



# 2025-2026 ANNUAL ACTION PLAN



Economic Development Department  
425 N. El Dorado St.  
Stockton, California 95202

**DATE:**  
MARCH 2025

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## Expected Resources

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

#### Introduction

During the five-year planning period, the City expects to receive approximately \$3.2 million in annual CDBG funding based on the allocation received in Program Year (PY) 2024. This would equal a five-year total of \$16.1 million. Additionally, the City anticipates \$1,864,610 in program income, and \$462,500 of prior year resources will be made available as part of (PY) 2025, for a grand total of \$18.4 million. The City anticipates receiving an annual allocation of approximately \$1.4 million in HOME funding for housing activities and administrative costs, which would equal a five-year total of \$7 million. Additionally, the City is estimating \$100,000 in program income for (PY) 2025, for a grand total of \$7.1 million. The City expects to receive an estimated \$283,000 in annual ESG funding, which would equal a five-year total of \$1.4 million. The table below provides a breakdown of these anticipated resources based on PY 2024 allocations.

#### Anticipated Resources

Program	Sources of Funds	Use of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of Con Plan: \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	Public-Federal	Acquisition, Administration and Planning, Economic Development, Housing, Public	\$3,240,738	\$1,864,610	\$462,500	\$5,567,848	\$12,859,262	Expected amount based on 24/25 allocation

		Facilities, Infrastructure Improvements, Public Services, Environmental Cleanup, Homeowner Rehab						
<b>HOME</b>	Public- Federal	Administration & Planning, Acquisition, Homebuyer Assistance, Multifamily Rental, Multifamily Rental Rehab, New Construction for ownership, Tenant Based Rental Assistance (TBRA)	\$1,393,227	\$100,000	\$0	\$1,493,227	\$5,606,773	Expected amount based on 24/25 allocation
<b>ESG</b>	Public- Federal	Administration & Planning, Homeless Prevention, Rapid Rehousing, Emergency Shelter	\$283,046	\$0	\$0	\$283,046	\$1,132,184	Expected amount based on 24/25 allocation



		Operations, Street Outreach, HMIS						
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Table 58 - Expected Resources

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

Existing HUD resources allow the City to leverage additional local, state, and private funding sources to maximize impact. The City identifies additional funds during the project planning phase and prior to project award to complement the goals in the five-year Consolidated Plan. For example, the City receives Homeless Housing, Assistance and Prevention (HHAP) funding from the State of California to build regional coordination and a unified regional response to reduce and end homelessness, informed by a best-practices framework focused on moving homeless individuals and families into permanent housing and supporting the efforts of those individuals and families to maintain their permanent housing. Another State source of funding is Project Homekey grant funding for the construction or renovation of permanent housing units for homeless individuals. Permanent Local Housing Allocation (PLHA) funds from the State provide resources to complement Federal and local resources allocated to a wider range of affordable housing projects. It is important to note that HHAP and Homekey funds are not permanent sources of funding, however the City will continue to use these resources to leverage HUD funds as they continue to become available.

In 2018, the City was awarded a Brownfields Assessment Coalition Grant from the Federal Environmental Protection Agency (EPA) which has supported several of the City's goals of transforming underutilized parcels to promote affordable housing, small business development, and promote overall economic growth and development. The EPA Grant expired in November 2023; however, the initiative resulted in the leveraging of nearly \$5.25 million of additional funding from the California Department of Toxic Substances Control (DTSC), as outlined below.

For the City's unsheltered population, funding has also been leveraged via the American Rescue Plan Act (ARPA) allocations to expand homeless services and strengthen public infrastructure and facilities for very-low-income communities, including those experiencing homelessness. The City also received funding from the US Small Business Administration Office of Grants Management

in 2022 and continues to leverage the funds to support economic development activities to support local microenterprises. The City continues to search for additional opportunities to leverage funds on a regular basis.

Private Resources: Affordable Housing Program (AHP) is a semi-annual competitive grant program offered by financial institutions associated with the twelve local Federal Home Loan (FHL) Banks. Private Mortgages provided by private lenders have financed many of the larger multifamily housing projects, as well as some CDBG projects undertaken within the City. Private Industry companies and groups have established funds that can be leveraged to facilitate affordable and workforce housing development. Private Philanthropy through the San Joaquin Community Foundation, local hospitals and health systems, and United Way of San Joaquin continues to support programs for the most vulnerable individuals in our communities. Philanthropic partners, including local managed care plans are making significant investments to programs within the homeless continuum of care. Any funding source matching requirements imposed on the City are generally passed on to subrecipients requiring the respective match as a minimum threshold.

HOME funded housing projects typically far exceed minimum matching requirements due to the need for developers to secure most of the funding from other public and private funding sources. Currently, HUD has granted the City a 100% match reduction for HOME funded projects per the match reductions published by HUD in November 2024.

HUD requires a 100% match for the City's ESG grant. ESG match requirements are passed on to subrecipients. The City closely assesses that this requirement is met during its review of program application review and enforced during the project period.

**If appropriate, describe publicly owned land or property located within the jurisdiction that may be used to address the needs identified in the plan.**

The City of Stockton was awarded \$5.2 million from the Department of Toxic Substances Control (DTSC) under the Equitable Community Revitalization Grant (ECRG) to remediate a nine-acre City-owned site along the waterfront. The four (4) parcels, collectively known as South Pointe, are located at 705, 833, and 855 West Weber Avenue. On February 6, 2024, City Council approved a Disposition and Development Agreement with RBH Stockton OZ Project, with Phase 1 including no fewer than 300 units (including independent living senior housing), 4,000 square feet of educational space, 16,00 sf of retail and/or community serving





facility space. Phase 2 will include 220 units of housing, including market rate and affordable housing. No fewer than fifteen percent (15%) of the total units in Phase 1 and Phase 2 shall be reserved as affordable for lower income households. Depending on the results of the remediation efforts, Phase I is expected to begin construction in 2026 or 2027.

In addition, the State Surplus Land Act requires the city to identify surplus and excess local public lands to be declared surplus by City Council and issue a Notice of Availability to housing developers and local agencies. All dispositions must be approved by HCD before a sale or lease can be finalized. Three areas of City-owned properties have been deemed surplus and are available and suitable for housing: Lafayette/Stanislaus (four parcels), Weber Avenue (four parcels, known as South Pointe), and South Airport (one parcel). The address and acreage of each property is listed below.

530 Lafayette - 0.11 acres

534 Lafayette - 0.09 acres

536 Lafayette - 0.14 acres

411 S Stanislaus – 1.66 acres

833 W Weber – 3.73 acres

705 W Weber – 3.08 acres

Weber Avenue – 0.29 acres

855 W Weber – 1.97 acres

2135 South Airport – 0.33 acres

The City of Stockton will be partnering with Visionary Home Builders Inc (VHB) for the development of affordable housing on a State-owned site located at 601 East Miner Avenue/ 622 E. Lindsay in Downtown Stockton.

### **Discussion**

The City of Stockton combines local, state, and private funds together with federal HUD resources to maximize its investment impact. State funds like HHAP and Project Homekey are used to help homeless individuals find permanent housing. EPA grants are used to transform underused land for housing and business development. The City continues to seek new funding opportunities and

partners with private organizations to support affordable housing projects. It will also continue to identify and use surplus land for housing development.

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## Annual Goals and Objectives

### AP-20 Annual Goals and Objectives

#### Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Develop & Rehabilitate Affordable Housing Units	2025	2026	Affordable Housing Homelessness	Citywide	Increase and Preserve Affordable Housing Opportunities	CDBG: \$2,753,898 HOME: \$1,203,904	50 new multifamily rental units constructed 5 units acquired 31 multifamily rental units rehabilitated/converted 5 homeowner housing units rehabilitated
2	Provide Services to Prevent & Reduce Homelessness	2025	2026	Affordable Housing Homelessness	Citywide	Reduce Homelessness	ESG: \$261,818	45 persons served with homeless prevention 14 homeless persons served at overnight shelters
3	Resilient Infrastructure & Public Facilities	2025	2026	Non-Housing Community Development	Citywide	Resilient & Healthy Communities	CDBG: \$1,000,000	3 public infrastructure improvements installed 200 persons served by public infrastructure improvements
4	Healthy Neighborhoods & Residents	2025	2026	Non-Housing Community Development Non-Homeless Special Needs	Citywide	Resilient & Healthy Communities	CDBG: \$765,802	25,000 persons served

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
5	Support Businesses	2025	2026	Non-Housing Community Development Non-Homeless Special Needs	Citywide	Strengthen Local Economy	Funded with carryover \$	3 façade treatment/business buildings rehabilitated 2 businesses assisted 2 micro-enterprises assisted
6	Increase Access to Economic Opportunity	2025	2026	Non-Housing Community Development Non-Homeless Special Needs	Citywide	Strengthen Local Economy	Funded with carryover \$	5 persons assisted 5 micro-enterprises assisted
7	Compliance	2025	2026	All	Citywide	All		

**Table 59 – Goals Summary**

### Goal Descriptions

1	<b>Goal Name</b>	Develop & Rehabilitate Affordable Housing Units
	<b>Goal Description</b>	Preserve, improve, and expand the supply of decent affordable housing for lower-income households. Assist existing low-income owner-occupied households keep their homes safe and well maintained by providing rehabilitation funding and other needed assistance.
2	<b>Goal Name</b>	Provide Services to Prevent & Reduce Homelessness
	<b>Goal Description</b>	Provide housing and supportive services for the City's homeless populations including emergency, transitional, and permanent supportive shelter, as well as rapid rehousing and homelessness prevention. Increase and maintain transitional housing opportunities with supportive services to improve outcomes and stability and promote successful transitions into permanent housing.

3	<b>Goal Name</b>	Resilient Infrastructure & Public Facilities
	<b>Goal Description</b>	Prioritize the maintenance and improvement of publicly owned facilities and infrastructure. If eligible, this goal may allow activities for the improvement of neighborhood parks, community centers, streets, sidewalks, lighting, ADA accessibility, among other activities that serve low-income residents.
4	<b>Goal Name</b>	Healthy Neighborhoods & Residents
	<b>Goal Description</b>	Through partnerships with qualified organizations, ensure the provision of high-quality public services to support ongoing community development, fair housing services, and other activities.
5	<b>Goal Name</b>	Support Businesses
	<b>Goal Description</b>	Promote economic development activities that restore commercial spaces, assist and retain small businesses, and promote economic activity, especially those that provide economic opportunities for low- and moderate-income persons.
6	<b>Goal Name</b>	Increase Access to Economic Opportunity
	<b>Goal Description</b>	Prioritize and expand job and business readiness programs targeting low-income persons, including low-income youth, disabled persons, and homeless persons.
7	<b>Goal Name</b>	Compliance
	<b>Goal Description</b>	Efficient use of administrative funding for general management, oversight, coordination, and subrecipient monitoring.

Table 60 – Goal Description



## Projects

### AP-35 Projects – 91.220(d)

#### Introduction

The projects that the City will fund with CDBG, HOME, and ESG funds during the 2025-2026 program year (July 1, 2025 – June 30, 2026) are summarized below. The City will utilize funds available to address the goals outlined in the Consolidated Plan to address the priority needs and specific objectives. Each year, the City’s funding is used for a range of eligible activities including but not limited to affordable housing, public services, economic development, homelessness services, and enhancements to public facilities or infrastructure improvements.

The projects and programs that the City funded with CDBG, HOME, and ESG funds during the previous five fiscal years have contributed toward substantial improvements in the lives and neighborhoods of Stockton’s low-income residents and provided safe, decent housing for many who would not otherwise be able to afford it. The activities funded in the FY 2025-26 Action Plan will build on prior successes and continue to meet the objectives of the 2025-2029 Consolidated Plan.

#### Projects

#	Project Name
1	CDBG Administration
2	CDBG Housing Program Delivery
3	CDBG Housing Programs
4	Business Support Programs
5	Public Services & Fair Housing
6	Public Infrastructure Improvements
7	Entrepreneurship Program
8	Commercial Rehabilitation
9	HOME Administration
10	HOME Program Delivery
11	HOME Housing Loans
12	HOME CHDO Set-Aside Funds
13	ESG Entitlement 2025 Stockton

**Table 1 – Project Information**

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

The allocation priorities derive from the needs and goals outlined in the 2025-2029 Consolidated Plan.

The City has identified the lack of sufficient funding as the greatest obstacle to meeting the underserved needs. Other noted obstacles in addressing community needs are, but not limited to, housing market conditions (e.g. affordability), economic conditions, services available to support diverse population, cost of real estate, prevailing wage requirements, increased construction costs, limited supply chain, etc.

During the next year, the City will continue to apply for funding and/or support applications by other organizations to expand affordable housing opportunities, homeless assistance and supportive services, and to meet the general needs of the low-income residents and neighborhoods. The city will continue to foster partnerships with local organizations to address the city's community development needs.

