

DRAFT AMENDED ANNUAL  
ACTION PLAN  
Round 3 CARES Act CDBG Funds

City of Hayward, Fiscal Year 2020

## **Public Information Summary**

### **City of Hayward Second Substantial Amendment to the FY 19-20 Action Plan**

#### **BACKGROUND**

The Community Development Block Grant (CDBG) Program is funded through entitlement funds the City receives from the U.S. Department of Housing and Urban Development (HUD). The City submits an Annual Action Plan to HUD to detail the City's funding strategy for the CDBG Program. These Annual Action Plans constitute the City's Five-Year Consolidated Plan and are developed through significant public input and evaluation.

The City's Citizen Participation Plan describes the efforts that the city will take to encourage its residents to participate in developing these plans. It also provides for public process when a "substantial amendment" to the Annual Action Plan is proposed. The following changes constitute a substantial amendment and require public notice as described in the Citizen Participation Plan:

- Funding of a new activity not previously described in the Action Plan
- Changes are proposed in the use of CDBG funds from one activity to another
- Changes are proposed in the use of unallocated CDBG funds to an existing or new activity

On March 31, 2020, HUD's Office of Community Planning and Development (CPD) released a memorandum detailing the availability of waivers of CPD grant program and Consolidated Plan requirements to prevent the spread of COVID-19 and to mitigate the economic impacts of COVID-19. Through this guidance, HUD waived the 30-day public comment requirement for comments on substantial amendments to the Consolidated Plan, allowing jurisdictions to implement a five-day public comment period. HUD also waived the requirement that jurisdictions follow their Citizen Participation Plan and any extended comment periods they may contain.

Given the guidance from HUD and the waiver of public comment and participation requirements, the City of Hayward will notice a public comment period of two weeks, with a remote public hearing occurring in the middle of the comment period.

#### **PROPOSED SUBSTANTIAL AMENDMENT**

On March 27, 2020, the President signed into law the CARES Act, allocating over two trillion funds in relief to respond to the COVID-19 pandemic at federal, state, and local levels. The CARES Act included additional funds for CDBG entitlement communities and waived the 15% Public Services spending cap for the current and subsequent program year. Through the CARES Act, the City of Hayward received \$902,238 in April 2020 to address the COVID-19 crisis in the first round of funding allocation, and another \$1,191,514 in September 2020 to further prevent, prepare for, and respond to the Coronavirus pandemic.

The City completed one Substantial Amendment to the FY 2020 Annual Action Plan in July and is proposing to amend the FY 2020 Action Plan again to a) reallocate non-committed and unspent entitlement funds and b) allocate the Round 3 additional CARES Act funds to address the COVID-19 as follows:

**Table 1: Anticipated Resources**

<b>Anticipated Resources</b>	<b>Annual Action Plan Funding Amount</b>	<b>Substantial Amendment Funding Amount</b>
<b>Annual Allocation</b>	\$1,502,138	\$1,502,138
<b>Program Income</b>	\$188,205	\$188,205
<b>CARES Act Allocation – Round 1</b>	N/A	\$902,238
<b>CARES Act Allocation – Round 3</b>	N/A	\$1,191,514
<b>Prior Year Resources</b>	\$515,000	\$515,000
<b>Total:</b>	<b>\$2,205,343</b>	<b>\$4,299,094</b>

Given the waived 15% spending cap on Public Services, the City is proposing to re-organize the projects as reported in the 2020 Annual Action Plan to allocate non-committed funds from the PY19 Public Facilities and Infrastructure and Housing projects into the Public Services-CV project. Additionally, the City is proposing to allocate all the additional CDBG funds made available in the CARES Act to the Public Services-CV and Economic Development-CV projects. The City is not proposing to remove funding from any existing activities.

The City is proposing to use the anticipated resources listed (**Table 1.1**) for the following project categories:

Table 1.1

No.	CDBG Project Categories	Current FY-2020 CDBG Funding	Amended Funding Recommendations	Proposed Changes
1.	Administration & Planning	\$300,427	\$ 419,527	Increase from CDBG-CV3 to cover increased administrative costs and costs of planning related to potential hotel conversion
2.	Acquisition, Disposition, Clearance & Relocation	\$0	\$0	No change
3.	Economic Development	\$389,999	\$389,999	No change
4.	Housing	\$300,000	\$218,711	Reallocate unspent funds
5.	Public Facilities & Infrastructure Improvements	\$440,000	\$40,000	Reallocate unspent funds
6.	Public Services	\$253,551	\$253,551	No change
7.	Economic Development-CV	\$50,000	\$175,000	Increase from CDBG-CV3 for more small business assistance grants
8.	Public Services-CV	\$852,238	\$2,292,565	Reallocate Unspent Housing and Public Facilities Funds and Increase from CDBG-CV3
	<b>Total</b>	<b>\$2,586,215</b>	<b>\$3,789,353</b>	<p><b>Allocate New Funds: Add \$1,191,514 from CARES Act to Public Services-CV and Economic Development-CV</b></p> <p><b>Move Unspent Funds to Public Services-CV: Add \$400,000 from Public Facilities, \$81,289 from FY 2020 Housing, and \$11,624 from FY 2019 Housing</b></p>

The purpose of this amendment is to continue the City's response to the COVID-19 pandemic by allocating Round 3 CDBG CARES Act funds (CDBG-CV3). Hayward is proposing the following changes: 1) allocate the third round of CDBG-CV funds from the 2020 CARES Act, and 2) reallocate currently uncommitted 2019 and 2018 funds to public services and economic development to prevent, prepare for, and respond to COVID-19.

## **Executive Summary**

### **AP-05 Executive Summary - 91.200(c), 91.220(b)**

#### **1. Introduction**

The FY 2019-2020 Annual Action Plan outlines proposed housing and community development objectives, activities, and budget in the City of Hayward. The plan includes information regarding federal, state, and local funding resources, a description of each activity to be implemented, and other actions that the City will take to address barriers to affordable housing, support anti-poverty strategies, and facilitate fair housing. The City amended this Action Plan in May 2020 to allocate the first round of CDBG-CV funds and is again amending the plan to allocate the third round of CDBG-CV funds. In total, including this amendment, the City has amended the plan to allocate an additional \$2,093,752 in CARES Act funds. Further including this amendment, the City has reallocated \$1,064,278 in previously uncommitted or unspent funds, bringing the total amount of CDBG (both entitlement and CARES Act grants) funding to respond to COVID-19 to \$3,158,030.

The FY 2015-2019 Consolidated Plan is a comprehensive review of the City's housing and community development characteristics and needs, an inventory of resources available to meet those needs, a five-year strategy for the use of those resources, and a one-year Action Plan (updated annually) that presents specific activities in which to implement the strategy.

**The City's FY 2019-2020 Community Development Block Grant (CDBG) entitlement grant from the US Department of Housing and Urban Development (HUD) is \$1,502,138.**

In preparing the proposed CDBG program budget, the following were considered: housing and community development priorities, the FY 2015-2019 Consolidated Plan, and CDBG eligibility criteria. The City is proposing to allocate CDBG funds towards the following eligible activities:

- Program Administration (20%)
- Acquisition, Disposition, Clearance, and Relocation
- Public Facilities and Infrastructure Improvements
- Housing
- Economic Development
- Public Services

Activities will benefit low and moderate-income individuals and households.

On March 27, 2020, the President signed the CARES Act into law, allocating over two trillion in relief funds to respond to the COVID-19 pandemic at federal, state, and local levels. The CARES Act included additional funds for CDBG entitlement communities and waived the 15% Public Services spending cap for the current and subsequent program year. Through the CARES Act, the City of Hayward received two separate allocations of CDBG funds (CDBG-CV1 and CDBG-CV3) to address the COVID-19 crisis for a total of \$2,093,752 in CARES Act funding. As stated above, the City has also contributed \$1,064,278 in unspent or uncommitted entitlement funds to further support efforts to prevent, prepare for, and respond to COVID-19.

## **2. Summarize the objectives and outcomes identified in the Plan**

This could be a restatement of items or a table listed elsewhere in the plan or a reference to another location. It may also contain any essential items from the housing and homeless needs assessment, the housing market analysis or the strategic plan.

