

Draft - 2022-2023 Consolidated Annual Performance and Evaluation Report

Community Development Block Grant



COMMENT PERIOD: 8/28/23 – 9/12/23

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CR-05 - Goals and Outcomes

Progress the jurisdiction has made in carrying out its Strategic Plan and its Action Plan.
91.520(a)

This 2022-2023 Consolidated Annual Performance and Evaluation Report (CAPER) is the City of Gardena's report to the U.S. Department of Housing and Urban Development (HUD) describing the use of federal Community Development Block Grant (CDBG) funds. The CAPER reports on the second Program Year of the 2021-2025 Consolidated Plan period, covering July 1, 2021 to June 30, 2026.

The City receives CDBG funds from HUD on a formula basis each year, and in turn, implements projects and activities in furtherance of the Consolidated Plan. The CDBG programs generally provide for a wide range of eligible activities for the benefit of low- and moderate-income Gardena residents, as discussed below.

For the 2022-2023 program year, the City received \$601,759 of CDBG funds for a total formula grant allocation of \$601,759 . These funds were intended to be used to meet the Action Plan goals, including funding for fair housing and landlord-tenant mediation services, code enforcement, services for low- and moderate-income persons, and housing rehabilitation. However, due to various reasons, including staffing and program compliance challenges, resulted in the City not meeting its annual goals. While the City did implement some of the eligible activities in FY2022-2023, the City did not use CDBG funds but instead used its General Funds to subsidize these activities. Nonetheless, the City will be reallocating all of FY2022-2023 CDBG funds and allocating them towards FY2023-2024 eligible activities and reporting the accomplishments in the FY2023-2024 CAPER.

Table 1 provides a summary of the proposed five-year and one-year accomplishments for the period ending June 30, 2023, listed by each of the Strategic Plan Goals included in the 2021-2025 Strategic Plan of the Consolidated Plan.

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)

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

Goal	Category	2022-2023 Amount	Indicator	Unit of Measure	5-Year Strategic Plan			2022-2023 Program Year 2		
					Expected	Actual	Percent Complete	Expected	Actual	Percent Complete
Program Administration)	Planning & Administration	CDBG: \$100,350	Planning Administration	Other	5			1		
Fair Housing Services	Affordable Housing Non-Homeless Special Needs	CDBG: \$20,000	Fair Housing Services	People	250			50		
Services for Low & Moderate Income Persons	Homeless Non-Homeless Special Needs	CDBG: \$90,260	Public services to help low-income residents.	People	100			100		

Goal	Category	2022-2023 Amount	Indicator	Unit of Measure	5-Year Strategic Plan			2022-2023 Program Year 2		
					Expected	Actual	Percent Complete	Expected	Actual	Percent Complete
Code Enforcement	Affordable Housing	CDBG: \$230,000	Neighborhood Preservation & Improvement Preservation of Supply of Affordable Housing	Housing Units	125			25		
Owner-Occupied Rehabilitation	Affordable Housing	CDBG: \$161,149	Preserve the supply of affordable housing	Housing Units	500			25		

Assess how the jurisdiction's use of funds, particularly CDBG, addresses the priorities and specific objectives identified in the Action Plan, giving special attention to the highest priority activities identified.

The City did implement some of the proposed activities in FY2022-2023, However, the City did not use CDBG funds, but instead used its General Funds to subsidize these activities. Nonetheless, the City will be reallocating all of FY2022-2023 CDBG funds and allocating them towards FY2023-2024 eligible activities and reporting the accomplishments in the FY2023-2024 CAPER.

