

CONSOLIDATED ANNUAL PERFORMANCE
EVALUATION REPORT
FOR PROGRAM YEAR 2018
City of Citrus Heights

Draft Report for Public Review; City Council Public Hearing Date:

March 14, 2019



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 city completed several activities in Program Year (PY) 2018, including the following:

- Completed an accessibility and drainage improvement project that made a variety of improvements to improve low- and moderate-income neighborhoods. The project completed a missing section of sidewalk along Auburn Boulevard with new curb, gutter, and sidewalk; constructed accessible curb ramps; reconstructed failed sections of existing curb, gutter, and sidewalk; reconstructed and relocating drainage inlets; and reinstalled associated traffic striping, legends and markings.
- Provided a range of social services through several partner agencies, including senior meals, case management, landlord/tenant and fair housing counseling, juvenile diversion and education services, domestic violence, and an after-school youth program.
- Offered a First-Time Homebuyer Program to eligible low-income persons interested in purchasing a home in Citrus Heights.
- Offered a Housing Repair Program to low-income homeowners to make health and safety repairs to their homes.
- Collaborated with several governmental entities in the region including Sacramento Housing and Redevelopment Agency, Elk Grove, and Rancho Cordova on a regional Assessment of Fair Housing.

In addition to CDBG-funded services, the city also assisted thousands of people through its locally funded non-profit grant programs. These grants provided funding for housing counseling and navigator services, domestic violence services, food for lower-income people and seniors, and an after-school program for at-risk youth.

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.

2018 Consolidated Annual Performance Evaluation Report

Table 1 - Accomplishments – Program Year & Strategic Plan to Date

GOAL	CATEGORY	INDICATOR	UNIT OF MEASURE	EXPECTED - STRATEGIC PLAN	ACTUAL - STRATEGIC PLAN	PERCENT COMPLETE	EXPECTED - PROGRAM YEAR	ACTUAL PROGRAM YEAR	PERCENT COMPLETE
Foster Affordable Housing	Affordable Housing	Rental Units Constructed	Household Housing Unit	35	0	0%	0	0	0%
Foster Affordable Housing	Affordable Housing	Homeowner Housing Rehabilitation	Household Housing Unit	25	0	0%	30	32	106%
Foster Affordable Housing	Affordable Housing	Direct Financial Assistance to Homebuyers	Household Assisted	20	0	0%	2	1	50%
Expand Transitional Housing	Homeless	Public service activities for Low/Moderate Income Housing Benefit	Beds	10	0	0%	0	0	0%
Expand Homeless Services	Homeless	Public service activities for Low/Moderate Income Housing Benefit	Persons Assisted	0	278	100%	112	278	248%
Create job Training Opportunities	Non-Homeless Special Needs	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	100	0	0%	50	164	328%

2018 Consolidated Annual Performance Evaluation Report

Improve Accessibility	Non-Housing Community Development	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	5,000	0	0%	12,270	12,270	100%
Construct or Upgrade Public Facilities	Non-Housing Community Development	Infrastructure Activities other than Low Moderate income Housing Benefit	Persons Assisted	500	0	0%	0	0	0%
Other Public Services Needs	Homeless Non-Homeless Special Needs	Public service activities other than Low/Moderate Income Housing Benefit	Households Assisted	2,500	0	0%	310	278	89.67%
Other Public Services Needs	Homeless Non-Homeless Special Needs	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	0	7502		8547	7502	87.77%

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.

As part of the Consolidated Plan effort, the city selected two key priorities:

1. Build healthy communities; and
2. Expand economic opportunities.

Those goals align closely with three of the City Council three-year goals, which include maintain fiscal stability, diversify for a changing economy, and improve streets and infrastructure.

Within those priorities, the city identified six main goals:

1. Foster affordable housing;
2. Expand homeless transitional housing and services;
3. Create job training opportunities;
4. Improve accessibility;
5. Construct or upgrade public facilities, and
6. Provide other social services.

Assess how the jurisdiction’s use of funds, particularly CDGB, addresses the priorities and specific objectives identified in the plan, giving special attention to the highest priority activities identified.

