

## 2020-2021 Annual Action Plan

This document is an extract from the 2020-2024 Consolidated Plan (Pages 155-199), which contains the 2020-2021 Annual Action Plan. See the 2020-2024 Consolidated Plan for additional sections, exhibits, and analysis.

After submitting the 2020-2024 Consolidated Plan and 2020-2021 Annual Action Plan, the City was notified that HUD adjusted its allocation formula resulting in decreases to the CDBG and HOME program allocations to the City of Fresno. This document was updated on September 7, 2022 to reflect a \$1,084 decrease to the CDBG program and a \$780 decrease to the HOME program. The City made subsequent decreases to its Compliance activities for the CDBG and HOME programs. Changes are noted in red font on pages 131, 132, 156, 157, 161, and 178.

Planning and Development Department
Housing and Community Development Division
2600 Fresno Street, Room 2065
Fresno, CA 93721
559-621-8300
HCDD@fresno.gov

### **EXPECTED RESOURCES**

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

#### Introduction

Table 55 shows the City's anticipated grant funding for the 2020 program year, along with an estimate of anticipated grant funding for the remaining years covered by this Consolidated Plan. The estimates for CDBG, HOME, ESG, and HOPWA assume level funding over the five years of the Consolidated Plan period at 100% of the 2020 allocation amounts.

Fresno has received \$15,225,650 in CARES Act funding as of June 16, 2020, with additional allocations possible. The City will receive \$4,184,132 of CDBG-CV, \$2,103,510 of ESG-CV, \$8,845,443 of ESG-CV2 and \$92,574 of HOPWA-CV funding. The city anticipates these funds will be spent during PY 2020-2021. Discussion of these funds can be found in amendments to the 2019 Annual Action Plan and subsequent CAPERs.

## **Anticipated Resources**

TABLE 55 - EXPECTED RESOURCES - PRIORITY TABLE

			Ex	pected Amou	ınt Available Y	'ear 1	Expected	Narrative Description
Program	Source of Funds	Uses of Funds	Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$	Amount Available Remainder of ConPlan \$	
CDBG	Public - Federal	<ul> <li>Housing Rehabilitation</li> <li>Senior Paint Program</li> <li>Economic Development</li> <li>Housing</li> <li>Street and Sidewalk Improvements</li> <li>Public Services</li> <li>Nonprofit facilities</li> <li>Park Improvements</li> <li>Programmatic Compliance</li> <li>Fair Housing Education and Assistance</li> </ul>	\$7,111,555	\$125,000	\$12,679	\$7,249,234	\$28,946,220	Anticipated funding will include Entitlement grant funds, program income, and prior year resources.

		Ex	pected Amoι	Expected				
Program	Source of Funds	Uses of Funds	Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$	Amount Available Remainder of ConPlan \$	Narrative Description
HOME	Public - Federal	<ul> <li>Affordable Housing Development or Rehabilitation</li> <li>CHDO Set Aside</li> <li>Tenant-Based Rental Assistance</li> <li>HOME Program Administration</li> </ul>	\$3,254,295	\$205,000	\$0	\$3,459,295	\$13,837,180	Anticipated funding will include Entitlement grant funds and program income.
ESG	Public - Federal	<ul> <li>Homeless Management Info System</li> <li>Homeless Prevention</li> <li>Outreach/ Emergency Shelter</li> <li>Rapid Rehousing</li> <li>Homeless Programs Administration</li> </ul>	\$610,018	N/A	\$63,212	\$673,230	\$2,440,072	Anticipated funding will include Entitlement grant funds and prior year resources.
HOPWA	Public - Federal	<ul> <li>STRMU</li> <li>Short Term or Transitional Housing Facilities</li> <li>TBRA</li> </ul>	\$636,124	N/A	\$0	\$636,124	\$2,544,496	Anticipated funding consists of Entitlement grant funds.

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

Leverage, in the context of entitlement funding, means bringing in other local, state, federal, and private-sector financial resources to maximize the reach and impact of the City's HUD funded programs. Like many other federal agencies, HUD encourages its grant recipients to strategically leverage additional funds in order to achieve greater results. Leverage is also a way to increase project efficiencies and benefit from economies of scale that often come with combining sources of funding for similar or expanded scopes.

In addition to the entitlement dollars listed in Table 55, the federal government has several other funding programs for community development and affordable housing activities. These include: Fair Housing Initiatives Program; Lead Based Paint; Choice Neighborhoods; the Supportive Housing Program; Section 202, Section 811; Youthbuild; the Housing Choice Voucher Program; the Affordable Housing Program (AHP) through the Federal Home Loan Bank, and others. It should be noted that in most cases the City would not be the applicant for these funding sources as many of these programs offer assistance to affordable housing developers and nonprofits rather than local jurisdictions.

In California, the Department of Housing and Community Development (HCD) and the California Housing Finance Agency (CalHFA) administer a variety of statewide public affordable housing programs that offer assistance to nonprofit affordable housing developers. Examples of HCD's programs include the Multifamily Housing Program (MHP), Affordable Housing Innovation Fund (AHIF), Building Equity and Growth in Neighborhoods Program (BEGIN), and CalHOME. Many HCD programs have historically been funded by one-time State bond issuances and, as such, are subject to limited availability of funding. CalHFA offers multiple mortgage loan programs, down payment assistance programs, and funding for the construction, acquisition, and rehabilitation of affordable ownership units.

The National Housing Trust Fund (HTF) is a new affordable housing production program that will complement existing federal, state and local efforts to increase and preserve the supply of decent, safe, and sanitary affordable housing for extremely low- and very low-income households, including homeless families.<sup>27</sup> States and state-designated entities are eligible grantees for the HTF. HUD will allocate HTF funds by formula annually. A state must use at least 80 percent of each annual grant for rental housing; up to 10 percent for homeownership; and up to 10 percent for the grantee's reasonable administrative and planning costs.