Figure 1 – Use of CDBG Funds

Strategic Plan Goal / Activity	Source	Allocation	Spent through 6/30/23	Percent Spent
1. Planning and Administration				
Program Administration	CDBG	\$100,350.00	\$0.00	0.00%
	Subtotal	\$100,350.00	\$0.00	0.00%
2. Fair Housing Services				
Fair Housing Services	CDBG	\$20,000.00	0.00	0.00%
	Subtotal	\$20,000.00	\$0.00	0.00%
3. Public Services				
Services for Low- & Moderate-Income Persons	CDBG	\$90,260.00	\$0.00	0.00%
	Subtotal	\$90,260.00	\$0.00	0.00%
4. Affordable Housing Preservation and Access				
Code Enforcement (LMA Residential)	CDBG	\$230,000.00	\$0.00	0.00%
Housing Rehabilitation	CDBG	\$161,149.00	\$0.00	0.00%
	Subtotal	\$391,149.00	\$0.00	0.00%
Total for all Goals:		\$601,759.00	\$0.00	0.00%

Figure 2–Program Year Accomplishments by Strategic Plan Goal

Strategic Plan Goal / Activity	Unit of Measure	Expected	Actual	Percent Accomplished
1. Program Administration CDBG Program Administration	Other	6,000		
2. Fair Housing Services Fair Housing Services	People	250		
3. Public Services Services for Low- & Moderate-Income Persons	People	100		
4. Affordable Housing Preservation and Access Code Enforcement (LMA Residential)	Households Inspected	500		
Housing Rehabilitation	Households	125		

Figure 3 – Use of CDBG-CV COVID-19 Funds

Strategic Plan Goal / Activity	Source	Allocation	Spent through 6/30/23	Percent Spent
1. CDBG-CV Emergency Assistance				
CDBG-CV Program Administration	CDBG-CV	\$	\$	%
CDBG-CV Rental/Utility and Sustenance Programs	CDBG-CV	\$	\$	%
	Subtotal	\$	\$	%
2. CDBG-CV Emergency Economic Opportunity				
CDBG-CV Small Business Program	CDBG-CV	\$	\$	%
	Subtotal	\$	\$	%
3. CDBG-CV Public Services				
Homelessness Prevention Services	CDBG-CV	\$	\$	%
	Subtotal	\$	\$	%
	Total for all Goals:	\$	\$	%
NOTES:				

Figure 4—Program Year Accomplishments for COVID-19 Funds

Strategic Plan Goal / Activity	Unit of Measure	Expected	Actual	Percent Accomplished
1. CDBG-CV Emergency Assistance				
CDBG-CV Program Administration	N/A	-	-	-
CDBG-CV Rental/Utility and Sustenance Programs	Households			%
2. CDBG-CV Emergency Economic Opportunity				
CDBG-CV Small Business Program	Businesses			%
3. Public Services				
Homelessness Prevention Services	People			%
NOTES:				

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

Race / Ethnicity	CDBG
White	
Black or African American	
Asian	
American Indian or American Native	
Native Hawaiian or Other Pacific Islander	
Other Multi-Racial	
Total	
Hispanic	
Not Hispanic	

Narrative

The City did implement some of the proposed activities in FY2022-2023, However, the City did not use CDBG funds, but instead used its General Funds to subsidize these activities. Nonetheless, the City will be reallocating all of FY2022-2023 CDBG funds and allocating them towards FY2023-2024 eligible activities and reporting the accomplishments in the FY2023-2024 CAPER.

CR-15 - Resources and Investments 91.520(a)

Identify the resources made available

Table 2 - Resources Made Available

Source of Funds	Resources Made Available in the 2022-2023 Action Plan	Amount Expended During Program Year
CDBG	\$601,759.00	\$0.00

Narrative

The federal resources allocated in the 2022-2023 Action Plan for the implementation of projects are identified in Table 3. A grand total of \$601,759.00 of CDBG funds were allocated to projects in the 2022-2023 Action Plan but no CDBG funds were expended. 2022-2023 funds will be reallocated to 2023-2024 projects.

Identify the geographic distribution and location of investments

Table 3 – Identify the geographic distribution and location of investments

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description
Citywide Area	100%	100%	All projects were Citywide projects.

*Note: The data in this table is generated by HUD's database. The City did not designate specific CDBG target areas in the 2021-2025 Consolidated Plan; therefore, 100 percent of all CDBG funds are represented under the "Citywide Area" designation.