The 2015-2019 Consolidated Plan identifies the following housing goals:

- Enhance the quality of safety of the existing housing stock
- Provide programs that assist first-time homebuyers in order to stabilize homeownership rates and to increase the level of resident investment in neighborhoods

All projects funded during 2018 addressed one or more of the priorities included in the Consolidated Plan. The city has made progress towards addressing homelessness prevention, provided homebuyer assistance loans to first-time homebuyers, provided health and safety housing repair loans to homeowners, supported nonprofits while offering a wide range of social services, and assisted with an accessibility and drainage improvement project.

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)

Table 2 – Table of assistance to racial and ethnic populations by source of funds

	CDBG	HOME
White	4,409	0
Black or African American	541	0
Asian	102	0
American Indian or American Native	98	0
Native Hawaiian or Other Pacific Islander	69	0
Total	5,219	0
Hispanic	875	0
Not Hispanic	6,909	0

Demographically, the race/ethnicity of persons assisted generally reflects the diversity of Citrus Heights residents. Each Subrecipient is required to gather demographics for each client and/or household.

CR-15 - Resources and Investments 91.520(a)

Identify the resources made available

Table 3 - Resources Made Available

Source of Funds	Source	Resources Made Available	Amount Expended During Program Year
CDBG	CDBG	1,354,427.70	723,003.40
HOME	HOME	565,377.36	40,000.00
General Fund	General Fund	118,400.00	118,400.00
Other	Other	1,000,000.00	685,440.36

Narrative

The city expended a total of \$723,003.40 in CDBG funds during Program Year (PY) 2018. The largest project this year was the citywide accessibility project, which expended \$406,405.00 in CDBG funds. In addition, the city invested \$118,400 in General Fund monies in support of public service activities to CDBG-eligible nonprofits. Meals on Wheels by ACC, Sunrise Christian Food Ministry, Sayonara Youth Center, and many other organizations were beneficiaries of these funds. The city's First-Time Homebuyer Program assists first-time homebuyers who are income eligible to purchase their first home in the City of Citrus Heights. This program is funded with CalHome and HOME funds the city receives through loan repayments. The Sacramento Housing and Redevelopment Agency (SHRA) is the lead agency in the HOME Consortium and manage the city's HOME funds. The city expended \$40,000 in 2018 to assist one first-time homebuyer. Due to the competitive real estate market in Sacramento County and the income restrictions of the program, it is difficult for first-time homebuyers to enter the market, but the city assists where possible through this program.

Another source of funds is a \$1,000,000-grant the city was awarded from the California Department of Housing and Community Development (HCD) for upgrading substandard mobile homes. The City Council approved the program guidelines in January 2016. The city expended \$685,440.36 in 2018 to provide low-interest, deferred payment 20-year forgivable loans to eligible mobile home homeowners. The city completed this grant in 2018 and assisted 29 homeowners.

Narrative

The city's CDBG-funded projects took place at various locations throughout Citrus Heights. The capital projects, such as the annual Accessibility and Drainage Improvement Project, primarily took place in the CDBG target area. Most programs the city offered, including the housing repair program, first-time homebuyer program, and all public services, were available to eligible individuals and households citywide.

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.

There is no federal requirement for the city to match CDBG fund with other non-federal program resources. In 2018, the city allocated \$118,400 in General Fund revenue to non-profits providing a community service in Citrus Heights, in addition to the CDGB investments. All capital improvement projects funded with CDBG have been able to take advantage of other federal and state funding sources including Measure A funds to complete design, engineering, and construction work that exceed the city's CDBG allocation for these projects.

With respect to public services, the city requires all Subrecipients to identify other resources that will be utilized during the program year to operate and implement CDBG –supportive activities. It is the city's intent to ensure adequate non-federal and private funds are available, thus minimizing the dependence on federal funds.

Note: Table Fiscal Year Summary-Home Match is applicable only to HOME grantees. The city does not receive HOME funding through HUD, rather SHRA is the reporting agency to HUD for this funding, and therefore the table has been removed from this report.

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.

