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# STANISLAUS URBAN COUNTY



**Fiscal Year 2022-2023**

**Consolidated Annual Performance  
and Evaluation Report (CAPER)**

*for HUD Entitlement Programs that include CDBG,  
ESG, and NSP Programs*

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**August 2023**

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# PROGRAM YEAR – 3

## CONSOLIDATED PLAN 2020-2025

2022-2023 STANISLAUS URBAN COUNTY CONSOLIDATED ANNUAL PERFORMANCE AND EVALUATION REPORT

### INTRODUCTION

The 2022-2023 Consolidated Annual Performance and Evaluation Report (CAPER) constitutes the third reporting period (the Fiscal Year covering July 1, 2022 to June 30, 2023) of the Five-Year Consolidated Planning period. The Stanislaus Urban County annually receives Community Development Block Grant (CDBG) and Emergency Solutions Grants (ESG) program funds from the U.S. Department of Housing and Urban Development (HUD) as an entitlement jurisdiction. The Stanislaus Urban County is made up of the unincorporated areas of Stanislaus County along with cities of: Ceres, Hughson, Newman, Oakdale, Patterson, Riverbank, and Waterford. Stanislaus County is the “lead entity” for the Stanislaus Urban County.

HUD requires the Stanislaus Urban County to prepare and adopt a five-year Consolidated Plan (Con Plan) and Annual Action Plans to inform HUD on how the allocated grant funds will be used. At the end of each fiscal year, HUD requires this annual CAPER to report the progress made in accomplishing the goals set forth in the Con Plan, also referred to as a Strategic Plan, and Annual Action Plan (AAP). As a recipient of Neighborhood Stabilization Program (NSP) funding in prior fiscal years, the Stanislaus Urban County’s CAPER reports on NSP activities occurring during the reporting fiscal year. The projects and activities outlined within this CAPER were administered and overseen by the County’s Department of Planning and Community Development.

In Fiscal Year 2022-2023, the Stanislaus Urban County continued its focus on effectively administering and implementing CDBG, ESG, and NSP programs. Despite of the ongoing impacts of the Coronavirus pandemic (COVID 19) experienced during the fiscal year, HUD funded programs continued to serve the community and assisted in the continuing response to COVID 19. HUD funded infrastructure projects continued with a mixture of preliminary design, engineering, environmental assessments, and construction activities occur during the fiscal year. Non-profits awarded CDBG and ESG funding for delivery of public services and emergency shelter operations continued with staffing constraints but carried on in order to provide needed services to the communities most vulnerable.

The annual HUD Entitlement program funding allocated to the Stanislaus Urban County in Fiscal Year 2022-2023 were:

CDBG	\$2,370,213
ESG	\$ 207,577
<b>Total:</b>	<b>\$2,577,790</b>

In addition to the funding listed above, the CAPER also reports on the use of federal CDBG and ESG Coronavirus Aid, Relief, and Economic Security (CARES) Act funding awarded to the Stanislaus Urban County in Fiscal Years 2019-2020 and 2020-2021. The CARES Act identified additional funding for the

CDBG and ESG programs to prevent, prepare for, and respond to the community impacts of the COVID 19 pandemic.

HUD’s distribution plan for CDBG and ESG CARES Act funding included multiple rounds: an initial round (CV1) that would allow for quick access to funding necessary to address the immediate crisis resulting from the pandemic and rounds two and three, CV2 and CV3, that would support post-pandemic community recovery. Below are the amounts that the Stanislaus Urban County was awarded for round one CDBG (CV1) and ESG (CV1), round two ESG (CV2), and round three CDBG (CV3) funding:

CDBG Round One (CV1) Allocation:	\$1,358,994
CDBG Round Three (CV3) Allocation:	<u>\$1,432,755</u>
<b>Total</b>	<b>\$2,791,749</b>

ESG Round One (CV1) Allocation:	\$ 683,103 (Original Award \$698,717)
ESG Round Two (CV2) Allocation:	<u>\$3,292,823 (Original Award \$3,891,785)</u>
<b>Total</b>	<b>\$3,975,926 (Original Award \$4,590,502)*</b>

***\*\$614,576 in ESG CV funding was recaptured by HUD on March 16, 2022 – see discussion in CR-05- Goals and Outcomes of this CAPER.***

In Fiscal Year 2022-2023, the Stanislaus Urban County members were also members in the City of Turlock/Stanislaus County HOME Investment Partnerships Program (HOME) Consortium (hereafter referred to as the “HOME Consortium”). The Fiscal Year 2022-2023 HOME allocation for the HOME Consortium was \$1,730,311; of which approximately \$1.5 was allocated to the HOME Consortium’s Housing Rehabilitation program. As the lead entity for the HOME Consortium in Fiscal Year 2022-2023, the City of Turlock administered the HOME program and will report on HOME activities in the City of Turlock’s CAPER which will be presented to the Turlock City Council for adoption. The City of Turlock’s CAPER is made available on the City’s website and may also be accessed by contacting the City of Turlock’s Housing Program Services Division. Effective July 1, 2023, Stanislaus County has become the lead entity for the new Stanislaus HOME Consortium and will be reporting on HOME activities for its members in the Fiscal Year 2023-2024 CAPER.

CDBG, ESG, NSP, and HOME funds are designed to primarily serve the low-income community as defined by the Area Median Income (AMI) limits per program for Stanislaus County as determined by HUD. Funds are used by the Stanislaus Urban County to meet the following goals of the Con Plan:

1. Increase and improve supply of affordable housing
2. Work to end and prevent homelessness
3. Improve infrastructure and public facilities
4. Provide public services
5. Community emergency responses
6. Administration

In Fiscal Year 2022-2023, the Stanislaus Urban County continued to collaborate with the Stanislaus Community System of Care (CSOC), the local federally recognized Continuum of Care (CoC), on homeless services and programs. A CoC is an integrated system of care that guides and tracks homeless individuals and households through a comprehensive array of housing and services designed to prevent and end

homelessness. The programming of ESG funding is brought to the local CoC for feedback and to ensure coordination with countywide efforts to address homelessness.

The County's Department of Planning and Community Development has also served as the Administrative Entity for the local CoC for state ESG since 2017. The department works with the CoC to identify service needs and allocates the CA-ESG funding through its annual grant application process that is later described in the CAPER. On average the local CoC area receives approximately \$280,000 annually in CA-ESG funding.

This CAPER is presented in the template format generated by HUD which includes a series of questions and answers in relation to specific program funding received by the Stanislaus Urban County. The information provided in the CAPER is limited to the specific questions that HUD requires of the Stanislaus Urban County and does not address any other federal or state funding received by the members of the Stanislaus Urban County.

## CR-05 – GOALS AND OUTCOMES

### **PROGRESS THE JURISDICTION HAS MADE IN CARRYING OUT ITS STRATEGIC PLAN AND ITS ACTION PLAN. 91.520(A)**

**This could be an overview that includes major initiatives and highlights that were proposed and executed throughout the program year.**

The priorities identified in the Con Plan are public infrastructure, economic development, affordable housing, public services, and community emergency response to COVID 19. In many neighborhoods and communities throughout the planning area, public infrastructure (sewer, curb, gutter, sidewalk, storm drainage, etc.) is minimal or non-existent, causing this to be a high priority need. All of the Stanislaus Urban County members utilize CDBG funds for infrastructure improvement projects in an effort to improve the quality of life for residents in and around the project areas.

Through the CDBG Public Services Grant (PSG) program, the Stanislaus Urban County sets aside approximately 10% of its annual CDBG allocation for programs that provide services to low to moderate-income households (families or individuals). In Fiscal Year 2022-2023, a total of 10 public service programs were funded \$237,025 to carry-out a number of needed services that included assistance to the homeless and those at risk of becoming homeless. Approximately 2,875 individuals received a form of service through the CDBG-PSG funded public service programs. Funded public service programs ranged from meals and shelter for low-income households to emergency food assistance programs.

Throughout Fiscal Year 2022-2023, the Stanislaus Urban County and the local CoC worked together on strengthening efforts to address and collaborate on homeless issues. Those efforts included working with the CoC, and other entitlement jurisdictions, to oversee and monitor, for federal compliance, the Coordinated Entry System (CES) operated in conjunction with the Homeless Management Information System (HMIS). Efforts to oversee and monitor the CES included continuing to update local CES policies and procedures.

In response to COVID 19, the Con Plan included a "community emergency response" goal allowing for the Stanislaus Urban County to direct CARES funding, as well as other annual CDBG and ESG entitlement funding, as needed, to assist the community to prepare, prevent, and protect its residents, service providers, and businesses from the impacts of COVID 19.

In Fiscal Year 2020 CDBG CV1 and ESG CV1, the first round of CARES funding were awarded and in 2021 CDBG CV3 and ESG CV2 the second round were awarded through a competitive grant application process. A total of twelve programs provided by eight (8) service providers were funded CDBG CV funding and four activities by four (4) service providers were funded ESG CV funds, including one shelter rehabilitation project. A total of 572 individuals were assisted with annual ESG funds and a total of 20 additional shelter beds are under construction with ESG CV funds. The outcomes for these CARES funded programs are included in the Fiscal Year 2022-2023 CAPER.