Narrative

For the 2022-2023 Program Year, the City allocated 100 percent of its non-administrative CDBG investments for Program Year 2022-2023 to projects and activities that benefit low- and moderate-income persons throughout the City of Gardena.

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 Action Plan.

To address housing and community development needs in Gardena, CDBG entitlement grants are used to leverage a variety of funding resources in order to maximize the effectiveness of available funds. The City's former Redevelopment Agency was the primary non-federal source of leveraged funds. With the elimination of the City's Redevelopment Agency, the City's ability to leverage federal funds has been substantially reduced. The City and its development partners will continue to seek new opportunities to leverage other resources.

The City of Gardena did not receive HOME entitlement funds for the 2022-2023 program Year. HUD requires HOME Participating Jurisdictions (PJs) to match 25 percent of their HOME annual allocation. In accordance with 24 CFR 92.222, PJ's satisfying the distress criteria established by the HOME Program regulations are provided a match reduction. The match reductions are granted due to fiscal distress, severe fiscal distress, and Presidential disaster declarations. For those PJs with both fiscal distress and Presidential disaster match reductions, the PJ may take the higher match reduction for the current fiscal year.

When a local jurisdiction meets one of the distress criteria, it is determined to be in fiscal distress and receives a 50 percent reduction of match. If a local jurisdiction satisfies both of the distress criteria, it is determined to be in severe fiscal distress and receives a 100 percent reduction of match. The City of Gardena has received a 100% match reduction from HUD, and therefore, will match 0 percent of HOME Funds using non-federal funds.

Table 4 – Fiscal Year Summary - HOME Match Report

Fiscal Year Summary – HOME Match	
1. Excess match from prior Federal Fiscal Year	\$0.00
2. Match contributed during current Federal Fiscal Year	\$0.00
3. Total match available for current Federal Fiscal Year (Line 1 plus Line 2)	\$0.00
4. Match liability for current Federal Fiscal Year	\$0.00
5. Excess match carried over to next Federal Fiscal Year (Line 3 minus Line 4)	\$0.00

Table 5 – Match Contribution for the Federal Fiscal Year

Match Contribution for the Federal Fiscal Year								
Project No. or Other ID	Date of Contrib.	Cash (non-Federal sources)	Foregone Taxes, Fees, Charges	Appraised Land/Real Property	Required Infrastructure	Site Prep., Const. Materials, Donated labor	Bond Financing	Total Match
-	-	\$0	\$0	\$0	\$0	\$0	\$0	\$0

Table 6 – HOME Program Income

HOME Program Income – Enter the program amounts for the reporting period				
Balance on hand at beginning of reporting period	Amount received during reporting period	Total amount expended during reporting period	Amount expended for TBRA	Balance on hand at end of reporting period
\$0.00	\$0.00	\$0.00	\$0.00	\$0.00

HOME MBE/WBE report

Minority Business Enterprises and Women Business Enterprises – Indicate the number and dollar value of contracts for HOME projects completed during the reporting period

Table 7 – Minority Business and Women Business Enterprises

	Total	Minority Business Enterprises				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
Contracts						
Number	0	0	0	0	0	0
Dollar Amount	\$0	\$0	\$0	\$0	\$0	\$0.00
Sub-Contracts						
Number	0	0	0	0	0	0
Dollar Amount	\$0	\$0	\$0	\$0	\$0	\$0
	Total	Women Business Enterprises		Male		
Contracts						
Number	0	0		0		
Dollar Amount	\$0	\$0		\$0		
Sub-Contracts						
Number	0	0		0		
Dollar Amount	\$0	\$0		\$0		

Minority Owners of Rental Property – Indicate the number of HOME assisted rental property owners and the total amount of HOME funds in these rental properties assisted

Table 8 – Minority Owners of Rental Property

	Total	Minority Owners				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
Number	0	0	0	0	0	0
Dollar Amount	\$0	\$0	\$0	\$0	\$0	\$0