As designed in Spring of 2019, the City proposed CDBG-funded activities to address the following priorities in FY 2019-2020: Affordable Housing, Homelessness Prevention, Public Facilities and Improvements, and Community and Economic Development. Affordable Housing programs will preserve existing affordable rental and ownership housing for low and moderate-income households, and reduce housing discrimination. Homelessness Prevention activities funded with CDBG, HOME and general funds will support countywide strategies to end homelessness by funding the coordination and operations of permanent supportive housing, emergency shelters, transitional housing, and housing-related support services programs. Public Facilities and Improvements include the rehabilitation of sites or properties located in low-income census tracts and that serve low-income individuals and families. Economic Development programs will increase the number of permanent jobs available to low-income residents by offering training opportunities and job placement, as well as support businesses located in low-income census tracts. As a result of the COVID-19 pandemic, the City has adjusted these outcomes and objectives to focus on activities that prevent, prepare for, and respond to COVID-19.

## **3. Evaluation of past performance**

This is an evaluation of past performance that helped lead the grantee to choose its goals or projects.

The City regularly monitors progress on activities carried out in the Annual Action Plan to ensure compliance with program requirements. Evaluation takes place during the application and funding process, and after sub-grantee contracting has been executed. Agreements with sub-recipients and Memoranda of Understandings (MOUs) with other public agencies or internal departments set clear performance measures, reporting procedures, timeliness, and budgets against which goals are measured. City staff regularly monitor compliance with contracting requirements and performance

goals through the implementation and review of quarterly performance reports, monthly reimbursement requests, and annual desk and on-site monitoring. City staff provide feedback to sub-grantees regarding areas of concern, and findings where corrective action or improvements are required. The City publishes an Annual Performance Report, aggregating data to analyze progress towards goals, cost effectiveness, community impact, and compliance with regulations. Additional Monitoring Standards and Procedures are outlined in the Alameda County HOME Consortium-wide Consolidated Plan. Contracting standards and policies and procedures can also be found in the City's CDBG Policies and Procedures Manual. Information obtained from all the evaluation and monitoring efforts is used to assist in the determination of which projects to allocate CDBG funds.

#### **4. Summary of Citizen Participation Process and consultation process**

Summary from citizen participation section of plan.

City staff lead the preparation, implementation, and evaluation of the Consolidated and Action Plans, related reports, and citizen participation and consultation processes. City staff coordinate housing and community development activities, which includes administration of the CDBG, Social Services, Paratransit, and the Housing Rehabilitation Program. All programs are administered through one competitive grant application process. City staff review grant applications to ensure that CDBG eligibility and national objective criteria are addressed and to categorize proposals into the appropriate funding source category.

The City's Community Services Commission (CSC) further reviews each grant proposal for merit, impact, and cost-effectiveness. The CSC is a seventeen-member entity appointed by City Council, with the primary responsibilities of reviewing proposals and establishing funding recommendations for consideration by council. The CSC represents the larger Hayward community, with the only eligibility requirement to serve being residency within Hayward city limits. The CSC therefore, serves a key role in the CDBG Citizen Participation Plan process. All CSC meetings are open to the public and other stakeholders are welcome to offer public comments for consideration during the City's grant funding cycle. A formal public hearing is held in front of City Council regarding the funding recommendations and the Annual Action Plan.

City Council receives funding recommendations from the CSC, with additional in-depth information from staff, and discusses the proposal at a public Work Session. A formal Public Hearing is conducted two weeks to four weeks later, in which members of the public can address City Council regarding the CDBG funding recommendations. Ultimately, City Council has the final determination in authorizing CDBG grant awards at the local level.

The City consults with neighboring jurisdictions, public agencies, members of the public, and aligns with other strategic planning efforts when establishing local priorities. Finally, as a member of the Alameda County HOME Consortium, the City also participates in the Consortium's Citizen Participation Plan process.

## *Citizen Participation and COVID-19*

For its first substantial amendment, City staff applied feedback and input from the CSC given during the annual Community Agency Funding process to inform the plan for allocating the CDBG-CV1 funds. Given that several months passed following the first amendment, City staff again sought guidance and input from the CSC on the most effective ways to address community need and prevent, prepare for, and respond to COVID-19 through the allocation of CDBG-CV3 funds.

HUD released guidance waiving the 30-day public comment period and Citizen Participation Plans in order to enable jurisdictions to allocate CDBG-CV funds quickly. For its first Substantial Amendment to this plan, the City of Hayward held an abbreviated public comment period from April 21, 2020, through May 5, 2020 and a City Council Public Hearing on April 28, 2020, to solicit community feedback on the proposed use of CDBG-CV1 and uncommitted FY 2020 CDBG funds. For the second Substantial Amendment to this plan required to allocate CDBG-CV3 funding, the City held an abbreviated comment period from November 30, 2020 to December 8, 2020 and a City Council Public Hearing on December 8, 2020. Both public hearings were noticed in the local newspaper and online.

### **5. Summary of public comments**

This could be a brief narrative summary or reference an attached document from the Citizen Participation section of the Con Plan.

Each public meeting convened by City Council or the CSC opens with an agendaized Public Comments section to provide an opportunity for members of the public to address the Commission and City Council, and to comment on the funding process and recommendations.

#### **ORIGINAL ACTION PLAN PUBLIC COMMENT SUMMARY:**

From February 20, 2019 through March 20, 2019, the Public Comment period for CDBG funding recommendations was in effect. During this public comment period, public comments were submitted to the CSC and/or City staff via e-mail, phone, or at the February 20, 2019 and the March 20, 2019 CSC meetings. During this time the following comments were made:

The following organizations submitted a statement of thanks:

- Jayanti Addleman, City of Hayward Library

A representative of A-1 Housing had follow-up questions regarding non-funding of A-1 Housing during the funding process. A representative of the Eden Youth and Family Center had follow-up questions about the general funding process.



A second 30 day public comment period was initiated on Friday, May 10, 2019 and closed on June 10, 2019. A Public Hearing was held on Tuesday, May 14, 2019 in the City Council Chamber, Hayward City Hall. Citizens were invited to provide comments to the City's Community Services Division via email or in writing. During this time the following comments were made:

The following organizations submitted a statement of thanks:

- Davida Scott, Hayward Adult School
- Amanda Olson, Downtown Streets, Inc.
- Angie Watson-Hajjem, ECHO Housing

Suzanne Luther, Claire Dugan, and Ron Myers expressed dissatisfaction at funding Abode Services Depot Road Micro Apartments with CDBG funds.

#### **FIRST SUBSTANTIAL AMENDMENT TO ANNUAL ACTION PLAN PUBLIC COMMENT:**

The public comment period of the first Substantial Amendment to the Annual Action Plan was in effect from April 21, 2020 through May 5, 2020. The following comments were submitted:

- Angela Andrews, Planning Commissioner, called into the Public Hearing in support of the item and expressed interest in including Downtown Streets Team in the funding allocation.
- Alicia Lawrence, Community Services Commissioner, commented in support of the proposed allocation, inquired about specific agencies receiving funds, and specifically endorsed the proposed plan for allocating funds to promote food security.
- Lisa Moore, Community Services Commissioner, commented in support of the proposed allocation.

#### **SECOND SUBSTANTIAL AMENDMENT TO ANNUAL ACTION PLAN PUBLIC COMMENT:**

The public comment period of the second Substantial Amendment to the Annual Action Plan was in effect from November 30, 2020, through December 8, 2020. Additionally, public comment was heard at the CSC meeting held on November 18, 2020. The following comments were submitted either during the comment period or at the CSC meeting:

*This is a draft of the amendment. Comments provided during the public comment period and at public meetings will be included in the final version of this amendment.*

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

During the FY 2019-2020 funding process and both substantial amendment processes no comments have been rejected.

*This is a draft of the amendment. Any comments provided during the public comment period and at public meetings that were rejected will be included in the final version of this amendment.*

## **7. Summary**

This Annual Action Plan and FY 2019-2020 proposed projects are consistent with the City of Hayward Council Priorities and meet HUD National Objectives.

DRAFT

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

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

The following are the agencies/entities responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

Agency Role		Name	Department/Agency
Lead Agency		HAYWARD	
CDBG Administrator	HAYWARD		Community Services Division
HOPWA Administrator			
HOME Administrator	Alameda County		Department of Housing and Community Development
HOPWA-C Administrator			

Table 2 – Responsible Agencies

### Narrative

The City of Hayward is an entitlement jurisdiction which receives CDBG funds directly from HUD. To be eligible for HOME funds, Hayward is also a member of the Alameda County HOME Consortium, which is led by the Alameda County Department of Housing and Community Development. The Consolidated Plan is prepared by City staff utilizing local engagement efforts and community feedback. The local process is conducted in collaboration with the County and other partner jurisdictions within the HOME Consortium. While the local process identifies needs specific to Hayward, regional input is considered to share resources and collectively identify gaps in service delivery. City staff is responsible for the administration and implementation of CDBG funds, while the County is responsible for the administration of HOME funds.

