

2. If applicable to a planned HOME TBRA activity, a description of the preference for persons with special needs or disabilities. (See 24 CFR 92.209(c)(2)(i) and CFR 91.220(l)(2)(vii)).
3. If applicable to a planned HOME TBRA activity, a description of how the preference for a specific category of individuals with disabilities (e.g. persons with HIV/AIDS or chronic mental illness) will narrow the gap in benefits and the preference is needed to narrow the gap in benefits and services received by such persons. (See 24 CFR 92.209(c)(2)(ii) and 91.220(l)(2)(vii)).
4. If applicable, a description of any preference or limitation for rental housing projects. (See 24 CFR 92.253(d)(3) and CFR 91.220(l)(2)(vii)). Note: Preferences cannot be administered in a manner that limits the opportunities of persons on any basis prohibited by the laws listed under 24 CFR 5.105(a).

### **Emergency Solutions Grant (ESG)**

#### **Reference 91.220(l)(4)**

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

The City of San Diego and SDHC adopted performance standards in line with the Continuum of Care. These standards include: rapidly rehousing clients into permanent housing within 30 days after determination of eligibility; retaining this housing for at least six months; attaining or maintaining income while in permanent housing. The City of San Diego and SDHC also require programs use progressive engagement with clients to determine their financial need and receive just enough assistance to maintain housing. The ESG Policies and Procedures can be found in Attachment B, Appendix 3.

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



Since the inception of Coordinated Entry, **San Diego's Coordinated Entry System (CES)** has evolved into a fair and equitable process that came together with the assistance of various providers and community leaders that make up the San Diego Continuum of Care (CoC). The CoC established a Coordinated Entry working group with a representation of service providers from each region and based on sub-population they serve. This working group, in collaboration with the RTFH's HMIS and CES team, established a new CES Prioritization Tool, which produces a composite score mainly based on client's enrollment data from the HMIS, to ensure the new composite score prioritization process is reflective of San Diego's CoC Community Standards. With the establishment of the new CES Prioritization Tool, the Vulnerability Index – Service Prioritization Decision Assistance Tool (VI-SPDAT) score contributes only to 10% of the overall score assigned to the client for prioritization. San Diego's CES has produced this prioritization process, which will focus its limited regional housing resources to households with the greatest vulnerability in a timely and consistent manner.

The San Diego CES Prioritization tool aligned with the priorities identified on the Community Standards, which are households by the following four categories:

1. The longest history of experiencing homelessness and most needs.
2. The longest history of experiencing homelessness.
3. The most needs, particularly mental illness or substance use disorder.
4. All other: Non-Chronically homeless individuals, youth, and families.

Data are compiled and entered by homelessness service providers within the San Diego HMIS Trust Network and conform with HUD's standard for Coordinated Entry implementation and data collection. RTFH continues to update the data collection requirements to be compliant as HUD changes the HMIS data standard every year.

1. 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 City of San Diego and SDHC, as a subrecipient of the City's ESG allocation for homelessness services programs, issue competitive solicitations to procure subrecipients and contractors to operate programs funded with ESG as well as other federal, state, and local sources. Competitive solicitations are made available for download on the PlanetBids website through both SDHC's and the City of San Diego's portals. Notifications are sent through the PlanetBids system to register agencies and other organizations, as identified by SDHC and the City. At the close of the competitive solicitation, a source selection committee evaluates and scores responses based on criteria contained in the competitive solicitation. Once a subrecipient is selected, the City or SDHC conduct contract and budget negotiations and seeks City Council or SDHC Board of Commissioners and Housing

Authority approval, as applicable, before entering into a contract. The contract is executed between the City or SDHC and the subrecipient to conclude the process.

In certain circumstances, the City or SDHC may employ a non-competitive solicitation process if it determines eligibility under the San Diego Municipal Code or a potential change in program operator would disrupt the continuity of care for program participants; a competitive solicitation process would delay implementation of a program needed to address an immediate public health and safety concern such as an infectious disease outbreak; or the program model is specific to the degree a competitive solicitation would not yield a sufficient pool of applicants, such as the target population requires specialized services provided by only one agency operating in San Diego.

1. 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.

SDHC does not have homeless or formerly homeless people on its Board of Commissioners nor does the City Council. However, the City and SDHC do consult with the Regional Continuum of Care which has formerly homeless individuals 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.