Relocation and Real Property Acquisition – Indicate the number of persons displaced, the cost of relocation payments, the number of parcels acquired and the cost of acquisition

Table 9 – Relocation and Real Property Acquisition

Parcels Acquired		0	\$0
Businesses Displaced		0	\$0
Nonprofit Organizations Displaced		0	\$0
Households Temporarily Relocated, not Displaced		0	\$0

Households Displaced	Total	Minority Property Enterprises				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
Number	0	0	0	0	0	0
Cost	\$0	\$0	\$0	\$0	\$0	\$0

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 10 – Number of Households

	One-Year Goal	Actual
Number of homeless households to be provided affordable housing units	2	0
Number of non-homeless households to be provided affordable housing units	25	0
Number of special-needs households to be provided affordable housing units	0	0
Total	27	0

Table 11 – 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 the rehab of existing units	0	0
Number of households supported through the acquisition of existing units	0	0
Total	0	0

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

One high priority affordable housing goal was identified in the 2021-2025 Consolidated Plan to provide the framework necessary to invest CDBG funds to address affordable housing needs. This included Affordable Housing Preservation, Development and Access. Tables 11 and 12 indicate the number of households supported with affordable housing assistance through the CDBG program during the 2022-2023 Program Year.

As the City's housing stock ages, a growing percentage of housing units may need rehabilitation to allow them to remain safe and habitable. The situation is of particular concern for low- and moderate-income homeowners who are generally not in a financial position to properly maintain their homes. As such, the 2022-2023 Action Plan allocated \$161,149 of

CDBG funds for the preservation of owner-occupied single-family dwellings as part of the Handy-Worker/Residential Rebate Program. This Program served ____ low- and moderate-income households during the year.

Affordable housing renovations are typically multi-year projects and are subject to the ability to secure funding from various sources. Often, the ability to meet the anticipated goals is dictated by various factors that can create disparities between goals and actual outcomes such as: funding availability, costs of raw materials, timing, and project schedules. Unexpected challenges are commonly encountered during the repair phase of the project which causes delays that impact project delivery.

Discuss how these outcomes will impact future annual action plans.

The 2021-2025 Consolidated Plan - Strategic Plan identified a high priority need to preserve the supply of affordable housing. During the 2022-2023 Program Year, the City of Gardena invested CDBG funds in the rehabilitation of __ () owner-occupied single-family dwellings. In future annual action plans, the City anticipates continuing to invest in affordable housing preservation in addition to investing in projects that will create new affordable housing opportunities for low-income residents.

As community needs change the City may need to undertake additional activities to best achieve the City's ability to meet its affordable housing goals. All future Annual Action Plans will provide additional information on any on-going affordable housing activities and the City will continue to assess and determine affordable housing needs that best utilize available funding sources.

Include the number of extremely low-income, low-income, and moderate-income families or households served by each activity where information on income by family size is required to determine the eligibility of the activity.

Table 12 – Number of Families or Households Served

Number Served	CDBG Actual
Extremely Low-Income	0
Low-Income	0
Moderate-Income	0
Total	0

Narrative Information

The 2021-2025 Consolidated Plan - Strategic Plan identified high priority affordable housing needs including preserving the supply of affordable rental and owner-occupied housing. To preserve housing that is already affordable to low-income homeowners, the City of Gardena's Handy-Worker/Residential Rebate programs rehabilitated __ owner-occupied units.

To address what HUD defines as “worst case housing need” the City provided funds in the 2022-2023 Action Plan for the preservation of the physical and functional integrity of existing housing units occupied by low- and extremely low-income residents who would otherwise continue to live in substandard housing because they were not in the financial position to properly maintain their home. This includes attempts to meet the needs of persons with disabilities by making necessary improvements which aid the mobility of the elderly and physically disabled such as shower units with seats, handrails, ramping and reconstructing doorways.