HUD Community Planning and Development (CPD) Notice CPD-21-08 – Waivers and Alternative Requirements for the Emergency Solutions Grants (ESG) program, issued April 18, 2022, sets the requirements for the recapture of funds, along with the process for redistribution of captured funds, if the 20% and 50% expenditure deadlines were not met. If the 20% expenditure deadline was not met, the jurisdiction would have a recapture of 20% of its grant allocation. On March 16, 2022, the County received a notice that the September 30, 2021 deadline to expend 20% of the ESG CV funds was not met resulting in a recapture of \$614,576.04. An attempt by County staff to appeal the recapture decision was denied by HUD with HUD representatives strongly recommending moving forward to meet the June 16, 2022 deadline for 50% expenditure in order to avoid further recapturing of funds. It was explained that the jurisdictions that met the 50% expenditure deadline would be considered for receipt of redistributed recaptured funding. While the County met the June 16, 2022 deadline, on August 23, 2022 HUD released the awarding of redistributed funding and none of the funding was awarded to the Stanislaus Urban County.

While all of the ESG CV1 funding was awarded by the Board of Supervisors on December 14, 2021 to three agencies, two of the agencies (Family Promise and Community Housing and Shelter Services) never executed their agreements with the County due to concerns that they would not be able to meet the September 30, 2022 expenditure deadline. Those two agreements totaled, \$668,404, thus the recapture (reduction) in federal ESG CV funds did not impact any active programs. The remaining \$53,828, the difference from the amount recaptured and the amount of the unexecuted agreements, was redistributed to the We Care Program- Turlock in accordance with the Board of Supervisors December 14, 2021 award allowing for redistribution of funding among the awarded agencies if a grantee were unable to expend funding.

**COMPARISON OF THE PROPOSED VERSUS ACTUAL OUTCOMES FOR EACH OUTCOME MEASURE SUBMITTED WITH THE CONSOLIDATED PLAN AND EXPLAIN, IF APPLICABLE, WHY PROGRESS WAS NOT MADE TOWARD MEETING GOALS AND OBJECTIVES. 91.520(G)**

**Categories, priority levels, funding sources and amounts, outcomes/objectives, goal outcome indicators, units of measure, targets, actual outcomes/outputs, and percentage completed for each of the grantee's program year goals.**



Consolidated Plan Accomplishments					Strategic Plan to Date			Program Year 3		
Goal	Category	Source / Amount	Indicator	Unit of Measure	Expected	Actual	Percent Complete	Expected	Actual	Percent Complete
Administration	Other-Administration	CDBG: \$334,219 ESG: \$15,568 CDBG CV1: \$271,796 CDBG CV3: \$286,551 ESG CV1: \$54,257.28 ESG CV2: \$343,335.32	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Community Emergency Response Program	Other-Emergency Assistance	CDBG CV1: \$1,087,198 CDBG CV3: \$1,146,204 ESG CV1: \$628,846 ESG CV2: \$2,838,825	Rapid Re-Housing	Households Assisted	385	35	9%	10	30	300%
			Homeless Persons Overnight Shelter	Persons Assisted	970	1,254	129.2%	500	528	105.6%
			Homeless Prevention	Persons Assisted	900	23	2.5	10	23	230
			Other	Other	4,361	4,251	97.4%	1,000	1,001	100
Improve Public Infrastructure	Non-Housing Community Development	CDBG: \$1,659,148	Infrastructure Activities	Households Assisted	7,500	1,061	14.1%	1,500	250	16.6%
Provide Public Services	Homeless Non-Homeless Special Needs	CDBG Public Services: \$237,025	Public service activities other than Low/Moderate-Income Housing Benefit	Persons Assisted	7,000	7,442	106.3%	1,400	2,875	205.3%
Work to End and Prevent Homelessness	Homeless	ESG: \$192,009	Other	Other	2,100	1,380	65.7%	500	572	114.4%
*Affordable Housing	Affordable Housing	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

Table 1 – Consolidated Plan Accomplishments – Program Year 3 and Strategic Plan to Date

\*The Affordable Housing goal is in the FY 2020-2025 Con Plan as a goal for the overall City of Turlock/Stanislaus Urban County HOME Consortium, which is administered by the City of Turlock. All HOME Program funded projects, housing goals and related activities are reported in the City of Turlock’s CAPER.

**ASSESS HOW THE JURISDICTION’S USE OF FUNDS, PARTICULARLY CDBG, ADDRESSES THE PRIORITIES AND SPECIFIC OBJECTIVES IDENTIFIED IN THE PLAN, GIVING SPECIAL ATTENTION TO THE HIGHEST PRIORITY ACTIVITIES IDENTIFIED.**

The Stanislaus Urban County’s Con Plan identifies public infrastructure and facility improvement, affordable housing, community and economic development, public services, homeless services, and community emergency response as the high priority needs. Consistent with these priorities, the Stanislaus Urban County’s undertook the following activities:

- Each member continued with the design, engineering, and construction of various public infrastructure projects contributing to the improvement of neighborhoods.
- Continued to fund public service programs through a competitive grant process to assist non-profits to aid low- and moderate-income persons in need of services such as food, shelter, and youth services. Without the assistance, many individuals and families in the Urban County would lack access to valuable services that address some of their basic needs.
- Offered grants, to non-profits, through a competitive process, to assist the community to prepare, prevent, and protect its residents, service providers, and businesses from the impact of COVID 19.

The following service provider’s expenditures and outcomes are reflected in the CAPER:

CDBG-PSG Program Funded Service Providers (Fiscal Year 2022-2023)

Court Appointed Special Advocates - Direct Services Program	\$25,000
Center for Human Services -Ceres Family Resource Center	\$12,037
Center for Human Services - Oakdale Family Resource Center	\$25,000
Center for Human Services - Westside Family Resource Center	\$25,000
Children’s Crisis Center - Guardian House	\$24,996
Children’s Crisis Center - Marsha’s House	\$24,996
Children’s Crisis Center - Verda’s House	\$24,996
Salvation Army Red Shield - At Risk Teen Program	\$25,000
United Samaritans Foundation - Daily Lunch Program - Ceres/Keyes	\$25,000
United Samaritans Foundation- Daily Lunch Program - Westside	\$25,000

2022 ESG Program Funded Service Providers

Center for Human Services - Youth Low Barrier Shelter Program	\$79,364
Community Housing and Shelter Services - Rental Assistance Program	\$90,000
We Care Program -Turlock - Emergency Shelter Program and RRH Program	\$22,645

2021 ESG Program Funded Service Providers

Community Housing and Shelter Services - HMIS Data Entry	\$15,949
Family Promise of Greater Modesto - Shelter to Solutions	\$90,382
We Care Program – Turlock - Emergency Shelter Program and RRH Program	\$90,382

CDBG CV1 Program Funded Service Providers

Cambridge Academies - Enterprise Connection Program	\$201,731.50
Center for Human Services - Family Resource Center Concrete Support	\$201,731.50
Children’s Crisis Center - CDBG CARES Program	\$170,691.50
Family Promise of Greater Modesto - Rent/Utility Assistance Program	\$201,731.50

Salvation Army - Red Shield - Feed the Need Program	\$201,731.50
United Samaritans Foundation - Employee Hazard Pay	\$109,578.50

CDBG CV3 Program Funded Service Providers

Cambridge Academies - HOST House Shelter Program	\$200,000
Cambridge Academies - Naomi’s House Shelter Program	\$200,000
Center for Human Services - Family Resource Center Concrete Support	\$200,000
Community Housing and Shelter Services - Rental Assistance Program	\$180,000
Haven Women’s Center of Stanislaus-Haven Emergency Shelter Program	\$166,204
Salvation Army - Red Shield- Feed the Need Program	\$200,000

ESG CV1 Program Funded Service Providers:

Community Housing and Shelter Services - Rental Assistance	\$244,615.34
Family Promise of Greater Modesto - Shelter to Solutions	\$264,615.33
We Care Program – Turlock - Emergency Shelter Program	\$119,615.33

ESG CV2 Program Funded Service Providers:

United Samaritans Foundation - Shelter Renovation Project	\$2,500,000
We Care Program - Turlock - Emergency Shelter Program	\$338,824.86

As the Stanislaus Urban County’s lead entity, county staff administratively supported all of the Stanislaus Urban County members on their paths towards meeting the goals identified by the community during the Con Plan process. The competitive grant review process utilized a Grant Review Panel made up of representatives from each of the Stanislaus Urban County’s members and the CSOC to assure progress towards meeting the Con Plan’s priorities and addressing community needs.