## AP-38 Project Summary

### Project Summary Information

<b>1</b>	<b>Project Name</b>	<b>CDBG Administration</b>
	<b>Target Area</b>	City-wide
	<b>Goals Supported</b>	Develop & Rehabilitate Affordable Housing Units Resilient Infrastructure & Public Facilities Healthy Neighborhoods & Residents Support Businesses Increase Access to Economic Opportunity Compliance
	<b>Needs Addressed</b>	Increase and Preserve Affordable Housing Opportunities Resilient & Healthy Communities Strengthen Local Economy
	<b>Funding</b>	CDBG: \$648,148
	<b>Description</b>	Administration of CDBG program including staff and operational costs of oversight and management. Matrix code: 21A Citation: 570.206
	<b>Target Date</b>	6/30/2026
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	N/A - Administration
	<b>Location Description</b>	N/A - Administration
	<b>Planned Activities</b>	General Program Administration
<b>2</b>	<b>Project Name</b>	<b>CDBG Housing Program Delivery</b>
	<b>Target Area</b>	City-wide
	<b>Goals Supported</b>	Develop & Rehabilitate Affordable Housing Units
	<b>Needs Addressed</b>	Increase and Preserve Affordable Housing Opportunities
	<b>Funding</b>	CDBG: \$400,000
	<b>Description</b>	Staff and service delivery costs associated with implementation of various housing programs. Matrix Code: 14H National Objective: LMH Citation: 570.202
	<b>Target Date</b>	6/30/2026

	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	N/A - Delivery Costs
	<b>Location Description</b>	N/A - Delivery Costs
	<b>Planned Activities</b>	Rehabilitation Administration
<b>3</b>	<b>Project Name</b>	<b>CDBG Housing Programs</b>
	<b>Target Area</b>	City-wide
	<b>Goals Supported</b>	Develop & Rehabilitate Affordable Housing Units
	<b>Needs Addressed</b>	Increase and Preserve Affordable Housing Opportunities
	<b>Funding</b>	CDBG: \$2,753,898
	<b>Description</b>	<p>CDBG funds will be provided through various City housing programs for the improvement of low- and moderate-income housing city-wide. The Single-Family Housing Repair Loan Program assists in the rehabilitation of owner-occupied residences, and the Emergency Repair Loan Program provides for the repair of immediate health and safety conditions that present a danger to the occupants of the owner-occupied home. The Housing Loan/Grant Program will provide CDBG funds for property acquisition and/or rehabilitation and other eligible uses to develop affordable housing units.</p> <p>Citation: 570.201(a) or (c); 570.202 Matrix Code: 01, 14A, 14B, 14C, 03C, National Objective: 570.208(a)(3) LMH</p>
	<b>Target Date</b>	6/30/2026
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Four affordable single-family homes will be rehabilitated for low- and moderate-income persons, and multi-family units will be subject to proposals received.
	<b>Location Description</b>	City-wide
	<b>Planned Activities</b>	Acquisition, Rehabilitation; Develop affordable housing units
<b>4</b>	<b>Project Name</b>	<b>Business Support Programs</b>



	<b>Target Area</b>	City-wide; Slum Blight Area Map
	<b>Goals Supported</b>	Support Businesses
	<b>Needs Addressed</b>	Strengthen Local Economic
	<b>Funding</b>	CDBG: \$0
	<b>Description</b>	Provide financial assistance to microenterprises and small, low-income for-profit business owners for economic development activities. Programs include the Stocked Full of Produce Program for equipment purchases and the Code Compliance Program to address documented code violations for active or prospective businesses.
	<b>Target Date</b>	6/30/2026
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Businesses assisted: 4
	<b>Location Description</b>	City-wide; Slum Blight Area Map
	<b>Planned Activities</b>	Matrix Codes: 18A, 18B, 18C National Objectives: SBA, SBS, LMC, LMA
<b>5</b>	<b>Project Name</b>	<b>Public Services &amp; Fair Housing</b>
	<b>Target Area</b>	City-wide
	<b>Goals Supported</b>	Healthy Neighborhoods & Residents
	<b>Needs Addressed</b>	Resilient & Healthy Communities
	<b>Funding</b>	CDBG: \$765,802
	<b>Description</b>	Invest in services and partner with agencies that provide public services to address priority goals and needs that provide essential services to the community.
	<b>Target Date</b>	6/30/2026
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Public service activities for Low/Moderate Income benefit: 25,000 Persons Assisted
	<b>Location Description</b>	City-wide
	<b>Planned Activities</b>	Matrix Codes: 05A to 05Z Nation Objective: LMC 570.208(a)(2) Citation: 570.201(e)
<b>6</b>	<b>Project Name</b>	<b>Public Infrastructure Improvements</b>

	<b>Target Area</b>	City-wide
	<b>Goals Supported</b>	Resilient Infrastructure & Public Facilities
	<b>Needs Addressed</b>	Resilient & Healthy Communities
	<b>Funding</b>	CDBG: \$1,000,000
	<b>Description</b>	Street and Sidewalk Repairs (including ADA); Curb, gutter, storm drain, or sidewalk installation; Safety improvements (Streetlights, crosswalks); Water and Sewer line Improvements/Replacement; Tree Planting
	<b>Target Date</b>	06/30/2026
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	3 public infrastructure improvements installed 200 persons served by public infrastructure improvements
	<b>Location Description</b>	Low/Mod Census Block Groups
	<b>Planned Activities</b>	Matrix Codes: 03J to 03L Nation Objective: LMA 570.208(a)(1) Citation: 570.201(c)
<b>7</b>	<b>Project Name</b>	<b>Entrepreneurship Program</b>
	<b>Target Area</b>	City-wide
	<b>Goals Supported</b>	Increase Access to Economic Opportunity
	<b>Needs Addressed</b>	Strengthen Local Economy
	<b>Funding</b>	CDBG: \$0.00
	<b>Description</b>	Funding for organizations that serve as business service providers to facilitate and provide services to entrepreneurs, new innovators, emerging or existing businesses.
	<b>Target Date</b>	06/30/2026
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	5 persons assisted 5 micro-enterprises assisted
	<b>Location Description</b>	City-wide
	<b>Planned Activities</b>	Matrix Codes: 18B, 18C National Objectives: LMC, LMA, LMH
<b>8</b>	<b>Project Name</b>	<b>Commercial Rehabilitation</b>
	<b>Target Area</b>	City-wide, Slum-Blight Area
	<b>Goals Supported</b>	<u>Support Businesses</u>

	<b>Needs Addressed</b>	Strengthen Local Economy
	<b>Funding</b>	CDBG: \$0
	<b>Description</b>	<u>Provide financial assistance for exterior improvements to support commercial revitalization.</u>
	<b>Target Date</b>	6/30/2026
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Façade treatment: 3
	<b>Location Description</b>	City-wide; Slum Blight Area Map
	<b>Planned Activities</b>	Matrix Codes 14E, 18A, National Objectives: SBA, SBS, and LMA
<b>9</b>	<b>Project Name</b>	<b>HOME Administration</b>
	<b>Target Area</b>	City-wide
	<b>Goals Supported</b>	Develop & Rehabilitate Affordable Housing Units Provide Services to Prevent & Reduce Homelessness Resilient Infrastructure & Public Facilities
	<b>Needs Addressed</b>	Increase and Preserve Affordable Housing Opportunities Reduce Homelessness Resilient & Healthy Communities
	<b>Funding</b>	HOME: \$139,323
	<b>Description</b>	Staff costs associated with the implementation of HOME program activities. Citation: 92.207
	<b>Target Date</b>	06/30/2026
	<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>	HOME Program Administration
<b>10</b>	<b>Project Name</b>	<b>HOME Program Delivery</b>
	<b>Target Area</b>	City-wide
	<b>Goals Supported</b>	Develop & Rehabilitate Affordable Housing Units
	<b>Needs Addressed</b>	Increase and Preserve Affordable Housing

		Opportunities
	<b>Funding</b>	HOME: \$150,000
	<b>Description</b>	Staff and service delivery costs are associated with the implementation of various affordable housing projects. Citation: 92.206
	<b>Target Date</b>	06/30/2026
	<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>	HOME Administration
<b>11</b>	<b>Project Name</b>	<b>HOME Housing Loans</b>
	<b>Target Area</b>	City-wide
	<b>Goals Supported</b>	Develop & Rehabilitate Affordable Housing Units Provide Services to Prevent & Reduce Homelessness
	<b>Needs Addressed</b>	Increase and Preserve Affordable Housing Opportunities Reduce Homelessness
	<b>Funding</b>	HOME: \$994,920.36
	<b>Description</b>	Financial assistance for the rehabilitation or development of low-income housing. The Housing Rehabilitation Program assists single-family dwelling homeowners to make repairs to their residence. Funds will also be available for multi-family rehabilitation or construction projects. Citation: 92.205 & 92.206
	<b>Target Date</b>	06/30/2026
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	To be determined subject to housing proposals/awards.
	<b>Location Description</b>	City-wide
	<b>Planned Activities</b>	Rehabilitation; Construction; Multi-unit residential
<b>12</b>	<b>Project Name</b>	<b>CHDO Set-Aside Funds</b>

	<b>Target Area</b>	City-wide
	<b>Goals Supported</b>	Provide Services to Prevent & Reduce Homelessness Develop & Rehabilitate Affordable Housing Units
	<b>Needs Addressed</b>	Reduce Homelessness Increase and Preserve Affordable Housing Opportunities
	<b>Funding</b>	HOME: \$208,984.12
	<b>Description</b>	Set-aside funds are required by HUD HOME regulations for housing activities owned, developed, and/or sponsored by qualified Community Housing Development Organizations (CHDO). Citation: 92.205 & 92.206
	<b>Target Date</b>	06/30/2026
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	To be determined subject to housing proposals/awards.
	<b>Location Description</b>	City-wide
	<b>Planned Activities</b>	Rehabilitation; Construction; Multi-unit residential
<b>13</b>	<b>Project Name</b>	<b>ESG Entitlement 2025 Stockton</b>
	<b>Target Area</b>	City-wide
	<b>Goals Supported</b>	Provide Services to Prevent & Reduce Homelessness Healthy Neighborhoods & Residents
	<b>Needs Addressed</b>	Reduce Homelessness Resilient & Healthy Communities
	<b>Funding</b>	ESG: \$283,046
	<b>Description</b>	Homeless services including Emergency Shelter, Homeless Prevention, Rapid Rehousing, Street Outreach, and HMIS costs. Citations: 576.100; 576.101; 576.103; 576.104; 576.105; 576.106; 576.107; 576.108; 576.109
	<b>Target Date</b>	06/30/2026
	<b>Estimate the number and type</b>	Homeless Person Overnight Shelter: 14 Persons

	<b>of families that will benefit from the proposed activities</b>	Assisted Homelessness Prevention: 45 Persons Assisted
	<b>Location Description</b>	City-wide
	<b>Planned Activities</b>	Homeless Prevention and Emergency Shelter

Table 22 – Project Summary

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## **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**

### **Geographic Distribution**

The City makes resources available on a citywide basis, but provides additional focus in areas with high concentrations of unmet needs. The CDBG Slum Blight Area (SBA) national objective allows the use of CDBG program funds to fund activities aimed at preventing or eliminating slums or blight. Since 1996, Stockton has used a portion of CDBG funds in addressing slum and blight through various programs, including the Commercial Façade Improvement Forgivable Loan Program. The programs have aided in revitalizing blighted commercial properties within the previous Redevelopment Project Areas, which also met the definition for HUD’s Slum Blight Area designation.

Pursuant to HUD guidelines, 24 CFR 570.208(b)(1), an activity will be considered to address prevention or elimination of slums or blight on an area basis if:

- i) The area “meets a definition of a slum, blighted, deteriorated or deteriorating area under State or local law”;
- ii) The area also meets the conditions in either paragraph (A) or (B):
  - A) At least 25 percent of properties throughout the area experience one or more of the following conditions:
    - 1) Physical deterioration of buildings or improvements;
    - 2) Abandonment of properties;
    - 3) Chronic high occupancy turnover rates or chronic high vacancy rates in commercial or industrial buildings;
    - 4) Significant declines in property values or abnormally low property values relative to other areas in the community; or
    - 5) Known or suspected environmental contamination.
  - B) The public improvements throughout the area are in a general state of deterioration.