The State also administers the federal Low Income Housing Tax Credits program, a widely used financing source for affordable housing projects. As with the other federal grant programs discussed above, the City of Fresno would not apply for these funding sources. Rather, local affordable housing developers could apply for funding through these programs for particular developments in the City.

<sup>&</sup>lt;sup>27</sup> HUD Exchange. "Housing Trust Fund." https://www.hudexchange.info/htf

Over the Consolidated Plan cycle, there are several specific sources of additional funding, particularly related to homelessness, already identified and planned for use within the greater Fresno community. These sources include:

- HUD funding to the Fresno-Madera Continuum of Care estimated at \$10.7 million per year based on 2018 figures (estimate is based on 46% of the CoC's total award representing the City's share of the Fresno and Madera County populations);
- CalHome funding of \$2 million for mobile home rehabilitation;
- Homeless Housing, Assistance, and Prevention Program (HHAPP) funding through a onetime state bond issue (\$6.15 million for the City of Fresno and \$2.95 million for the Fresno-Madera CoC).

As a recipient of HOME and ESG funding, the City is required to generate matching funds. For the HOME Program, the City is required to match twenty-five percent of all project expenditures. In recent years, and for PY 2020, HUD has waived the City's HOME match requirement based on fiscal distress criteria. In PY 2020, the City will continue to seek HOME match funds to contribute to future year match liabilities. Examples of matching funds under the HOME Program include private financing and interest subsidies from homebuyer and residential rehabilitation programs.

ESG requires a 100% match of program funds. The City generally passes this matching requirement on to the service providers receiving ESG funds from the City. ESG providers meet this requirement through the use of private donations, state and other federal grants, and/or volunteer hours.

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

The City maintains a list of vacant city-owned real estate parcels that could potentially be used for opportunities arising in connection with needs identified in this plan. The current list consists of 176 parcels. Of those, 150 (approximately 204 total acres) are located south of Shields Avenue and 7 (totaling 18 acres) are within what the City terms "High Opportunity Areas". City staff are currently assessing the list of vacant parcels against the priorities and objectives of the draft strategic plan and will provide additional information on anticipated use of any of these city-owned properties in the final report.

### **ANNUAL GOALS AND OBJECTIVES**

## AP-20 Annual Goals and Objectives

## **Goals Summary Information**

TABLE 56 - GOALS SUMMARY

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Homelessness and the Prevention of Homelessness	2020	2024	Homeless	Citywide	Homelessness	ESG: \$627,479 HOPWA: \$617,040	<ul> <li>Tenant-Based Rental         Assistance/Rapid Rehousing:         180 households assisted</li> <li>Homeless Person Overnight         Shelter: 500 persons assisted</li> <li>Public service activities for         low/moderate-income housing         benefit: 36 persons assisted</li> </ul>
2	Safe and Affordable Housing	2020	2024	Affordable Housing	Citywide	Affordable Housing	CDBG: \$1,378,001 HOME: \$3,114,068	<ul> <li>Rental Units Constructed / Rehabilitated: 26 household housing units</li> <li>Homeowner Housing Added / Rehabilitated: 54 household housing units</li> </ul>
3	Public Infrastructure and Facilities	2020	2024	Non-Housing Community Development  Non- Homeless Special Needs	Citywide	Public Infrastructure and City- Owned Facilities	CDBG: \$3,095,105	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 10,000 persons assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
4	Community Services	2020	2024	Non-Housing Community Development Non- Homeless Special Needs	Citywide	Community Services	CDBG: \$1,101,900	<ul> <li>Public service activities other than Low/Moderate Income Housing Benefit: 2,260</li> <li>Micro-enterprise assistance: 40 persons assisted</li> </ul>
5	Fair Housing	2020	2024	Other: Fair Housing	Citywide	Promote Fair Housing	CDBG: \$50,000	• N/A
6	Compliance	2020	2024	Other: Administration	Citywide	Programmatic Compliance	CDBG: \$1,396,445 HOME: \$345,228 ESG: \$45,751 HOPWA: \$19,084	Full compliance with adopted Consolidated Plan, Annual Action Plans, Citizen Participation Plans, and all other applicable regulations (Federal, State, Local, and HUD)
7	Section 108 Loan Repayment	2020	2024	Other: Section 108 Loan Repayment	Citywide	N/A	CDBG: \$227,783	Construction of a Community Center

#### **Goal Descriptions**

#### **Goal 1: Homelessness and the Prevention of Homelessness**

Provide assistance for the homeless and those at risk of becoming homeless through safe low-barrier shelter options, housing first collaborations, and associated supportive services.

#### Goal 2: Safe and Affordable Housing

Improve access to affordable housing for low-income and special needs households by partnering with interested developers to increase development of low-income and affordable housing in high opportunity areas, and by promoting the preservation and rehabilitation of existing affordable housing units.

#### Goal 3: Public Infrastructure and Facilities

Promote quality of life and neighborhood revitalization through improvements to current public infrastructure and facilities, and by closing gaps in areas with aging, lower quality, or nonexistent public infrastructure and facilities.

#### **Goal 4: Community Services**

Provide services to low-income and special needs households that develop human capital and improve quality of life.

#### **Goal 5: Fair Housing**

Provide services to residents and housing providers to advance fair housing.

#### Goal 6: Compliance

Plan and administer funding for community development, housing, and homelessness activities with improved transparency, increased community involvement, and full compliance with federal regulations.

### **PROJECTS**

### **AP-35 Projects - 91.220(d)**

#### Introduction

The City of Fresno expects to implement activities under 18 different projects over the 2020 program year toward addressing priority needs. These projects include rehabilitation and development of affordable housing; the delivery of services to residents, particularly to students and seniors; assistance to people experiencing homelessness; support to households in danger of becoming homeless; improvements to parks, sidewalks, and other public facilities; and funding for fair housing activities. These projects are identified in the table below, with additional detail provided in AP-38.

