

# City of Rialto

# CONSOLIDATED ANNUAL PERFORMANCE AND EVALUATION REPORT (CAPER) DRAFT

Program Year 2021-2022

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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 2021-2022 Consolidated Annual Performance and Evaluation Report (CAPER) is the City of Rialto's report to the U.S. Department of Housing and Urban Development (HUD) describing the use of federal Community Development Block Grant (CDBG) funds during the second program year of the 2020-2024 Consolidated Plan period, covering July 1, 2021, to June 30, 2022.

The City receives CDBG funds from HUD on a formula basis each year, and in turn, implements projects and awards grants to nonprofit, or public organizations for projects in furtherance of the adopted Consolidated Plan. The CDBG program generally provides for a wide range of eligible activities for the benefit of low- and moderate-income Rialto residents.

For the 2021-2022 program year, the City received \$1,266,458 of CDBG funds from HUD, which were combined in the Action Plan with \$184,826 of prior years CDBG funds for a total investment of \$1,451,284. This investment of CDBG funds was a catalyst for positive change in the community. Together with other federal, state and local investments, HUD resources allowed the City and its partners to:

- Provide fair housing services to 283 residents
- Beginning work on Building 300 of the Community Center which includes updating of the facilities Building Code and Americans with Disability Act (ADA) requirements
- Provide Public Services to 163 Low-income residents in the City of Rialto
- Ensure payments were made to the City's Section 108 loan repayment totaling \$489,383.28

#### COVID-19 Allocations

In response to the COVID-19 pandemic, Congress passed the Coronavirus Aid, Relief, and Economic Security (CARES) Act and it was signed into law on March 27, 2020, authorizing \$2.2 trillion for a variety of measures to prevent, prepare for, and respond to the COVID-19 pandemic. Under the CARES Act, HUD provided special allocations of CDBG funds to the City of Rialto. In total, the City received \$1,339,584 of CDBG-CV funds to prevent, prepare for, and respond to the COVID-19 Pandemic.

CDBG-CV funds are being used by the City of Rialto to address homelessness, senior food insecurity, workforce development, Small Business Assistance, and Rental, Mortgage, and Utility Assistance.

The City of Rialto has made progress toward their goals for CDBG-CV. The City has expended

\$290,854.64 thus far of CDBG-CV funds.

**Table 1** provides a summary of the five-year and one-year accomplishments for the period ending June 30, 2022, arranged by each of the Strategic Plan Goals included in the 2020-2024 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)

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

Goal	Category	2021-2022 Amount	Indicator	Unit of Measure	5-Ye	5-Year Strategic Plan 2021-2022 Program Ye		2021-2022 Program Year		ear
		Allocated			Expected	Actual	Percent Complete	Expected	Actual	Percent Complete
Planning	Planning and Administration	CDBG: \$220,813	Other	Other	N/A	N/A	N/A	N/A	N/A	N/A
Community Facilities & Infrastructure Improvement	Non-Housing Community Development	CDBG: \$453,330	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	30,000 People	3,000	10.00%	6000	0	0.00%
Fair Housing Services	Affordable Housing	CDBG: \$32,478	Other	Other	2,500 Persons	739	29.60%	500	283	56.60%
Housing Preservation	Affordable Housing	CDBG: \$121,435	Homeowner Housing Rehabilitated	Household Housing Unit	24 Households	0	0.00%	5	0	0.00%
Public Services for low-income residents	Non-Housing Community Development	CDBG: \$189,968	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	3,500 Persons	405	12.00%	468	163	34.83%
	Affordable Housing Non-Homeless Special Needs		Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	2684 Persons	126	4.69%	2684	126	4.69%
COVID-19 Response	Non-Housing Community Development Economic Development	CDBG-CV: \$1,339,584	Businesses Assisted	Business Assisted	50 Businesses	12	24.00%	50	12	24.00%

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

City of Rialto

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

During the program year, the City and its housing and community development partners made progress on several 2021-2022 activities as well as some multi-year activities that continued during the program year. All CDBG funded activities addressed specific high priority objectives identified in the 2020-2024 Consolidated Plan.

During the FY 2021-2022 program year, the CDBG-funded Fair Housing Services serviced a total of 283 Rialto residents, just short of their goal of servicing 500. The amount of people served, continues to confirm that a high need exists for these services in the community.