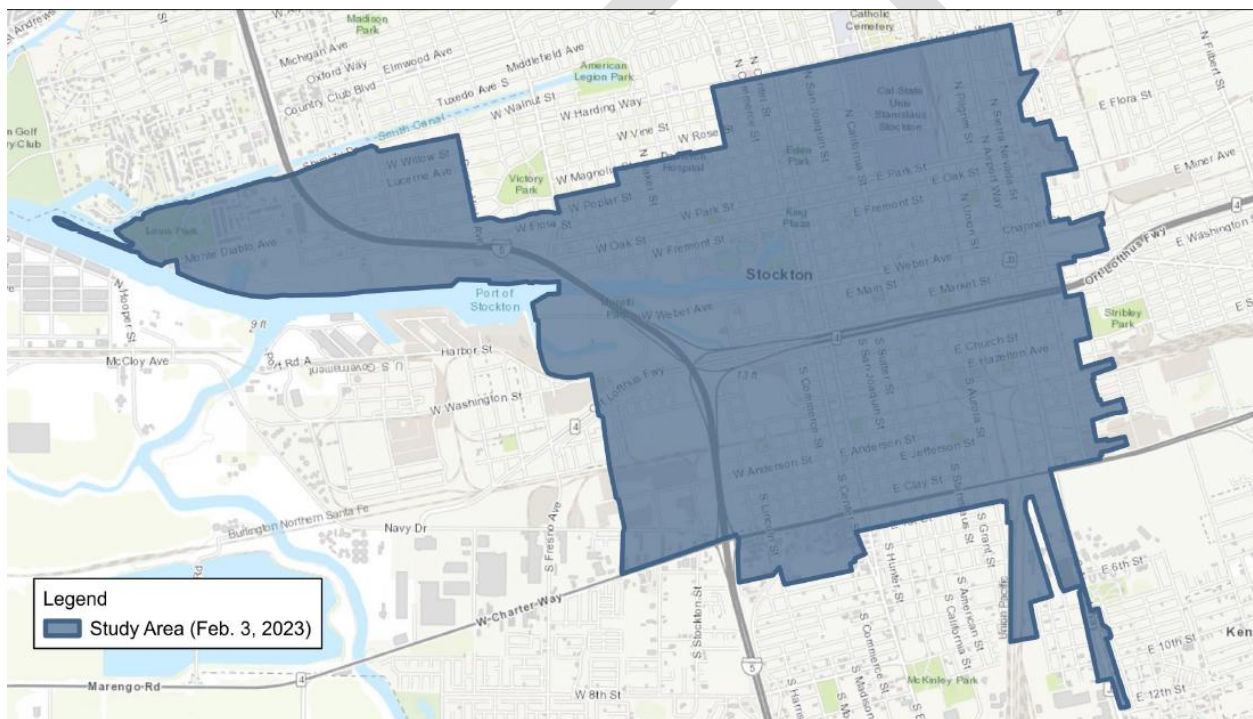
### **Rationale for the priorities for allocating investments geographically**

The City of Stockton allocates HUD resources on a city-wide basis. For example, the City’s housing rehabilitation program is equally available to qualifying residents in all geographic subareas, with eligibility being determined based on the income of the household receiving assistance.



A Slum Blight Area Map will be used for activities / programs related to the elimination of slums and blight including but not limited to infrastructure improvements in a deteriorated area and economic development assistance to induce redevelopment in blighted areas.

The City conducted a lot by lot survey in 2023 for these areas. The evaluation determined that 34 percent of properties within the Slum Blight Area exhibit one or more forms of HUD’s condition of blight. The area also met the slum and blight criteria established under State law (California Health and Safety Code Section 33030 and 33031(a)(1)) and local law (Stockton Municipal Code Section 8.36.040). Therefore, the area qualifies as a slum and blighted area under the CDBG program regulations, and the SBA national objective will be used in deploying CDBG-funded activities and programs to assist in addressing slum and blight within the map area. The new Slum-Blight Area map is below.



**Figure 1 – 2023 Stockton Slum-Blight Area Map**

**Data Source:** City of Stockton GIS

## Discussion

To provide further guidance for the use of public funds in blighted areas throughout the city and to encourage further investment in specific areas, the City developed a Slum Blight Area map for eligible activities. The Slum Blight Area consists of 5.62 square miles with 34% of all parcels being categorized as “blighted / deteriorated”. The 5.62 square miles is comprised of

7,728 parcels, of which, 1,406 parcels have conditions of physical blight, 33 buildings with a vacancy rate of 9.9 percent or higher, 258 parcels with reports of environmental contamination.

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## Affordable Housing

### AP-55 Affordable Housing – 91.220(g)

#### Introduction

The 2025-2029 Consolidated Plan includes goals directly associated with addressing affordable housing needs. The City's approach to addressing affordable housing needs includes but is not limited to 1) Developing new affordable housing, 2) Rehabilitating existing affordable housing stock, and/or 3) Preserving existing affordable housing.

The City operates its housing programs based on these strategies, which have been prioritized to guide the allocation of resources. Consistent with the priorities outlined in the Consolidated Plan, the City will undertake or fund the following activities to address housing needs:

- Partner with local affordable housing developers and public agencies to develop additional single family and/or multi-family housing, as well as substantial rehabilitation of multi-family housing.
- Continue to administer the Housing Rehabilitation Program and Emergency Repair Program designed to assist owner-occupied residential properties with low-interest loans to conduct health and safety related repairs; this includes emergency assistance.

The following are the City's one-year goals for affordable housing activities to be supported:

<b>Population to Be Supported</b>	<b># of Households (HUD Sponsored Units)</b>	<b>Non-HUD Sponsored Units</b>
Homeless	55	31
Non-Homeless	5	0
Special-Needs	0	0
<b>Total</b>	<b>60</b>	<b>31</b>

**Table 63 – One Year Goals for Affordable Housing by Support Requirement**

<b>Type of Housing Production</b>	<b># of Households (HUD Sponsored Units)</b>	<b>Non-HUD Sponsored Units</b>
Rental Assistance (TBRA)	0	0
The Production of New Units	50	31
Rehab of Existing Units	5	0
Acquisition of Existing Units	5	0
<b>Total</b>	<b>60</b>	<b>31</b>

**Table 64 – One Year Goals for Affordable Housing by Support Type**

## **Discussion**

### **Housing Production (HUD Sponsored Units):**

Park Center Apartments: 50 affordable units

Acquisition of Existing Units: 5 units

Owner Occupied Rehabilitation: 5 Units

### **Housing Production (Non-HUD Sponsored Units):**

Satellite Apartments: 31 Units

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## **AP-60 Public Housing – 91.220(h)**

### **Introduction**

The City of Stockton and the Housing Authority of San Joaquin County (HASJC) maintain a strong partnership built on the common goal and priority of providing affordable housing opportunities for Stockton's low-income residents. The Housing Authority of the County of San Joaquin (HACSJ) is the largest affordable housing property manager of multi-family and single household public housing units for lower income people in San Joaquin County. According to the HACSJ 2024 PHA Plan, the HACSJ currently operates 955 public housing units and 5,227 housing choice vouchers.

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

HASJC will continue to seek funding local, state, federal, and private sources to replace aging housing stock at the public housing sites with new affordable housing units.

The Housing Authority's 5-Year PHA Plan defines the following goals related to public housing:

- Expand the supply of assisted housing:
- Reduce the number of vacancies at each Public Housing site by decreasing maintenance turnaround time
- Improve curb appeal at all Public Housing sites.
- Replace aging/outdated housing stock.
- Continue to conduct outreach efforts to Public Housing residents to promote community involvement. These include community meetings, resident fairs, and quarterly resident newsletters.
- Manage the assisted housing programs in an efficient and effective manner to maintain the Authority's High Performing status.
- Provide an improved living environment
- Continue plans to upgrade or replace aging housing stock in Sierra Vista Homes and Conway Homes.
- Expand Resident Councils' community involvement.
- Increase public housing security improvements

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

The City continues to maintain a partnership with the HASJC to assist public housing residents to achieve homeownership. The HASJC administers a Family Self Sufficiency (FSS) Program. Public housing FSS participants are invited to attend a variety of workshops hosted by the Housing Authority including health fairs, homeownership fairs, and job fairs.

Under its Family Self-Sufficiency (FSS) program, public housing residents can participate in the program and receive referred to services and establish a family escrow savings account. The FSS program allows residents to establish an escrow savings account based on earned income. Contributions can be made to the escrow savings account monthly if there is an increase in earned income during their participation in the FSS program. FSS participants have utilized the escrow savings account to accomplish homeownership goals, such as credit repair, credit counseling, and down payments on a home. HASJC will continue to collaborate with the City to provide supportive services for potential homeownership families.

HASJC also has a homeownership program available to its Housing Choice Voucher (HCV) participants who meet the homeownership eligibility requirements. The homeownership program allows first-time homebuyers to use the voucher subsidy to meet monthly homeownership expenses. HCV participants interested in applying for the HCV Homeownership program must meet the following program criteria:

- Must be a participant in the HCV program for at least one year in San Joaquin County.
- Must be a first-time homebuyer.
- Meet the minimum employment and income requirements.

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

The Housing Authority of San Joaquin County is not designated as “troubled” by HUD.

### **Discussion**

The City of Stockton and the Housing Authority of San Joaquin County (HASJC) have a strong partnership focused on providing affordable housing for low-income residents. Over the past five years, HASJC has secured funding through the City's Notice of Funding Availability (NOFA) to support projects like the Sierra Vista and Conway Homes redevelopments. In the coming year, HASJC plans to apply for more funding to continue these efforts. HASJC provides its residents with homeownership opportunities through its Family Self-Sufficiency (FSS) and Housing Choice Voucher (HCV) homeownership programs.

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

### **Introduction**

In 2018, the Stockton City Council declared a local homeless emergency directing the City Manager and all applicable City departments to develop strategies and solutions to address homelessness. Much has been accomplished since then but the number of people experiencing homelessness and living unsheltered remains a top concern for City leaders and residents.

According to the 2024 Point-in-Time (PIT) Count, 2,450 unique individuals experienced homelessness on a given night, with 520 utilizing emergency shelters or transitional housing facilities within the City. The City actively works with the San Joaquin Continuum of Care, to investigate the needs and concerns of those experiencing homelessness, develop strategic approaches to prevent and end homelessness, and to prioritize investments in housing, programming, and capacity-building initiatives. Jointly, the City and the CoC have developed and adopted a Regional Plan describing the County-wide Community Response Prevent and End Homelessness, and the City has created an Action Plan describing investments through 2025/2026, to address the City's commitment to meeting the regional goals and objectives. The Regional Plan outlines the following three major objectives:

1. Establish a Coordinated and Engaged Regional System
2. Increase Access and Reduce Barriers to Homeless Crisis Response Services
3. Ensure Households Experiencing Homelessness Have Access to Affordable and Sustainable Permanent Housing

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

With its ESG and CDBG public service funding, the City plans to provide services to prevent and reduce homelessness in the coming year:

- 45 persons served with homeless prevention
- 14 homeless persons served at overnight shelters

These goals are part of a broader strategy to address homelessness. These actions include investing in critical homeless system infrastructure supports, such as Coordinated Entry, the Homeless Management Information System, and the Point in Time Count. The City will invest in and participate in regional and local strategic planning efforts and will grant funds to support local organizations to enhance services and to support local non-profit housing development for underserved homeless individuals.

In recent years, ESG funds have been supplemented by State of California funding from programs such as the Homekey and Homeless Housing, Assistance and Prevention (HHAP) programs which require a regional coordination and a unified regional response to reduce and end homelessness. The City will continue to work with local agency partners in addressing homelessness challenges.

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

The San Joaquin County Coordinated Entry system has a “no wrong door” approach. This means that an unhoused family or individual can present at any homeless housing and service provider and be assessed using the same assessment tool to determine their needs. Additionally, all CoC meetings are open to the public and people with lived experiences in homelessness make up a portion of the Board and/or regularly attend meetings.

The City conducts a variety of activities to engage and listen to unhoused people including ongoing program planning and monitoring, including regular reviews of HMIS data, discussion groups with unhoused individuals, and site visits to encampments and emergency shelters. The City is also an active participant in the Point in Time count, Dozens of City staff, officials, and community members are deployed to count and talk with those experiencing homelessness.

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

The City relies upon a talented cadre of local program partners and their staff to provide emergency shelter and transitional housing needs of homeless persons. The City’s primary role is to fund and monitor program operations to ensure programs are achieving overall objectives and program goals. Additionally, the City works with stakeholders and regional partners to prioritize the strategies/actions needed to meet objectives and achieve target goals. The City is currently focused on the following major emergency shelter and transitional housing strategies:

1. Increase Bed/Unit Capacity - Point in Time Count data shows that there an insufficient count of shelter beds or emergency housing units for individuals and families. The City is currently pursuing projects to create capacity for about 500 additional homeless persons to receive safe sheltering through two major shelter expansion projects. The new shelter spaces mark an abrupt shift from congregate, dormitory style programs, to shelters that offer non-congregate private spaces for individuals and couples and more accommodations for people with mobility limitations or other serious and ongoing health care needs. In addition to the creation of more privacy all shelter expansions are designed to accommodate pets and provide options to store personal possessions.