**CR-10 – RACIAL AND ETHNIC COMPOSITION OF FAMILIES ASSISTED**

**DESCRIBE THE FAMILIES ASSISTED (INCLUDING THE RACIAL AND ETHNIC STATUS OF FAMILIES ASSISTED). 91.520(A)**

Race/Ethnicity	CDBG	Percentage	ESG	Percentage
White	2,538	88.28%	357	62.41%
Black or African American	135	4.70	92	16.08
Asian	26	0.90	11	1.92
American Indian or American Native	26	0.90	65	11.36
Native Hawaiian or Other Pacific Islander	16	0.56	3	0.52
Other	134	4.60	38	6.64
Refused to Answer	-	-	6	1.04
<b>Total</b>	<b>2,875</b>	<b>100</b>	<b>572</b>	<b>100</b>
Hispanic	1,465	50.95	192	33.57
Not Hispanic	1,410	49.04	380	66.43

Table 2 – Table of Assistance to Racial and Ethnic Populations by Source of Funds

Race/Ethnicity	CDBG CV	Percentage	ESG CV	Percentage
White	863	86.21%	357	62.41%
Black or African American	48	4.79	92	16.08
Asian	13	1.29	11	1.92
American Indian or American Native	9	0.89	65	11.36
Native Hawaiian or Other Pacific Islander	21	2.09	3	0.52
Other	47	4.69	38	6.64
Refused to Answer	-	-	6	1.04
<b>Total</b>	<b>1,001</b>	<b>100</b>	<b>572</b>	<b>100</b>
Hispanic	743	74.22	192	33.57
Not Hispanic	258	25.77	380	66.43

Table 2 A – Table of Assistance to Racial and Ethnic Populations by Source of Funds

## NARRATIVE

The Stanislaus Urban County identifies priority needs and offers services and programs to eligible individuals and households regardless of race and ethnicity. Tables 2 and 2 A above reflect the CDBG PSG and the ESG programs for Fiscal Year 2022-2023 and is generated by the HUD CAPER template and the information reported reflects demographic information provided by participants and recorded in the HUD Integrated Disbursement and Information System (IDIS) reporting system.

Through CDBG PSG funds there were several non-profits that addressed the needs of special populations in the Stanislaus Urban County. Of the total 2,875 individuals assisted, approximately 568 individuals with disabilities were assisted with emergency food, shelter, and/or utility assistance were assisted. Among the total assisted individuals, there were also 268 female head of households, 51 veterans, 688 seniors, 21 domestic violence victims, 111 homeless, 11 were provided with homeless prevention, 220 were provided case management, and 1,348 were provided emergency food assistance.

Through ESG funds there were several non-profits that assisted homeless persons and families, both the chronically homeless populations and temporarily homeless households, make a transition to permanent housing and independent living. While enrolled in these programs, case managers worked with each household to set goals and work on a housing action plan in order to identify and connect with any needed services such as: Temporary Assistance for Needy Families (TANF), food stamps, Veteran’s benefits, future employment opportunities, etc. Throughout the fiscal year, ESG homeless prevention and rapid re-housing funds placed 53 homeless individuals into permanent housing. At the end of the fiscal year, 49 of those individuals were stably housed. The ESG funded programs assisted a total of 572 individuals throughout the fiscal year.

ESG funds were also used to provide emergency shelter to homeless individuals and households. Clients that showed progress and motivation toward self-sufficiency receive extended case management in conjunction with rapid re-housing assistance funds to assist in the placement of job and permanent housing placement.

**IDENTIFY THE RESOURCES MADE AVAILABLE.**

<b>Source of Funds</b>	<b>Resources Made Available</b>
CDBG	\$2,370,213
ESG	\$207,577
CDBG CV1	\$1,358,994
CDBG CV3	\$1,432,755
ESG CV1	\$683,103.28
ESG CV2	\$3,182,160.18

Table 3 – Resources Made Available

[ Space below intentionally left blank. ]

**NARRATIVE**

In Fiscal Year 2022-2023, the annual entitlement CDBG and ESG funding and CARES Act CDBG and ESG funding, in the amounts identified in *Table 3 – Resources Made Available*, continued to provide much needed public services in the community and helped alleviate the impact of COVID 19. Collectively, these resources assist the Stanislaus Urban County in addressing infrastructure needs and to provide services to the most vulnerable of our community. When other resources are available, Stanislaus Urban County members leverage CDBG funds with local, state, or other federal funds. In Fiscal Year 2022-2023, CDBG and ESG activities leveraged \$3,941,205 and \$844,004 respectively to support service delivery.

**IDENTIFY THE GEOGRAPHIC DISTRIBUTION AND LOCATION OF INVESTMENTS**

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description
West Modesto (unincorporated)	30	30	Infrastructure, Public Services and Economic Development
Ceres	11	11	Infrastructure, Public Services and Economic Development
Empire	0	0	Infrastructure, Public Services and Economic Development
Hughson	7	7	Infrastructure, Public Services and Economic Development
Newman	7	7	Infrastructure, Public Services and Economic Development
Oakdale	8	8	Infrastructure, Public Services and Economic Development
Patterson	8	8	Infrastructure, Public Services and Economic Development
Riverbank	7	7	Infrastructure, Public Services and Economic Development
Unincorporated Stanislaus County	15	15	Infrastructure, Public Services and Economic Development
Waterford	7	7	Infrastructure, Public Services and Economic Development

Table 4 – Identify the Geographic Distribution and Location of Investments

## **NARRATIVE**

CDBG funding is allocated among all the Stanislaus Urban County's members based on a population and poverty formula, along with an equitable amount of funding for administration. Stanislaus County, as lead entity, receives a greater percentage of funding for administration. Each member sets their own priority for public infrastructure projects. In many neighborhoods and communities within the Stanislaus Urban County's planning area, public infrastructure is minimal or non-existent, causing this to be a high priority need. Infrastructure such as sewer, water, curb, gutter, sidewalk, and storm drainage are typical development standards in newer neighborhoods but are non-existent or antiquated in older neighborhoods. The Stanislaus Urban County members each use the majority of their annual CDBG entitlement funds for infrastructure improvement-related projects. CDBG PSG and ESG, annual entitlement and CARES Act, funding is made available for use throughout the entire Stanislaus Urban County. CDBG annual entitlement funding is also used to fund fair housing services throughout the entire Stanislaus Urban County.

## **LEVERAGING**

**Explain how federal funds leveraged additional resources (private, state and local funds), including a description of how matching requirements were satisfied, as well as how any publicly owned land or property located within the jurisdiction that were used to address the needs identified in the plan.**

## **LEVERAGING RESOURCES**

In Fiscal Year 2022-2023, CDBG and ESG activities leveraged \$3,941,205 and \$844,004 respectively to support service delivery. The sources of leveraged funding included: private donations, other local funding, program income, and in-kind donations. Although match was not required of the CARES Act ESG funded service providers during the fiscal year, the amounts were still provided to County staff.

Under the NSP program, the Stanislaus Urban County was provided funding to mitigate the negative effects of high foreclosure rates. The program design took foreclosed and vacant homes that were deteriorating due to neglect, and in turn rehabilitated the homes utilizing local workers and material suppliers. The homes were then resold to qualified first time homebuyers and the sales proceeds were retained by the Stanislaus Urban County as Program Income (PI); along with the future repayment of first-time down payment assistance provided by the NSP program. NSP PI is available for housing development activities, including the Abandoned and Dangerous Buildings program.

Collectively, the leveraging of resources assists the Stanislaus Urban County in addressing its affordable housing and infrastructure needs; and to provide services to the most vulnerable of our community.

## **MATCHING**

Under the annual entitlement ESG program, 50% of the costs related to the projects are reimbursed and the remainder of the costs paid by non-ESG match funding sources (i.e., local unrestricted donations). In this manner, the subrecipient in turn commits their dollar-to-dollar match by paying the remainder of the expenses from non-ESG sources. County staff reviews quarterly ESG statistical tables, narratives, HMIS activity reports, request for funds forms, and budget printouts that identify the total funds used/requested by each grantee during that reporting period. County staff verifies and cross-references the information with IDIS on the quarterly budget activity reports. Monitoring visits are also scheduled

quarterly by county staff for each grantee to ensure appropriate expenditure of funds. As part of the ESG monitoring process, invoices and accompanying receipts are reviewed for reimbursement eligibility.

**CR-20 – AFFORDABLE HOUSING 91.520(B)**

**EVALUATION OF THE JURISDICTION’S PROGRESS IN PROVIDING AFFORDABLE HOUSING, INCLUDING THE NUMBER AND TYPES OF FAMILIES SERVED, THE NUMBER OF EXTREMELY LOW-INCOME, LOW-INCOME, MODERATE-INCOME, AND MIDDLE-INCOME PERSONS SERVED.**

	<b>One-Year Goal</b>	<b>Actual</b>
Number of Homeless households to be provided affordable housing units	4	0
Number of Non-Homeless households to be provided affordable housing units	6	0
Number of Special-Needs households to be provided affordable housing units	2	0
<b>Total</b>	<b>12</b>	<b>0</b>

Table 5 – Number of Households

	<b>One-Year Goal</b>	<b>Actual</b>
Number of households supported through Rental Assistance (ESG only)	5	23
Number of households supported through The Production of New Units	0	0
Number of households supported through Rehab of Existing Units	0	0
Number of households supported through Acquisition of Existing Units	0	0
<b>Total</b>	<b>5</b>	<b>23</b>

Table 6 – Number of Households Supported

[ Space below intentionally left blank. ]



**DISCUSS THE DIFFERENCE BETWEEN GOALS AND OUTCOMES AND PROBLEMS ENCOUNTERED IN MEETING THESE GOALS.**

The Stanislaus Urban County’s progress in meeting the affordable housing goals reflected in Tables 5 and 6 are generally reported in the City of Turlock’s CAPER with regards to participation in the HOME Investment Partnership Program (HOME) program; however, this CAPER captures the goals and actual outcomes specific to the Stanislaus Urban County’s CDBG, ESG, and NSP programs. ESG funds were used to assist 23 households (30 clients) in obtaining affordable rental housing through the rapid re-housing program, however, the use of rapid re-housing funding was impacted by increasing rents, combined with a COVID 19 eviction moratorium, which limited the supply of affordable housing rental opportunities. Limited staffing and staff turnover has limited outreach efforts for the housing rehabilitation programs offered by the Stanislaus Urban County and may have kept eligible property owners from seeking assistance.