Table 4 – Number of Households

	One-Year Goal	Actual
Number of Homeless households to be provided affordable housing units	60	0
Number of Non-Homeless households to be provided affordable housing units	0	0
Number of Special-Needs households to be provided affordable housing units	0	0
Total	60	0

Table 4 – Number of Households Supported

	One-Year Goal	Actual
Number of households supported through Rental Assistance	0	0
Number of households supported through The Production of New Units	0	0
Number of households supported through Rehab of Existing Units	30	32
Number of households supported through Acquisition of Existing Units	0	0
Total	30	32

Discuss the difference between goals and outcomes and problems encountered in meeting these goals.

The city was unable to meet its affordable housing goals as outlined in the Consolidated Plan this year. This is due to a lack of viable projects and a lack of available funding. The City of Citrus Heights is 98% built out so there is little land available for new housing developments. Additionally, this means the city does not have substantial development fees with which to fund these efforts. Furthermore, due to the city’s revenue neutrality agreement with the county, Citrus Heights does not receive any property tax revenue until 2022. The elimination of Redevelopment funding at the state level made the development of affordable housing increasingly challenging.

Despite these challenges, the city has taken steps toward meeting its affordable housing goals. On January 11, 2019, the City Council approved a 47 unit multi-family affordable housing development, named Sunrise Pointe. In addition, the City Council approved the allocation of \$1.3 million from the Citrus Heights HOME Investment Partnerships Fund. The Sacramento Housing and Redevelopment Agency (SHRA) is the lead agency in the HOME Consortium and is responsible for managing the city’s annual HOME allocation and related program income. The Sunrise Pointe developer is Jamboree Housing Corporation and the service provider is TLCS, Incorporated. Sunrise Pointe will provide permanent affordable housing for persons and families identified through the coordinated entry system.

This project is a qualified “affordable” project under State Government Code. To qualify as an affordable housing development, the project must set aside a certain number of units to households whose income is considered low to very low. Sunrise Pointe is a 100 percent affordable development, meaning all 46 units will be for residents whose income ranges all within or below the income limits. The developer has agreed to execute 55-year affordability covenants on the property in exchange for the HOME funds. The Sunrise Pointe development is made up of two residential buildings totaling 46 rental units and one manager apartment. This project is currently identifying gap funding sources and is estimated to begin construction in March of 2020.

Additionally, the city is optimistic that we will move forward with Sayonara Drive development as described below.

Discuss how these outcomes will impact future annual action plans.

The city owns 13 vacant lots on Sayonara Drive, which once contained dilapidated four-plexes that were demolished using Neighborhood Stabilization funds. The tenants were relocated and the city has a state statutory requirement to replace these units. As part of the Sunrise Pointe Project approved in January 2019, the city will replace 23 units or 46 bedrooms. This leaves a remaining replacement obligation of 12 units or 24 bedrooms. The city is currently working on a plan to satisfy the remaining replacement obligation.

Additionally, the city promotes affordable housing opportunities through its Housing Repair Program – offering low-interest, deferred payment loans to homeowners for essential repairs. This program assists homeowners in maintaining affordable housing and improves the overall condition of the city’s housing stock for future generations.

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.

Table 6 – Number of Households Served

Number of Households Served	CDBG Actual
Extremely Low-income	173
Low-income	73
Moderate-income	24
Total	270

Narrative Information

The Sacramento Self-Help Housing Counseling/Navigator Program assisted all persons served. This program is available to all Citrus Heights residents who are currently homeless, or in immediate danger of becoming homeless. The navigator partners with various non-profits in the city such as Campus Life, A Community for Peace, WEAVE, Crossroads Employment Center and others to identify individuals and families in need of housing counseling.

In 2019, the navigator will continue to provide outreach services to individuals and families who are currently or in immediate danger of becoming homeless. The navigator will network with Citrus Heights agencies to connect the person or household with services and to be their advocate in finding permanent stable 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

The city provided funding to Sacramento Self-Help Housing (SSHH), which delivers an ongoing service to an increasing number of households each year. SSHH continues to provide housing counseling services and navigator services to low-income and homeless persons as well as those at risk of becoming homeless. The city's navigator engages and interacts with individuals located in Citrus Heights.

The housing counselor provides housing information and other referrals based on the household's intake assessment. Each household is provided with information regarding housing availability and rental criteria. In addition, participants may receive assistance in completing housing-related paperwork such as rental applications, and receive housing interview tips. The housing counselor served as the household's advocate and maintained regular contact through routine follow-up. The housing counselor may provide additional housing referrals and support as needed until the household secures permanent and stable housing.