#### **Projects**

Table 57 - Project Information

#	Project Name
1	Housing Rehabilitation
2	Housing Rehabilitation Program Delivery
3	Senior Paint Program
4	Affordable Housing Development or Rehabilitation
5	Community Housing Development Organization Set-Aside
6	Tenant-Based Rental Assistance
7	Non-Profit Public Services
8	PARCS After School Program
9	PARCS Senior Hot Meals Program
10	Emergency Solutions Grant (ESG)
11	Housing Opportunities for Persons with HIV/AIDS
12	Neighborhood Street and Sidewalk Improvements
13	CDBG Program Administration and Planning
14	HOME Program Administration
15	Housing Opportunities for Persons with HIV/AIDS Program Administration
16	Fair Housing
17	Section 108 Repayment
18	Micro-Enterprise Assistance

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

The City's allocation priorities reflect its focus on highest-priority needs identified through data analysis, extensive community engagement, public survey results, consultation with stakeholders, and reviews of other plans and studies developed for Fresno and its region. The key strategic priorities that emerged from the Consolidated Plan process and that these projects are designed to address are listed below:

#### Homelessness

The 500 respondents to the Fresno Housing and Community Needs Survey ranked the City's homelessness needs above all other types of needs surveyed. Additionally, public meeting participants frequently discussed needs related to homelessness. These included needs for more low-barrier shelter space, case management for people experiencing homelessness, job and skills training, drug/alcohol counseling, and shelters for LGBTQ people that are not coupled to requirements for religious participation.

#### Affordable Housing

More than one in three Fresno households (36%) is cost burdened, spending more than 30% of its income on housing expenses; nearly a quarter of the city's households (22%) spend more than 50%. Cost burdening is particularly pervasive among renters, who make up more 75% of the city's cost burdened households. Compounding the housing affordability issue is the fact that housing prices have increased far more steeply than household income, meaning that a housing supply that meets all of Fresno's affordability needs today will be insufficient to do so in the future. Public meeting participants and stakeholders interviewed as part of the development of the Consolidated Plan identified a wide variety of needs related to housing affordability in Fresno. For many, the issue was primarily related to expanding the supply and improving the quality of rental housing. Other needs identified in public meeting breakout groups and ranked highly by survey respondents included energy efficiency improvements, rental assistance, homebuyer assistance, and housing for specific subpopulations (large families, seniors, people with disabilities).

#### Public Infrastructure

Other than homelessness-related needs, street, road, and sidewalk improvements were ranked more highly than any other needs queried in the public survey.

#### **Public Facilities**

In public meetings and through the Community Need Scorecard exercise, meeting participants tended to rank parks, gymnasiums, outdoor recreation space, and youth centers among the highest priorities. The priority is also supported by survey results, where these types of city-owned facilities were given priority just behind street, road, and sidewalk improvements.

#### **Community Services**

Stakeholders and public meeting participants, including groups of seniors and teens, were instrumental in identifying these high-priority community services needs. The Community Need Scorecard exercise used in public meeting settings generally shows these types of needs as lower priority than those related to homelessness and affordable housing, yet many of the activity types included in the description of this priority were nonetheless ranked highly by survey respondents.

The top five public services needs ranked by survey respondents included drug abuse and crime prevention, child abuse prevention, afterschool services, employment training, and neighborhood deterioration. These needs were frequently named in public meeting settings as well.

#### Fair Housing

Survey responses reveal a gap in the community's understanding of fair housing and a need for greater education and enforcement around this subject. While 64% of respondents reported knowing their fair housing rights, fewer than half (45%) knew where to file a complaint of housing discrimination. Further, 20% of respondents (91 individuals) said they had experienced some form of housing discrimination since living in Fresno, with more than four in five of those instances going unreported. Stakeholder interviews further support this priority and particularly indicate wrongful evictions as a fair housing issue to be addressed.

#### **Programmatic Compliance**

These are necessary administrative costs associated with ensuring effective coordination and delivery of services to Fresno residents. The City of Fresno is committed to ensuring compliance with federal regulations.

The City does not anticipate any obstacles to completing the projects it has identified for the 2020 program year.

## AP-38 Project Summary

## **Project Summary Information**

1	Project Name	Housing Rehabilitation
	Target Area	Citywide
	Goals Supported	Safe and Affordable Housing
	Needs Addressed	Affordable Housing
	Funding	CDBG: \$1,028,001
	Description	Address the home repair, building systems, and housing rehabilitation needs of low-income homeowners.
	Target Date	06/30/2021
	Estimate the number and type of persons that will benefit from the proposed activity	39 low-income units
	Location Description	Available to income eligible homeowners throughout the City.
	Planned Activities	21A: General Administration – 24 CFR 570.206  NA: National Objective not applicable

2	Project Name	Housing Rehabilitation Program Delivery
	Target Area	Citywide
	Goals Supported	Safe and Affordable Housing
	Needs Addressed	Affordable Housing
	Funding	CDBG: \$200,000
	Description	CDBG funds will pay for the delivery costs associated with housing rehabilitation targeted to income-eligible households
	Target Date	06/30/2021
	Estimate the number and type of persons that will benefit from the proposed activity	N/A
	Location Description	2600 Fresno Street, Room 3065, Fresno CA 93721
	Planned Activities	14H: Rehabilitation Administration (24 CFR 570.202) LMH: Low Mod Housing national objective (24 CFR 570.208(a)(3))