### Consolidated Plan Public Contact Information

Amy Cole-Bloom, Management Analyst  
Community Services Division  
777 B Street  
Hayward, CA 94541

Amy.Cole@hayward-ca.gov  
(510) 583-4252

DRAFT

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

### **1. Introduction**

The City of Hayward is active in the Alameda County HOME Consortium. Alameda County has a history of collaborative efforts focused at the consumer or provider level; the EveryOne Home Plan also looks at coordination at the systems level. The creation of this integrated, regional response offers several measurable, outcome-oriented alternatives, including:

1. Increased efficiency and effectiveness of local and regional housing and supportive service programs through sharing of information, planning, clients, resources, and responsibility across the multiple systems that must work together to address common issues.
2. More coordination of government and philanthropic funding. National research has demonstrated that an integrated approach to long-term homelessness can significantly reduce overall expenditures. An example of the collaborative efforts undergone in Alameda County was the Homelessness Prevention and Rapid Re-Housing Program (HPRP) county-wide collaborative.
3. Increased local capacity to attract competitive grants from federal, state and philanthropic sources that can augment existing housing and service systems and support the replication of emerging promising practice models.
4. Increased public interest and support for creative solutions to homelessness, excitement about and involvement in regional efforts, and willingness to support the creation of a new local or regional revenue stream. For more detailed information please refer to the Alameda County EveryOne Home Plan at [www.everyonehome.org](http://www.everyonehome.org).

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

The City of Hayward works with several housing providers and health service agencies. We fund several housing and health providers through subrecipient grants, including St. Rose Hospital, Tri-Valley Health Center and Tiburcio Vasquez Health Center. The City is in partnership with Tiburcio Vasquez Health Center for a one-of-a-kind collaboration Fire House Clinic in the underserved area of South Hayward. Over the next few years we will be working with La Familia Counseling services to construct and develop programming for the South Hayward Family Center.

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

In December 2006, City Council adopted the Alameda Countywide Homeless and Special Needs Housing Plan, also known as the EveryOne Home Plan. This is a long-term special needs housing plan which seeks to address the housing-related needs of persons with serious mental illness, those living with HIV/AIDS, and those who are homeless. The EveryOne Home Plan reflects an increased recognition among healthcare and services agencies throughout Alameda County that affordable housing is crucial to the achievement of public and mental health program outcomes. Without stable, decent, and affordable housing, efforts to promote mental health and the physical wellbeing of low income populations in the County are compromised. In January 2008, EveryOne Home became the backbone organization of the Alameda Countywide Continuum of Care, with governmental entities collectively funding operations and serving on its strategic Leadership Board.

The City of Hayward is well represented within the EveryOne Home leadership committee and City of Hayward Community Services staff serve on several Continuum of Care (CoC) subcommittees. The CSC, which make funding recommendations to Council, regularly received updates and reports regarding CoC activities and successes, and utilizes this information and best practices to make their recommendations. City of Hayward staff and leadership assist in the coordination, planning, and participate in the biennial Point-In-Time (PIT) Count which provides data necessary to formulate strategies to address homelessness. For the 2019 PIT, Hayward provided additional funding to EveryOne Home to receive enhanced, in-depth data regarding homeless populations. At the time of submitting the second Substantial Amendment, staff from the City's Community Services Division was actively engaged in the 2021 PIT Planning Committee.

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

The City is not an entitlement Emergency Solutions Grant (ESG) grantee. The City works in collaboration with the County and local CoC to determine the need for local funds and offers Certifications of Local Need for ESG applicants within City limits. The City consults with the Continuum of Care to develop performance standards and evaluate the outcomes of projects and activities funded with CDBG in alignment with ESG goals. The City of Hayward utilizes the Alameda County Priority Home Partnership ESG Policies and Procedures Manual, which covers policies and procedures for all ESG recipients and sub-recipients operating programs within Alameda County.

The City also works with EveryOne Home regarding the operation and administration of HMIS. City staff, in their roles as committee members, have assisted in the development of an RFP for new HMIS software to better serve our continuum and enhance the roll out of Coordinated Entry. The new HMIS system will be a comprehensive health and housing data solutions and an integral part component of a collective impact effort to ensure all individuals living in Hayward have safe, healthy, and affordable housing.

**2. Agencies, groups, organizations and others who participated in the process and consultations**

DRAFT

**Table 3 – Agencies, groups, organizations who participated**

1	<b>Agency/Group/Organization</b>	ALAMEDA COUNTY HOUSING & COMMUNITY DEVELOPMENT
	<b>Agency/Group/Organization Type</b>	Other government - County
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	On site visits and meetings. Anticipated improved coordination of financial resources and alignment of goals. Improved understanding of housing and homeless needs and overall needs of the county. Partnered with Alameda County to implement a winter warming shelter in Hayward using General Fund local dollars
2	<b>Agency/Group/Organization</b>	Alameda County Everyone HOME
	<b>Agency/Group/Organization Type</b>	Regional organization
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	On site meetings. Anticipated improved coordination of financial resources and alignment of goals. Improved understanding of homelessness issues and resources across Alameda County. Development of local policy and practices



3	<b>Agency/Group/Organization</b>	COMMUNITY RESOURCES FOR INDEPENDENT LIVING
	<b>Agency/Group/Organization Type</b>	Housing Services-Elderly Persons Services-Persons with Disabilities Services-Employment Service-Fair Housing
	<b>What section of the Plan was addressed by Consultation?</b>	Public Housing Needs Non-Homeless Special Needs Anti-poverty Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	On site meetings. Anticipated improved coordination of financial resources and alignment of goals. Improved understanding of issues and immediate needs of individuals living with disabilities.
4	<b>Agency/Group/Organization</b>	Abode Services
	<b>Agency/Group/Organization Type</b>	Housing Services-homeless
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs Anti-poverty Strategy

	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	On site visits and meetings. Anticipated improved coordination of financial resources and alignment of goals. Improved understanding of issues and immediate needs of chronically homeless individuals. Assist in the development of policies and practices. Development of affordable housing opportunities.
5	<b>Agency/Group/Organization</b>	FAMILY EMERGENCY SHELTER COALITION
	<b>Agency/Group/Organization Type</b>	Housing Services - Housing Services-Children Services-Victims of Domestic Violence Services-homeless Services-Employment Services - Victims
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homeless Needs - Families with children Homelessness Needs - Unaccompanied youth Homelessness Strategy Anti-poverty Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	On site visits and meetings. Anticipated improved coordination of financial resources and alignment of goals. Improved understanding of issues and immediate needs domestic violence victims and homeless families.
6	<b>Agency/Group/Organization</b>	Ruby's Place
	<b>Agency/Group/Organization Type</b>	Housing Services - Housing Services-Victims of Domestic Violence Services-homeless Services-Employment Services - Victims

	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homeless Needs - Families with children Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs Anti-poverty Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	On site visits and meetings. Anticipated improved coordination of financial resources and alignment of goals. Improved understanding of issues and immediate needs domestic violence victims and homeless families.
7	<b>Agency/Group/Organization</b>	Economic Development Division - City of hayward
	<b>Agency/Group/Organization Type</b>	Other government - Local Business Leaders Civic Leaders Grantee Department
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Market Analysis Economic Development Anti-poverty Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Meetings with Economic Development staff and meetings between Economic Development and business leaders. Anticipated improved coordination of financial resources and alignment of goals. Improved understanding of issues and immediate needs of the business community. Coordination on the development of a cohesive ED plan that considers low-income residents and creates economic opportunities for all.

8	<b>Agency/Group/Organization</b>	Hayward Library & Community Services
	<b>Agency/Group/Organization Type</b>	Services-Children Services-Education Other government - Local Grantee Department
	<b>What section of the Plan was addressed by Consultation?</b>	Non-Homeless Special Needs Anti-poverty Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Meetings between Education Services staff and Community Services staff. Work with the Hayward Library based Family education program for anticipated improved coordination of financial resources and alignment of goals towards full adult literacy and educational support of Hayward youth.
9	<b>Agency/Group/Organization</b>	Community Child Care Council (4-Cs) of Alameda County
	<b>Agency/Group/Organization Type</b>	Services-Children Services-Employment
	<b>What section of the Plan was addressed by Consultation?</b>	Non-Homeless Special Needs Economic Development Anti-poverty Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Meetings and site visits between staff. Anticipated improved coordination of financial resources and alignment of goals. Improved understanding of issues and immediate needs low-income residents working towards developing their own micro-enterprise, as well as child care needs of local families seeking to improve their economic opportunities.