The navigator provided outreach services to individual and/or families who are currently or in immediate danger of becoming homeless. The navigator is an employee of Sacramento Self-Help Housing who collaborates with the Citrus Heights Homeless Outreach Officer to locate and identify persons within the homeless population in want of services. The Navigator's goal is to remove the barriers to accessing housing including connecting individuals to available services and transporting clients to appointments. The Navigator will interact with the homeless in a positive way, get to know the person and assist them with overcoming the barriers that keep them from obtaining and maintaining permanent and stable housing.

Addressing the emergency shelter and transitional housing needs of homeless persons

City staff participates in the Homeless Assistance Resource Team (HART), a group of agencies, non-profits, faith-based organizations, members of the business community and interested individuals dedicated to addressing Citrus Heights homeless issues. The goal of HART is to provide homeless individuals with resources so they may better access housing options. The Navigator also provides referrals and resources. The Citrus Heights HART operates an annual Winter Sanctuary Program that provides overnight shelter and services from November to February for up to 25 individuals per night.

City staff also participates in outreach efforts to the unsheltered homeless. Police officers who are in contact with the homeless population connect with the Navigator to conduct outreach along the trails, creeks and other known homeless camps. The Navigator will also connect clients to Sacramento Steps Forward, the HUD-designated Continuum of Care (CoC) for the Sacramento Region.

The city maintains strong involvement with Sacramento Steps Forward as it manages the Continuum of Care. The city's Development Specialist, Stephanie Cotter, currently serves on the Continuum of Care Advisory Board. The Continuum of Care Board is responsible for advising the Sacramento Steps Forward Board of Directors on policy around the issue of homelessness. The goal of the Advisory Board is to ensure Sacramento Steps Forward retains a broad representation of the constituents in the community, allowing the organization to establish a more efficient method of community planning and evaluation.

As mentioned, the city funds Sacramento Self-Help Housing who offers housing counseling to those who are at risk of homelessness or who are homeless along with the Navigator who reaches out to the homeless in partnership with the Citrus Heights Police Department. Additionally, the City of Citrus Heights is an active participant in the regional Homeless Emergency Aid Program (HEAP) efforts. The City Council adopted an emergency shelter crisis declaration in January 2019 and is working with the CoC to implement and monitor the HEAP-funded programs within Sacramento County.

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

The city provided funding to Sacramento Self-Help Housing who offers housing counseling to households who are at risk of becoming homeless. Self-Help collaborates with nonprofits to reach a greater number of clients who many need assistance locating stable housing options. In addition, Self-Help provides a searchable database of low-income housing options on their website.

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

**2018 Consolidated Annual
Performance Evaluation Report**

The city coordinates and participates in the Homeless Assistance Resource Team (HART), a group of agencies, nonprofits, faith-based organizations, and interested individuals dedicated to addressing Citrus Heights homeless issues. The goal of HART members is to provide homeless individuals with resources in order to access housing. The city also participates in outreach efforts to unsheltered homeless with the Citrus Heights Navigator and the Citrus Heights Police Department, resources provided upon contact of someone experiencing homelessness or at-risk of homelessness.

CR-30 - Public Housing 91.220(h); 91.320(j)

Actions taken to address the needs of public housing

The Sacramento Housing and Redevelopment Agency (SHRA) is the public housing agency serving the City of Citrus Heights. SHRA is independent of Citrus Heights, and the city retains no control over their funding or implementation of programs. Refer to the SHRA Public Housing Authority Annual Action Plan for information on the ways that SHRA addresses public housing needs.

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

SHRA encourages public housing residents to participate in policy, procedure, and program implementation of development through its Resident Advisory Board. In addition, the Housing Authority recognizes Resident Committees throughout the Sacramento Region; the residents are elected bodies representing residents in their respective complexes. SHRA also distributes a quarterly newsletter to all residents, contains relevant news, information on training and employment opportunities, and other community resources available to public housing residents. Public housing residents also participate in the development of SHRA's five-year annual plan. The Resident Services Division distributes a survey to prioritize resident needs, and short- and long- term improvements.