3	Project Name	Senior Paint Program
	Target Area	Citywide
	Goals Supported	Safe and Affordable Housing
	Needs Addressed	Affordable Housing
	Funding	CDBG: \$150,000
	Description	CDBG funds will pay for a licensed lead-certified painting contractor to paint the exterior of the home and may include minor repairs, (i.e., screens, broken window panes, loose or damaged gutters, etc.) provided there are enough funds available after deducting the cost of the paint project. This program serves low-income seniors (62 years of age or older) who own and occupy their homes.
	Target Date	06/30/2021
	Estimate the number and type of persons that will benefit from the proposed activity	15 low mod income senior households
	Location Description	2600 Fresno Street, Room 2065, Fresno CA 93721
	Planned Activities	14A: Single-Unit Residential Rehabilitation (24 CFR 570.202) LMH: Low Mod Housing national objective (24 CFR 570.208(a)(3))

4	Project Name	Affordable Housing Development or Rehabilitation
	Target Area	Citywide
	Goals Supported	Safe and Affordable Housing
	Needs Addressed	Affordable Housing
	Funding	HOME: \$1,914,018
	Description	HOME funds will be loaned to local affordable housing developers to finance the development or rehabilitation of rental housing projects affordable to low-income households
	Target Date	06/30/2023
	Estimate the number and type of persons that will benefit from the proposed activity	24 new housing units
	Location Description	TBD
	Planned Activities	Development/Rehabilitation of Rental Housing

5	Project Name	Community Housing Development Organization Set-Aside
	Target Area	Citywide
	Goals Supported	Safe and Affordable Housing
	Needs Addressed	Affordable Housing
	Funding	HOME: \$488,261
	Description	HOME funds will be loaned to a qualified Community Housing Development Organization (CHDO) to finance the development of housing affordable to low-income households. Developments may be either rental or homebuyer.
	Target Date	06/30/2023
	Estimate the number and type of persons that will benefit from the proposed activity	2 new single-family housing units
	Location Description	TBD
	Planned Activities	Rental Housing Development or Homebuyer Housing Development

6	Project Name	Tenant-Based Rental Assistance
	Target Area	Citywide
	Goals Supported	Safe and Affordable Housing
	Needs Addressed	Affordable Housing
	Funding	HOME: \$711,789
	Description	HOME funds will be used to subsidize private market units for homeless and low-income households to increase affordability.
	Target Date	06/30/2021
	Estimate the number and type of persons that will benefit from the proposed activity	65 low-income households
	Location Description	Citywide
	Planned Activities	Tenant-Based Rental Assistance

7	Project Name	Non-Profit Public Services
	Target Area	Citywide
	Goals Supported	Community Services
	Needs Addressed	Community Services
	Funding	CDBG: \$161,000
	Description	CDBG funds will be provided to local non-profits to support programs that serve predominantly low and moderate income clientele.
	Target Date	06/30/2021
	Estimate the number and type of persons that will benefit from the proposed activity	560 persons
	Location Description	TBD
	Planned Activities	TBD

8	Project Name	PARCS After School Program	
	Target Area	Citywide	
	Goals Supported	Community Services	
	Needs Addressed	Community Services	
	Funding	CDBG: \$718,100	
	Description	Programs after school on weekdays and Saturday programming for targeted neighborhood community centers to provide enrichment activities, homework assistance, career development, socialization, crime & drug prevention, and meal supplements for low and very low-income youth	
	Target Date	06/30/2021	
	Estimate the number and type of persons that will benefit from the proposed activity	700 youth	
Various community centers in low/mod income areas  1. Dickey Youth Development Center 2. Einstein Neighborhood Center 3. Fink White Neighborhood Center 4. Frank H. Ball Neighborhood Center 5. Holmes Neighborhood Center 6. Lafayette Neighborhood Center 7. Maxie L Parks Community Center 8. Quigley Neighborhood Center 9. Romain Community Center		<ol> <li>Dickey Youth Development Center</li> <li>Einstein Neighborhood Center</li> <li>Fink White Neighborhood Center</li> <li>Frank H. Ball Neighborhood Center</li> <li>Holmes Neighborhood Center</li> <li>Lafayette Neighborhood Center</li> <li>Maxie L Parks Community Center</li> <li>Quigley Neighborhood Center</li> </ol>	
	Planned Activities	05D: Youth Services – 24 CFR 570.201(e) LMC: Limited Clientele – 24 CFR 570.208(a)(2) using Nature/Location Presumption	

9	Project Name	PARCS Senior Hot Meal Program	
	Target Area	Citywide	
	Goals Supported	Community Services	
	Needs Addressed	Community Services	
	Funding	CDBG: \$187,800	
	Description	Weekday enrichment programming for limited clientele in targeted neighborhood community centers; compliments senior meal activity.	
	Target Date	06/30/2021	
	Estimate the number and type of persons that will benefit from the proposed activity	1,000 seniors	
	Location Description	Various locations include:  1. Lafayette Neighborhood Center 2. Mary Ella Brown Community Center 3. Mosqueda Community Center 4. Pinedale Community Center 5. Senior Citizens Village 6. Ted C. Wills Community Center 7. Inspiration Park	
	Planned Activities	05C: Senior Services – 24 CFR 570.201(e)  LMC: Limited Clientele – 24 CFR 570.208(a)(2) – Presumed Benefit	

10	Project Name	Emergency Solutions Grant (ESG)	
	Target Area	Citywide	
	Goals Supported	Homelessness and the Prevention of Homelessness	
	Needs Addressed	Homelessness	
	Funding	ESG: \$673,230	
	Description	ESG funds will be used to provide:  1. Street outreach and emergency shelter: \$227,248  2. Homelessness Prevention: \$33,918  3. Rapid Rehousing: \$366,313  4. Program Administration: \$45,751	
	Target Date	06/30/2021	
	Estimate the number and type of persons that will benefit from the proposed activity	10 Units of homeless prevention 480 persons provided overnight shelter 95 units of rapid rehousing	
	Location Description	TBD	
	Planned Activities	TBD	