10	<b>Agency/Group/Organization</b>	Development Services Dept- City of Hayward
	<b>Agency/Group/Organization Type</b>	Housing Services - Housing Services-homeless Other government - Local Planning organization Grantee Department
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Public Housing Needs Market Analysis Economic Development
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Meeting between staffers in each department. Anticipated improved coordination of financial resources and alignment of goals. Improved understanding of issues and needs surrounding housing development and planning. Coordination on development and implementation of Accessory Dwelling Unit program, and well as coordination between Housing Rehabilitation Program and the Codes Enforcement Division
11	<b>Agency/Group/Organization</b>	EDEN COUNCIL FOR HOPE AND OPPORTUNITY
	<b>Agency/Group/Organization Type</b>	Housing Services - Housing Services-Persons with Disabilities Services-homeless Service-Fair Housing

	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs Anti-poverty Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Meetings and on-site visits. Anticipated improved coordination of financial resources and alignment of goals. Improved understanding of issues and immediate needs of low-income renters in Hayward. Assistance in development of policies and Fair Housing practices.
12	<b>Agency/Group/Organization</b>	HAYWARD UNIFIED SCHOOL DISTRICT
	<b>Agency/Group/Organization Type</b>	Services-Education Other government - Local
	<b>What section of the Plan was addressed by Consultation?</b>	Non-Homeless Special Needs Anti-poverty Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Regular meetings with staff regarding programming and development of educational opportunities that can create economic opportunities. Anticipated improved coordination of financial resources and alignment of goals. Improved understanding of issues and immediate needs of Hayward students and their families.

13	<b>Agency/Group/Organization</b>	St. Rose Hospital Foundation
	<b>Agency/Group/Organization Type</b>	Services-Health Services-Education Services-Employment Health Agency Publicly Funded Institution/System of Care Business Leaders Civic Leaders Foundation
	<b>What section of the Plan was addressed by Consultation?</b>	Non-Homeless Special Needs Economic Development Anti-poverty Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	St Rose Hospital is unique in that not only is a health organization providing medical services, but educational and economic opportunities through their foundation based programs for students. Regular meetings, calls and visits by staff will lead to anticipated improved coordination of financial resources and alignment of goals. Improved understanding of issues and immediate needs of Hayward residents accessing healthcare, as well as local students seeking to enter the healthcare industry.
14	<b>Agency/Group/Organization</b>	LA FAMILIA COUNSELING CENTER
	<b>Agency/Group/Organization Type</b>	Services-Children Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-Victims of Domestic Violence Services-Health Health Agency

	<b>What section of the Plan was addressed by Consultation?</b>	Non-Homeless Special Needs Anti-poverty Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Meetings with staff with anticipated improved coordination of financial resources and alignment of goals. Improved understanding of issues and immediate needs of residents as it relates to mental health counseling services, as well as other medical services. Coordination regarding the development of the South Hayward Family Center which will include comprehensive, low-cost counselling services in a culturally sensitive manner.

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

None

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

<b>Name of Plan</b>	<b>Lead Organization</b>	<b>How do the goals of your Strategic Plan overlap with the goals of each plan?</b>
Continuum of Care	EveryOne Home	Homeless services, homelessness prevention, and homeless special needs.

**Table 4 - Other local / regional / federal planning efforts**

**Narrative**



## **AP-12 Participation - 91.401, 91.105, 91.200(c)**

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

The City's Citizen Participation Plan seeks to involve all City residents including low and moderate-income persons, persons living in blighted areas, minority populations, non-English speakers, residents of areas where a significant amount of federally-funded activity is proposed, seniors, people with disabilities, the business community, and civic groups. The Citizen Participation Plan provides opportunities for citizen engagement related to CDBG, HOME, and other HUD funded programs. The plan also provides information regarding annual performance reports and HUD-related issues. Goals of the plan are to:

- Provide residents with adequate and timely information about the range of activities that may be undertaken through HUD-funded programs, the kinds of activities previously funded in the community, the level of funding available to carry out these activities, and an estimate of the amount of funds that will benefit low and moderate-income persons;
- Provide an appropriate means to ensure the involvement of low and moderate-income residents most likely to be affected by HUD-funded programs, and to provide reasonable efforts to ensure continuity of involvement of residents or resident organizations throughout all stages of the program;
- Provide residents with an adequate opportunity to articulate needs, express preferences about proposed activities, assist in the selection of priorities, and the development of the plans, applications, and reports; and
- Provide residents with the opportunity to assess and submit comments on all aspects of the HUD funded programs and their performance.

The Community Services Commission (CSC) is the primary conduit for resident participation in all phases of the CDBG program and other HUD-funded programs. The CSC advises City Council regarding the identification of housing and community development needs, setting priorities, making recommendations concerning the annual allocation of CDBG and other HUD funds, and amending Annual Action Plans as necessary. CSC members must be Hayward residents and are appointed by City Council. Citizens may submit comments, complaints, suggestions, or questions by letter, facsimile, telephone, email, or in person regarding any aspect of any HUD-funded program. Written comments should be sent to the following address: Community Services Division, 777 B Street, Hayward, CA 94541. All written complaints will be answered in writing within 15 working days.

Notices regarding all public meetings and hearings are sent out to an "Interested Parties" email list at least 72 hours prior to the meeting, and at least 15 days prior to Public Hearings. The interested parties list incorporates civic and business leaders, nonprofits, members of the community, elected officials, applicants for funding, and commissioners among others. Interpretive and adaptive services and accommodations are available upon request for all meetings and hearings.

### Substantial Amendment Process

Given HUD guidance waiving the 30-day public comment period and Citizen Participation Plan, the City of Hayward held an abbreviated two-week public comment period for both Substantial Amendments submitted to HUD, which enables the City to distribute COVID-19 emergency relief in a timely manner. The City still held virtual Public Hearings on April 28, 2020, and December 8, 2020, and encouraged public comment through online and print mediums for both hearings.

### Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Public Meeting	Non-English Speaking - Specify other language: Spanish  Non-targeted/broad community	CSC Commissioners, City Staff, Members of the Public	NA	None	<a href="https://hayward.legistar.com/LegislationDetail.aspx?ID=3677710&amp;GUID=62E6177D-D4D6-4B56-B901-1D19A386F364&amp;Options=&amp;Search=">https://hayward.legistar.com/LegislationDetail.aspx?ID=3677710&amp;GUID=62E6177D-D4D6-4B56-B901-1D19A386F364&amp;Options=&amp;Search=</a>

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
2	Newspaper Ad	<p>Non-English Speaking - Specify other language: Spanish</p> <p>Non-targeted/broad community</p> <p>Also emailed to Interested Parties and commissioners</p>	NA - newspaper legal notice	None	None	<a href="https://www.capublicnotice.com/Details.aspx?SID=sqpfmr3dky5nsisp1zmtty4hf&amp;ID=494">https://www.capublicnotice.com/Details.aspx?SID=sqpfmr3dky5nsisp1zmtty4hf&amp;ID=494</a>
3	Public Meeting	Non-targeted/broad community	CSC Commissioners, City Staff, Members of the Public	None	None	<a href="https://hayward.legistar.com/MeetingDetail.aspx?ID=593203&amp;GUID=A9B31725-BE05-4112-A728-3B051EDC9B5D&amp;Options=&amp;Search=">https://hayward.legistar.com/MeetingDetail.aspx?ID=593203&amp;GUID=A9B31725-BE05-4112-A728-3B051EDC9B5D&amp;Options=&amp;Search=</a>