**DISCUSS HOW THESE OUTCOMES WILL IMPACT FUTURE ANNUAL ACTION PLANS.**

The Stanislaus Urban County will continue to coordinate at a regional level with the Stanislaus Regional Housing Authority (SRHA), non-profit housing developers, the CSOC (and participating agencies with housing funds), and other entitlement jurisdictions (cities of Modesto and Turlock) to address affordable housing issues as well as homeless prevention strategies. New sources of funding for the planning and development of affordable housing have been made available at the state level and several planning efforts are underway throughout Stanislaus County to accelerate affordable and market-rate housing in Stanislaus County; however, while the new source of funding will aid the efforts to address affordable housing needs, the high cost of developing affordable housing will remain a challenge in getting actual units developed in the volume needed.

During Fiscal Year 2022-2023, the County’s Department of Planning and Community Development and the Department of Behavioral Health and Recovery Services partnered with the SRHA and the City of Modesto on the development of the Central Valley Homes Development Project, an affordable housing project located in the City of Modesto. The project will consist of 35 units that will be available to seniors and veterans and 15 units that will be made available to individuals in need of behavioral health supportive services. Permanent Local Housing Allocation funding allocated to Stanislaus County will be leveraged with the City’s HOME and CDBG funds, along with No Place Like Home Program, Mental Health Services Act funds, and financing from Farmers and Merchants Bank.

With respect to HUD funding, there are simply not enough funds available from the yearly CDBG allocation or remaining NSP PI to meet the Stanislaus Urban County’s affordable housing need. The Stanislaus Urban County will continue to use its annual CDBG allocation to: improve the public infrastructure needed to preserve existing affordable housing and support new affordable housing, and to provide fair housing services to assist with tenant/landlord issues.

**INCLUDE THE NUMBER OF EXTREMELY LOW-INCOME, LOW-INCOME, AND MODERATE-INCOME PERSONS SERVED BY EACH ACTIVITY WHERE INFORMATION ON INCOME BY FAMILY SIZE IS REQUIRED TO DETERMINE THE ELIGIBILITY OF THE ACTIVITY.**

<b>Number of Persons Served</b>	<b>CDBG Actual</b>	<b>Percentage</b>	<b>CDBG CV Actual</b>	<b>Percentage</b>
Extremely Low-income	1,927	67%	489	49%
Low-income	932	32%	478	48%
Moderate-income	16	1%	34	3%
Total	2,875	100%	1,001	100%

Table 7 – Number of Persons Served

**NARRATIVE**

The Stanislaus Urban County does not use CDBG funds directly for affordable housing development but does provide CDBG PSG and ESG funding to assist the homeless and those at risk of becoming homeless with housing needs.

In Fiscal Year 2022-2023, 2,875 individuals received services from the five (5) non-profit service providers awarded CDBG PSG funds and 1,001 individuals received services from the eight (8) non-profit service providers awarded CDBG CV funding. Services received included emergency food assistance, utility assistance, respite childcare, case management, shelter services, education classes, and resource referrals.

During Fiscal Year 2022-2023, a total of five hundred sixty-eight (568) clients with special needs were assisted in obtaining housing through the ESG rental assistances programs and a total of 30 individuals were assisted with ESG funds in finding affordable rental housing.

**CR-25 - HOMELESS AND OTHER SPECIAL NEEDS 91.220(D, E); 91.320(D, E); 91.520(C)**

**EVALUATE THE JURISDICTION’S PROGRESS IN MEETING ITS SPECIFIC OBJECTIVES FOR REDUCING AND ENDING HOMELESSNESS THROUGH:**

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

Throughout Fiscal Year 2022-2023, the Stanislaus Urban County utilized CDBG PSG and ESG funding to implement outreach strategies to assist in addressing the homeless population. The Stanislaus Urban County awarded grants to non-profit homeless service providers to provide homeless prevention, case management, food, shelter, and rapid re-housing. All grantees are required to actively participate in the CSOC in an effort to enhance the coordinated outreach and engagement efforts to the homeless population. The Stanislaus Urban County continues to be actively involved in the development and planning of the local CSOC's outreach and engagement efforts to identify needs and gaps in services for the homeless. The CSOC has developed a system for coordinated intake, assessment, and referral that fully complies with federal CoC requirements.

In Fiscal Year 2022-2023, ESG funding was provided to non-profit service providers to assist with Homeless Management Information System (HMIS) data entry. During the fiscal year, a total of 572 individuals were sheltered and 53 individuals obtained housing through ESG funded programs. All Stanislaus Urban County ESG funded non-profits maintain client information in the HMIS system and track the progress of the clients while in the programs. Once out of the programs, progress is difficult to track due to lack of funding to pay for the cost of follow-up.

In addition to federal ESG funding, the County's has also served as the Administrative Entity for the local Continuum of Care (CoC) for California Emergency Solutions Grants (CA-ESG) funding since 2017. CA-ESG funding administered in Fiscal Year 2022-2023 included the continued expenditure of CA-ESG CARES Act funding used throughout Stanislaus County.

Activities undertaken in Fiscal Year 2022-2023 utilizing CA-ESG CARES Act funding included emergency shelter and street outreach, including a youth low barrier shelter with a navigation center that coordinates the needs of homeless and emancipated youth.

The following two programs were funded with CA-ESG CARES Act funding and provided services throughout Stanislaus County:

- Stanislaus County Behavioral Health and Recovery Services (BHRS) Community Program. Through a subcontract with Turning Point Community Program (TPCP), BHRS provides a comprehensive whole person approach program to assist individuals to access shelter in collaboration with the County's Access Center and Emergency Shelter (ACES) and other community homeless outreach partners. The program provides the following services for the homeless: rehabilitation support, case management, psychiatric medication outreach support services, employment and housing assistance, substance use linkage, intervention and supports, and other services and supports critical to an individual's ability to access shelter placement. A total of 638 homeless individuals were assisted during the fiscal year.
- Stanislaus County Probation Departments Community Assessment Response and Engagement (CARE) Team. The CARE Team facilitates the identification, assessment, and linkage of homeless clients to housing and supportive services. In addition, case managers broker access to services and community supports and ensure that each client is tracked throughout the entire engagement process for continuity of care. The program consists of an Outreach Coordinator, three case managers and a nurse.

The case manager positions are filled by three Behavioral Health Specialists. The specialists link homeless clients to community resources and provide case management services. Their duties include linking homeless clients to a primary care physician to facilitate medical appointments and transportation to COVID 19 vaccination sites. They follow up with clients to ensure they receive two doses and booster vaccines, if eligible. In addition, they link clients to mental health services and medical services. They also provide support and advocacy for homeless clients, while ensuring they address their level of needs.

The nurse position is filled by a Public Health Nurse. The nurse provides COVID 19 vaccines to homeless individuals in the community, assists with educating the homeless population regarding COVID 19 transmission and prevention. The nurse also conducts rapid COVID 19 tests in the

community and assists with contact tracing regarding homeless individuals. A total of 2,038 homeless individuals were assisted during the fiscal year.

The Stanislaus Urban County, through its participation in the CSOC, continues to be engaged in homeless discharge coordination from health care facilities through the Stanislaus County Hospital and Shelter Partners (SCHSP) meetings. Since April 2019, the Hospital Council of Northern California has coordinated SCHSP monthly meetings with representatives from local hospitals, homeless shelters, public agencies, and stakeholder groups to plan for the discharge of homeless individuals from health care facilities to comply with SB 1152. The objective has been to create a community standard of care and greater connection and cooperation between discharging and receiving providers of services for the homeless.

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

Throughout Fiscal Year 2022-2023, the Stanislaus Urban County provided CDBG PSG and ESG grant funding to various emergency shelters and housing service providers to address emergency shelter needs of homeless persons and households. A number of the emergency shelter clients subsequently received rapid re-housing assistance and became stably housed.

The Stanislaus Urban County has been working in collaboration with the local CoC, currently recognized as the CSOC, for over 23 years to improve services for the homeless and those at risk of homelessness. This collaborative is comprised of the Stanislaus Regional Housing Authority (SRHA), the City of Turlock, the City of Modesto, various County's Departments (Behavioral Health and Recovery Services [BHRS], Community Services Agency [CSA], and Planning & Community Development), shelter providers, housing and housing counseling services providers, faith-based organizations, and over a dozen housing and supportive service providers.

The HMIS sub-committee of the CSOC, has continued to work diligently throughout the fiscal year to improve the data quality of the current HMIS system. Through ESG funding from the Stanislaus Urban County, Community Housing and Shelter Services (CHSS) has entered non-HUD funded homeless service providers client information into the HMIS system. This data allows the CSOC's homeless data collection to be a much more valuable tool for tracking individuals patterns into and out of homelessness. Improving data quality will allow funding to be prioritized based on trends of homeless populations within Stanislaus County.

The County was able to provide support through ESG CV funds to two (2) shelter facilities, three (3) shelter programs, and the rehabilitation of a shelter facility (We Care Program, Turlock) to provide an additional 20 beds in Fiscal Year 2022-2023. In addition to adding beds, the We Care Program shelter project, scheduled to be completed in September of 2023, also includes rehabilitating the dining hall to provide overflow beds during excessive heat and cold weather and to allow the shelter to expand its services as a day navigation center.

In total, CA-ESG CV funds were used during the fiscal year to support operations and services to 11 shelter facilities.