2. Enhance Operations - The City is working with local homeless service providers to implement programming geared toward housing navigation and intensive case managers. In part, this is being accomplished with a shift from a model of night-by-night shelter operations to the creation and delivery of full service (24/7) navigation centers. Site development and construction is underway with build-out of the newly designed shelter spaces and associated program offerings.
3. Secure Program Resources - The City continues to seek and procure additional state and regional funding to address homelessness. In addition to federal CDBG and ESG resources, the City has been awarded three rounds of temporary state funds and is working in partnership with homeless programs to help them develop the certifications and capacity to provide Medicare/Medicaid reimbursable services under the State's CalAIM project.

**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**

Federal regulations encourage providing homeless persons and households with housing as quickly as is practicable. The City has adopted a housing first model, with rapid rehousing and preventative services, emerging as the most effective strategies to shorten or ameliorate the risk of homelessness. Core strategies include:

1. Strengthening the coordinated entry system. Through non-federal funds, the City is making investments into the development and build-out of a county-wide coordinated entry system. Additionally, the City is requiring all homeless service partners to upload data into the HMIS and work through the coordinated entry system to find housing placements.
2. Investing in housing stabilization. Homelessness prevention, rapid rehousing, and rental assistance investments all help strengthen housing stability. Rapid rehousing is a strategy that has proven to help people stay housed, and to shorten the length of time that individuals and families experience homelessness. Rapid rehousing provides case management services and short-term rental assistance. Often, funding for short term rental assistance, such as rental application fees, security deposits, rental arrears or utility deposits, may make the difference in an individual's ability to remain stably housed.

The City invests in programs to help individuals and families remain safe and stable in their homes. This includes:

- \$245,000 in CDBG investments of public services allocations to fund programs that promote food security.
- \$207,802, in CDBG investments of public services allocations to fund fair housing programs that promote landlord/tenant mediations and prevent evictions.
- \$107,500, in ESG investments of allocations to fund homeless prevention services.

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

The City is working with San Joaquin County Whole Person Care health outreach workers, hospital discharge planners, the custody division, and local street outreach teams to identify people who are at risk of discharge or release from health care facilities or institutions into homelessness. Connecting patients with competent social workers is critical in preventing homelessness when discharging extremely low-income individuals from hospitals, mental health care facilities, and other inpatient health care institutions. Social workers work with health care professionals to create discharge plans and identify appropriate housing for patients who may not have a home to return to. In addition, the social worker can connect the patient to other supportive resources that may be needed. Funding for these initiatives is through sources other than the federal funds describes through this Action Plan, but are a critical component of the homeless continuum.

Investments through federal and state funds as well as local philanthropies include:

- Mobile teams, comprised of highly trained health outreach workers that are meeting people prior to discharge from hospitals or release from custody settings to develop a plan to address ongoing housing, health, and care stabilization needs.
- Mobile teams, working in partnership with law enforcement to de-escalate situations involving homeless individuals or people with mental health disorders / co-occurring substance use disorders and avert arrest for low level quality of life violations.
- Rental supplements and permanent housing vouchers, enabling people with serious mental illnesses or other permanent disabilities to pay local market rents.

This year's ESG funding commitments targets emergency programming for these vulnerable populations including \$152,500 in ESG investments toward emergency shelter services, and

\$107,500 to an organization providing homelessness prevention services to individuals and families at risk of homelessness.

**Discussion**

The City of Stockton is committed to a comprehensive and effective system to support homeless individuals and those with special needs. The City's partners use a coordinated and engaged regional system of care, ensuring that households experiencing homelessness have access to affordable and sustainable permanent housing solutions. Efforts are focused on preventing homelessness through activities designed to keep individuals and families from moving into emergency shelters or living in unsuitable conditions. Additionally, Stockton supports basic needs programs that provide food, hygiene, and other essentials to unsheltered individuals. These comprehensive efforts aim to build a supportive and sustainable environment for residents in need.

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

### **Introduction**

Barriers to affordable housing in Stockton include limited resources and significant development costs. Development impact fees represent a substantial constraint. Estimated fees in Stockton are \$61,725 for the hypothetical 1,800 sq ft single-family unit and \$33,028 for the hypothetical multifamily unit, including City fees, permit fees, as well as County fees and school district fees. The City's 2023-2031 Housing Element identifies these cost as barriers while highlighting opportunities to expand housing production through flexible development standards and streamlined processes.

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

The City of Stockton has implemented several measures to address development barriers. The 2022 Density Waivers program for small infill lots allows modification of underlying zoning requirements to facilitate development. Expanded density allowances now permit up to 136 units per acre in the Downtown Core, while development standards have been modified to encourage infill development in areas with existing infrastructure. The City continues to address development barriers through the Stockton Economic Stimulus Plan (SESP), which includes fee reductions that apply to single-family residential, multifamily residential, and nonresidential (commercial/industrial) permits issued citywide for builders/developers who comply with the terms of the program. The City maintains streamlined permit processing and has reduced parking requirements for affordable housing and transit-oriented developments.

The City is working to address financial barriers to development progress by collaborating more closely with housing developers and exploring new funding sources. Project feasibility remains challenging in the current environment. Construction costs, interest rates, and insurance costs create significant barriers to development. The affordable housing development process faces additional challenges related to state regulations and utility coordination, including significant delays caused by utility companies such as PG&E which are delaying housing development progress by three to six months or more. The City recognizes that sustainable affordable housing programs require stronger site control and partnerships. Property management services and wrap-around support services add complexity to project implementation, particularly when multiple funding sources are involved. These operational considerations affect both new development and ongoing maintenance of affordable housing stock.

**Pro-Housing Designation:**

In April 2023, the City received a Pro-housing Designation from the California Housing and Community Development Department (HCD), and now Stockton is one of several jurisdictions within California that has this designation. This designation was determined by the community's commitment to build more housing and adopting policies whose goal is to increase housing production to help meet the state's goal of 2.5 million new homes over the program life, with at least one million serving the needs of low-income Californians. The Pro-housing Designation allows the City to receive incentives such as additional points or other preferences in the scoring of competitive funding programs administered by the HCD and allow the City to be eligible for the Pro-housing Incentive Pilot Program with funding to help accelerate the City's affordable housing production.

**The Economic Review Committee**

The Economic Review Committee (ERC) provides guidance and assistance for development in Stockton. Coordinated through the Economic Development Department, the Committee is comprised of high-level staff from each of the permitting departments. The Committee will meet with project managers and review preliminary site plans, providing feedback and project requirements before the project is submitted for site plan/design review and building permits. This allows the project manager to be aware of and address the possible challenges to the project early in the development process. The ERC committee has assisted with many recent affordable housing development projects to help developers navigate and understand the regulatory environment and entitlement process, meet additional building regulations based on funding sources, and provide additional access to local and state resources.

**Discussion**

Stockton faces barriers to affordable housing due to limited resources and high development costs, including significant impact fees. The City's 2023-2031 Housing Element identifies these barriers and suggests flexible development standards and streamlined processes to expand housing production. Measures like the 2022 Density Waivers program, expanded density allowances, and the Stockton Economic Stimulus Plan (SESP) aim to reduce fees and streamline permits. The City collaborates with developers and explores new funding sources to address financial barriers, despite challenges from construction costs, interest rates, and regulations.



## **AP-85 Other Actions – 91.220(k)**

### **Introduction**

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

The City will continue to work in partnership with several non-profit and public service agencies to address the needs of the underserved populations. The City will identify agencies to provide food assistance, youth services, shelter, affordable/fair housing services, and/or services for the homeless and vulnerable populations.

#### **Actions planned to foster and maintain affordable housing**

The City will leverage public funds with other resources and align its program with other city initiatives, including the Single-Family Rehabilitation Loan Program. The City will continue to use its Notice of Funding Availability (NOFA) process to solicit eligible affordable housing projects to fund and continue to pursue funding at the State level, including Homekey, Pro-housing Incentive Pilot Program, Permanent Local Housing Allocation Program (PLHA), and Homeless Housing, Assistance and Prevention (HHAP) funds to advance affordable housing developments.

#### **Actions planned to reduce lead-based paint hazards**

The City of Stockton and the Housing Authority of San Joaquin County (HACSJ) comply with federal and state lead poisoning prevention requirements. HACSJ actively identifies, evaluates, and mitigates lead-based paint (LBP) hazards in public housing and Housing Choice Voucher (HCV) units. Households in the HCV program receive lead poisoning danger notices, and units built before 1978 with peeling paint are inspected and remediated if necessary. The City also provides EPA information pamphlets and uses certified professionals for inspections and risk assessments. If LBP hazards are found, the City works with the housing provider to address the presence of lead-based paint in accordance lead-safe housing rules. Children with elevated blood lead levels are referred for home inspections and families are guided on reducing exposure. After lead hazard control work, final inspections ensure safety.

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

The activities in the City's antipoverty strategy can be classified under two categories: Economic Development and Supportive Service Programs. The Consolidated Plan recognizes that households need vocational training, resource management, and life skill training to increase economic empowerment. The Plan also recognizes that households will continue to need assistance in meeting their basic needs while obtaining this training. The City will allocate

resources to organization that provide food, youth services, and services to vulnerable populations, including:

- Programs that provide food and nutritional education to homeless and low-income individuals
- Programs that provide tutoring, counseling, and literacy and creative writing services to youth.
- A fair housing program that provides tenant and landlord mediation services as well as workshops for tenants and landlords to be informed of their rights.
- Programs that serve vulnerable populations such as transition age youth, elderly, and women.
- Operational costs for shelters. In addition to providing shelter, these organizations also provide services that assist individuals in achieving self-sufficiency.
- Fund homelessness prevention activities to help keep households stably housed.

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

The City of Stockton Economic Development Department (EDD) is the lead agency responsible for the development of the Consolidated Plan and Annual Action Plan. EDD is also the primary agency responsible for the administration and management of programs and projects covered by these Plans.

During the 2025-2026 Program Year the City will:

- Continue to work with private housing developers to expand the availability of affordable housing, including pursuing joint funding opportunities
- Continue to participate in the San Joaquin County Continuum of Care
- Continue implementation of the Housing Element
- Continue to work with affordable housing developers to ensure that their developments include the facilities to provide the services needed for the residents
- Involve the public in the establishment of the Plans' goals and objectives to ensure measurable progress
- Follow the procedures outlined in the Language Access Plan and the updated Community Participation Plan
- Update its website, providing handouts and program guidelines to keep the public informed
- Continue ongoing training opportunities for staff, including but not limited to environmental review certifications and enhancing staff expertise of the CDBG, ESG, and HOME programs.

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

To facilitate preparation of the Annual Plan, the City of Stockton consulted with various agencies and organizations located throughout the city and county, including public and assisted housing providers and developers, an assortment of government agencies, as well as social service agencies. These consultations represent a continuation of ongoing interactions between the City and the agencies or organizations described.

**Discussion**

The City of Stockton plans to address obstacles to meeting underserved needs by partnering with non-profits and public service agencies to provide essential services. To foster affordable housing, the City will leverage public funds, align its programs with city initiatives, and use the Notice of Funding Availability (NOFA) process to solicit projects. The City will support economic development and service programs, including food assistance, youth services, and homelessness prevention. The City will also enhance coordination between public and private housing and economic development entities through ongoing consultations and public involvement.

## Program Specific Requirements

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

#### Introduction

#### Community Development Block Grant Program (CDBG)

##### Reference 24 CFR 91.220(I)(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	\$0.00
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	\$0.00
3. The amount of surplus funds from urban renewal settlements	\$0.00
4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan.	\$0.00
5. The amount of income from float-funded activities	\$0.00
Total Program Income	

#### 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.	80%

**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 propose to use HOME funds to provide any assistance in a form not included in Section 92.205(b). Developer proposals for HOME funds are accepted through a Notice of Funding Availability (NOFA) identifying the purpose and type of funds available, with announcements sent via email, posted to the City's website, social media pages, and a public notice (in both English and Spanish) in the local newspaper. . .

To encourage a variety of project types and locations, the City's HOME program does not limit beneficiaries. Applications are made available electronically through the City's online grant application program. The competitive applications are reviewed by City staff and/or a committee of regional housing experts and representatives from the community. The applications are scored through set criteria, including eligible uses, commitment and expenditure deadlines, developer capacity, experience, concurrence with established goals and policies, leveraging, or other requirements. Recommendations for funding are made to the City Council, which holds a publicly noticed hearing to vote on moving forward with the recommended allocations.