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
4	Bidder's Conference	Non-English Speaking - Specify other language: Spanish  Residents of Public and Assisted Housing	Representatives from organizations interested in receiving funding in FY 19-20, City Staff	NA	None	
5	Public Meeting	Non-targeted/broad community	CSC Commissioners, City Staff, Members of the Public	None	None	<a href="https://hayward.legistar.com/MeetingDetail.aspx?ID=593204&amp;GUID=F3F2E603-A10B-4E45-A364-7A4197E7E9B5&amp;Options=&amp;Search=">https://hayward.legistar.com/MeetingDetail.aspx?ID=593204&amp;GUID=F3F2E603-A10B-4E45-A364-7A4197E7E9B5&amp;Options=&amp;Search=</a>
7	Public Meeting	Non-targeted/broad community	CSC Commissioners, City Staff, Members of the Public	6 comments	None	<a href="https://hayward.legistar.com/MeetingDetail.aspx?ID=646336&amp;GUID=8219619B-06E8-421C-844C-973ACA5BD448&amp;Options=&amp;Search=">https://hayward.legistar.com/MeetingDetail.aspx?ID=646336&amp;GUID=8219619B-06E8-421C-844C-973ACA5BD448&amp;Options=&amp;Search=</a>
8	Public Meeting	Non-targeted/broad community	CSC Commissioners, City Staff, Members of the Public	2 comments	None	<a href="https://hayward.legistar.com/MeetingDetail.aspx?ID=684792&amp;GUID=4824D5C1-6BCE-438E-A7C8-7A3132F800CD&amp;Options=&amp;Search=">https://hayward.legistar.com/MeetingDetail.aspx?ID=684792&amp;GUID=4824D5C1-6BCE-438E-A7C8-7A3132F800CD&amp;Options=&amp;Search=</a>

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
9	Public Meeting	Non-targeted/broad community	City Council, CSC Commissioners, City Staff, Members of the Public	5 comments	None	<a href="https://hayward.legistar.com/LegislationDetail.aspx?ID=3906527&amp;GUID=D2128B57-CE33-4736-A0F5-D14A618BE0B7&amp;Options=&amp;Search=">https://hayward.legistar.com/LegislationDetail.aspx?ID=3906527&amp;GUID=D2128B57-CE33-4736-A0F5-D14A618BE0B7&amp;Options=&amp;Search=</a>
10	Newspaper Ad	Non-English Speaking - Specify other language: Spanish  Non-targeted/broad community	NA	None	None	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
11	Public Meeting	Non-English Speaking - Specify other language: Spanish  Non-targeted/broad community	City Council, CSC Commissioners, City Staff, Members of the Public	5 comments	None	<a href="https://hayward.legistar.com/LegislationDetail.aspx?ID=3945376&amp;GUID=7091BC05-2FCC-42E6-925A-BE596BF127B3&amp;Options=&amp;Search=">https://hayward.legistar.com/LegislationDetail.aspx?ID=3945376&amp;GUID=7091BC05-2FCC-42E6-925A-BE596BF127B3&amp;Options=&amp;Search=</a>
12	Public Hearing	Non-English Speaking - Specify other language: Spanish  Residents of Public and Assisted Housing	City Council, CSC Commissioners, City Staff, Members of the Public	3 comments	None	<a href="https://hayward.legistar.com/MeetingDetail.aspx?ID=769795&amp;GUID=38811BD6-8000-41F9-BAC3-14E8D11826A3&amp;Options=info &amp;Search=">https://hayward.legistar.com/MeetingDetail.aspx?ID=769795&amp;GUID=38811BD6-8000-41F9-BAC3-14E8D11826A3&amp;Options=info &amp;Search=</a>

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
13	Newspaper Ad	Non-English Speaking - Specify other language: Spanish  Residents of Public and Assisted Housing	NA	None	None	
14	Public Meeting	Non-targeted/broad community	CSC Commissioners, City Staff, Members of the Public	TBD	TBD	
15	Public Meeting	Non-targeted/broad community	City Council, City Staff, Members of the Public	TBD	TBD	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
16	Newspaper Ad	Non-English Speaking - Specify other language: Spanish  Residents of Public and Assisted Housing	NA	TBD	None	

Table 5 – Citizen Participation Outreach



## Expected Resources

### AP-15 Expected Resources - 91.420(b), 91.220(c)(1,2)

#### Introduction

This section of the Action Plan identifies funding resources that will be utilized in Program Year 2019 to address the City's community development priorities.

In addition to funds provided by the CDBG entitlement and HOME programs, the City of Hayward will utilize local, county and state resources to facilitate Community Development Block Grant goals of providing decent housing, a suitable living environment, and opportunities to expand economic opportunities, principally for low- and moderate-income persons.

CDBG and HOME resources will be allocated towards projects that meet HUD national objectives and are able to comply with federal reporting and financial management regulations.

#### Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	1,502,138	188,205	526,624	2,205,343	0	In FY 19-20, the City will utilize approximately \$1.5 million in annual entitlement allocation and assign available prior year CDBG allocation and program income to projects identified through consultant with the community and Hayward City Council.
Other	public - federal	Economic Development Public Services Other	2,093,752	0	0	2,093,752	0	The City will use the CDBG relief funds from the federal government CARES Act to fund community agencies to respond to the COVID-19 pandemic.

Table 6 - Expected Resources – Priority Table

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

In addition to funds provided by HUD, the City will utilize local resources to address community and economic development needs. The City is able to match federal funds with its General Fund dollars, as well as with its Measure B allocation from the Alameda County Transportation Commission (ACTC). CDBG and HOME resources will be allocated towards projects that meet HUD national objectives and are able to comply with federal reporting and financial management regulations. The General Fund will support local providers that provide support services to under-served populations, which include low-income seniors, non-English speaking communities, youth, and people with disabilities. These projects must align with Council Priorities. Finally, the Measure B allocation will allow the City to address the transportation needs of seniors and residents with disabilities. **If appropriate, describe publically owned land or property located within the jurisdiction that may be used**

**to address the needs identified in the plan**

N/A

### **Discussion**

In December 2018 Hayward City Council provided direction to staff regarding allocating funding to the creation of permanent affordable housing, strengthening of homelessness support services, and public facilities and improvements to address low-income resident needs. The identified projects provide the City flexibility and capability to rapidly respond to trending issues and critical community needs beyond the annual agency funding process.

The City anticipates having \$515,000 in prior year resources and estimates receiving \$188,205.00 in Program Income. Combined with an Entitlement of \$1,502,138, the City estimates \$2,205,343.00 in CDBG funds for PY 2019. In addition to these funds, the City received \$902,238 additional CDBG funds from the 2020 CARES Act to respond to the COVID-19 pandemic. Based on guidance from Council and the City's Community Services Commission (CSC), the additional CARES Act funds and all non-committed 2019 entitlement funds will be allocated toward public services to help individuals and families remain housed, meet basic needs, and reduce exposure to the virus. The funds will also be allocated toward economic development activities to help micro-enterprises recover from economic impacts of the virus.

## Annual Goals and Objectives

### AP-20 Annual Goals and Objectives - 91.420, 91.220(c)(3)&(e)

#### Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Administration	2015	2019	Affordable Housing Public Housing Homeless Non-Homeless Special Needs Non-Housing Community Development Administration & Reporting	City-wide based on participant eligibility.	Community Development - Administration & Planning	CDBG: \$419,527	Other: 1 Other
2	Neighborhood Facilities	2015	2019	Non-Housing Community Development	City-wide based on participant eligibility.	Community Development - Public Facilities	CDBG: \$40,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 35 Persons Assisted
3	Economic Development	2015	2019	Homeless Non-Homeless Special Needs Non-Housing Community Development	City-wide based on participant eligibility.	Community Development - Economic Development	CDBG: \$539,999	Jobs created/retained: 10 Jobs Businesses assisted: 70 Businesses Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
4	Sustainable Housing	2015	2019	Affordable Housing Homeless	City-wide based on participant eligibility.	Affordable Housing	CDBG: \$218,711	Homeowner Housing Rehabilitated: 30 Household Housing Unit
5	Homelessness Prevention	2015	2019	Homeless Non-Homeless Special Needs Homelessness Prevention	City-wide based on participant eligibility.	Affordable Housing Community Development - Homelessness Community Development - Permanent Support Housing Community Development - Public Services	CDBG: \$2,350,271	Public service activities for Low/Moderate Income Housing Benefit: 2400 Households Assisted Homelessness Prevention: 1120 Persons Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
6	Non-Homeless Special Needs	2015	2019	Non-Homeless Special Needs Non-Housing Community Development	City-wide based on participant eligibility.	Community Development - Elderly Services Community Development - Family Education Community Development - Homelessness Community Development - Public Services Community Development - Youth Services	CDBG:  \$723,608	Public service activities other than low/mod income housing benefit: 3000

Table 7 – Goals Summary

## Goal Descriptions

1	Goal Name	Administration
	Goal Description	
2	Goal Name	Neighborhood Facilities
	Goal Description	

3	<b>Goal Name</b>	Economic Development
	<b>Goal Description</b>	
4	<b>Goal Name</b>	Sustainable Housing
	<b>Goal Description</b>	
5	<b>Goal Name</b>	Homelessness Prevention
	<b>Goal Description</b>	
6	<b>Goal Name</b>	Non-Homeless Special Needs
	<b>Goal Description</b>	

## AP-35 Projects - 91.420, 91.220(d)

### Introduction

The following projects are CDBG eligible activities that will meet a HUD national objective. All applicants participated in the City's competitive funding process, in alignment with the City's Citizen Participation Plan. Final allocation amounts were authorized by City Council.