While not funded by the Stanislaus Urban County, the following are some of the facilities available, and efforts undertaken, during the fiscal year to address the emergency shelter and transitional housing needs of homeless persons countywide:

### Access Center Emergency Shelter (ACES)

The Access Center Emergency Shelter (ACES), located in the City of Modesto, is a 182 bed, low-barrier, shelter focused on providing shelter to the most vulnerable unsheltered population by decreasing common barriers to individuals accepting shelter service, such as, pets, partners, and possessions. ACES opened November 26, 2019 and is being operated by the Salvation Army through an agreement approved by the Board of Supervisors on October 1, 2019. Included in the bed count is a 22-bed dorm area available for those individuals experiencing homelessness that suffer from a significant mental illness. This dorm-style room reduces instances of victimization and increases the efficacy of therapeutic intervention. The County's Community Assessment Response and Engagement (CARE) Team is also able to use the location to provide case management and shelter to the most vulnerable unsheltered individuals. ACES has also afforded an opportunity for the most vulnerable unsheltered population to be sheltered and connected with case management services, with a strong emphasis on assisting shelter guests to become document ready for entry into the community's coordinated entry housing continuum. Additionally, Stanislaus County Animal Services Agency partnered with ACES to create a healthy pets program. This program provides pet food, crates, and animal health services to pets residing at ACES.

### Empire Cold Weather Family Shelter

The Empire Cold Weather Family Shelter, located in the community of Empire, was initiated by the County's Community Services Agency (CSA) in November 2018 as a partnership with the SRHA. The target population served are families who are currently being case managed in CSA Housing Support Program (HSP) unit, have used all available temporary shelter nights, are still engaged in the search for permanent housing and have been unsheltered the longest based on date of referral to the HSP program.

CSA works in partnership with Community Housing and Shelter Services (CHSS) for placement of families at the Empire Cold Weather Family Shelter and has an existing contract with CHSS to administer, arrange and facilitate temporary housing services to CalWORKs and Welfare-to-Work eligible families. CHSS also provides case management services, which include assisting and educating participants on their income, household budgets, and housing options; aiding participants in completion of housing applications and landlord outreach; and providing housing search workshops.

The Empire Migrant center consists of 90 dwelling units used for farmworker housing from April to October each year. This project allows CSA to use 22 units during the months of November through March. In Fiscal Year 2022-2023, 20 families and 80 individuals were served with case management services. Of the families served, 73% received permanent housing.

### Family Housing Facility (FHF)

In November 2019, CSA began leasing a motel, located in Modesto area, to operate a year-round family shelter using the model implemented at the Empire Cold Weather Family Shelter. The property has 21 units and a three-room office space.

CSA works in partnership with CHSS for placement at FHF. CHSS services include primary case management oversight which include, assisting participants with household budget, understanding their income, housing options, completing housing application, landlord outreach and housing search workshops, working with families to remove barriers to self-sufficiency, and connecting families to applicable and relevant community resources.

In Fiscal Year 2022-2023, the FHF program, running at full capacity, served 42 families receiving 223 case management services and seven (7) employment services/employment connections.

### Access Center

On February 3, 2020, the Access Center, a “hub location” for multiple homeless programs and the entry way into the shelter system, opened in the City of Modesto. The Access Center serves as a one-stop hub and physical entry point for individuals at-risk of or currently experiencing homelessness to access a wide range of co-located homelessness services including centralized homeless outreach and engagement; housing assessments and navigation; and homelessness support services and referrals. The Access Center also employs a “meet you where you are” strategy that has specialized homeless outreach workers meet individuals on the street and in homeless encampment areas and encourages individuals to connect to services.

The following partners are co-located at the Access Center: Center for Human Services; Community Housing and Shelter Services; Community Impact Central Valley; Disability Resource Agency for Independent Living; Downtown Streets Team Modesto; Golden Valley Health Centers; Salvation Army - Modesto; Stanislaus County (Behavioral Health and Recovery Services and Community Services Agency); Telecare Corporation; and Turning Point Community Programs.

### Homeless Strategic Plan

The Stanislaus Homeless Alliance (SHA) and CSOC have collaborated to update the Plan to Address Homelessness in Stanislaus County, originally prepared in January 2019. In September 2020, the SHA and the CSOC each appointed three members to serve on a work group to spearhead the effort. The updated plan, now referred to as the Homeless Strategic Plan, was approved by the CSOC on July 14, 2021 and aims to address the needs of people experiencing homelessness by enhancing community decision-making, supporting organizational and provider capacity, and improving systems coordination. A joint committee made up of members from the CSOC and the SHA has been formed to continue the examination of the plan and begin implementation of the goals outlined in the plan.

The facilities and efforts identified above are ongoing and form a critical piece of the homeless support foundation in Stanislaus County. The Stanislaus Urban County will continue to align its funding strategy with the broader efforts of the CSOC by supporting the service and shelter providers in their efforts to address the emergency shelter and transitional needs of homeless persons.

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

Throughout Fiscal Year 2022-2023, the Stanislaus Urban County continued to actively participate in the CSOC in an effort to ensure CDBG PSG and ESG funding was aligned with countywide efforts to help low-income individuals and families avoid becoming homeless. CSOC efforts include improving the program planning for homeless funding utilization throughout Stanislaus County and working with private hospitals to encourage the incorporation of rental assistance and case management into discharge planning. CSOC representatives actively collaborate with the County Sheriff's Office and the Probation Department to identify services available for recently discharged parolees to help prevent homelessness among that population. Non-profit awarded CDBG PSG and ESG funding are required to participate in the CSOC as part of the effort to ensure alignment with the broader community efforts to address homelessness and to allow for education opportunities on new community programs that can be value added to existing programs.

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

The Stanislaus Urban County partnered with CHSS, Family Promise, and the We Care Program in efforts to help homeless individuals and families make a transition to permanent housing and independent living. With the use of ESG grant funds, both the chronically homeless populations and temporarily homeless households were provided the opportunity to be placed into permanent housing. While enrolled in these programs, case managers work with each household to set goals and work on a housing action plan in order to identify and connect with any needed services such as: Temporary Assistance for Needy Families (TANF), Food Stamps, Veteran's Benefits, future employment opportunities, etc. Throughout Fiscal Year 2022-2023, ESG shelter, homeless prevention, and rapid re-housing funds placed 98 homeless individuals into permanent housing. At the end of the fiscal year, 77 of those individuals were stably housed.

Family Promise and the We Care Program utilized ESG funds to provide emergency shelter to homeless individuals and households. Clients that showed progress toward self-sufficiency received extended case management in conjunction with rapid re-housing assistance funds to assist in the placement of job and permanent housing placement.

## **CR-30 - PUBLIC HOUSING 91.220(H); 91.320(J)**

### **ACTIONS TAKEN TO ADDRESS THE NEEDS OF PUBLIC HOUSING.**

In California, public housing is administered directly through local Public Housing Authorities (PHAs). The Stanislaus Regional Housing Authority (SRHA) is the largest property manager of multi-family and single

household public housing units for the lower income population of Stanislaus County; serving also as the administrator of the Housing Authority of the City of Riverbank. The SRHA is committed to provide decent affordable housing to its residents and, in doing so, the SRHA keeps public housing units in favorable conditions so that its residents have a safe and healthy living environment. According to the SRHA 2023 PHA Plan, the SRHA currently operates a combined total of 5,576 units (647 public housing units and 4,929 housing choice vouchers) as the SRHA and a combined total of 90 units (all public housing units) as the Housing Authority of the City of Riverbank. The Housing Authority of the City of Riverbank operates 60 units for seniors and 30 family units for low-income households.

Of 4,929 vouchers in Stanislaus County, 212 vouchers are specifically for homeless veterans (Veterans Affairs Supportive Housing [VASH] vouchers), 270 vouchers are specifically for reunifying families that are facing homelessness or living in substandard housing with children removed from the home, 380 are project-based vouchers, and 11 are project-based vouchers for a senior complex in the City of Patterson.

The SRHA and the Stanislaus Urban County have a strong relationship and continue to work together towards furthering decent, safe, and affordable housing throughout the community.

#### **ACTIONS TAKEN TO ENCOURAGE PUBLIC HOUSING RESIDENTS TO BECOME MORE INVOLVED IN MANAGEMENT AND PARTICIPATE IN HOMEOWNERSHIP.**

The Stanislaus Regional Housing Authority (SRHA) has a Resident Advisory Board (RAB) which is comprised of Public Housing Authority (PHA) and Voucher program participants. Any time there are substantial policy changes (such as prioritization of the wait list, program termination changes, or areas where there is flexibility in establishing program guidelines), this board must be notified and given an opportunity to respond by either supporting and/or rejecting policy changes. The RAB's determination then goes to the Housing Authority Board of Commissioners (BOC) for consideration of whether to support or reject. In addition, the SRHA is required to have program participants sit on their BOC per regulations.

#### **ACTIONS TAKEN TO PROVIDE ASSISTANCE TO TROUBLED PHAS.**

The Stanislaus Urban County has no PHAs that are troubled and/or that have requested assistance.