Actions taken to provide assistance to troubled PHAs

SHRA is not designated as "troubled".

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)

A continued supply of housing to all household income levels is essential to meet the needs of the residents of the city. Citrus Heights is largely “built-out” and the supply is dependent not only on production, but on the preservation of existing affordable housing. To assure the continuing production of affordable housing, the city has examined possible constraints and barriers. Constraints to affordable housing are both governmental and non-governmental. Governmental constraints include land use controls, entitlement processing, fees and building codes.

Land use controls are necessary to ensure orderly and appropriate development and growth in the city. Fees, land dedication and public improvements are usually required as part of land development and entitlement processing to ensure an adequate supply of infrastructure, parks and schools to serve the development. The city may also consider waiving appropriate development fees to facilitate development of affordable housing. Building and housing codes are implemented to ensure the safety of the community (housing residents, specifically).

Actions taken to address obstacles to meeting underserved needs. 91.220(k); 91.320(j)

While there are several constraints to meeting low-income residents noted in the Consolidated Plan, there are two primary obstacles to meeting underserved needs:

- Available funding is not sufficient to address the community’s needs. In 2018, \$ 88,000 in CDBG funding was available to public service agencies and the city provided \$ 118,400 in local funding for Fiscal Year (FY) 17/18. The city continues to support nonprofits to identify other public or private funding sources.
- Although the majority of the region’s service providers are located in Sacramento, Citrus Heights is home to services such as food banks, youth programs, and domestic violence service providers. Citrus Heights offers public transportation to the Sacramento area, but residents are sometimes reluctant or unable to travel outside of their community to receive services.

Actions taken to reduce lead-based paint hazards. 91.220(k); 91.320(j)

The city contracts with a third-party firm to administer its housing programs. This firm contracts with qualified lead abatement contractors to conduct lead-based paint identification, assessment, and clearance services to reduce lead hazard. The work is compliant with Title X requirements. The city provided lead-based grants to one single-family household.

Actions taken to reduce the number of poverty-level families. 91.220(k); 91.320(j)

The city's anti-poverty strategy focuses on providing a range of employment opportunities and supportive services aimed at enabling those in poverty to move into the workforce, as well as supporting activities that preserve and expand the supply of housing affordable to target-income households.

- Meals on Wheels by ACC offered daily nutritious meals to low-income homebound seniors and offered congregate meals to seniors.
- Sacramento Self-Help Housing provided counseling and social services to homeless individuals or those at risk of becoming homeless, including drop-in counseling/office hours and case management services.
- Sunrise Christian Food Ministry operates an emergency food closet in Citrus Heights available to low-income persons.
- The city also provides code enforcement services to ensure lower-income households have a safe and decent place to live.

Citrus Heights residents also have access to anti-poverty services provided by the County Department of Human Assistance. The County provides many programs designed to provide temporary assistance to families in need, and coordinates the County's welfare-to-work programs, with an emphasis on creating employment connections and increasing the income of the program's participants. Overall, the goal of all agencies' programs is economic self-sufficiency.

Actions taken to develop institutional structure. 91.220(k); 91.320(j)

In an effort to eliminate gaps in institutional structures, the city remains actively involved with neighboring jurisdictions and regional governmental entities. The city coordinated with Sacramento Housing and Redevelopment Agency (SHRA) to address affordable housing needs related to Section 8 and public housing activities. In addition, the city collaborated with SHRA to allocate the city's HOME funds to the Sunrise Pointe Affordable Apartment Project. The city also collaborated with several municipalities and SHRA to prepare regional grant applications for the Emergency Solutions Grants and No Place Like Home programs. As mentioned previously, Citrus Heights is also partnering with Sacramento Steps Forward, Sacramento County, City of Sacramento, City of Elk Grove, and the City of Rancho Cordova on the California Homeless Emergency Aid Program (HEAP).

In addition, the city worked with Elk Grove and Rancho Cordova, the two other small entitlement jurisdictions in Sacramento County, to research issues of interest to all jurisdictions and to coordinate on shared subrecipient monitoring. The city continues to look for opportunities to collaborate with other jurisdictions to increase and enhance services to residents.