The City provided public service assistance to 163 low- and moderate-income residents. During the second quarter of the program year, the City was made aware that the non-profit Veterans Partnering with Communities, requested to terminate their agreement with the City due to unforeseen circumstances. In addition, the non-profit Get Better Through Hoops program did not execute the agreement with the City. Therefore, these programs did not utilize their CDBG allocations and there is no accomplishment data for these services.

The majority of CDBG funds were allocated to public facilities and infrastructure improvement activities to benefit low- and moderate-income neighborhoods, provide disabled access, and the preservation of community facilities. Key accomplishment include construction beginning for Wing 300 of the Community Center ADA Improvements project. The project will include updating the facilities building codes and Americas with Disabilities Act (ADA) requirements. This project is set to be completed in the fall of 2022. In addition, the Sidewalk Curb and Gutter project was awarded a construction contract, which will consist of installation of new, removal, repair and/or replacement of curbs, gutters, driveway approaches, sidewalks, curb ramps, alley intersections, and all associated work as identified along Palm Avenue, Orange Avenue, Rialto Avenue and Willow Avenue between the Metrolink Station (261 S. Palm Avenue) and the Rialto City Hall (150 S. Palm Avenue). Construction began in May 2022 and is expected to be completed in December 2022.

Each of the activities that were underway during the 2021-2022 program year are listed in **Figure 1**, including the amount of CDBG funds allocated to the activity and the amount spent as of June 30, 2021. **Figure 2** provides the numeric accomplishment goal and the amount accomplished as of June 30, 2022.

Figure 1 – Use of CDBG Funds

Strategic Plan Goal/Activity	Source	Allocation	Spent through 6/30/22	Percent Spent
1. Program Administration				
CDBG Program Administraton	CDBG	\$220,813.00	\$220,813.00	100%
Inland Fair Housing & Mediation Board	CDBG	\$32,478.00	\$32,478.00	100%
2. Community Facilities & Infrasturcture Improvemennt				
2019 Community Center Building/Tenant Improvements Building 200	CDBG	\$490,749.00	\$490,749.00	100%
2020 Community Center Building/Tenant Improvements Building 300	CDBG	\$439,275.00	\$167,629.10	38%
2021 Community Center Building/Tenant Improvements Building 400	CDBG	\$331,895.00	\$0.00	0%
2021 Sidewalk, Curb, Gutter	CDBG	\$121,435.00	\$2,250.00	2%
3. Housing Preservation				
2021 Mobile Home Program	CDBG	\$121,435.00	\$0.00	0%
4. Public Services for low-income residents				
Inland Equity Community Land Trust	CDBG	\$13,244.67	\$6,289.39	47%
Veterans Partnering with Communities	CDBG	\$13,244.67	\$0.00	0%
Easterseals South California	CDBG	\$20,000.00	\$13,264.63	66%
Legal Aid Society of San Bernardino	CDBG	\$13,244.67	\$13,244.42	100%
Rialto Family Health Services	CDBG	\$13,244.67	\$13,244.67	100%
San Bernardino Community Services	CDBG	\$13,244.66	\$5,705.67	43%
National Council of Negro Women/Bethune Center	CDBG	\$42,000.00	\$41,998.88	100%
Get Better Through Hoops	CDBG	\$13,244.66	\$0.00	0%
City of Rialto: Senior Services Division	CDBG	\$48,500.00	\$46,828.98	97%
5. Section 108 Loan Payment				
2021-2022 Seciton 108 Loan Payment	CDBG	\$433,261.00	\$489,383.28	113%
	Total	\$2,381,309.00	\$1,543,879.02	65%

Strategic Plan Goal/Activity	Unit of Measure	Expected	Actual
1. Program Administration Activities			
CDBG Program Administration	N/A	N/A	N/A
2021 Inland Fair Housing & Mediation Board	People	500	283
2. Community Facilities & Infrastructure Improvement			
2019 Community Center Building/Tenant Improvements  • Building 200	Public Facilities	1	1
2020 Community Center Building/Tenant Improvements  • Building 300	Public Facilities	1	0
2021 Community Center Building/Tenant Improvements  • Building 400	Public Facilities	1	0
3. Housing Preservation			
2021 Mobile Home Repair Program	Household	5	0
4. Public Services for low-income residents			
Inland Equity Community Land Trust	People	20	14
Veterans Partnering with Communities	People	NA	NA
Easterseals South California	People	170	19
Legal Aid Society of San Bernardino	People	66	79
Rialto Family Health Services	People	20	12
San Bernardino Community Services	People	26	8
National Council of Negro Women/Bethune Center	People	26	19
Get Better Through Hoops	People	NA	NA
City of Rialto: Senior Services Division	People	100	12
5. Section 108 Loan Payment			
2021-2022 Section 108 Loan Repayment	Other	1	1