11	Project Name	Housing Opportunities for Persons with HIV/AIDS	
	Target Area	Citywide	
	Goals Supported	Homelessness and the Prevention of Homelessness	
	Needs Addressed	Homelessness	
	Funding	HOPWA: \$617,040	
	Description	HOPWA funds will be used to provide housing assistance and housing-related supportive services for person living with AIDS/HIV and their families. HOPWA funds will be used for supportive services, housing informati and referral services, tenant-based rental assistance, short-term rent, mortgage, and utility assistance.	
	Target Date 06/30/2021		
	Estimate the number and type of persons that will benefit from the proposed activity	66 persons (20 persons/households assisted with TBRA, 20 persons with housing in a short-term facility, and 26 persons/households with STRMU	
	Location Description	TBD	
	Planned Activities	TBD	

12	Project Name	Neighborhood Street and Sidewalk Improvements	
	Target Area	Citywide	
	Goals Supported	Public Infrastructure and Facilities	
	Needs Addressed	Public Infrastructure and City-Owned Facilities	
	Funding	CDBG: \$3,095,105	
	Description	<ol> <li>Yosemite Middle School Complete Streets (year one of multi-year project) \$300,000</li> <li>Highway City Neighborhood Street Reconstruction (year one of multi-year project) \$615,000</li> <li>West Fresno Elementary &amp; MLK Neighborhood Street Improvements \$1,200,000</li> <li>Burroughs Elementary Neighborhood Street Reconstruction \$801,105</li> <li>Ericson Elementary Neighborhood Street Reconstruction (year one of multi-year project) \$179,000</li> </ol>	
	Target Date	06/30/2021  10,000 persons residing in selected residential service areas	
	Estimate the number and type of persons that will benefit from the proposed activity		
	Location Description	Proposed areas are listed in the description section	
	Planned Activities	03K: Street Improvements – 24 CFR 570.201(c) LMA – Low Moderate Income Areas – 24 CFR 570.208(a)	

13	Project Name	CDBG Program Administration and Planning	
	Target Area	Citywide	
	Goals Supported	Compliance	
	Needs Addressed	Programmatic Compliance	
	Funding	CDBG: \$1,396,445	
	Description	Grant Monitoring and Administration, Historic Preservation, Environmental Assessments	
	Target Date	06/30/2021	
	Estimate the number and type of persons that will benefit from the proposed activity  N/A		
	Location Description	2600 Fresno Street, Fresno CA 93721	
	Planned Activities	Objective not applicable 21A: General Administration – 24 CFR 570.206  NA: National	

14	Project Name	HOME Program Administration	
	Target Area	Citywide	
	Goals Supported	Compliance	
	Needs Addressed	Programmatic Compliance	
	Funding	HOME: \$345,228	
	Description	Grant Monitoring and Administration	
	Target Date	06/30/2021	
	Estimate the number and type of persons that will benefit from the proposed activity	Not applicable	
	Location Description	2600 Fresno Street, Fresno CA 93721	
	Planned Activities	General Administration and Oversight of the Program and HOME-Funded Projects	

15	Project Name	Housing Opportunities for Persons with HIV/AIDS Program Administration  Citywide	
	Target Area		
	Goals Supported	Compliance	
	Needs Addressed	Programmatic Compliance	
	Funding	HOPWA: \$19,084	
	Description	HOPWA funds will be used for administrative and compliance oversight activities associated with HOPWA fund projects.	
	Target Date	06/30/2021	
	Estimate the number and type of persons that will benefit from the proposed activity	Not applicable	
	Location Description	2600 Fresno Street, Fresno CA 93721	
	Planned Activities	Grant administration and oversight	

16	Project Name	Fair Housing
	Target Area	Citywide
	Goals Supported	Fair Housing
	Needs Addressed	Promote Fair Housing
	Funding	CDBG: \$50,000
	Description	CDBG funds will be used to support fair housing outreach and education to ensure fair housing opportunities
	Target Date	06/30/2021
	Estimate the number and type of persons that will benefit from the proposed activity	TBD
	Location Description	TBD
	Planned Activities	TBD

17	Project Name	Section 108 Loan Repayment	
	Target Area	Citywide	
	Goals Supported	Public Infrastructure and Facilities	
	Needs Addressed	Public Infrastructure and City-Owned Facilities	
	Funding	CDBG: \$227,783	
	Description	CDBG funds will be used to pay Section 108 debt service for the construction of a Community Center	
	Target Date	06/30/2021	
	Estimate the number and type of persons that will benefit from the proposed activity	N/A	
	Location Description	2600 Fresno Street, Fresno CA	
	Planned Activities	19F: Section 108 Planned Repayment NA: National Objective not applicable to 108 repayment	

18	Project Name	Micro-Enterprise Assistance
	Target Area	Citywide
	Goals Supported	Community Services
	Needs Addressed	Community Services
	Funding	CDBG: \$35,000
	Description	TBD
	Target Date	06/30/2021
	Estimate the number and type of persons that will benefit from the proposed activity	40 persons assisted
	Location Description	TBD
	Planned Activities	TBD

### AP-50 Geographic Distribution – 91.220(f)

### Description of the geographic areas of the entitlement (including areas of lowincome and minority concentration) where assistance will be directed

The Consolidated Plan generally allocates CDBG, HOME, and ESG dollars according to low-and moderate-income (LMI) census tracts without specification of target areas. The City's LMI areas include much of south Fresno as well as neighborhoods such as El Dorado Park, Herndon Town, Highway City, Manchester, and Pinedale.

#### **Geographic Distribution**

Not applicable. The City has not established specific target areas to focus the investment of entitlement funds.

Table 58 - Geographic Distribution

Target Area	Percentage of Funds

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

The Consolidated Plan does not formally identify any specific target areas, however input from stakeholders and members of the public has strongly suggested a particular need for investment in south Fresno communities. Southwest and southeast Fresno were frequently described as having the greatest need for public infrastructure and improvements (such as sidewalks and park space) as well as for programs and services to strengthen human capital (such as job training and afterschool programming). The City will spread resources throughout the City, with the understanding that most funding will go toward the improvement of predominantly low- and moderate-income residential areas to include south Fresno.