Addressing substandard housing conditions through housing preservation activities is a cost-effective way to invest limited resources to retain housing units that are already affordable to low- and moderate-income residents and ensure all economic segments of the community have the opportunity to live in decent housing.

In addition, the City amended its 2019-2020 Action Plan to utilize CDBG-CV funds to address worst-case housing needs that resulted from the coronavirus pandemic. This investment included funds for a rental/utility assistance and sustenance programs that assisted ____ households.

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 of Gardena is not the recipient of federal or state funds targeted to homeless individuals and families. However, the City of Gardena supported homeless and other special needs activities through community grants administered by the Youth and Family Services Bureau. This year, the City allocated approximately \$90,260 of CDBG funds to support the Youth and Family Services Bureau, a community-based nonprofit which focuses their work on addressing homelessness and providing services to special needs populations.

Preventing and ending homelessness is a HUD priority addressed nationally through coordination of regional strategies carried out locally by government agencies and a wide variety of community-based organizations and faith-based groups. To reach out to unsheltered homeless persons and assess their individual needs for the purpose of connecting them with available emergency shelter and transitional housing resources, the City of Gardena provided information and referrals to the Los Angeles County Continuum of Care (CoC) led by the Los Angeles Homeless Services Authority (LAHSA) and the organizations receiving CDBG funds for homelessness prevention activities.

During the 2020-2021 Program Year, the City funded the Youth and Family Services program CDBG-CV funds totaling \$_____ to provide emergency shelter and supportive services for Gardena residents who have become homeless or are at-risk homelessness. In June of 2022, the City reallocated an additional \$_____ of CDBG-CV funds to continue its partnership with Family Promise of South Bay to continue providing homeless prevention services to Gardena residents.

Addressing the emergency shelter and transitional housing needs of homeless persons

The ultimate solution to ending homelessness is transitional to permanent housing closely aligned with supportive services that ensure housing stability can be maintained. However, because the demand for affordable housing far outpaces the region's supply, the CoC continues to rely on its emergency and transitional housing system in order, to address the immediate needs of Los Angeles County's homeless population.

Los Angeles County has implemented policy and program changes aimed at ensuring homeless persons in Los Angeles County are rapidly housed and offered an appropriate level of support services to meet their circumstances and keep them stably housed. An increase in permanent supportive housing for the most vulnerable populations is attributed to Los

Angeles County homeless service providers re-tooling their programs and shifting their focus to moving people quickly into permanent supportive housing throughout the County.

To address the emergency shelter and transitional housing needs of homeless persons, the City continues to support the Youth and Family Services Bureau which provides emergency shelter and transitional housing assistance, counseling, and case management for families who are homeless or at-risk of homelessness. During the Program Year, Youth and Family Services Bureau served ____ unduplicated persons.

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

Inadequate discharge planning and coordination contributes to homelessness in situations where people are released from public institutions or public systems of care without having an appropriate mainstream or supportive housing option available upon discharge from an institutional setting. Public institutions such as jails, hospitals, treatment facilities, mental health facilities, youth facilities, and foster care homes are central to limiting the creation of newly homeless persons upon discharge.

In California, discharge coordination and planning is largely unregulated unless county or municipal ordinances provide rules preventing public institutions from discharging people into homelessness. One of the goals included in the Los Angeles Ten Year Strategy to End Homelessness is to formalize protocols and improve the coordination of discharge planning among key institutional systems of care and supervision. The goal calls for the CoC to close the “revolving door” to homelessness so that new persons do not find themselves living in the community without the social and economic support necessary to access and maintain themselves in a safe environment.

The City coordinated with the CoC and other subrecipients receiving CDBG funds to ensure that its HUD-funded programs are targeted, to the greatest extent feasible, to address the discharge of persons from publicly funded institutions or systems of care so that these individuals and families have access to public services and affordable housing opportunities necessary to prevent homelessness. The City will continue to explore additional ways to prevent and address homelessness caused by discharge from public institutions.