Figure 2 – Program Year Accomplishments by Strategic Plan Goal

### 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)

	CDBG
White	287
Black or African American	136
Asian	3
American Indian or American Native	3
Native Hawaiian or Other Pacific Islander	6
American Indian/Alaskan Native White	0
Asian & White	0
Black/African American & White	0
American Indian/Alaskan Native & Black	0
Other	11
Total	446
Hispanic	227
Not Hispanic	219

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

#### **Narrative**

**Table 2** provides an aggregate of race and ethnicity data for persons and households served during the program year based on accomplishment data from all CDBG activities reported in HUD's Integrated Disbursement and Information System (IDIS).

Based on the information in **Table 2**, a diverse array of persons and households benefitted from CDBG funded housing, public facilities or public service projects during the program year.

<sup>\*</sup>Note: The data in this table is supplied by HUD's database and reports from the Fair Housing Foundation. The figures in this table represent the sum of the reported number of people, families, households or housing units reported during the fiscal year, without regard to the number of people in each family, household or housing unit.

### CR-15 - Resources and Investments 91.520(a)

### Identify the resources made available

Source of Funds	Resources Made	Amount Expended
	Available	During Program Year
CDBG	\$2,381,309.00	\$1,543,879.02

Table 3 - Resources Made Available

#### **Narrative**

The federal, state, local and private resources available for the implementation of projects during the 2021-2022 program year are identified in **Table 3**. The total amount expended during this program year was \$1,543,879.02; representing 65% of the resources made available during the 2021-2022 program year. Table 3 includes carryover funds from previous years which were allocated to Community Facilities and Infrastructure Improvements which continue to be carried out during the reporting period.

Under the CARES Act, HUD provided special allocations of CDBG funds to the City of Rialto. In total, the City received \$1,339,584 of CDBG-CV funds to prevent, prepare for, and respond to the COVID-19 Pandemic as follows:

CDBG-CV \$1,339,584 Total: **\$1,339,584** 

### Identify the geographic distribution and location of investments

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description
CDBG Low- and Moderate-Income Census Tract/Block Group	72%	72%	All public facility improvements targeted L/M income Census Tract/Block Groups
Citywide	28%	28%	All public service and housing activities targeted all L/M residents of the City

Table 4 – Identify the geographic distribution and location of investments

#### **Narrative**

During 2021-2022, the City expended CDBG funds in a manner consistent with the National Objectives of the program. One-hundred percent of the CDBG funds expended were for activities that benefit low to moderate income persons. The percentage includes Administration and Planning activities (CDBG Program Administration, Fair Housing Activities, and Section 108 Loan Repayment).

### Leveraging

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

To address housing and community development needs in Rialto, the City leverages its CDBG entitlement grant with a variety of funding resources in order to maximize the effectiveness of available funds such as appropriate state, local and private resources.

The City also utilized existing City buildings (Rialto Resource Center, Rialto Community Center, and Grace Vargas Senior Center) to house several subrecipients, host and allocate space for CDBG subrecipients space to run CDBG funded activities and provide meeting space for the various public services agencies that were funded with CDBG dollars during the program year to assist Rialto residents.

Other examples of funds that were leveraged but difficult to account include but not limited to those listed below:

#### **Federal Resources**

- Continuum of Care (CoC) Program
- HUD Veterans Affairs Supportive Housing (HUD-VASH)
- Supportive Housing for the Elderly (Section 202)
- Supportive Housing for Persons with Disabilities (Section 811)
- Housing Opportunities for Persons with AIDS (HOPWA)
- Youth build
- Federal Low-Income Housing Tax Credit Program
- Department of Transportation Grants
- Department of Energy Grants
- Federal Highway Administration

#### **State Resources**

- State Low-Income Housing Tax Credit Program
- Building Equity and Growth in Neighborhoods Program (BEGIN)
- Multifamily Housing Program (MHP)
- Housing Related Parks Grant
- CalHFA Single and Multi-Family Program
- Mental Health Service Act (MHSA) Funding
- Prop 47 Board of State & Community Corrections
- Justice Assistance Grant (JAG) Program
- Homeless Emergency Aid Program (HEAP)