1. Describe performance standards for evaluating ESG.

The City evaluates ESG-funded programs through an extensive monitoring process involving desk audits of reports and supporting documentation; on-site monitoring reviews; frequent telephone contacts; written communications; and meetings. Through regular monitoring of subrecipients, City staff ensures subrecipients abide by all applicable federal, state and local standards. The City provides technical assistance to subrecipients to increase efficiencies and augment performance. As part of this process, City staff watches for the potential of fraud, waste, mismanagement, and/or other opportunities for potential abuse. Contract provisions are in place that provide for the suspension of funds, termination of the contract, and disallowance of reimbursement requests at any time during the program year based on performance deficiencies. On an individual basis, staff works with subrecipients to correct identified deficiencies through discussion and/or technical assistance, prior to imposing any sanctions.

As part of the year-end requirements, subrecipients are required to submit fiscal reports based on contract terms. Governmental units and nonprofit organizations expending more than \$750,000 in federal funds during the given fiscal year are required to submit a copy of a Single Audit to the City to adhere to OMB Circular A-133 requirements. A Single Audit is

required for desk review by the CDBG program, regardless of whether there were findings noted in the audit pertaining to CDBG funds, since it serves as an additional monitoring tool used to evaluate the fiscal accountability of subrecipients. As part of the closeout process, subrecipients expending CDBG funds are required to submit an Audited Financial Statement for desk review, if submission of a Single Audit is not applicable.

For homelessness services program contracts administered by SDHC, SDHC's Compliance Team performs a similar monitoring process as the City by performing monitoring reviews, file reviews, site visits, desk audits, and interviews with program participants and program staff. An annual monitoring report is created to document contract compliance and any deficiencies requiring mitigation. A financial audit is also performed annually by SDHC's Fiscal Team to determine if funds are used according to state and federal regulations and local policies. Monthly submissions of requests for reimbursement for program expenses submitted by subrecipients undergo two levels of review by SDHC staff to determine if the expenses are eligible and in alignment with the approved program budget. Contracts also include performance standards in alignment with the RTFH performance standards. SDHC staff monitor outcomes on a monthly or quarterly basis to ensure outcome measures are being met by subrecipients. Lastly, SDHC staff regularly contact subrecipients, including facilitating quarterly fiscal and performance reviews and site visits, to evaluate program performance and areas requiring technical assistance.

## Appendix – Alternate/Local Data Sources

1	<b>Data Source Name</b> 2023 SDHC
	<b>List the name of the organization or individual who originated the data set.</b> United States Department of Housing and Urban Development(HUD)
	<b>Provide a brief summary of the data set.</b> The Data set shows the distribution of median incomes (very low, low, moderate) compared to different family sizes (1-8 people).
	<b>What was the purpose for developing this data set?</b> Please see above.
	<b>How comprehensive is the coverage of this administrative data? Is data collection concentrated in one geographic area or among a certain population?</b> This data used was collected for the City of San Diego
	<b>What time period (provide the year, and optionally month, or month and day) is covered by this data set?</b> 05/2023
	<b>What is the status of the data set (complete, in progress, or planned)?</b> Complete
2	<b>Data Source Name</b> 2010-2022 ACS
	<b>List the name of the organization or individual who originated the data set.</b> United States Census Bureau
	<b>Provide a brief summary of the data set.</b> The United States Census Bureau facilitates an annual survey, the America Community Survey (ACS), that collects detailed demographic information pertaining to social, economic, and housing characteristics of the U.S. population.
	<b>What was the purpose for developing this data set?</b> Please see above.

	<p><b>How comprehensive is the coverage of this administrative data? Is data collection concentrated in one geographic area or among a certain population?</b></p> <p>Data is collected for different regions of sizes ranging from the entire United States to the Block-Group level, with some regions receiving 1- and 5-year estimates, while others only receive 5-year estimates.</p>
	<p><b>What time period (provide the year, and optionally month, or month and day) is covered by this data set?</b></p> <p>2010-2022</p>
	<p><b>What is the status of the data set (complete, in progress, or planned)?</b></p> <p>Complete</p>
<b>3</b>	<p><b>Data Source Name</b></p> <p>2013-2017 CHAS</p>
	<p><b>List the name of the organization or individual who originated the data set.</b></p> <p>HUD</p>
	<p><b>Provide a brief summary of the data set.</b></p> <p>HUD releases Comprehensive Housing Affordability Strategy (CHAS) data based on special tabulations of five-year American Community Survey (ACS) estimates. CHAS data are used by state and local governments in their consolidated planning processes and can also be used by advocates to determine housing needs in their communities.</p>
	<p><b>What was the purpose for developing this data set?</b></p> <p>The data set is to be used in analysis by state and local governments to identify housing needs in their community.</p>
	<p><b>How comprehensive is the coverage of this administrative data? Is data collection concentrated in one geographic area or among a certain population?</b></p> <p>Data is collected for different regions of sizes ranging from the entire United States to the Block-Group level, with some regions receiving 1- and 5-year estimates, while others only receive 5-year estimates.</p>
	<p><b>What time period (provide the year, and optionally month, or month and day) is covered by this data set?</b></p> <p>2013-2017</p>
	<p><b>What is the status of the data set (complete, in progress, or planned)?</b></p> <p>Complete</p>
<b>4</b>	<p><b>Data Source Name</b></p> <p>City of San Diego Housing Element – Regional Housing Needs Assessment</p>