Actions taken to enhance coordination between public and private housing and social service agencies. 91.220(k); 91.320(j)

The city continued to work with neighboring jurisdictions, including the City of Rancho Cordova, City of Elk Grove, County and City of Sacramento and the Sacramento Housing and Redevelopment Agency, to address the regional issues that affect the needs of low-income persons as well as special need programs, shared Subrecipient monitoring and research into issues of interest such as the Affirmatively Furthering Fair Housing final rule. The city also continues to work with many of the local nonprofits that provide a range of services to low-income residents.

Identify actions taken to overcome the effects of any impediments identified in the jurisdictions analysis of impediments to fair housing choice. 91.520(a)

HUD provides specific requirements that entitlement grantees certify that they will affirmatively further fair housing in their jurisdiction. Fair Housing objectives are broad, and include requirements to promote fair housing choice for all persons and to foster compliance with nondiscrimination provisions of the Fair Housing Act. These requirements are satisfied, in part, by analyzing impediments to fair housing choice within the jurisdiction and taking appropriate action to overcome the effects of identified impediments.

The city's approach to fair housing in 2018 focused on outreach and education:

- Sacramento Self-Help Housing (SSHH) has provided education on tenant/landlord and fair housing law to clientele in need since 2013. SSHH also works with the California Apartments Association (CAA), Legal Services of Northern California, and Project Sentinel to provide fair housing education, investigation, and resources.
- The city supported a series of trainings offered to landlords provided by CAA on fair housing and discrimination issues. The trainings covered topics such as reasonable accommodation, familial status discrimination and occupancy limits. Trainings were offered three different times throughout the year Countywide, including Citrus Heights via webinar.
- The city entered into an agreement in December 2016 between the Sacramento Housing and Redevelopment Agency (SHRA) and 10 other municipal corporations to cost share the fees to assess fair housing. The regional assessment of fair housing is currently underway. This is the first partnership of its kind nationwide.

CR-40 - Monitoring 91.220 and 91.230

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 city uses a monitoring system to ensure that CDBG-funded activities are in compliance of applicable laws, regulations, policies, sound management, and account practices. The primary objective of the city's monitoring efforts includes:

- To ensure the Subrecipient have the capacity to carry out their responsibility and to do so in a timely manner.
- To ensure the Subrecipient is carrying out the project as described in their agreement, complying with applicable laws and regulations.
- To ensure the project is operating in a manner that minimizes the opportunity for fraud, waste, and mismanagement.

At the beginning of the program year, all Subrecipients are informed of their obligations to collect the required information on income, household composition, race, and ethnicity. The city also provides information to each Subrecipient that outlines the agreement terms and CDBG policies such as data collection and financial management. City staff also recommends each Subrecipient read the "Playing by the Rules" guide produced by HUD. Staff will provide technical assistance to each Subrecipient throughout the year as needed.

Quarterly, staff reviews the progress the Subrecipient has been making toward achieving performance goals. Public service Subrecipients must report their service population with each invoice. Each Subrecipient agreement contains provisions for reduction or termination in the event goals are not accomplished or when past performance issues have not been resolved. Onsite monitoring of Subrecipients is conducted based on an annual desk assessments performed by city staff.

The city has placed a strong emphasis on its Subrecipients to gather complete and accurate information on the persons or households served, and regularly reporting of progress.

Citizen Participation Plan 91.105(d); 91.115(d)

Describe the efforts to provide citizens with reasonable notice and an opportunity to comment on performance reports.

The City of Citrus Heights Housing and Grants Division, under the Community and Economic Development Department, serves as the lead agency for the administration of the city's CDBG funds.

Direct questions relating to this report to:

**City of Citrus Heights
6360 Fountain Square Drive
Citrus Heights, CA 95621
Housing Division
Stephanie Cotter, Development Specialist
916-727-4768
scotter@citrusheights.net**

This report was made available for public review during a 15-day public comment period from February 27, 2019 to March 14, 2019. A public notice announcing its availability was published in the Sacramento Bee on February 13, 2019. A public hearing on this report will be held March 14, 2019 during the Citrus Heights Council meeting and any public comments received will be summarized and attached to this report prior to final submission to HUD.