#### **Local Resources**

San Bernardino County Homeless Partnership (SBCHP)

City of Rialto

- Housing Authority of San Bernardino County (HACSB)
- Southern California Home Financing Authority (SCHFA)
- General Fund

### **Private Resources**

- Federal Home Loan Bank Affordable Housing Program (AHP)
- Community Reinvestment Act Programs
- United Way Funding
- Private Contributions

### **Matching Requirements**

The CDBG regulations do not require a match contribution; the City encourages its awarded departments and agencies to leverage the CDBG funding to further aid in the assistance provided to its residents. The City of Rialto does not receive HOME or ESG funds as part of its allocation.

### 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.

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

**Table 5- Number of Households** 

	One-Year Goal	Actual
Number of households supported	0	0
through rental assistance		
Number of households supported	0	0
through the production of new units		
Number of households supported	5	0
through the rehab of existing units		
Number of households supported	0	0
through the acquisition of existing		
units		
Total	5	0

**Table 6 - Number of Households Supported** 

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

The City recently amended their guidelines for the Mobile Home Repair Program to include homes built prior to 1978. During the 2021-2022 program year, the City was not successful in finding contractors, therefore there were zero projects completed during the program year. However, the program was successful in receiving over 20 applications and pre-approving at least 3 residents who are in the process of selecting a contractor. This program will be carried into the next fiscal year and is projected to begin during the 1st quarter of program 2022-2023.

### Discuss how these outcomes will impact future annual action plans.

In future annual action plans, the City anticipates continuing to invest CDBG funds to address housing affordability for homeowners through the rehabilitation of existing substandard units to

the City's most vulnerable residents – low-to-moderate residents. The City will continue to focus its CDBG funds towards the Mobile Home Repair Program in future action plans.

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

Number of Households Served	CDBG Actual
Extremely Low-income	0
Low-income	0
Moderate-income	0
Non-Low Mod	0
Total	0

Table 7 – Number of Households Served

### **Narrative Information**

The 2020-2024 Consolidated Plan - Strategic Plan identified affordable housing needs as a high priority including preserving the supply of affordable housing. By providing Mobile Home Repair Program to low-to-moderate income residents, the City attempted to address the priority need as part of the 2021-2022 Action Plan. The City is planning on programming CDBG funds to continue to pursue preserving the supply of affordable housing in upcoming program years.

In an effort to address worst case needs, the City is prioritizing the needs that were addressed in the Plan by funding capital improvement projects which identify barriers to those with disabilities. The City will address those barriers through the rehabilitation of its Community Center Rehabilitation Project which were scheduled to be completed in the 2021-2022 program year due to slowdowns in construction due to the COVID-19 Pandemic.

### 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

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. Consistent with this approach, the City of Rialto supports the efforts of San Bernardino County Continuum of Care (CoC) and its member organizations that address homelessness throughout San Bernardino County and HUD's collaboration with other federal, state and local agencies implementation of the "Opening Doors: Federal Strategic Plan to Prevent and End Homelessness". In alignment with these strategies, the City programmed CDBG funds to support local service providers with programs to prevent homelessness and to preserve the supply of affordable housing in Rialto for low- and moderate-income residents.

The City of Rialto's progress in reaching out to homeless persons, especially unsheltered persons, and assessing their individual needs relies on the data that comes from the City's participation in the annual countywide homeless survey. The City of Rialto participates in the annual Countywide homeless survey each year, Homeless Point-In-Time Count. The 2022 count took place in February 2022. During the count, Rialto had 70 unsheltered persons in the City, which was a decrease from previous years.

During the previous program year, the City utilized its HEAP grant programs to facilitate outreach, provide client intake, and provide actual services to homeless persons, especially those unsheltered, and assessing their induvial needs through outreach services to obtain housing vouchers, transportation costs, assistance of obtaining and maintaining vital documents (phone, state issued IDs, P.O. Boxes) and most importantly mental health services.

### 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 San Bernardino County's homeless population.

The CoC is improving the efficacy of emergency shelters and the access system including their seasonal emergency shelters and the County's three (3) Cold Weather Shelter facilities, the closest being located in the City of Redlands.