	<p><b>List the name of the organization or individual who originated the data set.</b></p> <p>San Diego City Planning Department</p>
	<p><b>Provide a brief summary of the data set.</b></p> <p>An 8-year plan that outlines the housing needs that San Diego plans to address and meet.</p>
	<p><b>What was the purpose for developing this data set?</b></p> <p>Please see above.</p>
	<p><b>How comprehensive is the coverage of this administrative data? Is data collection concentrated in one geographic area or among a certain population?</b></p> <p>The Regional Housing Needs Assessment collects data for the entire state, but the Housing Element only represents the data for San Diego.</p>
	<p><b>What time period (provide the year, and optionally month, or month and day) is covered by this data set?</b></p> <p>2021-2029</p>
	<p><b>What is the status of the data set (complete, in progress, or planned)?</b></p> <p>In progress</p>
5	<p><b>Data Source Name</b></p> <p>2022 We All Count Point-in-Time count</p>
	<p><b>List the name of the organization or individual who originated the data set.</b></p> <p>San Diego Regional Task Force on Homelessness</p>
	<p><b>Provide a brief summary of the data set.</b></p> <p>A survey mandated by the United States Department of Housing and Urban Development (HUD), which provides an estimate on the number of homeless persons in San Diego as well as descriptive information about the characteristics of the homeless in their community.</p>
	<p><b>What was the purpose for developing this data set?</b></p> <p>Please see above.</p>
	<p><b>How comprehensive is the coverage of this administrative data? Is data collection concentrated in one geographic area or among a certain population?</b></p> <p>Limited to those in the homeless population who were able to be contacted in person by the survey, for the City of San Diego.</p>
	<p><b>What time period (provide the year, and optionally month, or month and day) is covered by this data set?</b></p> <p>2022</p>

	<p><b>What is the status of the data set (complete, in progress, or planned)?</b></p> <p>Completed</p>
6	<p><b>Data Source Name</b></p> <p>San Diego County Office of Education</p>
	<p><b>List the name of the organization or individual who originated the data set.</b></p> <p>San Diego County Office of Education</p>
	<p><b>Provide a brief summary of the data set.</b></p> <p>The San Diego County Office of Education gathers information on students experiencing homelessness to ensure they receive the rights and services under the McKinney-Vento Homeless Assistance Act.</p>
	<p><b>What was the purpose for developing this data set?</b></p> <p>Please see above.</p>
	<p><b>How comprehensive is the coverage of this administrative data? Is data collection concentrated in one geographic area or among a certain population?</b></p> <p>The data is concentrated on San Diego County.</p>
	<p><b>What time period (provide the year, and optionally month, or month and day) is covered by this data set?</b></p> <p>2023</p>
	<p><b>What is the status of the data set (complete, in progress, or planned)?</b></p> <p>In progress</p>
7	<p><b>Data Source Name</b></p> <p>National Intimate Partner and Sexual Violence Survey</p>
	<p><b>List the name of the organization or individual who originated the data set.</b></p> <p>CDC, DOJ, BJS and the National Sexual Violence Resource Center</p>
	<p><b>Provide a brief summary of the data set.</b></p> <p>A compilation of data around sexual assault, harassment, and abuse, using reports from the CDC, Department of Justice, and Bureau of Justice Statistics.</p>
	<p><b>What was the purpose for developing this data set?</b></p> <p>To take information from other data sets and reports to create a report with a broader scope of data surrounding sexual assault, harassment, and abuse.</p>
	<p><b>How comprehensive is the coverage of this administrative data? Is data collection concentrated in one geographic area or among a certain population?</b></p> <p>It covers the U.S. population, but the data referenced only covers Washington D.C.</p>