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

To address the needs of homeless families, families with children, veterans and their families, the City provided a total of \$90,260 of CDBG funds for the Youth and Family Services Bureau which provide homeless prevention program to help families achieve stability by connecting them to the appropriate resources based on their needs.

This program provides tailored counseling and case management services to families experiencing homelessness or at risk of homelessness. When paired with financial counseling, career coaching, and other available case management services, Gardena makes certain that individuals and families have the tools necessary to succeed.

Additionally, the City's partnership with LAHSA provides intensive, field-based engagement services and support that meets clients and their families where they live. As a result, the City has been able to leverage its partnerships with the County agencies to bolster its homeless outreach.

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

Actions taken to address the needs of public housing

The Gardena Housing Authority does not administer Section 8 and does not own HUD Public Housing; however, the City is within the service area of the Los Angeles Community Development Agency (LACDA), formerly known as the Housing Authority of the County of Los Angeles (HACoLA), for the purposes of Section 8 and Public Housing.

LACDA continues to serve the needs of residents through public housing and Section 8 vouchers. Specifically, the U.S. Census Bureau projects that the elderly in California will have an overall increase of 112 percent from 1990 to 2020. Los Angeles County mirrors this trend. To address the need for the growing senior population, in August of 2013, HUD approved LACDA's application to designate 13 public housing senior developments as housing for elderly families only (62 years or older).

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

LACDA actively encourages residents to be involved in the organization through resident councils and active participation in housing authority decisions via surveys and other forms of engagement. LACDA also maintains quarterly newsletters for Section 8 tenants, public housing residents, and Section 8 property owners.

LACDA encourages residents to explore homeownership opportunities. LACDA currently administers Family Self-Sufficiency (FSS) program for public conventional housing and Housing Choice Voucher program residents. The FSS program provides critical tools and supportive services to foster a resident's transition from financial and housing assistance to economic and housing self-sufficiency, most importantly homeownership.

To support this effort, LACDA utilizes marketing materials to outreach and further promote the program's requirements and benefits to all public housing residents. For families that are eligible to participate, a Contract of Participation (COP) is prepared to govern the terms and conditions of their participation and an Individual Training Service Plan (ITSP) is created that outlines the following: supportive services to be provided, activities to be completed by the participant, and agreed upon completion dates for the services and activities. The COP is valid for five years and may be extended to allow the family to meet their ITSP goals.

Actions taken to provide assistance to troubled PHAs

N/A, LACDA is designated as a High Performing Public Housing Agency.

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 barrier to affordable housing is a public policy or nongovernmental condition that constrains the development or rehabilitation of affordable housing, such as land use controls, property taxes, state prevailing wage requirements, environmental protection, cost of land and availability of monetary resources. Barriers to affordable housing are distinguished from impediments to fair housing choice in the sense that barriers are lawful and impediments to fair housing choice are usually unlawful.

Based on information gathered during community meetings, the Consolidated Plan Needs Assessment Survey, the Housing Element, and market analysis, the primary barriers to affordable housing in Gardena continue to be housing affordability and the lack of monetary resources necessary to develop and sustain affordable housing. The two barriers are related in the sense that demand for affordable housing exceeds the supply and insufficient resources are available to increase the supply of affordable housing to meet demand.

To address housing affordability and the lack of monetary resources for affordable housing, the City's Strategic Plan calls for the investment of a portion of CDBG funds to leverage possible acquisition, rehabilitation and resale activities in conjunction with Housing Asset Funds or other State or local resources. Although the City no longer has access to Redevelopment Housing Set-Aside funds, the City continued to leverage its CDBG funds to attract private and other available public resources to facilitate additional affordable housing. In future Program Years, the City will also leverage the forthcoming American Rescue Plan HOME funds to facilitate affordable housing development.

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

The primary obstacles to meeting the underserved needs of low- and moderate-income people include lack of funding from federal, state and other local sources, the high cost of housing that is not affordable to low-income people and the lack of availability of home improvement financing in the private lending industry.