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

The City does not currently use HOME funds for homebuyer activities; however, the City will use the recapture provisions (pursuant to 24 CFR 92.254(a)(5)(ii)) in future cases where a homebuyer subsidy exists. For HOME-funded homebuyer assistance loans, the Promissory Note, Deed of Trust, Declaration of Restrictions, and the Homebuyer Agreement will be the enforcement mechanisms for the City's recapture provisions. The City will enforce minimum periods of affordability based on the amount of homebuyer subsidy provided to the buyer of not less than:

- Five years for less than \$15,000
- Ten years for between \$15,000-\$40,000 and
- Fifteen years for more than \$40,00

Recapture provisions are based on 24 CFR 92.254 (a) (5) (ii), which stipulates the conditions for recapture of the HOME investment used to assist low-income families in purchasing a home. Homebuyer recapture provisions will be included in the recorded deed of trust that secures a

HOME loan note, or as a deed restriction rider. This requires recapture of funds if the home does not continue to be the borrower's principal residence or if all or any part of the property or any interest in it is sold, rented, conveyed, or transferred during the affordability period. Recapture provisions also stipulate that only the direct subsidy to the homebuyer is subject to recapture, which includes down payment assistance, closing costs, other HOME assistance provided directly to homebuyer, and the difference between fair market value and the sales price.

The net proceeds are the sale price minus the senior loan payment (other than HOME funds) and any closing costs. If the net proceeds are not sufficient to recapture the full HOME investment plus enable the homeowner to recover the amount of the homeowner's down payment and any capital improvement investment made by the owner since the purchase, the City may share the net proceeds. The net proceeds may be divided proportionally between the City and the homeowner as set forth in the following mathematical formulas:

$$\frac{\text{HOME subsidy}}{\text{HOME subsidy} + \text{Homeowner Investment}} \times \text{Net proceeds} = \text{HOME amount to be recaptured}$$

$$\frac{\text{Homeowner Investment}}{\text{HOME subsidy} + \text{Homeowner Investment}} \times \text{Net proceeds} = \text{Amount to homeowner}$$

In the event of foreclosure, the amount subject to recapture is based on the amount of net proceeds (if any) from the foreclosure sale.

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

Part 92.254(a)(4) applies to homeownership activities including housing acquired by a family with HOME program assistance. The City does not currently use HOME funds for homeownership activities, however in the case HOME funds are used, the city will follow HOME affordability period requirements as a minimum standard as well as the recapture requirements as specified in question 2 of this section.

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

The City does not provide HOME funds for the refinancing of multi-family housing.

5. If applicable to a planned HOME TBRA activity, a description of the preference for persons with special needs or disabilities.

The City does not currently offer HOME TBRA.

6. 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)).

Not applicable.

7. 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).

The City's HOME funding is used to support local or regional housing developers' affordable housing projects through loans or grants. Developers use local housing needs market data and/or other housing subsidy requirements in deciding the target sub-population that each proposed housing project will serve (e.g. homeless, at risk of homeless, veterans, seniors, farm workers, etc.). However, HOME program requirements at 24 CFR 92.253(d)(3), require that if there is any limitation or preference given to a particular segment of the population on any affordable housing project assisted with HOME program funds, the limitation or preference must be described in the City's HUD Consolidated Plan (without violating any nondiscrimination requirements). To comply with this requirement, the City adopted HOME preferences in 2024 as part of a Substantial Amendment to its 2020-2025 Consolidated Plan. The City's HOME preference policy stipulates that when issuing affordable housing NOFAs, the City will consider awarding HOME funds to eligible projects that propose to serve any of the following target populations:

Housing Project Population	Definition of Population	Rationale Notes/Supporting Data
<b>Housing for Homeless or at Risk of Homeless (includes unaccompanied/foster care youth)</b>	Homeless or at risk of homeless individuals or households.  Must meet HUD/HCD definition of homelessness.	The need for permanent homes for homeless residents is overwhelming and immediate. Consistent with City/Regional plans. The San Joaquin County 2024 Point in Time Count reported a total of 4,732 persons experiencing homelessness in San Joaquin County in 2024, with 2,996 (63%) within the City of Stockton. According to the 2022 Point in Time Count 2,319 persons experiencing homelessness resided within in San Joaquin County. The fact that the homeless population has doubled in the past two years indicates that more attention and resources need to be dedicated to addressing this issue. The San Joaquin County 2024 Point in Time Count collected data

		<p>on four subpopulations that the federal government determined to face particular challenges related to housing. One of the key subpopulations identified by the federal government was children and youth under age 25 experiencing homelessness. Of the 4,732 persons experiencing homelessness in San Joaquin County, 304 individuals were identified as being children and transition aged youth under 25. Compared to the other four vulnerable subpopulations identified in the report, children and youth under the age of 25 experienced the highest share of unsheltered homelessness as 80% of this population reported they were unsheltered.</p> <p>The Analysis of Impediments that was completed in correspondence with the 2020-2025 Consolidated Plan identified homeless persons as a special housing needs population. The report suggests the lead determinate for homelessness is due to the inability to afford housing in a particular community. Increasing the stock of affordable housing for this subpopulation can alleviate some of the challenges faced by this special housing needs subpopulation.</p>
<b>Housing for Homeless with Special Needs</b>	<p>Homeless individuals w/ special needs including but not limited to individuals experiencing or recovering from substance abuse disorders, mental or physical disabilities, chronic homelessness, justice involved individuals, etc.</p> <p>Must meet HUD/HCD definition of homelessness.</p>	<p>The 2024 City of Stockton Housing Element cites persons with disabilities as a key population with special housing needs. The report cites “14.6 percent of the total population in Stockton five years and older had one or more disabilities in 2020, compared 13.3 percent countywide, and 8.0 percent in California.”</p> <p>Using HMIS data, the 2024 Regional Homeless Action Plan identified statistically significant vulnerable populations withing the San Joaquin Continuum of Care district. According to HMIS data, people with serious mental illness (SMI) and people with substance use disorders (SUD) were a significant population that faced housing insecurity.</p> <p>The San Joaquin County 2024 Point in Time Count (PITC) collected data on four subpopulations that the federal government determined to face particular challenges related to housing. One of the key subpopulations identified by the federal government was individuals with disabilities experiencing chronic homelessness. Of the 4,732 persons experiencing homelessness in San Joaquin County, 1,078 individuals were identified as being chronically homeless. According to the PITC, 72% of the chronically homeless population are unsheltered.</p> <p>The Analysis of Impediments that was completed in correspondence with the 2020-2025 Consolidated Plan identified persons with disabilities as a special housing needs population. The analysis cites that persons with disabilities can face discrimination in the housing market due to biases about adaptive equipment and the need for modifications. Property owners might be concerned about potential damage from equipment or</p>



		<p>be reluctant to accommodate service animals, even if it means violating a no-pet policy.</p> <p>According to San Joaquin County Behavioral Health Services, “there is an urgent and increasing need for affordable housing in San Joaquin County, particularly for justice-involved mental health consumers. According to the National Institute of Mental Health, approximately 37% of individuals in the U.S. incarcerated in state and federal prisons and 44% in local jails have been diagnosed with a mental illness. Furthermore, justice-involved individuals with mental health conditions are significantly more likely to experience homelessness, with studies indicating that about 15% of people leaving jails and prisons become homeless within a year of release.”</p>
<b>Housing for Low/Moderate Income Individuals and Families (includes families with children and large families)</b>	<p>Low-income individuals and Families. Must meet HUD/HCD low/moderate income definition(s).</p>	<p>The updated 2024 City of Stockton Housing Element cites large families as a key population with special housing needs. HUD defines a large household or family as consisting of five or more members. Large families are cited as a special housing needs population because 21.2% of households in Stockton are considered large households compared to 19.6% in the County and 13.8% in California.</p> <p>The San Joaquin County 2024 Point in Time Count collected data on four subpopulations that the federal government determined to face particular challenges related to housing. One of the key subpopulations identified by the federal government was families with children experiencing homelessness. Of the 4,732 persons experiencing homelessness in San Joaquin County, 454 individuals were identified as being members of homeless families with children.</p> <p>The Analysis of Impediments that was completed in correspondence with the 2020-2025 Consolidated Plan identified large households as a special housing needs population. The analysis conducted cited that lower-income large households often face excessive housing costs due to the higher expense of larger units and the scarcity of such units in conventional apartment complexes. Additionally, these families may experience overcrowded living conditions and discrimination in the housing market, such as higher rents or outright denial of rental applications.</p>
<b>Housing for Veterans</b>	<p>U.S. Military Veterans</p>	<p>Many housing authorities have preferences for award of housing vouchers to veterans.</p> <p>Rationale is that veterans are more likely to be physically and financially vulnerable and to need affordable housing more than the general population. VASH rental vouchers from the VA are either portable or project based. Preference could be for VASH holders.</p> <p>The San Joaquin County 2024 Point in Time Count collected data</p>

		<p>on four subpopulations that the federal government determined to face particular challenges related to housing. One of the key subpopulations identified by the federal government was veterans. Of the 4,732 persons experiencing homelessness in San Joaquin County, 249 individuals were identified as being members of homeless families with children. Moreover, the report cites that 79% of the homeless veteran population were unsheltered. Using HMIS data, the 2024 Regional Homeless Action Plan identified statistically significant vulnerable populations within the San Joaquin Continuum of Care district. According to HMIS data, veterans were a significant population that faced housing insecurity. The plan states that “while veterans had the highest rate for permanent housing placement, they also have a higher-than-average rate of returning to homelessness after placement, suggesting that veterans' housing programs might benefit from additional support for clients (perhaps trauma or PTSD-specific).” The plan also outlines that one of the four funding priorities of HHAP round 5 involves targeted outreach and support services for vulnerable populations such as veterans.</p>
<b>Housing for Survivors of Domestic Violence</b>	Victims of Domestic Violence	<p>Many housing authority voucher programs give priority to the Violence Against Women Act population. HUD recently issued new resources for advancing housing protections for survivors of domestic violence. Using HMIS data, the 2024 Regional Homeless Action Plan identified statistically significant vulnerable populations within the San Joaquin Continuum of Care district. According to HMIS data, people fleeing domestic violence was a significant population that faced housing insecurity. The plan outlines that one of the four funding priorities of HHAP round 5 involves targeted outreach and support services for vulnerable populations such as victims of domestic violence.</p>
<b>Senior Housing</b>	<ul style="list-style-type: none"> <li>• 55 years of age or older if at least 80% of units are occupied by at least one person of this age.</li> <li>• OR at least one person 62 or older resides in each unit (100% of the units)</li> <li>• AND the housing project is required to demonstrate the “intent” to be</li> </ul>	<p>The 2024 City of Stockton Housing Element cites seniors as a key population with special housing needs. Senior households make up 21.6% of Stockton households and nearly 30% of senior households in Stockton have an income of less than \$25,000. The Analysis of Impediments that was completed in correspondence with the 2020-2025 Consolidated Plan identified seniors as a special housing needs population. The analysis describes that seniors possess special housing needs due to living on fixed incomes, limited mobility, and physical or mental impairments or disabilities. In order to make housing accessible to this subpopulation, housing must be affordable within their fixed income budget and designed for individuals with limited mobility.</p>

	<p>“Housing for Older Persons.”</p> <ul style="list-style-type: none"> <li>• Head of Household or spouse must meet the age definition.</li> </ul>	
<b>Farmworker Housing</b>	Farmworkers including those that meet other funding source farmworker definitions.	<p>The updated 2024 City of Stockton Housing Element cites farmworkers as a key population with special housing needs. The plan states that farmworkers are an essential component of Stockton’s economy and according to the 2016-2020 American Community Survey 5,010 Stockton residents work in agriculture, forestry, fishing and hunting, or mining. Moreover, according to the 2017 Census, 19,741 farmworkers worked in San Joaquin County. Programs 11, 12, 16, 22, 23, and 30 of the Housing Element commit to actions to support developing new homes and rehabilitating existing homes for farmworkers, along with prioritizing outreach and programs for farmworkers. While farmworkers are important to the local economy, many are low-income workers and are often subject to substandard housing. The Analysis of Impediments that was completed in correspondence with the 2020-2025 Consolidated Plan identified farmworkers as a special housing needs population. While farmworkers were identified as being an essential component of the regional agricultural system they face challenges in obtaining adequate and affordable housing due to high poverty rates, large household sizes, linguistic isolation, and intimidation and fear due to citizenship status. Due to limited capital in farmworker housing, the farm-working community frequently ends up in overcrowded, substandard housing that is often geographically isolated and lacks essential services, increasing their risk of homelessness.</p>
<b>Workforce Housing</b>	Housing that is affordable for those earning between 80% and 120% of AMI.	<p>Households in workforce housing typically earn too much to qualify for programs under HUD. At the same time, they are also unable to afford most quality market-rate apartments. Development of workforce housing will be subject to the availability of public or private resources tailored to this population.</p>
<b>Artists’ Housing</b>	Those engaging in defined artistic pursuits, including visual arts, music, dance, and other media.	<p>Artists are underpaid relative to housing prices, part of the City’s priorities for placemaking, and at high risk of displacement. Need for flexible and affordable live/workspace.</p>