	<p><b>What time period (provide the year, and optionally month, or month and day) is covered by this data set?</b></p> <p>2018</p>
	<p><b>What is the status of the data set (complete, in progress, or planned)?</b></p> <p>Complete</p>
<b>8</b>	<p><b>Data Source Name</b></p> <p>Educational Attainment in the United States</p>
	<p><b>List the name of the organization or individual who originated the data set.</b></p> <p>United States Census Bureau</p>
	<p><b>Provide a brief summary of the data set.</b></p> <p>A table package using statistics from the Current Populations Survey's Annual Social and Economic supplement to examine the educational attainment of adults age 25 or older by demographic and social characteristics.</p>
	<p><b>What was the purpose for developing this data set?</b></p> <p>Please see above</p>
	<p><b>How comprehensive is the coverage of this administrative data? Is data collection concentrated in one geographic area or among a certain population?</b></p> <p>The entire United States Population.</p>
	<p><b>What time period (provide the year, and optionally month, or month and day) is covered by this data set?</b></p> <p>2021</p>
	<p><b>What is the status of the data set (complete, in progress, or planned)?</b></p> <p>Complete</p>
<b>9</b>	<p><b>Data Source Name</b></p> <p>2020 Analysis of Impediments to Fair Housing Choice (AI)</p>
	<p><b>List the name of the organization or individual who originated the data set.</b></p> <p>City of San Diego Community Development Block Grant Program</p>
	<p><b>Provide a brief summary of the data set.</b></p> <p>The analysis is a report put together by the City of San Diego that collects information covering access to and possible discrimination in all aspects of housing.</p>
	<p><b>What was the purpose for developing this data set?</b></p> <p>Please see above.</p>



	<p><b>How comprehensive is the coverage of this administrative data? Is data collection concentrated in one geographic area or among a certain population?</b></p> <p>This report covers the City of San Diego.</p>
	<p><b>What time period (provide the year, and optionally month, or month and day) is covered by this data set?</b></p> <p>FY2020/2021-FY2025/2025</p>
	<p><b>What is the status of the data set (complete, in progress, or planned)?</b></p> <p>In progress</p>
<b>10</b>	<p><b>Data Source Name</b></p> <p>SDHC Fiscal Year 2022 Annual Report</p>
	<p><b>List the name of the organization or individual who originated the data set.</b></p> <p>SDHC</p>
	<p><b>Provide a brief summary of the data set.</b></p> <p>Annual Report on SDHC's operations and performance.</p>
	<p><b>What was the purpose for developing this data set?</b></p> <p>Provide insight into the operations of the SDHC and data relevant to San Diego housing situations.</p>
	<p><b>How comprehensive is the coverage of this administrative data? Is data collection concentrated in one geographic area or among a certain population?</b></p> <p>This report is concentrated on the City of San Diego.</p>
	<p><b>What time period (provide the year, and optionally month, or month and day) is covered by this data set?</b></p> <p>FY2022</p>
	<p><b>What is the status of the data set (complete, in progress, or planned)?</b></p> <p>Complete</p>
<b>11</b>	<p><b>Data Source Name</b></p> <p>PIC (PIH Information Center)</p>
	<p><b>List the name of the organization or individual who originated the data set.</b></p> <p>HUD</p>
	<p><b>Provide a brief summary of the data set.</b></p> <p>The Office of Public and Indian Housing (PIH) ensures safe, decent, and affordable housing, creates opportunities for residents' self-sufficiency and economic independence, and assures the fiscal integrity of all program participants.</p>