To address these obstacles, the City continued to invest CDBG funds through the 2022-2023 Action Plan in projects that provided assistance to low- and moderate-income homeowners for home improvements, projects that provide public and public services to low- and moderate-income people and projects that prevent homelessness.

To address underserved needs, the City allocated 100 percent of its non-administrative CDBG funds for program year 2022-2023 to projects and activities that benefit low- and moderate-income people.

The Hand-Worker/Residential Rebate programs provides financing for home improvements necessary to ensure Gardena residents can continue to live in quality housing that is already affordable to the occupants.

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

The Residential Lead Based Paint Hazard Reduction Act of 1992 (Title X) emphasizes prevention of childhood lead poisoning through housing-based approaches. To reduce lead-based paint hazards, the City of Gardena's Hand-Worker/Residential Rebate Program conducted lead-based paint testing and risk assessments for each property assisted that was built prior to January 1, 1978 and incorporated safe work practices or abatement into the scope of work as required to reduce lead-based paint hazards in accordance with 24 CFR Part 35.

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

During the Program Year, the City supported the following strategies and actions to reduce the number of poverty-level families:

- Supported activities that ensure equal access to housing opportunities;
- Supported activities that improve neighborhoods, facilities & infrastructure;
- Supported activities that promote economic opportunity;
- Supported activities that preserve the supply of housing that is affordable to low- and moderate-income residents; and
- Supported activities that provide services to low-income residents, those with special needs and the homeless.

In addition to these efforts, mainstream state and federal resources also contributed to reducing the number of individuals and families in poverty. Federal programs such as the Earned Income Tax Credit and Head Start provided a pathway out of poverty for families who were ready to pursue employment and educational opportunities. Poverty-level families also had access to CalWORKS, CalFresh (formerly food stamps) and Medi-Cal. Together these programs provided individuals and families with employment assistance, subsidy for food, medical care, childcare and cash payments to meet basic needs such as housing, nutrition, and transportation.

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

The institutional delivery system in Gardena is high-functioning and collaborative — particularly the relationship between local government and the nonprofit sector comprised of a network of capable community-based organizations that are delivering a full range of services to residents.

In order to support and enhance this existing institutional structure, the City of Gardena collaborated with nonprofit agencies to ensure that the needs of low- and moderate-income residents were met as envisioned within the 2021-2025 Consolidated Plan - Strategic Plan.

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

To enhance coordination between public and private housing and social service agencies, the City continued consulting with and inviting a wide variety of agencies and organizations involved in the delivery of housing and supportive services to low- and moderate-income residents to participate in Gardena - particularly in low- and moderate-income areas.

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

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

To ensure that CDBG funds are used efficiently and in compliance with applicable regulations, the City provided technical assistance to all subrecipients at least once per year and monitored subrecipients throughout the program year.

Technical Assistance

To enhance compliance with federal program regulations, the Finance Department provided technical assistance to prospective applicants for any CDBG Notice of Funding Availability (NOFA) upon request to review the Strategic Plan goals, program requirements and available resources with potential applicants. Additionally, technical assistance was provided during the implementation of CDBG funded projects to ensure that appropriate resources were provided in furtherance of compliance with the program regulations.

Activity Monitoring

All activities were monitored, beginning with a detailed review upon receipt of an application to determine eligibility, conformance with a National Objective and conformance with an Action Plan goal. This review also examined the proposed use of funds, eligibility of the service area, the intended beneficiaries, and likelihood of compliance with other federal requirements such as the National Environmental Policy Act, the System for Award Management (SAM) debarment list, prevailing wage, Minority and Women Business Enterprise, Section 3 and federal acquisition and relocation regulations, as applicable.