### **CR-35 - OTHER ACTIONS 91.220(J)-(K); 91.320(I)-(J)**

#### **ACTIONS TAKEN TO REMOVE OR AMELIORATE THE NEGATIVE EFFECTS OF PUBLIC POLICIES THAT SERVE AS BARRIERS TO AFFORDABLE HOUSING SUCH AS LAND USE CONTROLS, TAX POLICIES AFFECTING LAND, ZONING ORDINANCES, BUILDING CODES, FEES AND CHARGES, GROWTH LIMITATIONS, AND POLICIES AFFECTING THE RETURN ON RESIDENTIAL INVESTMENT. 91.220 (J); 91.320 (I)**

The Con Plan identifies the following public policies as having the potential to negatively affect affordable housing and residential investment: shortage of affordable housing funding, climate change, environmental protection, growth management, planning and development fees, and prevailing wages. To address the potential negative effects of these policies, the members of the Stanislaus Urban County strive to consistently review all potential barriers to affordable housing that are within their authority to address (local development standards and development review procedures); to continue to pursue and utilize available funding for mortgage assistance and housing rehabilitation; and to continue to work with,



and partner with, housing developers, from the nonprofit and for-profit sectors, to promote the development of affordable housing and special-needs housing.

In Fiscal Year 2022-2023, the members of the Stanislaus Urban County continued to take steps to program various state funding sources aimed at increasing the production of housing. Funding sources include the SB 2 Planning Grant and Permanent Local Housing Allocation (PLHA); and Local Early Action Planning (LEAP). Efforts undertaken with these funding sources included: a countywide initiative to build a shared vision and policy framework for housing in Stanislaus County (Housing Stanislaus), development of Accessory Dwelling Unit (ADU) templates, various housing related ordinance amendments (including ADU ordinances for compliance with state law), and development of the state required 6<sup>th</sup> Cycle Housing Elements. Other Stanislaus Urban County efforts aimed at increasing housing production include the construction of public sewer infrastructure, review of ADU development fees, and the continuation of owner-occupied housing rehabilitation programs which help to maintaining existing affordable housing stock.

PLHA is an ongoing funding source that is based on the Stanislaus Urban County's 2017 CDBG entitlement allocation. As such, the funding is available for use in the unincorporated areas of Stanislaus County along with cities of: Ceres, Hughson, Newman, Oakdale, Patterson, and Waterford. The City of Riverbank joined the Stanislaus Urban County in Fiscal Year 2020-2021 and, as such, is eligible for PLHA funding directly from the state. The Stanislaus County Board of Supervisors adopted 5-year plan for PLHA funding provides for the: acquisition/development of permanent supportive housing, development/preservation of ADUs, fiscal incentives, and multi-family rental housing.

**ACTIONS TAKEN TO ADDRESS OBSTACLES TO MEETING UNDERSERVED NEEDS. 91.220(K); 91.320(J)**

The Stanislaus Urban County continuously tries to identify underserved needs through community and program engagement. CDBG Public Service Grant (PSG) and ESG grants are reviewed and scored based on defined criteria that emphasize: collaboration, prevention focused services, and innovative methods to providing public services. The grant review panel for both CDBG PSG and ESG funding is comprised of one representative from each for Stanislaus Urban County members and a representative from the CoC in an effort to make sure needs being addressed are reflective of the entire Stanislaus Urban County area and to align with efforts being taken by other agencies throughout Stanislaus County.

For Fiscal Year 2022-2023, a total of \$237,025 in CDBG Public Services Grant funds were allocated based on a competitive grant process to which public service providers had the opportunity to apply for grants up to \$25,000. A total of 10 grants were awarded to non-profits to provide services such as: food assistance, emergency shelter, counseling, utility assistance, and tutoring to underserved areas and individuals. CDBG funding in the amount of \$25,000 for fair housing services was awarded to Project Sentinel. Over 2,875 individuals received assistance through the CDBG-PSG funded service providers throughout Fiscal Year 2022-2023.

For Fiscal Year 2022-2023, a total of \$192,009 in ESG funds were allocated based a competitive grant process. A total of 45% of the grant awards went towards emergency shelter programs, 40% went toward homeless prevention and rapid re-housing program, 7.5% went towards funding data entry for the Homeless Management and Information System (HMIS), and the remaining 7.5% went to Stanislaus County for the administration of the ESG program. Over 572 homeless persons, or persons at-risk of becoming homeless, were assisted with overnight shelter, emergency food, and housing stability

assistance throughout Fiscal Year 2022-2023.

In addition to the allocation of Fiscal Year 2022-2023 CDBG and ESG entitlement funding, the remaining Fiscal Year 2021-2022 ESG entitlement funding contracts along with CDBG CV1 (\$1,087,198), CDBG CV3 (\$1,146,204), and ESG CV1 (\$628,846) contracted funding were used to provide a variety of services aimed at meeting the needs of the underserved.

#### **ACTIONS TAKEN TO REDUCE LEAD-BASED PAINT HAZARDS. 91.220(K); 91.320(J)**

The Health Services Agency (HSA) of Stanislaus County is the lead agency for the identification, documentation, and prevention of lead poisoning in Stanislaus County. HSA works with referrals from schools and other agencies to test for lead-based paint hazards. During Fiscal Year 2022-2023, approximately 23 homes were tested and five (5) were found to have contamination. If a housing unit is found to have lead-based paint, the abatement process and consequences of living in a home that is contaminated, is explained to the residents. The Stanislaus Urban County members provide lead-based paint information to all residents that participate in the down payment assistance and/or housing rehabilitation programs. If, during a housing rehabilitation, a housing unit is found to have any lead-based paint issues, information on the dangers of lead-based paint are provided to the property owner and lead abatement is conducted as part of the rehabilitation work. Every effort is made to provide a safe and healthy housing opportunity for clients participating in Stanislaus Urban County funded housing assistance programs.

During Fiscal Year 2022-2023, no activities necessitating the need to test for lead-based paint were undertaken.

#### **ACTIONS TAKEN TO REDUCE THE NUMBER OF POVERTY-LEVEL FAMILIES. 91.220(K); 91.320(J)**

To reduce the number of persons living under the poverty level, the Stanislaus Urban County has continued its partnership with other local entitlement jurisdictions, agencies, and the CSOC to provide services and resources to families in need. As well as providing a portion of CDBG and ESG funding, through a competitive process, to eligible non-profits that have a proven track record of assisting the homeless on their path towards employment and permanent housing.

During Fiscal Year 2022-2023, the Stanislaus Urban County allocated a total of \$237,025 in CDBG PSG funds and \$192,009 in ESG funds to non-profits for various programs aimed at assisting individuals and families experiencing homelessness or at risk of experiencing homelessness; and to assist low- and moderate- income individuals and families achieve self-sufficiency.

#### **ACTIONS TAKEN TO DEVELOP INSTITUTIONAL STRUCTURE. 91.220(K); 91.320(J)**

The strategies identified in the Con Plan for overcoming gaps in the institutional structure and service delivery system for carrying out a strategy to address priority needs is to: 1) continue to work collaboratively with service and shelter providers to identify and address gaps in the service delivery system; and 2) continue to invest time and resources to strengthen the entire CoC system and not one particular agency or organization.

During the Stanislaus Urban County's CDBG PSG and ESG program monitoring, agency-to-agency referrals are reviewed to verify that participants receiving services do not experience gaps in services as they strive to reach their goal of independence from the need of public services.

The CoC, locally recognized as the Stanislaus Community System of Care (CSOC), is a dedicated network of service providers, consumers, and government agencies that work collaboratively to identify where gaps exist and how they can be best addressed. The CSOC continues working to improve coordination among service providers and to further enhance the Coordinated Entry System (CES). The main goal of the CES is to assist service providers to tracking and responding to the needs of individuals that seek services. To date, only a limited number of service providers utilize the HMIS coordinated entry system component to track clients and report program accomplishments.

Building the capacity of non-profits continues to be an important issue for the Stanislaus Urban County and other entitlement jurisdictions (the cities of Modesto and Turlock). The Stanislaus Urban County has partnered with both the cities of Modesto and Turlock to provide technical assistance and trainings to local service providers in the areas of client screening, HMIS data collection, and basic case management requirements.

### **ACTIONS TAKEN TO ENHANCE COORDINATION BETWEEN PUBLIC AND PRIVATE HOUSING AND SOCIAL SERVICE AGENCIES. 91.220(K); 91.320(J)**

The Stanislaus Urban County recognizes it cannot work alone in achieving the goals outlined in the Con Plan. Therefore, the Stanislaus Urban County participates with and coordinates with the following collaboratives and public housing agency in order to better serve and coordinate the needs of the community:

#### **Turlock Community Collaborative**

This collaborative was formed to deal with homeless issues facing the Turlock community. The group is comprised of concerned community members, faith-based groups, and government agencies working together to deal with issues concerning the homeless and the community.

#### **Stanislaus Community System of Care (CSOC)**

The CSOC, the locally recognized CoC, is a collaborative comprised of local government agencies, shelter providers, housing and housing counseling services providers, faith-based organizations, and over a dozen housing and supportive service providers. The Stanislaus County's Community Services Agency (CSA), serving as the Collaborative Applicant (CA), assists the CSOC to coordinate with service providers, law enforcement, and community members to conduct the County's annual Homeless Point in Time (PIT) Count. During Fiscal Year 2022-2023, the Stanislaus Urban County continued to participate in efforts to improving the functionality of the CSOC's HMIS, including the CES component, and to update the CES policies and procedures. Fiscal year efforts have also included working with the CSOC's CA on the operations of the HMIS in order to meet HUD's mandate that all ESG program participants are part of and actively entering pertinent universal data elements into the HMIS.