Table 65 – HOME Preferences and Supporting Data

In addition, The following requirements shall apply to all HOME-assisted housing projects that adopt any of the target populations allowable under this policy:

- a. The project shall not violate of any local, state, or federal fair housing regulations.
- b. The project shall comply with all applicable housing regulations at 24 CFR Part 92.
- c. The project shall comply with the HOME Tenant Selection requirements at 24 CFR 92.253(d) as follows:
  - i. An owner of rental housing assisted with HOME funds must comply with the affirmative marketing requirements established by the City of Stockton pursuant to [§ 92.351\(a\)](#).
  - ii. The owner must adopt and follow written tenant selection policies and criteria that:
    - 1) Limit the housing to very low- income and low-income families;
    - 2) Are reasonably related to the applicants' ability to perform the obligations of the lease (i.e., to pay the rent, not to damage the housing; not to interfere with the rights and quiet enjoyment of other tenants);
    - 3) Limit eligibility or give a preference to a particular segment of the population if permitted in its written agreement with the City of Stockton (and only if the limitation or preference is described in the City of Stockton's Consolidated Plan).
      - (i.) Any limitation or preference must not violate nondiscrimination requirements in [§ 92.350](#). A limitation or preference does not violate nondiscrimination requirements if the housing also receives funding from a Federal program that limits eligibility to a particular segment of the population (e.g., the Housing Opportunity for Persons with AIDS program under [24 CFR part 574](#), the Shelter Plus Care program under [24 CFR part 582](#), the Supportive Housing program under [24 CFR part 583](#), supportive housing for the elderly or persons with disabilities under [24 CFR part 891](#)), and the limit or preference is tailored to serve that segment of the population.
      - (ii.) If a project does not receive funding from a Federal program that limits eligibility to a particular segment of the population, the project may have a limitation or preference for persons with disabilities who need services offered at a project only if:
        - (A.)The limitation or preference is limited to the population of families (including individuals) with

disabilities that significantly interfere with their ability to obtain and maintain housing;

(B.) Such families will not be able to obtain or maintain themselves in housing without appropriate supportive services; and

(C.) Such services cannot be provided in a nonsegregated setting. The families must not be required to accept the services offered at the project. In advertising the project, the owner may advertise the project as offering services for a particular type of disability; however, the project must be open to all otherwise eligible persons with disabilities who may benefit from the services provided in the project.

- 4) Do not exclude an applicant with a voucher under the Section 8 Tenant-Based Assistance: Housing Choice Voucher Program ([24 CFR part 982](#)) or an applicant participating in a HOME tenant-based rental assistance program because of the status of the prospective tenant as a holder of such voucher or comparable HOME tenant-based assistance document.
- 5) Provide for the selection of tenants from a written waiting list in the chronological order of their application, insofar as is practicable. The Continuum of Care's (CoC) Coordinated Entry process is not a compliant tenant selection process therefore not permitted;
- 6) Give prompt written notification to any rejected applicant of the grounds for any rejection; and
- 7) Comply with the VAWA requirements prescribed in [§ 92.359](#).

**Emergency Solutions Grant (ESG)  
Reference 91.220(l)(4)**

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

See “ESG Written Standards” attachment.

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

The San Joaquin County Coordinated Entry System (CES) of the San Joaquin Continuum of Care (CoC) facilitates the coordination and management of resources and services for the homeless. The function of CES is to quickly and equitably connect the highest need, most vulnerable persons in San Joaquin County to available housing and supportive services, to rapidly resolve their housing crisis and make homelessness rare, brief, and non-recurring in our region. In San Joaquin County, Family Resource and Referral Center is the administrator of CES through their 211 San Joaquin program. The CoC has adopted a “no wrong door” approach to coordinated entry, in which a homeless family or individual can present at any homeless housing and service provider in the geographic area but is assessed using the same tool and methodology so that referrals are consistently completed across the CoC. This means that in San Joaquin County, CES is not focused on moving households from the streets into shelter but rather from shelter into permanent housing.

Coordinated Entry is intended to act as the referral point to various permanent housing programs. Those in need of services contact an Access Point, typically an emergency shelter or 211 San Joaquin, to complete an assessment. The household will receive the same assessment regardless of which Access Point they engage. This assessment provides information on the household’s vulnerability and length of time experiencing homelessness, which is used to prioritize households for placement. After completing the assessment, the household is placed in a queue of households eligible to receive a referral into various housing programs. Once a housing program has an opening, the CES will provide the agency with a referral from the queue of those assessed, based upon the program’s eligibility criteria and the household’s vulnerability. Coordinated Entry prioritizes the most vulnerable households who also meet the eligibility requirements of available housing programs.

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

The City of Stockton will implement the Emergency Solutions Grant (ESG) program in accordance with The McKinney-Vento Homeless Assistance Act as amended by S.896 HEARTH Act of 2009, found at 24 CFR Part 576, to ensure eligible activities are selected and financially managed in accordance with local and federal requirements.

The competitive sub-award process begins with the Community Development Committee (CDC) annual Kick-off Meeting in the fall, as outlined in the Annual Action Plan schedule. The City updates the Annual Action Plan schedule, application, and guidelines, issues public notices, and releases the competitive Notice of Funding Availability (NOFA).

Applications for funding are submitted by mid-January. Staff reviews these applications for eligibility, organizational capacity, completeness, ESG requirements, consistency with the Consolidated Plan, and compliance with 24 CFR Part 576. After the City's review a CDC meeting is held for eligible applicants to present their applications to the committee. During this meeting, CDC members review and score applications which assist in informing the City's recommendations to City Council. Final scoring recommendations are presented to CDC and are taken to City Council along with the Annual Action Plan for approval. Ahead of the two public hearings (CDC and City Council) the public is informed of the public hearings and 30-day public comment period via a public hearing notice published in The Record (a local newspaper publication) and by posting the plan and related information on the City website. .

- 4. In April, the City Council reviews and votes on the funding recommendations at a publicly noticed meeting. The Annual Action Plan is then submitted to HUD via IDIS. Award letters are sent to subrecipients following submittal. 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.**

Planning for homeless services is primarily done in collaboration with the CoC, which includes several Board members and active participants who have experienced homelessness. City staff also engage with homeless individuals through community discussion groups, listening sessions, and site visits to encampments and shelters to gather input on proposed policies, funding decisions, and service needs. Additionally, the involvement of paid staff and Board members with lived experiences in homelessness is considered during grant reviews and funding decisions.

**5. Describe performance standards for evaluating ESG.**

The City of Stockton will work with the CoC and utilize data captured by HMIS to evaluate the outcomes of ESG assisted programs. The goal of this approach is to use these performance measures to measure the efficacy of the programs and inform future programming decisions. When evaluating the programs, we will look to data collected in HMIS such as length of homelessness, employment status, and retention into permanent housing solutions to build reasonable and attainable performance measures for ESG funded programs.

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## City of Stockton Housing Element Assessment of Fair Housing and the Consolidated Plan

The City of Stockton's 2025-2029 Consolidated Plan and the 2023-2031 Housing Element are key components of the City's strategy to address housing and community development needs over the next several years. The Consolidated Plan serves as a comprehensive framework for allocating federal funds from the Department of Housing and Urban Development (HUD), to support affordable housing and community development. The 2023-2031 Housing Element, required by the State of California, focuses specifically on ensuring that communities plan for sufficient housing to meet their growing and diverse needs. Both plans aim to create equitable access to housing and resources for all Stockton residents, particularly those who are low-income or experiencing housing instability. The Consolidated Plan aims to address the issues outlined in the Housing Element and establish policies to ensure these problems are prioritized and mitigated.

The Housing Element includes the requirement for inclusion of an Assessment of Fair Housing (AFH). The requirements for the California AFH were modeled on the federal Affirmatively Furthering Fair Housing (AFFH) guidelines and exceed what is required by a federal Analysis of Impediments (AI). By complying California Housing Element requirements, the City of Stockton is therefore in compliance with federal fair housing requirements and is identifying actions that increase fair housing.

### Housing Element

The 2023-2031 Housing Element identified the following factors that contribute to fair housing issues: presence of concentrated racially and ethnically concentrated areas of poverty (R/ECAPs) in Greater Downtown, South Stockton, East Stockton, and between West Lane and Pacific Avenue in Northern Stockton; barriers to homeownership, particularly for communities of color; displacement risk due to economic pressures, particularly for lower-income households; disproportionately limited access to resources for lower-income and communities of color households; and high rates of unsheltered individuals and families.

Issue	Key Contributing Factors	Key Actions
Concentration of R/ECAPs	Concentrations of poverty and lower-income households, highest share of minority residents compared to county and megaregion, older	Produce affordable rental housing in opportunity-rich locations near transit, services, and key amenities, encourage landlords and property managers in high resource areas to advertise their units to

	housing stock and areas with poor housing conditions resulting in lower housing costs in South Stockton, Downtown and East Stockton, and scattered residential areas along major commercial corridors north of Midtown	Section 8 voucher holders, provide education to landlords and property owners on fair housing rights and requirements/discrimination
Barriers to Homeownership	Historical redlining and barriers to building generational wealth, household income growth that has not kept pace with housing costs	Offering programs to remove racially restrictive covenants on city and private property, continue to operate program for downpayment assistance for first-time homebuyers (depending on feasibility per market conditions)
Displacement Risk	Rising housing costs outpacing wage increases, cost of repairs and rehabilitation, outside demand for housing from relocating Bay Area residents with higher-paying jobs intensifies gentrification and competition for housing resources	Continue to operate the housing rehabilitation programs and improve communication about the program to eligible owners of mobile homes and rental properties, continue code enforcement in targeted areas, comply with State law regarding replacement of existing affordable units, assist the development of affordable housing using State and federal funds, provide support for low-income renters, including multilingual tenant counseling, rental assistance, financial counseling, crisis stabilization services, and legal support, provide weatherization services
Limited Access to Resources for Lower-Income and Communities of Color	Discriminatory lending and other barriers to home ownership for non-White populations, including language barriers and needed documentation	Implement multilingual communication and outreach strategies, offering programs to remove racially restrictive covenants on city and private property
High Rates of Unsheltered Individuals and Families	Increasing proportion of employed homeless face challenges in securing housing	Continue to support organizations assisting homeless persons

### Consolidated Plan

The 2025-2030 Consolidated Plan is designed to directly tackle the housing challenges identified in the Housing Element, with the goal of increasing the amount of affordable housing that is

accessible to Stockton residents. The activities the City will fund through its Consolidated Plan are not only aligned with the issues highlighted in the Housing Element, but also expand upon the key actions and strategies outlined in that document.

To further encourage affordable housing development, the City of Stockton has taken steps to reduce barriers to affordable housing development, such as modifying zoning requirements through the 2022 Density Waivers program, which allows for up to 136 units per acre in the Downtown Core. The city also offers fee reductions for builders and developers under the Stockton Economic Stimulus Plan (SESP) and has streamlined permit processing while reducing parking requirements for affordable housing and Transit Oriented Development projects. To address financial barriers, Stockton is working closely with housing developers and exploring new funding sources for both development and service provision.

Additionally, the City of Stockton employs a comprehensive outreach strategy to engage with homeless individuals, particularly unsheltered persons, through partnerships with local organizations. Outreach teams provide essential services and assess individual needs, using data from efforts like the annual Point-in-Time Count. The city offers Navigation Centers and low-barrier shelters for access to services and housing.

The Housing First approach guides Stockton's efforts to address emergency and transitional housing needs, providing immediate housing without preconditions. Programs like Emergency Housing, Transitional Housing, and Rapid Rehousing help homeless individuals and families access housing and support services. Stockton also focuses on helping chronically homeless individuals, families, veterans, and unaccompanied youth transition to permanent housing and independent living. This includes Rapid Rehousing, Permanent Supportive Housing, and specialized services for specific populations. Finally, the city provides financial support through ESG subrecipient grants for homelessness prevention programs and services to assist low-income individuals at risk of homelessness, especially those discharged from institutions or receiving social services, through programs like Emergency Rental Assistance and collaborations with local nonprofits and healthcare providers.