HUD generally awards HOPWA funds on a regional basis to the largest city within a HOPWA-eligible region. Fresno therefore receives and administers HOPWA funding for the entirety of Fresno County, known as its "Eligible Metropolitan Statistical Area" or EMSA. The City is required to serve eligible persons living anywhere within the EMSA and not just within City limits.

### **AFFORDABLE HOUSING**

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

#### Introduction

Although entitlement dollars are limited, the City does anticipate expending a significant portion of its federal allocation dollars on the preservation and provision of affordable housing. Over the 2020 program year, the City of Fresno estimates that it will support a total of 260 low- and moderate-income households through rental assistance and the construction and rehabilitation of affordable housing units. Of these 260 households, 180 are expected to be experiencing homelessness and assisted with a tenant-based housing voucher. Of the remaining 80 households 26 are expected to be able to access newly constructed affordable housing and 54 will have their homes rehabilitated.

TABLE 59 - ONE YEAR GOALS FOR AFFORDABLE HOUSING BY SUPPORT REQUIREMENT

One Year Goals for the Number of Households to be Supported		
Homeless		180
Non-Homeless		80
Special-Needs		0
Total		260

TABLE 60 - ONE YEAR GOALS FOR AFFORDABLE HOUSING BY SUPPORT TYPE

One Year Goals for the Number of Households Supported Through		
Rental Assistance	180	
The Production of New Units	26	
Rehab of Existing Units	54	
Acquisition of Existing Units	0	
Total	260	

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

#### Introduction

Fresno residents are served by the Housing Authority of the City of Fresno (FH). HUD PIC data reports that there are 651 units of conventional public housing and another 98 units designated for elderly and/or disabled households through the Section 202 and 811 programs. The FH 2020 Annual PHA Plan identifies 506 traditional public housing units, many of which will undergo demolition, disposition, or conversion to RAD in coming years.

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

The FH is continually planning for and working toward improvements to its housing and communities in order to provide its residents with quality housing options. In it's 2020 Annual Plan, the FH contemplates several mixed-finance developments that would potentially draw upon a variety of financing options, including Public Housing Capital Funds, rental subsidy, Project Based Vouchers, Project Based Rental Assistance Vouchers, and/or Public Housing Operating reserves. In some cases, the FH has planned for the demolition of housing that is obsolete; where public housing units are demolished, the FH will replace them with housing of better quality elsewhere within the city. The FH 2020 Annual Plan states that three of the city's public housing sites are being considered for disposition and conversion to a different low-income housing type or community facility. These three sites are Pacific Gardens, Yosemite Village — Phase 2, and Fairview Heights Terrace. Seventy-four of the units at Yosemite Village — Phase 2 are also being considered for demolition or disposition to be converted to a Low-Income Housing Tax Credit site. Three sites are also planned for conversion under the RAD program between 2019 and 2021: Yosemite Village (69 units), Parc Grove II (31 units), and Pacific Gardens (22 units). Conversion of these sites under the RAD program may include either demolition, rehabilitation or new construction at these sites.

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

The FH offers a number of activities for residents to increase their involvement in management and set them on the path to homeownership. As identified in its 2020 Annual PHA Plan, the FH conducts a financial literacy course through its Faith and Finance Program. The housing authority has also partnered with Self Help Enterprises to create a homeownership class and financial literacy workshop for residents with higher incomes. FH partners with Habitat for Humanity to help residents achieve homeownership.

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

Not applicable – the Fresno Housing Authority is not designated as "troubled."

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

The City of Fresno is covered by the Fresno Madera Continuum of Care, a network of service providers covering Fresno and Madera counties. The Fresno Madera Continuum of Care brings together housing and service providers to meet the needs of individuals and families experiencing homelessness.

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

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

Over the next year, the Fresno Madera Continuum of Care and other homeless housing and service providers in the city of Fresno will continue reaching out to homeless persons, including unsheltered persons, through street outreach, day centers, and emergency shelter services. For the 2020 program year, the City will fund organizations and/or projects for a variety of activities, including street outreach and needs assessment, through the Emergency Solutions Grants program.

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

During the 2020 program year, the City will fund nonprofit organizations and/or projects for the following emergency shelter and transitional housing activities:

- Emergency shelter and supportive services
- Rapid rehousing services

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

During the 2020 program year, the City of Fresno will prioritize the funding of permanent housing for people experiencing homelessness. In determining allocation of CDBG and ESG, the City will prioritize low-barrier permanent housing and optional supportive services for individuals and families living in permanent housing, consistent with a Housing First approach.

The City will fund nonprofit organizations for the following activities to prevent homelessness and to support people experiencing homelessness make the transition to permanent housing:

- Homelessness prevention
- Rapid Rehousing

The City will also work to increase the availability of affordable housing in the city by using HOME funds to support the development of affordable housing, including housing for seniors and people with disabilities, and to provide housing rehabilitation for low-income homeowners.

Finally, the City will take steps to implement the strategies in its Analysis of Impediments to Fair Housing Choice, which includes strategies to support housing affordability in the city.

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

Over the next year, housing and service providers in the City of Fresno will continue to work together to prevent homelessness in populations who are vulnerable to or at risk of homelessness. The City will support the following homelessness prevention programs during the 2020 program year:

• Homelessness prevention

## AP-70 HOPWA Goals - 91.220 (I)(3)

The City will continue to prioritize short-term rent, mortgage, and utility assistance; tenant-based rental assistance; and transitional housing throughout the 5-year period covered by this Consolidated Plan. Goals for the number of households to be provided housing through HOPWA funds have increased in proportion with funding increases for the HOPWA program for the 2020 program year.