	<p><b>What was the purpose for developing this data set?</b> Required by the HUD.</p>
	<p><b>How comprehensive is the coverage of this administrative data? Is data collection concentrated in one geographic area or among a certain population?</b> Data is collected from Housing Associations that participate in submitting their information to HUD.</p>
	<p><b>What time period (provide the year, and optionally month, or month and day) is covered by this data set?</b> 1999–Present</p>
	<p><b>What is the status of the data set (complete, in progress, or planned)?</b> In Progress</p>
12	<p><b>Data Source Name</b> Community Performance Dashboard</p>
	<p><b>List the name of the organization or individual who originated the data set.</b> Regional Task Force on the Homeless</p>
	<p><b>Provide a brief summary of the data set.</b> Reports characteristics of persons experiencing homelessness in the region as well as service outcomes.</p>
	<p><b>What was the purpose for developing this data set?</b> Provide a picture showing social and demographic characteristics of the homeless population in San Diego.</p>
	<p><b>How comprehensive is the coverage of this administrative data? Is data collection concentrated in one geographic area or among a certain population?</b> The report is limited to the City of San Diego.</p>
	<p><b>What time period (provide the year, and optionally month, or month and day) is covered by this data set?</b> 2021–2022</p>
	<p><b>What is the status of the data set (complete, in progress, or planned)?</b> Complete</p>
13	<p><b>Data Source Name</b> CoC Racial Equity Analysis Tool</p>
	<p><b>List the name of the organization or individual who originated the data set.</b> HUD</p>

	<p><b>Provide a brief summary of the data set.</b></p> <p>Provides data for the racial distributions of poverty by race and ethnicity, age, and veteran status, sourced from the ACS (2011–2015 5 –year estimates) and PIT (2017) data sets.</p>
	<p><b>What was the purpose for developing this data set?</b></p> <p>This data helps communities identify who is accessing their homeless service system and what outcomes individuals are realizing. As well as identify and address the overrepresentation of people of color among those experiencing homelessness.</p>
	<p><b>How comprehensive is the coverage of this administrative data? Is data collection concentrated in one geographic area or among a certain population?</b></p> <p>United States homeless population</p>
	<p><b>What time period (provide the year, and optionally month, or month and day) is covered by this data set?</b></p> <p>2011–2015 (ACS), 2017 (PIT)</p>
	<p><b>What is the status of the data set (complete, in progress, or planned)?</b></p> <p>Complete</p>
14	<p><b>Data Source Name</b></p> <p>SDHC Affordable Housing Overview dashboard</p>
	<p><b>List the name of the organization or individual who originated the data set.</b></p> <p>SDHC</p>
	<p><b>Provide a brief summary of the data set.</b></p> <p>Provide open access to information and maps for Affordable housing managed by the SDHC at the property level, ZIP-code level, or City level.</p>
	<p><b>What was the purpose for developing this data set?</b></p> <p>Provide the public and policy makers access to information about San Diegos Affordable Housing.</p>
	<p><b>How comprehensive is the coverage of this administrative data? Is data collection concentrated in one geographic area or among a certain population?</b></p> <p>The data is compiled for the City of San Diego and can be analyzed at different levels (property level through city level)</p>
	<p><b>What time period (provide the year, and optionally month, or month and day) is covered by this data set?</b></p> <p>2021–Present</p>

<p><b>What is the status of the data set (complete, in progress, or planned)?</b></p> <p>In Progress</p>
<p><b>Data Source Name</b></p> <p>HUD FMR and HOME Rents</p>
<p><b>List the name of the organization or individual who originated the data set.</b></p> <p>HUD</p>
<p><b>Provide a brief summary of the data set.</b></p> <p>Fair Market Rents are calculated to determine standard amounts to be used for a multitude of housing projects/programs. HOME Rent Limits are determined using FMR's, where rent does not exceed the lesser of 30 percent of a family's income which equals 65 percent of the area's median income or have 20 percent of the HOME-assisted units rent not exceed 30 percent of the family's income equaling 50 percent of the median income for the area.</p>
<p><b>What was the purpose for developing this data set?</b></p> <p>They are used to determine the standard rent amounts for fair/affordable housing programs, such as HOME-assisted housing.</p>
<p><b>How comprehensive is the coverage of this administrative data? Is data collection concentrated in one geographic area or among a certain population?</b></p> <p>The data is compiled at the state level for all states</p>
<p><b>What time period (provide the year, and optionally month, or month and day) is covered by this data set?</b></p> <p>FY2000-Present (FMR), 1998-Present (HOME Rents)</p>
<p><b>What is the status of the data set (complete, in progress, or planned)?</b></p> <p>In Progress</p>
<p><b>Data Source Name</b></p> <p>Economic Development Strategy</p>
<p><b>List the name of the organization or individual who originated the data set.</b></p> <p>City of San Diego</p>
<p><b>Provide a brief summary of the data set.</b></p> <p>The Economic Development Strategy is used as a 3-year guide for the City in an effort to support the City's businesses and spur job creation. It outlines the strategic and tactical positions for city departments and policy decisions, as well as track their progress in meeting the City's goals.</p>