The City will fund the following projects during the 2025-2029 planning period to remove and prevent barriers to affordable housing:

1. CDBG Administration
2. CDBG Housing Program Delivery
3. CDBG Housing Programs
4. Public Services & Fair Housing
5. HOME Administration
6. HOME Program Delivery

7. HOME Housing Loans
8. CHDO Set-Aside Funds
9. ESG Entitlement 2025 Stockton

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## City Of Stockton Emergency Solutions Grant (ESG) Written Standards

### Introduction

The ESG Program Interim Rule requires the ESG recipient to establish and consistently follow written standards for providing assistance with ESG funds (24 CFR 576.400 (e)). At a minimum, these written standards must include:

- Standard policies and procedures for evaluating individuals' and families' eligibility for assistance under Emergency Solutions Grant (ESG);
- Standards for targeting and providing essential services related to street outreach;
- Policies and procedures for admission, diversion, referral, and discharge by emergency shelters assisted under ESG, including standards regarding length of stay, if any, and safeguards to meet the safety and shelter needs of special populations, *e.g.*, victims of domestic violence, dating violence, sexual assault, and stalking; and individuals and families who have the highest barriers to housing and are likely to be homeless the longest;
- Policies and procedures for assessing, prioritizing, and reassessing individuals' and families' needs for essential services related to emergency shelter;
- Policies and procedures for coordination among emergency shelter providers, essential services providers, homelessness prevention, and rapid re-housing assistance providers; other homeless assistance providers; and mainstream service and housing providers (see [§ 576.400\(b\)](#) and [\(c\)](#) for a list of programs with which ESG-funded activities must be coordinated and integrated to the maximum extent practicable);
- Policies and procedures for determining and prioritizing which eligible families and individuals will receive homelessness prevention assistance and which eligible families and individuals will receive rapid re-housing assistance (these policies must include the emergency transfer priority required under [§ 576.409](#));
- Standards for determining what percentage or amount of rent and utilities costs each program participant must pay while receiving homelessness prevention or rapid re-housing assistance;
- Standards for determining how long a particular program participant will be provided with rental assistance and whether and how the amount of that assistance will be adjusted over time; and
- Standards for determining the type, amount, and duration of housing stabilization and/or relocation services to provide to a program participant, including the limits, if any, on the homelessness prevention or rapid re-housing assistance that each program

participant may receive, such as the maximum amount of assistance, maximum number of months the program participant receive assistance; or the maximum number of times the program participant may receive assistance.

The goals of the written standards are to:

- Establish community-wide expectations on the operations of homeless services projects within the community
- Ensure that the system is transparent to users and operators
- Establish a minimum set of standards to manage the quality of ESG-funded projects functioning in the community
- Make local priorities, as outlined in the Consolidated Plan
- Create consistency and coordination between ESG-funded projects within the San Joaquin County Continuum of Care (CoC).

All subrecipients of City of Stockton ESG Program funding must follow these standards and must be applied consistently. Homeless service providers that do not receive ESG funds are strongly encouraged to utilize these written standards to ensure consistency in the delivery of services. Subrecipients of Stockton ESG funding must not adopt standards that conflict with those established by these City of Stockton ESG Written Standards, the CoC Program, or ESG Program interim rules.

This document outlines the Written Standards for ESG Service Delivery which meet HUD's minimum requirements and addresses the City's expectations for all projects. For each project type, the standards outline the purpose of the project type, eligibility criteria, prioritization, minimum standards of assistance, client access, and performance standards.

## **ESG General Standards**

### **Homeless Participation**

All recipients and sub-recipients of ESG program funds are required to follow the minimum standards for homeless participation. Minimum standards for homeless participation are:

- (24 CFR 578.75) / ESG (24 CFR 576.405):
  - Each funded provider of ESG assistance must have at least one homeless individual or formerly homeless individual on the Board of Directors or equivalent policymaking entity of the provider.
  - To the maximum extent possible, the provider shall involve homeless individuals and families in paid or volunteer work for the ESG programs.

### Housing First

As the funding agency of ESG funds, HUD requires that the City align with the local Continuum of Care (CoC) homelessness funding policies. San Joaquin County is the lead agency of the local CoC and follows a Housing First approach.

Housing First is an approach to connect individuals and families experiencing homelessness quickly and successfully to permanent housing without preconditions and barriers to entry, such as sobriety, treatment, or service participation requirements. Housing First Policies were signed into law in California on September 29, 2016, with SB 1380 to add Chapter 6.5 (commencing with Section 8255) to Division 8 of the Welfare and Institutions Code, relating to homelessness. Supportive services are offered to maximize housing stability and prevent returns to homelessness as opposed to addressing predetermined treatment goals prior to permanent housing entry. Housing First is premised on the following principles:

- Homelessness is first, and foremost, a housing crisis and can be addressed through the provision of safe and affordable housing.
- All people experiencing homelessness, regardless of their housing history and duration of homelessness, can achieve housing stability in permanent housing. Some may need very little support for a brief period, while others may need more intensive and long-term supports.
- Everyone is “housing ready.” Sobriety, compliance in treatment, or clean criminal records are not necessary to succeed in housing. Rather, homelessness programs and housing providers must be “consumer ready”.
- Many people experience improvements in quality of life, in the areas of health, mental health, substance use, and employment, as a result of achieving housing.
- People experiencing homelessness have the right to self-determination and should be treated with dignity and respect.
- The exact configuration of housing and services depends upon the needs and preferences of the population.

### Housing First Core Features

- 1) Few to no programmatic prerequisites to permanent housing entry – People experiencing homelessness are offered permanent housing with no programmatic preconditions such as demonstration of sobriety, completion of alcohol or drug treatment, or agreeing to comply with a treatment regimen upon entry into the

program. People are also not required to first enter a transitional housing program in order to enter permanent housing.

- 2) Low barrier admission policies – Permanent Supportive Housing’s admissions policies are
- Designed to “screen-in” rather than screen-out applicants with the greatest barriers to housing, such as having no or very low income, poor rental history and past evictions, or criminal histories. Housing programs may have tenant selection policies that prioritize people who have been homeless the longest or who have the highest service needs as evidenced by vulnerability assessments or the high utilization of crisis services.
  - Rapid and streamlined entry into housing – Many people experiencing chronic homelessness may experience anxiety and uncertainty during a lengthy housing application and approval process. In order to ameliorate this, Housing First permanent supportive housing models make efforts to help people experiencing homelessness move into permanent housing as quickly as possible, streamlining application and approval processes, and reducing wait times.
  - Supportive services are voluntary but can and should be used to persistently engage tenants to ensure housing stability - Supportive services are proactively offered to help tenants achieve and maintain housing stability, but tenants are not required to participate in services as a condition of tenancy. Techniques such as harm reduction and motivational interviewing may be useful. Harm reduction techniques can confront and mitigate the harms of drug and alcohol use through non-judgmental communication while motivational interviewing may be useful in helping households acquire and utilize new skills and information.
  - Tenants have full rights, responsibilities, and legal protections – The goal of the Housing First approach is to help people experiencing homelessness achieve long-term housing stability in permanent housing. Permanent housing is defined as housing where tenants have leases that confer the full rights, responsibilities, and legal protections under Federal, state, and local housing laws. Tenants are educated about their lease terms, given access to legal assistance, and encouraged to exercise their full legal rights and responsibilities. Landlords and providers in Housing First models abide by their legally defined roles and obligations. For instance, landlords and providers do not enter tenants’ apartments without tenants’ knowledge and permission except under legally defined emergency circumstances. Many Housing First permanent supportive housing programs also have a tenant association or council to review program



policies and provide feedback, and formal processes for tenants to submit suggestions or grievances.

- Practices and policies to prevent lease violations and evictions – Housing First supportive housing programs should incorporate practices and policies that prevent lease violations and evictions among tenants. For instance, program policies consistent with a Housing First approach do not consider alcohol or drug use to be lease violations. Housing First models may also have policies that give tenants some flexibility and recourse in the rent payment, which in many subsidized housing programs is 30% of the participant's income. For example, rather than moving towards eviction proceedings due to missed rent payments, programs may allow tenants to enter payment installment plans for rent arrearages or offer money management assistance to tenants.
- Applicable in a variety of housing models – The Housing First approach can be implemented in different types of supportive housing settings, including: scattered-site models in private market apartments, where rental assistance is provided, and tenants have access to mobile and site-based supportive services; single-site models in which permanent supportive housing buildings are newly constructed or rehabilitated and tenants have access to voluntary on-site services; and set-asides, where supportive services are offered to participants in designated units within affordable housing developments.

#### Homelessness Definition (24 CFR 578.3)

For the purposes of this document and for determining the status of persons experiencing homelessness, the definition of homeless persons will be supported by the HUD definition of Homelessness as follows:

##### Category 1: Literally Homeless

- Individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:
  - i. Has a primary nighttime residence that is a public or private place not meant for human habitation; or
  - ii. Is living in a publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state and local government programs); or

- iii. Is exiting an institution where (s)he has resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution.

#### Category 2: Imminent Risk of Homelessness

- Individual or family who will imminently lose their primary nighttime residence, provided that:
  - i. Residence will be lost within 14 days of the date of application for homeless assistance;
  - ii. No subsequent residence has been identified; and
  - iii. The individual or family lacks the resources or support networks needed to obtain other permanent housing.

#### Category 3: Homeless under Federal statutes

- Unaccompanied youth under 25 years of age, or families with children and youth, who do not otherwise qualify as homeless under this definition, but who:
  - i. Are defined as homeless under other listed federal statutes;
  - ii. Have not had a lease, ownership interest, or occupancy agreement in permanent housing during the 60 days prior to the homeless assistance application;
  - iii. Have experienced persistent instability as measured by two moves or more during in the preceding 60 days; and
  - iv. Can be expected to continue in such status for an extended period of time due to special needs or barriers

#### Category 4 Fleeing/Attempting to Flee DV

- Any individual or family who:
  - i. Is fleeing, or is attempting to flee, domestic violence;
  - ii. Has no other residence; and
  - iii. Lacks the resources or support networks to obtain other permanent housing

#### Homeless Recordkeeping Requirements (576.500)

#### Category 1 Literally Homeless 24 CFR 576.500 (b)

- Third-party verification will always be attempted first to verify homeless status
  - i. Written observation by the outreach worker; or
  - ii. Written referral by another housing or service provider; or

- iii. A written certification by the individual or head of household seeking assistance; or
- iv. Records contained in an HMIS or comparable database used by victim service or legal service providers are acceptable evidence of third-party documentation and intake worker observations if the HMIS retains an auditable history of all entries, including the person who entered the data, the date of entry, and the change made; and if the HMIS prevents overrides or changes of the dates on which entries are made.
- Intake Worker Observation will be the second form of homeless status verification
- Certification by the individual or head of household seeking assistance stating that (s)he was living on the streets or in shelter will be the last resort of homeless status verification.
- For individuals exiting an institution – one of the forms of evidence above and:
  - i. Discharge paperwork or written/oral referral, or
  - ii. Written record of intake worker's due diligence to obtain above evidence and certification by individual that they exited institution

#### Category 2 Imminent Risk of Homelessness §576.500 (c)

- A court order resulting from an eviction action notifying the individual or family that they must leave; or
- For individuals and families leaving a hotel or motel – evidence that they lack the financial resources to stay; or
- A documented and verified oral statement; and
- Certification that no subsequent residence has been identified; and
- Self-certification or other written documentation that the individual lack the financial resources and support necessary to obtain permanent housing

#### Category 3 Homeless under Federal statutes

- Certification by the nonprofit or state or local government that the individual or head of household seeking assistance met the criteria of homelessness under another federal statute; and
- Certification of no permanent housing in last 60 days; and
- Certification by the individual or head of household, and any available supporting documentation, that (s)he has moved two or more times in the past 60 days; and
- Documentation of special needs or 2 or more barriers

#### Fleeing/Attempting to Flee DV

- For victim service providers:
  - i. An oral statement by the individual or head of household seeking assistance which states; they are fleeing; they have no subsequent residence; and they lack resources. Statement must be documented by a self-certification or a certification by the intake worker
- For non-victim service providers:
  - i. Oral statement by the individual or head of household seeking assistance that they are fleeing. This statement is documented by a self-certification or family is not jeopardized, the oral statement must be verified; and
  - ii. Certification by the individual or head of household that no subsequent residence has been identified; and
  - iii. Self-certification, or other written documentation, that the individual or family lacks the financial resources and support networks to obtain other permanent housing.