One-year goals for the number of households to be provided housing through the use of HOPWA for:		
Short-term rent, mortgage, and utility assistance to prevent	26	
homelessness of the individual or family (STRMU)		
Tenant-based rental assistance (TBRA)	20	
Units provided in permanent housing facilities developed, leased, or	0	
operated with HOPWA funds		
Units provided in transitional short-term housing facilities developed,	20	
leased, or operated with HOPWA funds		
Total	66	

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

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

The City of Fresno will continue to implement activities that remove barriers to affordable housing, such as its 50% permit fee reduction for residential projects in inner city areas, such as Highway City, Pinedale and Herndon Townsite. In its 2019 Downtown Displacement Report, the City also acknowledged its current opportunity to help preserve affordable housing in downtown and plans to prevent the displacement of current residents through its Downtown Displacement Program. Finally, the city will strengthen its police services in high crime areas and increase its provision of fair housing services to aid neighborhoods where affordable housing already exists.

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

#### Introduction

This section details the City of Fresno's actions planned to ensure safe and affordable housing for its residents, along with plans to meet underserved needs, reduce poverty, develop institutional structure, and enhance coordination between public and private sector housing and community development agencies.

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

To help remove obstacles to meeting underserved needs and improve service delivery, the City of Fresno supports the continued development of the Fresno Madera Continuum of Care, a comprehensive coordinated homeless housing and services delivery system that assists people experiencing homelessness in making the transition from homelessness to independent or supportive permanent housing, and in accessing education, health and mental health services, employment training, and life skills development. The City will provide funding for the following to address underserved needs:

- Homelessness prevention
- Outreach/ emergency shelter
- Rapid Rehousing
- Housing Opportunities for Persons with AIDS/HIV

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

The City of Fresno will fund multiple programs to foster housing affordability, including continuing to use HOME funds to support development of affordable housing by a local CHDO. In addition to specific programs designed to foster and maintain affordable housing, the City will review its zoning ordinances for prospective barriers to affordable housing development and make amendments as needed. The City is also currently in the process of developing an updated Analysis of Impediments

to Fair Housing Choice. As a result of this study, the City will undertake additional approaches to fostering fair and affordable housing.

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

Over the next year, the City of Fresno will continue to conduct lead-based paint inspections and, if a hazard is found, remediation. These actions will both reduce lead exposure risk and help to maintain the city's older, lower and moderately priced housing. Any housing rehabilitation activities conducted using HOME and CDBG funds will continue to monitor closely for any potential lead exposure.

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

Over the 2020 program year, the City of Fresno will continue to collaborate with the Continuum of Care through the ESG program to coordinate with homeless, housing, and service providers. Homeless service providers will continue to offer job search and resume assistance and connections to workforce development opportunities, as well as emergency shelter, transitional housing, and services such as food, clothing, and childcare. A focus on development of affordable housing and permanent housing that is located near transportation will also help poverty-level families access more employment opportunities, while lowering transportation and housing costs.

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

The City of Fresno has developed a robust administrative structure to manage its CDBG, HOME, ESG, and HOPWA funds. The City's Department of Housing and Community Development offers seminars for potential subrecipients, CHDOs, and contractors to learn more about the CDBG and HOME programs. In addition to working with organizations, the City's citizen participation process is designed to make engaged and informed citizens another vital part of the institutional structure. City plans focused on affordable housing, homelessness, and workforce development provide overarching goals and frameworks for collaboration among agencies and the use of federal, state, local, and other funding.

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

The City will work to enhance coordination between public and private housing and social service agencies by working to implement the strategies detailed in the *Street2Home Fresno County: A Framework for Action (2018)* plan, including addressing the gaps in the institutional and service delivery systems discussed in section SP-40 of this plan.

Public housing in Fresno is managed by the Fresno Housing Authority. The quasi-governmental authority is governed by 14 Commissioners – seven of whom are appointed as City Commissioners and seven of whom are appointed as County Commissioners. According to HUD's data on assisted housing, there are 630 public housing units in the city of Fresno. The Fresno Housing Authority will continue to partner with area agencies and organizations to offer opportunities for residents including:

- Housing counseling for first-time homebuyers
- Self-sufficiency training
- Services and housing for people experiencing homelessness, through programs such as the Fresno Housing Homeless Pilot Program and rapid rehousing programs
- Homelessness prevention

### PROGRAM SPECIFIC REQUIREMENTS

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

#### Introduction

Projects planned with CDBG funds expected to be available during the year are identified in the Projects Table (see AP-35). The following identifies program income that is available for use that is included in projects to be carried out.

## Community Development Block Grant Program (CDBG) Reference 24 CFR 91.220(I)(1)

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out.

The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed	\$0
2. The amount of proceeds from section 108 loan guarantees that will be	
used during the year to address the priority needs and specific objectives	\$0
identified in the grantee's strategic plan	
3. The amount of surplus funds from urban renewal settlements	\$0
4. The amount of any grant funds returned to the line of credit for which the	\$0
planned use has not been included in a prior statement or plan.	φυ
5. The amount of income from float-funded activities	\$0
Total Program Income	\$0

### Other CDBG Requirements

The amount of urgent need activities	\$0
2a. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income.	100%
2b. Specify the years covered that include this Annual Action Plan.	PY 2020

#### **HOME Investment Partnership Program (HOME) Reference 24 CFR 91.220(I)(2)**

1. A description of other forms of investment being used beyond those identified in Section 92.205 is as follows:

The City will not employ other forms of investment beyond those identified in Section 92.205.