#### **Stanislaus Regional Housing Authority (SRHA)**

The SRHA and the Stanislaus Urban County have a strong relationship and continue to work towards furthering decent, safe, and affordable housing throughout the County. The SRHA serves as the administrator for housing rehabilitation and Emergency Sewer Lateral Connection programs for Stanislaus

Urban County members. The SRHA also serves on several housing and community development related committees alongside Stanislaus Urban County members.

### **IDENTIFY ACTIONS TAKEN TO OVERCOME THE EFFECTS OF ANY IMPEDIMENTS IDENTIFIED IN THE JURISDICTION'S ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE. 91.520(A)**

In Fiscal Year 2022-2023, Project Sentinel, as the Stanislaus Urban County's fair housing service provider, responded to a total of 702 calls for landlord/tenant mediation and fair housing information within the Stanislaus Urban County area. A total of 11 fair housing cases and 31 tenant/landlord cases were handled by the agency during the fiscal year. Additionally, Project Sentinel fielded 327 fair housing information and service referral calls, benefiting 1,010 residents. In addition to fair housing services, HUD entitlement jurisdictions are asked to report on any fair housing investigations that may be conducted during the year in the CAPER. The U.S. Department of Justice, through their Fair Housing Testing Program, contracts out with fair housing agencies to conduct testing separate from their service agreements with any jurisdiction. Project Sentinel conducted no fair housing tests within the Stanislaus Urban County in Fiscal Year 2022-2023.

#### **Additional Actions Taken to Address Obstacles to Meeting Underserved Needs**

Some non-profits and community organizations may not be familiar with the HUD funding grant process and other funding resources that may be available to them. As a result, many organizations and non-profits have not used HUD funds and other types of financial assistance. In Fiscal Year 2022-2023, the Stanislaus Urban County, working collaboratively with agencies familiar with HUD processes, continued to share program and funding information with service providers and grassroots organizations throughout the community in an effort to better meet the underserved needs of the community.

An annual Notice of Funding Availability (NOFA) was announced for the release of CDBG and ESG funds for the Public Service Grant cycle. The NOFA included an announcement of a mandatory Grant Technical Workshop and timeline for the upcoming grant cycle. The NOFA was advertised in the local newspaper, The Modesto Bee, in English and Spanish. An e-mail was sent out to all past and current grantees and applicants that had applied in the last five years. County staff also announced the NOFA at the local CSOC meeting, distributed a reminder, and e-mailed the local CSOC agencies a NOFA announcement. County staff coordinated with its Stanislaus Urban County members to distribute the NOFA announcement to service providers working in their respective cities. It is through the funds awarded through the NOFA process that the Stanislaus Urban County is able provide much needed services to underserved communities.

The annual Grant Technical Workshop provides an opportunity for questions and answers. In addition to the workshop, County staff are available via phone, in person, and by e-mail to answer questions throughout the grant application process. Once grant awards are announced, the County also requires grantees to attend a Grantee Technical Workshop prior to receiving their agreements. In the workshop, the policies, procedures, program regulations, requirements, and obligations of the grant are explained. All grantees receive the information covered in the workshop via email. During Fiscal Year 2022-2023, all workshops continued to be conducted online due to COVID 19 safety precautions and to allow for enhanced efficiencies in grantee attendance.

Technical assistance is ongoing to those agencies awarded funding and those agencies interested in competing for future funding. Reference, guidance, and support materials are provided upon request and

staff is available to addressing inquiries in person, by phone/virtually, or via email. The Stanislaus Urban County is constantly looking for ways to expand service provider capacity and to encourage public and private partnerships and joint ventures between non-profit and for-profit housing developers.

## CR-40 - MONITORING 91.220 AND 91.230

### **EVALUATE THE JURISDICTION'S PROGRESS IN MEETING ITS SPECIFIC OBJECTIVES FOR REDUCING AND ENDING HOMELESSNESS THROUGH:**

**Describe the standards and procedures used to monitor activities carried out in furtherance of the plan and used to ensure long-term compliance with requirements of the programs involved, including minority business outreach and the comprehensive planning requirements.**

The County regularly monitors progress on activities to ensure compliance with program requirements. Evaluation takes place during the application and funding process, and after agreements have been executed. Funding and service agreements set clear performance measures, reporting procedures, timeliness, and budgets against which goals are measured. County staff regularly monitor compliance with contracting requirements and performance goals through the implementation and review of quarterly performance reports, reimbursement requests and desk and on-site monitoring. Due to COVID 19 restrictions, on-site monitoring performed during the fiscal year remained limited and alternative methods, such as video conference calls in combination with desk audits, were utilized to verify and confirm that grant funds are and were used in an eligible and appropriate manner.

County staff hosts a quarterly meeting with representatives of all the members of the Stanislaus Urban County to review financial items, update activity statuses, and to provide training on compliance.

For Stanislaus Urban County infrastructure projects, County staff reviews quarterly project progress reports, Request for Funds (RFF) forms, and budget activity printouts, which identify the total funds used by all jurisdictions during a given month. County staff also verify and cross-references the information on department's monthly budget activity reports. On and off-site monitoring visits are also held quarterly to track expenditure of funds as well as to ensure compliance with federal requirements such as labor standards enforcement (i.e., certified payroll and worker interviews) and Section 3 requirements.

For non-profits awarded CDBG PSG and ESG funds, County staff conducts an initial technical workshop with all awarded agencies to provide a comprehensive overview of the quarterly reporting, request for funds, and monitoring processes and requirements. County staff is available to awarded agencies during regular business hours to address technical concerns and questions as they arise. Non-profits that reach a certain performance threshold become eligible for bi-annual monitoring reviews in place of the quarterly reviews.

Under the ESG program, County staff reviews quarterly ESG statistical tables, narratives, HMIS activity reports, RFF forms and budget printouts, which identify the total funds used/requested by each grantee during that reporting period. ESG funded agencies are provided with ongoing HMIS system training. As part of the ESG monitoring process, only 50% of the costs related to the project are reimbursed, as the remainder of the costs is paid by non-ESG match funding sources (i.e., local unrestricted donations). In this manner, the subrecipient in turn ensures that dollar-to-dollar matching requirements are satisfied by paying the remainder of the expenses from non-ESG sources.



**Meeting Link:** <https://us06web.zoom.us/j/83021783263?pwd=R0ZnSGF0RkR5emNabWZCWUo3UjgzQT09>

**Meeting ID:** *Via Zoom*

**Join by Phone:** *+1 669 444 9171 US*

**Meeting ID:** *830 2178 3263*

**Passcode:** *976799*

**This section of the draft CAPER is presented in a past tense to reflect the version of the final CAPER to be considered for adoption:**

A Notice of Public Hearing and Document Availability was released in accordance with the Stanislaus Urban County’s Citizen Participation Plan advising residents of the availability of the draft CAPER for a 15-day public review period. The notice was published in both English and Spanish on August 24, 2023 in The Modesto Bee, defining the CAPER review process and how persons, agencies, and interested groups may participate; as well as instructions on how to submit written comments. As part of the public review process, notice of the Draft CAPER was also distributed electronically to the CSOC and to persons registered through the County Planning and Community Development Department’s Community Development StanAware electronic notification system. The Draft CAPER was also made available for public review via the County’s Planning and Community Development Department website and copies of the Draft CAPER were available for review at the Planning Departments of all the Stanislaus Urban County members.

A public hearing was held in accordance with the Stanislaus Urban County’s Citizen Participation Plan on September 12, 2023, at 9:00 a.m., at the County Administration Building, 1010 10<sup>th</sup> Street, Board Chambers, Modesto, CA 95354. Notice of the meeting and public hearing was sent out through the County’s StanAware electronic notification system, the CSOC list serve, and provided by email to community members that had expressed interest in the CAPER.

#### CR-45 - CDBG 91.520(C)

**Specify the nature of, and reasons for, any changes in the jurisdiction’s program objectives and indications of how the jurisdiction would change its programs as a result of its experiences.**

No changes in the Stanislaus Urban County's program objectives occurred during Fiscal Year 2022-2023.

**Does this Jurisdiction have any open Brownfields Economic Development Initiative (BEDI) grants?**

No.