As part of the substantial amendment, the following changes have been made:

- CDBG-CV funds have been allocated to the CV-Public Services (\$852,238) and CV-Economic Development (\$50,000) projects
- Uncommitted funds from the Acquisition, Disposition, Clearance, Relocation project have been moved to the Public Services project to fund activities to further respond to the increased need for public services resulting from COVID-19

Recipients of both the CARES Act allocation and uncommitted PY 2019 funds participated in the initial entitlement award competitive funding process and received the above-listed additional funding through a subsequent non-competitive allocation, which was open to public comment for two weeks and discussed in a public hearing.

Identified sub-grantees must comply with the local contracting standards and federal rules and regulations.

#	Project Name
1	PY19 Administration
2	PY19 Acquisition, Disposition, Clearance, Relocation
3	PY19 Economic Development
4	PY19 Housing
5	PY19 Public Facilities and Infrastructure Improvements
6	PY19 Public Services
7	CV-Public Services (2019)
8	CV-Economic Development (2019)

**Table 8 – Project Information**



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

Addressing the needs of the low-moderate income population, the City of Hayward's 2015-2019 Consolidated Plan lists six goals for the CDBG Program, regarding sustainable housing, economic development, non-homeless special needs, homelessness prevention, neighborhood facilities, and CDBG administration.

As directed by Council, CDBG Public Services will be focused on housing/homelessness and the creation of economic and educational opportunity for poverty-level families. To remain in compliance with the CDBG Public Services cap, the City limited Public Services to no more than 15% of projected funding availability; however, as the CARES Act removed the 15% public services spending cap for Program Year 2019, additional emergency relief funds were allocated to support public services in excess of the 15% available funding to ensure those most vulnerable to COVID-19 receive needed support.

The City acknowledges the data supporting the national move toward permanent supportive housing for the chronically homeless and rapid rehousing for families as best practice strategies. The shift of federal funds from emergency shelter and transitional housing projects have proven challenging for local service providers seek and required them to out alternative sources of funding. The City continues to work with its local homeless service providers and Continuum of Care to identify alternative mainstream resources as well as provide technical assistance and capacity building to encourage efficiency changes to the local homeless systems of care.

These goals are broad in nature and capture a range of community impacts that occur as a result of CDBG funded activities. There are always more funding requests than actual funding dollars available. The City makes every attempt to follow these goals when distributing the annual allocation of CDBG funds from HUD. Funding allocations for the 2019 program year focus on increasing economic development opportunities for those in need, providing public services, improving public infrastructure and public facilities, and increasing and maintaining the affordable housing supply in Hayward. The major obstacle to addressing the underserved needs is the lack of available funding and other resources to further improve and expand services to meet the ever-growing needs of the community.

This substantial amendment does not change any of the initial projects or the challenges experienced in the initial allocation. The substantial amendment does reflect a shift in priorities to respond to the COVID-19 crisis by allocating additional CDBG relief funds to public services and economic development projects to support individuals, families, and micro-enterprises respond to and recover from the crisis.

## AP-38 Project Summary

### Project Summary Information

1	<b>Project Name</b>	PY19 Administration
	<b>Target Area</b>	City wide based on participant eligibility.
	<b>Goals Supported</b>	Administration
	<b>Needs Addressed</b>	Community Development - Administration & Planning
	<b>Funding</b>	CDBG: \$419,527
	<b>Description</b>	Administration of the 2019 CDBG Program for the City of Hayward, CA. This will include consulting and technical assistance services as well as program planning efforts. There is no corresponding National Objective for Administration though these efforts support the successful completion of all other projects and activities. IDIS matrix codes will include but are not limited to 20, 21A, 21C, 21D.
	<b>Target Date</b>	6/30/2020
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	N/A
	<b>Location Description</b>	Hayward City Hall, 777 B Street Hayward CA 94541
	<b>Planned Activities</b>	City wide administration of the CDBG program.
2	<b>Project Name</b>	PY19 Acquisition, Disposition, Clearance, Relocation
	<b>Target Area</b>	City wide based on participant eligibility.
	<b>Goals Supported</b>	Sustainable Housing Homelessness Prevention
	<b>Needs Addressed</b>	Affordable Housing Community Development - Homelessness Community Development - Permanent Support Housing
	<b>Funding</b>	:

	<b>Description</b>	The City initially planned to utilize CDBG funds, including entitlement funds and program income, to fund this project. This project was designed to increase the supply of affordable housing for low income households through acquisition of land and real property IDIS Matrix Code will include but is not limited to 01. However, in response to the COVID-19 pandemic, these funds (none of which had been committed as of April 1, 2020) will be reallocated to the CV-Public Services projects.
	<b>Target Date</b>	7/31/2019
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	N/A - funds from this project are being reallocated to Public Services and Economic Development in response to COVID-19.
	<b>Location Description</b>	City-wide based on participant eligibility
	<b>Planned Activities</b>	N/A - funds from this project are being reallocated to Public Services and Economic Development in response to COVID-19.
3	<b>Project Name</b>	PY19 Economic Development
	<b>Target Area</b>	City wide based on participant eligibility.
	<b>Goals Supported</b>	Economic Development
	<b>Needs Addressed</b>	Community Development - Economic Development
	<b>Funding</b>	CDBG: \$339,999
	<b>Description</b>	Economic Development Activities for 2019 program year. IDIS Matrix Codes will include but are not limited to 14E, 18A, 18B, and 18C.
	<b>Target Date</b>	
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	5 low-income individuals and families. 14 micro-enterprise businesses.
	<b>Location Description</b>	City wide based on participant eligibility.
4	<b>Planned Activities</b>	Micro-enterprise assistance (18c) and Technical Assistance (18b)
	<b>Project Name</b>	PY19 Housing
	<b>Target Area</b>	City wide based on participant eligibility.
	<b>Goals Supported</b>	Sustainable Housing
	<b>Needs Addressed</b>	Community Development - Housing Preservation Community Development - Elderly Services

	<b>Funding</b>	CDBG: \$218,711
	<b>Description</b>	The City will utilize CDBG funds, including entitlement funds and program income, to fund housing project activities, including housing rehabilitation work, affordable housing rehabilitation, targeted code correction activities, and seismic retrofit program. IDIS Matrix Codes may include but are not limited to 14A. Given the COVID-19 pandemic, this project's benefit has been amended to reflect a reduced number of households, as construction timelines will be delayed. Unspent funds due to those delays will be reallocated to Public Services.
	<b>Target Date</b>	6/30/2020
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	30 low-income, senior and/or disabled households.
	<b>Location Description</b>	City wide based on participant eligibility.
	<b>Planned Activities</b>	Housing rehabilitation of single-unit residential homes, including seismic retrofit (14A)
5	<b>Project Name</b>	PY19 Public Facilities and Infrastructure Improvements
	<b>Target Area</b>	City wide based on participant eligibility.
	<b>Goals Supported</b>	Non-Homeless Special Needs Neighborhood Facilities
	<b>Needs Addressed</b>	Community Development - Public Facilities
	<b>Funding</b>	CDBG: \$40,000
	<b>Description</b>	The City will utilize CDBG funds, including entitlement funds and program income, to improve public facilities and public infrastructure to meet the demands of citizens in LMI areas, or to meet the needs of LMC in specific areas. IDIS Matrix Codes may include but are not limited to 03C and 03P. Given the COVID-19 pandemic, this project's benefit has been amended to reflect a reduced number of projects, as construction timelines will be delayed. Unspent funds due to those delays will be reallocated to Public Services.
	<b>Target Date</b>	6/30/2020
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	35 low/moderate income individuals and 175 families