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

The City will use the recapture provisions in all cases where a homebuyer subsidy exists. For HOME-funded homebuyer assistance loans, the Promissory Note, Deed of Trust, Declaration of Restrictions, and the Homebuyer Agreement are the enforcement mechanisms for the City's recapture provisions. The City will enforce minimum periods of affordability based on the amount of homebuyer subsidy provided to the buyer of not less than:

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

Recapture provisions are based on 24 CFR 92.254 (a) (5) (ii), which stipulates the conditions for recapture of the HOME investment used to assist low-income families in purchasing a home. Homebuyer recapture provisions are included in, or as a deed restriction rider, to the recorded deed of trust that secures a HOME loan Note, and requires recapture of funds if the home does not continue to be the borrower's principal residence or if all or any part of the property or any interest in it is sold, rented, conveyed or transferred during the duration of the period of affordability. Recapture provisions also stipulate that only the direct subsidy to the homebuyer is subject to recapture, which includes down payment assistance, closing cost, other home assistance provided directly to homebuyer, and the difference between fair market value and the sales price.

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

```
\frac{(HOME\ subsidy\ x\ Net\ proceeds)}{(HOME\ subsidy\ +\ Homeowner\ investment)} = HOME\ amount\ to\ be\ recaptured \frac{(Homeowner\ investment\ x\ Net\ proceeds)}{(HOME\ subsidy\ +\ Homeowner\ investment\ )} = Amount\ to\ homeowner
```

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

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

The City does not refinance existing debt for multifamily housing projects.

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

As required, a portion of funds will be awarded to a City-certified Community Housing Development Organization (CHDO) and the general development community for the new construction or substantial rehabilitation of affordable housing units available to lower income residents.

The TBRA program will be administered by the Fresno Housing Authority and will be targeted to homeless households as outlined in the Status Update of the City and County of Fresno 10- Year Plan to End Chronic Homelessness. Interested parties apply in person at the Fresno Housing Authority located at 1331 Fulton Street, Monday through Thursday between the hours of 8:00 am and 4:00 pm. An assessment and case management assignments are made in order to determine the level of assistance and program determination.

#### **Emergency Solutions Grant (ESG) Reference 91.220(I)(4)**

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

The City will continue to work cooperatively with Fresno County and the Fresno Madera Continuum of Care (FMCoC) to update the ESG Policies and Procedures. A copy of the current document is included in the Appendix. In addition, the City, County and FMCoC are also continuing to update and document written standards.

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

The Homeless Management Information System (HMIS) is used by all local homeless providers participating in the FMCoC. HMIS is a database used to track performance and outcomes for the agencies. As the HMIS Lead of the FMCoC, the Fresno Housing Authority plays a critical role in coordinating the annual Point-in-Time Count (PITC), collecting data, and distributing results from the annual count. The work of the Housing Authority in this regard meets and exceeds HUD requirements for the implementation and compliance of Homeless Management Information System Standards.

The FMCoC's Coordinated Entry System utilizes a common assessment tool – the Vulnerability Index (VI). The VI gave the community a way to identify and triage individuals most at risk. The VI was enhanced to the Vulnerability Index Service Prioritization Decision Assistance Tool (VI-SPDAT), which further triaged individual's priority for housing and other services.

All member agencies of the FMCoC have committed to using both the assessment tool and the Coordinated Entry System managed in partnership by FMCoC members. The assessment system is a client-centered process that streamlines access to the most appropriate housing interventions for individuals or families experiencing homelessness.

The Multi-Agency Access Program (MAP) Point at the Poverello House (Pov) was the first coordinated physical entry point collectively developed by the Community Conversations stakeholder group. The MAP Point at the Pov serves as a physical location of the Coordinated Entry System. The program has proved successful in its first two years and has begun expansion. Main components of this process include:

- 1. Assessment,
- 2. Navigation and Case Conferencing,
- 3. Housing Referral with Choice, and
- 4. Data Collection and Communication.

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

The City will issue a request for applications for the 2020- 2021 program year following the adoption of the consolidated plan by City Council. Prior to this release, the City consulted with the FMCoC on the needs of homeless in the community and the best use of ESG funds per category. Within the HUD defined homeless categories, the City of Fresno has determined the following sub-populations are a high priority for ESG services:

- Unsheltered homeless persons who are living outdoors or in other places not intended for human habitation;
- Chronically homeless persons;
- Homeless veterans;
- Victims of domestic violence; and
- Other homeless persons who have been identified as highly vulnerable.

In addition, the following populations are also a priority for ESG services in Fresno:

- Unaccompanied youth under the age of 18;
- · Youth aging out of the foster care system; and
- Households with children.

Proposals that propose to serve these populations will be given additional points in the scoring process. Proposals providing ESG services to populations outside of the identified high priority population will be considered for funding.

Bidders may propose to provide all or a portion of the ESG eligible activities stated above. Qualified/eligible vendor(s) are those agencies that are State certified non-profit entities, validly existing in California, with a tax-exempt IRS determination letter, as of the date the bid is submitted, or public agencies that are qualified to receive ESG funds under applicable federal rules. Qualified/eligible vendors are those that have a minimum of two years' experience serving the beneficiary populations and a minimum of two years' experience utilizing federal, state and/or local funding. Requests for applications will be widely distributed to an electronic distribution list of over 500 e-mail addresses.

4. If the jurisdiction is unable to meet the homeless participation requirement in 24 CFR 576.405(a), the jurisdiction must specify its plan for reaching out to and consulting with homeless or formerly homeless individuals in considering policies and funding decisions regarding facilities and services funded under ESG.

During the development of the Consolidated Plan, the City consulted with the FMCoC in making decisions related to ESG funds for the five year cycle. The FMCoC includes representation from the homeless community, which meet the homeless participation requirement in 24 CFR 576.405(a).

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

The following performance standards are outlined in the City's adopted written policies, however, updates to the standards are currently under way:

- 1. Decrease the number of homeless youth and households with children by 10% from the FMCoC Point in Time Count of January 2016.
- 2. Increase the percentage of participants in transitional housing that move into permanent housing to 80% or more.
- 3. Increase the percentage of participants that are employed at program exit to 25% or more.