	<p><b>What was the purpose for developing this data set?</b> Outline a plan of action and reflect on progress made towards the City’s objectives over three years.</p>
	<p><b>How comprehensive is the coverage of this administrative data? Is data collection concentrated in one geographic area or among a certain population?</b> The data is concentrated on the City of San Diego.</p>
	<p><b>What time period (provide the year, and optionally month, or month and day) is covered by this data set?</b> 2023-2026</p>
	<p><b>What is the status of the data set (complete, in progress, or planned)?</b> Planned</p>
	<p><b>Data Source Name</b> Environmental Justice Indicators</p>
	<p><b>List the name of the organization or individual who originated the data set.</b> Environmental Protection Agency (EPA)</p>
	<p><b>Provide a brief summary of the data set.</b> The EPA collects environmental, demographic/socioeconomic indexes to create the Environmental Justice Indicators to analyze the interplay between exposure to, proximity to, and the health risks of environmental hazards and socioeconomic characteristics across the country.</p>
	<p><b>What was the purpose for developing this data set?</b> To compare and visualize what demographic characteristics correlate to exposure/proximity/health risks</p>
	<p><b>How comprehensive is the coverage of this administrative data? Is data collection concentrated in one geographic area or among a certain population?</b> The data is collected for the entire country and can be analyzed from the block-group level to the country level.</p>
	<p><b>What time period (provide the year, and optionally month, or month and day) is covered by this data set?</b> 2015-2023</p>
13	<p><b>Data Source Name</b> Community Needs Survey</p>

## Table of Acronyms

<b>AAP</b>	Annual Action Plan
<b>ADA</b>	Americans with Disabilities Act
<b>AFH</b>	Assessment of Fair Housing
<b>AI</b>	Analysis of Impediments to Fair Housing Choice
<b>AMI</b>	Area Median Income
<b>CAPER</b>	Consolidated Annual Performance & Evaluation Report
<b>CDBG</b>	Community Development Block Grant
<b>CDC</b>	Centers of Disease Control and Prevention
<b>CFR</b>	Code of Federal Regulations
<b>CHAS</b>	Comprehensive Housing Affordability Strategy
<b>CoC</b>	Continuum of Care
<b>CPAB</b>	Consolidated Plan Advisory Board
<b>DIF</b>	Development Impact Fee
<b>EMSA</b>	Eligible Metropolitan Statistical Area
<b>EO</b>	Economic Opportunity
<b>EPA</b>	Environmental Protection Agency
<b>ESG</b>	Emergency Shelter Grant / Emergency Solutions Grant
<b>FH</b>	Fair Housing
<b>FY</b>	Fiscal Year
<b>HCD</b>	San Diego County Housing and Community Development Department
<b>HEARTH</b>	Homeless Emergency Assistance and Rapid Transition to Housing Act
<b>HIV</b>	Human Immunodeficiency Virus
<b>HMIS</b>	Homeless Management Information System

<b>HOME</b>	HOME Investment Partnerships Program
<b>HOPWA</b>	Housing Opportunities for Persons with AIDS
<b>HOT</b>	Homeless Outreach Team
<b>HTF</b>	Housing Trust Fund
<b>HUD</b>	United States Department of Housing and Urban Development
<b>HVAC</b>	Heating, Ventilation, and Air Conditioning
<b>HCV</b>	Housing Choice Voucher
<b>LGBT</b>	Lesbian, Gay, Bisexual, and Transgender
<b>LIHTC</b>	Low-Income Housing Tax Credits
<b>LMI</b>	Low/Moderate Income
<b>LSHHP</b>	Lead Safety and Healthy Homes Program
<b>MTW</b>	Moving to Work
<b>NCIP</b>	Nonprofit Capital Improvement Project
<b>OIG</b>	Office of Inspector General
<b>PBV</b>	Project Based Voucher
<b>PIC</b>	PIH Information Center
<b>PJ</b>	Participating Jurisdiction
<b>RFP</b>	Request for Proposals
<b>RTFH</b>	Regional Task Force on the Homeless
<b>SDHC</b>	San Diego Housing Commission
<b>SDPZ</b>	San Diego Promise Zone
<b>SMART</b>	San Diego Misdemeanants At-Risk Track
<b>SRA</b>	Sponsor-Based Rental Assistance
<b>TBRA</b>	Tenant-Based Rental Assistance

USDA United States Department of Agriculture

VASH Veterans Affairs Supportive Housing