	<b>Location Description</b>	Citywide public facilities improvements based on feasibility and eligibility. For public infrastructure improvements, eligible census tracts within the City Hayward.
	<b>Planned Activities</b>	Infrastructure improvements health facilities (03P) and homeless programs (03B).
<b>6</b>	<b>Project Name</b>	PY19 Public Services
	<b>Target Area</b>	City wide based on participant eligibility.
	<b>Goals Supported</b>	Non-Homeless Special Needs Homelessness Prevention
	<b>Needs Addressed</b>	Community Development - Public Services Community Development - Homelessness Community Development - Elderly Services Community Development - Youth Services Community Development - Family Education
	<b>Funding</b>	CDBG: \$824,917
	<b>Description</b>	Public services for the City will target low- and moderate-income citizens with a focus on special needs populations. These services will include: housing navigation services to unsheltered residents through Abode Services, an academic support program for low-income residents through the Hayward Public Library, and housing assistance and homelessness preventing services through area nonprofits. IDIS Matrix Codes may include but are limited to 03T, 05, 05K.
	<b>Target Date</b>	6/30/2020
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	3,200 low/moderate individuals and 1,500 families will benefit from public services.
	<b>Location Description</b>	City wide based on beneficiary eligibility as well as LMI areas.
	<b>Planned Activities</b>	Housing navigation services to unsheltered residents - (03T) Academic support services (05) Tenant/Landlord Counseling (05K)
<b>7</b>	<b>Project Name</b>	CV-Public Services (2019)
	<b>Target Area</b>	City wide based on participant eligibility.
	<b>Goals Supported</b>	Non-Homeless Special Needs

	<b>Needs Addressed</b>	Community Development - Public Services Community Development - Homelessness Community Development - Elderly Services Community Development - Youth Services Community Development - Family Education
	<b>Funding</b>	CDBG-CV: \$2,292,565
	<b>Description</b>	Public services funded with CDBG-CV1 and CDBG-CV3 allocations. Exceeds 15% spending cap, per HUD waiver. Additional funds allocated through the CARES Act and the redistribution of funds from the Acquisition, Disposition, Clearance, and Relocation and Housing projects will be used to provide food security and housing and homelessness-related services for individuals most vulnerable to the COVID-19 outbreak to prevent, prepare for, and respond to COVID-19.
	<b>Target Date</b>	
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Approximately 750 individuals and families will receive support through activities such as rental assistance, legal assistance, food security, and homelessness reduction activities in response to COVID-19.
	<b>Location Description</b>	
	<b>Planned Activities</b>	Public services activities to respond to COVID-19.
<b>8</b>	<b>Project Name</b>	CV-Economic Development (2019)
	<b>Target Area</b>	City wide based on participant eligibility.
	<b>Goals Supported</b>	Economic Development
	<b>Needs Addressed</b>	Community Development - Economic Development
	<b>Funding</b>	CDBG-CV: \$175,000
	<b>Description</b>	Many of Hayward's small businesses are experiencing significant economic impacts from COVID-19. Funds for this project will be administered as \$5,000 grants in financial assistance to micro-businesses to help them respond to and recover from COVID-19. Small business grant recipients may use funds for a variety of activities to recover from COVID-19 such as expenses to promote safe return to work or expenses related to changes in business models to enable social distancing.
	<b>Target Date</b>	

	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Provide small business grants of \$5,000 to 35 small businesses to enable them to address the economic impact of COVID-19 on their small business. Recipients may use funds for a variety of activities to recover from COVID-19 such as payroll, expenses to promote safe return to work, or expenses related to changes in business models to enable social distancing.
	<b>Location Description</b>	
	<b>Planned Activities</b>	Small business grant recipients may use funds for a variety of activities to recover from COVID-19 such as payroll, expenses to promote safe return to work, or expenses related to changes in business models to enable social distancing.

## **AP-50 Geographic Distribution - 91.420, 91.220(f)**

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

The City of Hayward will be targeting low to moderate income identified census tract areas in need of CDBG eligible activities. Additionally, the Tennyson Corridor has been identified by City Council as an area with priority need. For this reason, many activities are targeted toward the Tennyson Corridor. Agencies located outside the City of Hayward's boundaries that serve low income Hayward residents are also eligible to apply for and receive an allocation of CDBG funds, though they must restrict the use of Hayward allocated funds for Hayward resident services.

### **Geographic Distribution**

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

The City of Hayward does not allocate funding based solely on geographic requirements. When the project or planned activities are intended to serve individuals or households directly, those individuals or households must meet income qualifications, as well as residency requirements, in order to receive assistance from the program. In these instances, City staff and/or one of its partner agencies shall complete an in-take and eligibility status review of the applicant individual, or household, before the project/activity is initiated.



## **AP-75 Barriers to affordable housing -91.420, 91.220(j)**

### **Introduction**

The City will foster and preserve existing multifamily and single family affordable rental and ownership housing for low and moderate-income households. To support multifamily development of affordable rental housing, the City will release a notice of funding availability to award City funds to multifamily affordable housing developments and leverage other public and private funds. The process will expand the City's relationship with affordable housing developers to increase development of affordable housing.

In November 2017 the City amended the Affordable Housing Ordinance which requires developers to either provide affordable units or pay an in-lieu fee. Developers that include the affordable units be required to restrict 7.5 to 10 percent of the ownership units, depending on density of the project, as affordable for moderate income households and restrict six percent of the rental units as affordable to low and extremely low-income households. Additionally, to preserve existing multifamily affordable housing, the City will be facilitating recapitalization of existing affordable housing developments in exchange for the extension of regulatory terms.

Existing single-family housing stock occupied by lower-income households will be preserved by rehabilitating single-family owner-occupied homes and mobile homes. The Accessory Dwelling Unit (ADU) program will provide additional housing on single family properties creating by legalizing such units and providing these units as alternate affordable housing options.

The City will also fund services to address housing discrimination. Sub-recipient housing counselors will investigate then intervene or mediate fair housing complaints and conduct a fair housing audit to determine where future local efforts and strategies should be focused.

**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**

Many factors inhibit the development of affordable housing in Hayward including the high cost of land, construction costs, cost of development financing, cost of financing for homebuyers, development fees and process. The City staff will actively seek to address these barriers by further evaluating the following:

- Cost of Land, Construction and Development Fees
- Development Approval Permit Process

- Design Standards
- City Ordinances

After staff evaluation, viable mechanisms to reduce barriers to the development of affordable housing will be proposed to City Council for approval.

### **Discussion**

The City of Hayward intends to extend affordable housing opportunities through the in-house Housing Rehabilitation Program, as well as through funding agencies that provide homeless outreach and permanent supportive housing. Additionally, through the Alameda County HOME Consortium, the City is projected to receive HOME funds to help make additional affordable housing resources available to low-income Hayward residents.

## **AP-85 Other Actions - 91.420, 91.220(k)**

### **Introduction**

The City of Hayward will be undertaking and funding several programs throughout FY 2019-2020 to meet the needs of underserved communities, foster and maintain affordable housing, reduce lead-based paint hazards, reduce the number of poverty-level families, foster public private partnerships, and increase institutional structure.

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

Providing services for populations with underserved needs is a high priority for the City of Hayward, understanding that increased access to services can prevent these individuals from becoming homeless, increases quality of life and opportunity, and supports the City's anti-poverty strategy. In FY 2019-2020, the City will utilize its General Fund to provide direct resources while participating with other jurisdictions to jointly fund non-housing service-enriched projects that benefit Hayward residents with special needs. The City will also work to leverage all available local, state, federal, and private funds to respond to the increased need of Hayward residents as a result of the COVID-19 pandemic.

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

The City will preserve existing affordable rental and ownership housing for low and moderate-income households. Existing single-family housing stock occupied by lower-income households will be preserved by rehabilitating single-family owner-occupied homes and mobile homes. The City will also fund services to address housing discrimination. Sub-recipient housing counselors will investigate then intervene or mediate fair housing complaints and conduct a fair housing audit to determine where future local efforts and strategies should be focused. The City will foster the current relationships with non-profit housing development organizations such as Eden Housing and Allied Housing to leverage those relationships into new affordable housing opportunities. Additionally, in response to the significant economic impact of COVID-19 and the increased risk of displacement among individuals and families unable to pay rent, Hayward will provide temporary rental assistance to individuals at or below 80% AMI with significant rent burden in the form of one-time payments made by Centro Legal de la Raza directly to landlords on behalf of qualifying tenants.