Program Coordination (576.400(c)):

All recipients and subrecipients of ESG program funds are expected to maintain the minimum standards for ongoing system and program coordination and integration of ESG funded activities to the maximum extent practicable. This includes coordination with the following:

- Street Outreach (SO) providers
- Emergency Shelter (ES) providers
- Homelessness Prevention (HP) providers
- Transitional Housing (TH) providers
- Permanent Supportive Housing (PSH) providers
- Rapid rehousing (RRH) assistance providers

Other Homeless Assistance Programs:

- Shelter Plus Care Program
- Supportive Housing Program
- Section 8 Moderate Rehabilitation Program for Single Room Occupancy Program for Homeless Individuals
- HUD-Veterans Affairs Supportive Housing (HUD-VASH);
- Education for Homeless Children and Youth Grants for State and Local Activities (McKinney-Vento Homeless Assistance Act);
- Grants for the Benefit of Homeless Individuals;
- Healthcare for the Homeless;

- Programs for Runaway and Homeless Youth;
- Projects for the Assistance in the Transition from Homelessness;
- Services in Supportive Housing Grants;
- Emergency Food and Shelter Program;
- Transitional Housing Assistance Grants for Victims of Sexual Assault, Domestic Violence, Dating Violence, and Stalking Program (section 40299 of the Violent Crime Control and Law Enforcement Act);
- Homeless Veterans Reintegration Program (section 5(a)(1)) of the Homeless Veterans Comprehensive Assistance Act;
- Domiciliary Care for Homeless Veterans Program;
- VA Homeless Providers Grant and Per Diem Program;
- Health Care for Homeless Veterans Program;
- Homeless Veterans Dental Program;
- Supportive Services for Veteran Families Program; and
- Veteran Justice Outreach Initiative

Termination and Grievance Procedures (576.402):

Minimum standards for termination of assistance are:

- 1) In general: If a program violation occurs and the provider terminates assistance as a result, the termination shall follow an established process that recognizes the rights of the individuals affected. Termination shall only occur in the most severe cases after other remedies have been attempted. Termination of individuals and families in projects funded through the ESG program must be consistent with 576.402.
- 2) Due process rights for individuals and families facing program termination: When terminating assistance to an ESG program participant receiving rental assistance or housing relocation and stabilization services, the required formal process shall minimally consist of:
  - Written notice clearly stating the reasons for termination;
  - Review of the decision that gives the participant opportunity to present objections to the decision and to have representation. Any appeal of a decision shall be heard by an individual different from and not subordinate to the initial decision-maker; and
  - Prompt written notice of the final decision on the appeal.
  - Ability to provide further assistance: Termination will not bar the provider from providing later, additional assistance to the same family or individual

Coordinated Entry Participation (24 CFR 576.400(d))

Under the requirements of the Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act as well as requirements identified by the Continuum of Care (CoC) Program Interim Rule, and HUD's Notice Establishing Additional Requirements; San Joaquin County has established a Coordinated Entry (CE) process that aims to increase the efficiency of the local crisis response system and improve fairness and ease of access to resources, including mainstream resources. Additional goals of (CE) process include:

- Reduce the burden on households experiencing a housing crisis
- Identify the most appropriate housing resource to facilitate a rapid and permanent exit from homelessness
- Prioritize the most vulnerable households with the longest time homeless for housing resources
- Collect system-wide data to inform necessary shifts in resources, identify gaps, and enable data-driven decision making at the CoC, organizational and project levels

HMIS Participation (24 CFR 576.400(f))

A Homeless Management Information System (HMIS) is a locally administered, electronic data collection system that stores longitudinal person-level information about persons who access the homeless service system. All recipients and subrecipients of ESG and/or CoC program funds are required to enter and maintain their project data in the local HMIS. HMIS Participation Exceptions include:

- Providers, except for victim service providers shall actively utilize the Homeless Management Information System (HMIS), to enter data on people served and assistance provided under ESG and the CoC Programs.
- Victim service providers shall actively utilize a comparable data system that meets HUD's standards (24 CFR 576.107 and 578.7(b))

**Emergency Shelter**Participant Eligibility

People are eligible for these services if they qualify as "homeless" based on categories (1, 2, or 4) of the "homeless" definition found at 24 CFR 576.232. Eligible activities, in compliance with federal ESG rules (24 CFR 576.102) in addition to the provision of decent, safe, and sanitary emergency shelter accommodations include:

- Case management;
- Child Care;
- Education,
- Employment and Life Skills Services;
- Legal Services;
- Health,
- Mental Health and Substance Abuse Services; Transportation

### Shelter Diversion

Shelter Diversion is a strategy that prevents homelessness at the front door by helping to identify immediate alternate housing arrangements and, if necessary, connecting people experiencing homelessness with services and financial assistance to help them return to permanent housing. Diversion should be attempted with all households seeking homeless services assistance.

### Admission

Providers of Emergency Shelter services shall admit individuals and families who meet the HUD definition of “homeless,” as specified in 24 CFR 576.2 (1, 2, & 4) and agencies’ eligibility criteria.

### Assessment

- Individuals and families shall be assessed for Coordinated Entry using the Approved Coordinated Entry assessment, and that assessment must be recorded into HMIS.
- Families and individuals remaining in shelter for longer than thirty (30) days shall be reassessed by a Case Manager for housing every 30-45 days.

### Intake

When appropriate, based on the individual’s needs and wishes, the provision of or referral to Homelessness Prevention (HP) or Rapid Rehousing (RRH) services that can quickly assist individuals to maintain or obtain safe, permanent housing shall be prioritized over the provision of Emergency Shelter (ES) or Transitional Housing (TH) services. Emergency shelters will prioritize shelter services for those:

- Individuals and families lacking other resources in the community even if limited assistance could be provided to end their homelessness.
- Are literally homeless and in the absence of shelter are likely to be living in an unsheltered setting.

- Individuals and families vulnerable to injury or illness if not sheltered. Transgender placement will be based on gender self-identification

#### Discharge / Length of Stay

Program participants shall be discharged from Emergency Shelter services when they choose to leave or when they have successfully obtained safe, permanent housing. Any Length of Stay limitations determined by the funding source shall be determined by the individual service provider's policies and clearly communicated to program participants. Providers of shelter services are strongly encouraged not to discharge individuals and families who have not secured permanent housing and maintain those households in shelter until they can be placed in appropriate permanent housing. This process must be clearly lined out in the program policy and procedures and made aware to program participants

#### Safety and Shelter Safeguards for Special Populations

Safety and Shelter Safeguards shall be determined by the individual Special Population service provider's policies and clearly communicated to program participants.

#### **Rapid Rehousing/Homeless Prevention**

##### Participant Eligibility

**Homelessness Prevention (HP):** To be eligible for HP Relocation and Stabilization Services and Short-Term and Medium-Term Rental Assistance, people must qualify as "at risk of homelessness" based on categories (2 or 4) of the HUD "homeless" definition or based on the "at risk of homelessness" definition found at 24 CFR 576.2, require HP services to prevent moving into an emergency shelter or another place described in category (1) of the "homeless" definition in 24 CFR 576.2, have an annual income below 30% of the median income for the area and be a resident of Stockton for at least 30 days prior to requesting assistance. (24 CFR 576.103, 576.105, 576.106)

**Rapid Rehousing (RRH):** ESG funded rapid rehousing will follow the standards as set forth during the NOFA under which the program funds were awarded.

All participants must lack sufficient resources or support networks to retain housing without ESG assistance. Individuals & families assisted under ESG are required to have annual incomes at or below 30% of the area median at annual assessment. An annual assessment will be required of all program participants and documentation maintained in the participant files. Documentation of verifiable income consists of copies of paystubs, letter from SSDI/SSI, and documentation of any assistance, etc.



### Prioritization / Diversion / Referral

When appropriate, based on the individual's needs and wishes, the provision of or referral to Homelessness Prevention (HP) or Rapid Rehousing (RRH) services that can quickly assist individuals to maintain or obtain safe, permanent housing shall be prioritized over the provision of Emergency Shelter (ES) or Transitional Housing (TH) services. Proof of Homelessness status must be documented in the participant file, or proof of verification attempt. ESG Program-funded RRH and ESG Prevention projects must serve participants referred from the local Coordinated Entry System, which prioritizes the following characteristics:

- Households with the highest service needs
- Households with the longest history of homelessness
- Households sleeping in an unsheltered location

### Subpopulations

In providing RRH or Homelessness Prevention assistance, providers will receive referrals based on the prioritization established in the local Coordinated Entry Policies and Procedures. This prioritization will be updated periodically through the Coordinated Entry Committee based on subpopulation data and community input.

### Participant Contribution

Minimum standards for determining what percentage or amount of rent and utilities costs each program participant shall pay while receiving Homelessness Prevention (HP) or Rapid-Rehousing (RRH) assistance are:

- Participant's income shall be verified prior to approval for initial and additional financial assistance. Documentation of the participant's income and expenses, including how the participant is contributing to housing costs, if at all, shall be maintained in participant's file. This file shall also contain a plan to sustain housing following the assistance, including either a plan to increase income or decrease expenses or both.
- Providers must establish policies concerning notification of changes in participant income and/or family composition.
- Providers funded under ESG may pay up to 100 percent of the reasonable rent and utility costs for program participants. Providers may, at their discretion, choose to impose rental charges on participants in alignment with provider's written policies and procedures.
- Providers may but are not required to impose rental charges but if they elect to do so, the charges must be universally and consistently applied to all participants served.

- The maximum rental charge will not exceed the 30% of the household's adjusted income or 10% of the total monthly income and may not exceed rental limits established in 24 CFR 578.77.
- Any additional requirements regarding the percentage or amount of rent and utilities costs each program participant shall pay shall be determined by the individual service provider's policies and clearly communicated to program participants.
- The calculation of participant's income and the level of financial assistance provided are decisions that must be appealable to the provider.

#### Rental Assistance Duration and Adjustment

Minimum standards for determining how long a program participant shall be provided with rental assistance and how the amount of that assistance shall be adjusted over time are:

- Participants shall receive approval for the minimum amount of financial assistance necessary to prevent homelessness. Documentation of financial need shall be kept in the participant's file for each quarterly assessment. Participants shall not be approved for more rental assistance than can be justified given their income and expenses at a given time.
- Providers must re-assess the continuing need for rental assistance before approving an additional increment. In no event will assistance under rapid rehousing or homeless prevention exceed 24 months in any 3-year period (24 CFR 576.106(a)).
- Any additional requirements regarding how long a program participant shall be provided with rental assistance and whether and how the amount of that assistance shall be adjusted over time shall be determined by the individual service provider's policies and clearly communicated to program participants.

#### Housing Relocation and Stabilization Services – Service Type, Amount, and Duration

Determining the type, amount, and duration of housing stabilization and/or relocation services to provide to a program participant, including the limits, if any, on the homelessness prevention or rapid rehousing assistance that each program participant shall receive, such as the maximum amount of assistance, maximum number of months the program participant may receive assistance; or the maximum number of times the program participant may receive assistance are detailed in the following subsections. Any additional requirements regarding the type, amount, and duration of housing stabilization and/or relocation services that will be provided to a program participant, including any limitations shall be determined by the individual service provider's policies and clearly communicated to program participants.

Re-Evaluations (24 CFR 576.401(b))

Minimum standards for completing eligibility re-evaluations of individuals and families are listed below.

**Homeless Prevention (HP) and Rapid Rehousing (RRH):**

- Participants shall be re-evaluated not less than once every three months to determine eligibility for the program (24 CFR 576.401(b)(1)). Any changes will be documented in the case file and any necessary updates will be made to HMIS. At a minimum, each re-evaluation of eligibility must establish that:
  - The program participant does not have an annual income that exceeds 30 percent of median family income for the area, as determined by HUD; and
  - The program participant shall lack sufficient resources and support networks necessary to retain housing without ESG assistance.

Requirements Specific to Rapid Rehousing & Homeless Prevention

City ESG subrecipients must have policies and procedures in place that address the following:

- Termination Procedures – See “Termination and Grievance Procedures” section.
- Habitability Standards – must comply with requirements at 576.403
- Fair Market Rent & Rent Reasonableness Determination – 576.106(d)
- Lease Requirements per 576.106(g)

**Street Outreach**Participant Eligibility

Individuals and families who qualify as homeless under paragraph (1)(I) of the “homeless” definition under 24 CFR § 576.2, which is an individual or family with a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, including a car, park, abandoned building, bus or train station, airport, or camping ground.

Minimum Standards

People are eligible for these services if they are “unsheltered homeless” based on category (1)(i) of the “homeless” definition found under 24 CFR 576.2 are eligible for the following activities, in compliance with federal ESG rules (24 CFR 576.101): engagement, case management, emergency health and mental health services, transportation.

### Affirmative Outreach

Providers of Street Outreach services shall target unsheltered homeless individuals and families, meaning those with a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, including:

- a car
- park
- abandoned building
- bus, train station, or airport
- camping ground

### Assessment / Service Provision / Referral / Prioritization

Individuals and families shall be offered an initial need and eligibility assessment. Families and individuals engaged through Street Outreach should complete a Coordinated Entry Assessment and enter that information into HMIS as soon as is practicable. Qualifying program participants, including those meeting special population criteria, will be offered the following Street Outreach services, as needed and appropriate:

- Engagement;
- Case management;
- Emergency Health and Mental Health;
- Transportation Services

When appropriate based on the individual's needs and wishes, the provision of or referral to rapid rehousing services that can quickly assist individuals to obtain safe, permanent housing shall be prioritized over the provision of or referral to emergency shelter or transitional housing services. All recipients of ESG program funds are required to prioritize individuals who meet the "literally homeless" definition.