[ Space below intentionally left blank. ]

**ESG SUPPLEMENT TO THE CAPER IN E-SNAPS  
FOR PAPERWORK REDUCTION ACT**

**1. RECIPIENT INFORMATION—ALL RECIPIENTS COMPLETE**

**Basic Grant Information**

**Recipient Name:** STANISLAUS COUNTY  
**Organizational DUNS Number:** 073136772  
**EIN/TIN Number:** 946000540  
**Identify the Field Office:** San Francisco  
**Identify CoC(s) in which the recipient or subrecipients will provide ESG assistance:** Turlock/Modesto/Stanislaus CoC

**ESG Contact Name**

**Prefix:** Ms. **Suffix:** -  
**First Name:** Angela **Middle Name:** -  
**Last Name:** Freitas **Title:** Planning and Community Development Director

**ESG Contact Address**

**Street Address 1:** 1010 10th Street  
**Street Address 2:** Suite 3400  
**City:** Modesto **State:** CA **Zip Code:** 95354  
**Phone Number:** (209) 525-6330 **Extension:** -  
**Fax Number:** (209) 525-5911 **Email Address:** angela@stancounty.com

**ESG Secondary Contact**

**Prefix:** Ms. **Suffix:** -  
**First Name:** Ana **Middle Name:** -  
**Last Name:** San Nicolas **Title:** Deputy Director  
**Phone Number:** (209) 525-6330 **Extension:** -  
**Email:** sannicolasa@stancounty.com



**2. REPORTING PERIOD—ALL RECIPIENTS COMPLETE**

**Program Year Start Date** 07/01/2022  
**Program Year End Date** 06/30/2024

**3. SUBRECIPIENT FORM – COMPLETE ONE FORM FOR EACH SUBRECIPIENT**

Fiscal Year 2022 ESG FUNDS

**Subrecipient or Contractor Name:** Stanislaus County – Administration  
**City:** Modesto **State:** CA  
**Zip Code:** 95354-0859 **DUNS Number:** 073136772  
**Is subrecipient a victim services provider:** No  
**Subrecipient Organization Type:** Unit of Government  
**ESG Subgrant or Contract Award Amount:** \$15,568 (Administration)

**Subrecipient or Contractor Name:** Center for Human Services – Youth Low Barrier Shelter  
**City:** Turlock **State:** CA  
**Zip Code:** 95380-5413 **DUNS Number:** 179569772  
**Is subrecipient a victim services provider:** No  
**Subrecipient Organization Type:** Other Non-Profit Organization  
**ESG Subgrant or Contract Award Amount:** \$73,078 (Shelter)  
\$6,286 (HMIS)

**Subrecipient or Contractor Name:** Community Housing and Shelter – Rapid Re-Housing Program  
**City:** Modesto **State:** CA  
**Zip Code:** 95354-3436 **DUNS Number:** 835658782  
**Is subrecipient a victim services provider:** No  
**Subrecipient Organization Type:** Other Non-Profit Organization  
**ESG Subgrant or Contract Award Amount:** \$87,004 (Rapid Re-Housing)  
\$2,996 (HMIS)

**Subrecipient or Contractor Name:** We Care Program – Turlock – Emergency Shelter Program  
**City:** Turlock **State:** CA  
**Zip Code:** 95380-5413 **DUNS Number:** 179569772  
**Is subrecipient a victim services provider:** No  
**Subrecipient Organization Type:** Other Non-Profit Organization  
**ESG Subgrant or Contract Award Amount:** \$16,359 (Shelter)  
\$6,286 (HMIS)

Reporting Period

**Program Year Start Date:** 07/01/2021

**Program Year end date:** 06/30/2023

**Fiscal year 2021 ESG Funds – Year 2 Carry-Over**

*\*Starting Balance as of July 1, 2022 for grant awarded in Fiscal Year 2021.*

**Subrecipient or Contractor Name:** Stanislaus County – Administration

**City:** Modesto **State:** CA

**Zip Code:** 95354-0859 **DUNS Number:** 073136772

**Is subrecipient a victim services provider:** No

**Subrecipient Organization Type:** Unit of Government

**ESG Subgrant or Contract Award Amount:** \$15,949 (Administration)  
\*\$6,742.04

**Subrecipient or Contractor Name:** Community Housing and Shelter Services – HMIS Data Collection

**City:** Modesto **State:** CA

**Zip Code:** 95354-3436 **DUNS Number:** 835658782

**Is subrecipient a victim services provider:** No

**Subrecipient Organization Type:** Other Non-Profit Organization

**ESG Subgrant or Contract Award Amount:** \$15,949 (HMIS)  
\*\$15,949

**Subrecipient or Contractor Name:** Family Promise of Greater Modesto – Homeless Prevention, Rapid Re-Housing and Shelter

**City:** Modesto **State:** CA

**Zip Code:** 95358-9803 **DUNS Number:** 023267225

**Is subrecipient a victim services provider:** No

**Subrecipient Organization Type:** Other Non-Profit Organization

**ESG Subgrant or Contract Award Amount:** \$47,850 (Shelter)  
\$21,266 (Homeless Prevention)  
\$21,266 (Rapid Re-Housing)  
\*\$90,382

**Subrecipient or Contractor Name:** We Care Program – Turlock – Emergency Shelter Program

**City:** Turlock **State:** CA

**Zip Code:** 95380-5413 **DUNS Number:** 179569772

**Is subrecipient a victim services provider:** No

**Subrecipient Organization Type:** Other Non-Profit Organization

ESG Subgrant or Contract Award Amount: \$47,850 (Shelter)  
 \$21,266 (Homeless Prevention)  
 \$21,266 (Rapid Re-Housing)  
 \*\$88,931.94

**CR-65 - PERSONS ASSISTED**

**4. PERSONS SERVED**

**4a. Complete for Homelessness Prevention activities.**

Number of Persons	Total	Percentages
Adults	11	47.8
Children	12	52.1
Don't Know/Refused/Other	0	-
Missing Information	0	-
<b>Total</b>	<b>23</b>	<b>100</b>

Table 8 – Household Information for Homeless Prevention Activities

**4b. Complete for Rapid Re-Housing activities**

Number of Persons	Total	Percentages
Adults	14	46.6
Children	16	53.3
Don't Know/Refused/Other	0	-
Missing Information	0	-
<b>Total</b>	<b>30</b>	<b>100</b>

Table 9 – Household Information for Rapid Re-Housing Activities

**4c. Complete for Shelter**

Number of Persons	Total	Percentages
Adults	479	92.2
Children	40	7.7
Don't Know/Refused/Other	0	-
Missing Information	0	-
<b>Total</b>	<b>519</b>	<b>100</b>

Table 10 – Shelter Information

4d. Street Outreach

Number of Persons	Total	Percentages
Adults	0	-
Children	0	-
Don't Know/Refused/Other	0	-
Missing Information	0	-
<b>Total</b>	<b>0</b>	<b>-</b>

Table 11 – Household Information for Street Outreach

4e. Totals for all Persons Served with ESG

Number of Persons	Total	Percentages
Adults	504	88.1
Children	68	11.8
Don't Know/Refused/Other	-	-
Missing Information	-	-
<b>Total</b>	<b>572</b>	<b>100</b>

Table 12 – Household Information for Persons Served with ESG

5. GENDER—COMPLETE FOR ALL ACTIVITIES

Gender	Total	Percentages
Male	420	73.4
Female	76	13.2
Transgender	0	-
Don't Know/Refused/Other	76	13.2
Gender Non-Confirming	1	0.1
Missing Information	0	-
<b>Total</b>	<b>572</b>	<b>100</b>

Table 13 – Gender Information

**6. AGE—COMPLETE FOR ALL ACTIVITIES**

Age	Total	Percentage
Under 18	68	11.8
18-24	155	27
25-61	307	53.6
62 and Over	42	7.3
Don't Know/Refused/Other	0	-
Missing Information	0	-
<b>Total</b>	<b>572</b>	<b>100</b>

Table 14 – Age Information

**7. SPECIAL POPULATIONS SERVED—COMPLETE FOR ALL ACTIVITIES**

Subpopulation	Total	Total Persons Served – Homeless Prevention	Total Persons Served – Rapid Re-Housing	Total Persons Served in Emergency Shelters
Veterans	23	1	0	22
Victims of Domestic Violence	116	0	5	111
Elderly	42	1	1	40
HIV/AIDS	2	0	0	2
Chronically Homeless	275	0	12	263
<b>Persons with Disabilities:</b>				
Severely Mentally Ill	143	2	6	135
Chronic Substance Abuse	112	0	1	111
Other Disability	314	6	15	293

Table 15 - Special Population Served

**8. SHELTER UTILIZATION**

Number of New Units - Rehabbed	0
Number of New Units - Conversion	0
Total Number of bed-nights available	17,885
Total Number of bed-nights provided	17,150
Capacity Utilization	96%

Table 16 - Shelter Capacity

**9. PROJECT OUTCOMES DATA MEASURED UNDER THE PERFORMANCE STANDARDS DEVELOPED IN CONSULTATION WITH THE COC(S)**

The County regularly updates and utilizes a CDBG and ESG program Desk Guide for subrecipients. This guide was developed and is updated in consultation with the local CoC. The Desk Guide covers both federal and state ESG funds administered by Stanislaus County. Under the CDBG and ESG program, County staff track the progress of individual subrecipients in fulfilling goals and objectives set forth in the Con Plan in order to ensure that programs remain on task. Tracked data is reviewed and entered into the IDIS system on a semiannual basis. If tracked data falls short of the goals and objectives set forth, appropriate adjustments will be made, and notification sent to the respective subrecipients to make them aware of milestones and timeliness needing to be met in order to ensure continued receipt of funding.

The coordinated monitoring process has been established to verify and confirm that grant funds have been used in an eligible and appropriate manner for each and every program funded with CDBG and ESG funds.

County staff reviews quarterly ESG statistical tables, narratives, HMIS activity reports, Request for Funds forms, and budget printouts, which identify the total funds used/requested by each subrecipient during that reporting period. County staff also verifies and cross-references the information on the quarterly budget activity reports. Monitoring visits are also scheduled quarterly by County staff for each grantee to ensure appropriate expenditure of funds. As part of the ESG monitoring process, invoices and accompanying receipts are reviewed for reimbursement eligibility. Once eligibility is confirmed, 50% of the costs related to the project are reimbursed, as the remainder of the costs are paid by a non-ESG match funding sources (i.e., local unrestricted donations). In this manner, the subrecipient in turn commits their dollar-to-dollar match by paying the remainder of the expenses from non-Federal sources.