Subrecipients were required to submit an audit and other documentation to establish their capacity, and any findings noted in the audit were reviewed with the applicant. Eligible applications were then considered for funding. Community Development Department staff reviewed quarterly performance reports and invoices throughout the year as part of desk monitoring. For CDBG public service activities, an on-site monitoring will be conducted in person, or via teleconference, to ensure compliance. These reviews will include both a fiscal and programmatic review of the subrecipient's activities. The reviews will determine that each subrecipient is in compliance with the program regulations and City contract. Areas of review will include overall administration, financial systems, appropriateness of program expenditures, program delivery, client eligibility determination and documentation, reporting systems, and achievement toward achieving contractual goals. Following the monitoring visit, a written report will be provided delineating the results of the review and any findings of non-compliance and the required corrective action. Subrecipients will be given 30 days to provide the City with corrective actions taken to address any noted findings. For CDBG capital projects, monitoring also includes compliance with Regulatory Agreement requirements.

For CDBG-CV funded activities, a Duplication of Benefits policies and procedures were established in addition to the Subrogation Agreement and DOB Certification. These policies and procedures established the process for which the City will use to prevent the occurrence of duplication of benefits in accordance with the Stafford Act (section 312), as amended, the Disaster Recovery Reform Act of 2018, the Coronavirus Aid, Relief, and Economic Security Act, and the OMB Cost Principles (2 CFR § 200).

Additionally, businesses assisted through the Small Business Assistance component of the Emergency SBA Relief Grant program must provide ongoing reporting documenting program compliance and job creation/ retention as follows:

- Job creation/ retention form and supporting documentation for a period of six (6) months after the job is created or retained unless otherwise specified in the grant agreement
- Program expense documentation
- EDD DE-9 (Quarterly Contribution Return and Report of Wages Form) and DE 34 (Report of New Employee(s) Form) Forms, and the quarterly summary report must be submitted to the City quarterly during the term of the grant agreement

The grant recipient will be required to provide the City with verification for all new hires resulting from the investment of CDBG funds, during the term identified in the grant agreement.

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.

In accordance with the City's adopted Citizen Participation Plan, a public notice was published in the *Press Telegram* on September X, 202X, notifying the public of the availability of the Consolidated Annual Performance and Evaluation Report for a 15-day public review and comment period. A copy of the public notice is included in Appendix A.

The draft CAPER was available from September __, 2022 to September __, 2022 at the City of Gardena Planning Department, Gardena Public Library, and on the City's website.

A public hearing was conducted before the City Council on Tuesday, September __, 2023 to solicit comments from residents and interested parties. A summary of any written or oral comments received during the public hearing is included in Appendix B.

CR-45 - CDBG 91.520(c)

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

In review of the progress made toward accomplishing the goals established in the 2021-2025 Consolidated Plan – Strategic Plan during the Program Year, there is no need to change the program objectives or the projects and activities using CDBG funds.

CDBG and CDBG-CV funded activities are contributing significantly to the City's progress toward meeting the high priority needs identified in the Consolidated Plan. As shown in Table 1 on page 2 of this document, CDBG funds are contributing to four of the six Strategic Plan goals including Fair Housing Services, Neighborhood Services, Economic Opportunity Program, and Affordable Housing Preservation and Access.

The City's residents faced new challenges during the COVID-19 pandemic including job loss, food insecurity, housing insecurity, and disruption to normal in-person public services. Nonetheless, the City staff continuously worked to deliver high quality services to residents throughout the duration of the stay-at-home orders. City Departments altered their program delivery models to promote social distancing while continuing to provide essential services to low- and moderate-income residents. There were a few activities that were not able to convert to a socially distanced delivery model, such as housing rehabilitation activities that would require in-person contact with contractors and homeowners. As a result, only __ (__) Home Improvement projects listed in Figures 1 and 2 earlier in this report were completed. The City is currently making progress to ensure these projects are completed during the 2023-2024 Program Year.

The addition, \$700,000 of CDBG-CV funds fueled a significant increase in the City's capacity to address the challenges Gardena residents faced during the COVID-19 pandemic. HUD's decision to almost double the size of Gardena's HUD entitlement grant programs allowed the City to develop additional programs to better address the needs of low- and moderate-income residents.