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

Per the Alameda County Lead Abatement Program, Hayward has approximately 34,700 pre-1978 housing units. These units may contain lead-based paint. In accordance with the HUD/EPA regulations, City rehabilitation staff receives certification as Lead Supervisors. These staff members implement the lead regulations affecting property rehabilitation with CDBG funds. The EPA's Renovation, Repair, and Painting (RRP) Rule, which affects HUD-funded residential rehabilitation, went into effect on April 22, 2010, and the City has modified its contracting and rehabilitation procedures to

comply with the regulations.

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

A key component of the City of Hayward's anti-poverty strategy is to collaborate with other agencies whose focus is improving opportunities for low-income families, youth, single adults, and persons with disabilities who need shelter, prevention, and intervention activities to improve their lives. The City will collaborate with number of these public partners and fund non-profit organizations in implementing innovative programs to meet these needs.

A key example of this strategy is the Family Education Program (FEP) which will provide wrap-around literacy and academic support services to low-income Hayward families. A unique collaboration of HPL's successful Literacy Plus and Homework Support Center programs, FEP will provide after-school academic support to youth in grades K-12, four days a week, as well as ESL literacy services to the parents of the children attending the Homework Support Centers. The FEP directly addresses the cities priorities by providing high-quality educational opportunities for and improving K-12 academic performance in poverty-level families.

The City of Hayward is a strong partner and participant in the Hayward Promise Neighborhood Program which is a Cradle-to-Career continuum of partners and services. Recently Hayward was awarded a second Promise Neighborhood grant through the Department of Education. This \$30 million grant will assist Hayward families in the Jackson Triangle and South Hayward/Tennyson Area over the next five-years.

Further, Hayward's targeted efforts at responding to the COVID-19 will focus on increasing food security and providing public services to prevent and address homelessness for those at the greatest risk of displacement and contracting the disease.

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

The City of Hayward implements housing and community development programs within a structure that includes various public and private agencies and organizations. Additionally, the City regularly monitors progress on activities to be carried out in the Action Plan to ensure compliance with program requirements. The overall process begins with the identification of needs, soliciting and evaluating applications for CDBG funding, and allocating resources. Through Agreements with sub-recipients and Memoranda of Understanding (MOUs) with other public agencies, the City sets a benchmark by incorporating goal requirements and reporting procedures, timelines, and budgets against which performance is measured.

The executive leadership of the City of Hayward is committed to a well-trained and cross-trained workforce that provides opportunity for succession planning and talent development. Cross department working groups and initiatives allow for a greater understanding of available resources and

skill sets, as well as breaking down silos that are often an issue in government accountability. Staff has undergone Results Based Accountability training, and are well versed in the Lean Innovation methodology.

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

The City works closely with many private and nonprofit organizations on housing and community development activities. The City's grant funding process promotes collaboration and coordination between these organizations in the delivery of housing, community development and other public and social services to reduce duplication of effort and to maximize the use of limited public resources. The City extends its efforts to the primary health care institutions that serve Hayward residents on the delivery of, and access to, health care services. The City works in coordination with the Hayward Chamber of Commerce and many local and regional business representatives to address the economic and workforce development needs of the Hayward community.

### **Discussion**

In addition to the agencies and programs funded through HUD-based grants, the City of Hayward funds several non-profit organizations and programs using City General Funds for Social. These funds will supplement the FY 2019-2020 CDBG entitlement, allowing the City to support shelters for families and victims of domestic violence, after school programs, healthy meal programs for low-income seniors, and coordinated information and referral services among many others.

Alameda County Measure B and Measure BB sales tax funds of approximately \$860,000 will be utilized to provide specialized transportation services to seniors and disabled individuals. Services are restricted to the sole provision of transportation services for the above referenced populations. While these funds are restricted, they provide an important tool in improving the lives our senior and disabled Hayward residents outside of federal dollars.

## Program Specific Requirements

### AP-90 Program Specific Requirements - 91.420, 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	188,205
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
3. The amount of surplus funds from urban renewal settlements	0
4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan	0
5. The amount of income from float-funded activities	0
<b>Total Program Income:</b>	<b>188,205</b>

#### Other CDBG Requirements

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	100.00%

**Housing Trust Fund (HTF)**  
**Reference 24 CFR 91.220(I)(5)**

**1. Distribution of Funds**

- a. Describe the eligibility requirements for recipients of HTF funds (as defined in 24 CFR § 93.2).
- b. Describe the jurisdiction's application requirements for eligible recipients to apply for HTF funds.
- c. Describe the selection criteria that the jurisdiction will use to select applications submitted by eligible recipients.
- d. Describe the jurisdiction's required priority for funding based on geographic distribution, which is a description of the geographic areas of the State (including areas of low-income and minority concentration) in which it will direct assistance during the ensuing program year.
- e. Describe the jurisdiction's required priority for funding based on the applicant's ability to obligate HTF funds and undertake eligible activities in a timely manner.
- f. Describe the jurisdiction's required priority for funding based on the extent to which rents for units in the rental project are affordable to extremely low-income families.

g. Describe the jurisdiction's required priority for funding based on the financial feasibility of the project beyond the required 30-year period.

h. Describe the jurisdiction's required priority for funding based on the merits of the application in meeting the priority housing needs of the jurisdiction (such as housing that is accessible to transit or employment centers, housing that includes green building and sustainable development features, or housing that serves special needs populations).

i. Describe the jurisdiction's required priority for funding based on the location of existing affordable housing.

j. Describe the jurisdiction's required priority for funding based on the extent to which the application makes use of non-federal funding sources.

2. Does the jurisdiction's application require the applicant to include a description of the eligible activities to be conducted with HTF funds?

3. Does the jurisdiction's application require that each eligible recipient certify that housing units assisted with HTF funds will comply with HTF requirements?

4. **Performance Goals and Benchmarks.** The jurisdiction has met the requirement to provide for performance goals, consistent with the jurisdiction's goals established under 24 CFR 91.215(b)(2), by including HTF in its housing goals in the housing table on the SP-45 Goals and AP-20 Annual Goals and Objectives screens.

5. **Rehabilitation Standards.** The jurisdiction must establish rehabilitation standards for all HTF-assisted housing rehabilitation activities that set forth the requirements that the housing must meet upon project completion. The jurisdiction's description of its standards must be in sufficient detail to determine the required rehabilitation work including methods and materials. The standards may refer to applicable codes or they may establish requirements that exceed the minimum requirements of the codes. The jurisdiction must attach its rehabilitation standards below. If the jurisdiction will not use HTF funds for the rehabilitation of housing, enter "N/A".

In addition, the rehabilitation standards must address each of the following: health and safety; major systems; lead-based paint; accessibility; disaster mitigation (where relevant); state and local codes,



ordinances, and zoning requirements; Uniform Physical Condition Standards; and Capital Needs Assessments (if applicable).

**6. Resale or Recapture Guidelines.** Below, the jurisdiction must enter (or attach) a description of the guidelines that will be used for resale or recapture of HTF funds when used to assist first-time homebuyers. If the jurisdiction will not use HTF funds to assist first-time homebuyers, enter “N/A”.

**7. HTF Affordable Homeownership Limits.** If the jurisdiction intends to use HTF funds for homebuyer assistance and does not use the HTF affordable homeownership limits for the area provided by HUD, it must determine 95 percent of the median area purchase price and set forth the information in accordance with §93.305. If the jurisdiction will not use HTF funds to assist first-time homebuyers, enter “N/A”.

**8. Limited Beneficiaries or Preferences.** Describe how the jurisdiction will limit the beneficiaries or give preferences to a particular segment of the extremely low- or very low-income population to serve unmet needs identified in its consolidated plan or annual action plan. If the jurisdiction will not limit the beneficiaries or give preferences to a particular segment of the extremely low- or very low-income population, enter “N/A.”

Any limitation or preference must not violate nondiscrimination requirements in § 93.350, and the jurisdiction must not limit or give preferences to students. The jurisdiction may permit rental housing owners to limit tenants or give a preference in accordance with § 93.303 only if such limitation or preference is described in the action plan.

**9. Refinancing of Existing Debt.** Enter or attach the jurisdiction’s refinancing guidelines below. The guidelines describe the conditions under which the jurisdiction will refinance existing rental housing project debt. The jurisdiction’s refinancing guidelines must, at minimum, demonstrate that rehabilitation is the primary eligible activity and ensure that this requirement is met by establishing a minimum level of rehabilitation per unit or a required ratio between rehabilitation and refinancing. If the jurisdiction will not refinance existing debt, enter “N/A.”

## Discussion

DRAFT

DRAFT