The CoC continues to support transitional housing in special circumstances, the CoC is currently examining ways to shorten stays in emergency shelters and transitional housing so that resources may be more directed towards programs providing assistance with the emphasis of the "Housing First" model and low barrier approach for chronically homeless individuals and families and rapid rehousing and low barrier approach for non-chronic homeless individuals and families to help obtain and maintain permanent affordable housing. The County further stresses the importance of increasing the number of permanent supportive housing units in order to meet the needs of those homeless persons with disabling conditions.

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

An individual or family is considered to be at-risk of becoming homeless if it experiences extreme difficulty maintaining their housing and has no reasonable alternatives for obtaining subsequent housing. Homelessness often results from a complex set of circumstances that require people to choose between food, shelter and other basic needs. Examples of common circumstances that can cause homelessness include eviction, loss of income, insufficient income, disability, increase in the cost of housing, discharge from an institution, irreparable damage or deterioration to housing, and fleeing from family violence.

The most effective and cost-efficient means to address homelessness is to prevent episodes of homelessness from occurring in the first place. San Bernardino County's current CoC system encourages services aimed at reducing incidences of homelessness, including being discharged from publicly funded institutions and systems of care and receiving assistance from public or private agencies through:

- Emergency Rental (Rapid Rehousing Assistance) and Utility Assistance: Short-term financial assistance to prevent eviction and utility shut-off.
- Credit Counseling: Financial counseling and advocacy to assist households to repair credit

history.

- Legal/Mediation Services: Tenant-landlord legal/mediation services to prevent eviction.
- Food Banks and Pantries: Direct provision of food, toiletries and other necessities.
- Transportation Assistance: Direct provision of bus vouchers and other forms of transportation assistance.
- Clothing Assistance: Direct provision of clothing for needy families and individuals.
- Prescription/Medical/Dental Services: Direct provision of prescription, medical and dental services.
- Workforce Development: Direct provision of job training services designed to develop and enhance employment skills, as well as to help clients secure and retain living wage jobs.
- Information & Referral Services: Direct provision of 24-hour/7-days-a-week call center services to provide health and human service information to at-risk populations.
- Recuperative care for homeless individuals who become ill or injured.

The City of Rialto funded the Inland Fair Housing and Mediation Board with CDBG funds to provide fair housing, tenant/landlord mediation, education materials on homeowner and renter's legal rights and legal services for residents through consultations, and one-on-one meetings where Fair Housing and landlord/tenant issues arise. These services are provided to prevent undue evictions that could lead to homelessness.

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

In support of CoC efforts, the City's Consolidated Plan - Strategic Plan and Annual Action Plans call for the use of CDBG and leveraged funds to support activities implemented by local nonprofit organizations that provide services to help get job training; assist in legal matters for Rialto residents that can play an impact on losing a home; and provide fair housing services and mediation between landlords and tenants that can prevent and eliminate homelessness. The City has also leveraged CDBG funds to preserve the supply of affordable housing in Rialto through Rialto Successor Agency funds and the Mobile Home Repair Program.

In addition, efforts are underway at the regional level to shorten the period of time that individuals and families are experience homelessness and to prevent individuals and families who have recently become homeless are at-risk of becoming homeless again. The 2-1-1 is working with public service agencies to analyze resources and funding being used to operate

transitional housing programs and to consider how these resources could be used in alignment with the best practices (i.e. rapid re-housing and permanent housing) to end homelessness with the emphasis of the "Housing First" model. Many transitional housing providers are working to end homelessness by evaluating strategies to lower program threshold requirements and improve outcomes including shorter shelter stays and more rapid transitions to permanent housing. The County also stresses the importance of increasing the number of permanent supportive housing units within its jurisdiction and increase in rapid rehousing assistance which helps individuals and families quickly exit homelessness to permanent housing without any preconditions for obtaining assistance (such as employment, income, absence of criminal record, or sobriety).

The City's CDBG funds in the 2021-2022 program year also funded a wide variety of programs such as Rialto the Rialto Family Health Services, which assisted veterans with housing, transitional housing, and benefit establishment. CDBG funding for the NCNW Bethune Center also assisted with pre-employment job skills training, resume building, interview skills and job search assistance in the efforts to assist those who are unemployed or seeking additional employment to support the household income and to ensure housing isn't lost.

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

### Actions taken to address the needs of public housing

The City of Rialto Housing Authority was formed under State of California Housing Authority Law to actively improve existing neighborhoods and develop affordable housing opportunities using local, state and federal resources. The Rialto Housing Authority does not administer Section 8 and does not own HUD Public Housing; however, the City is within the service area of the Housing Authority of the County of San Bernardino (HACSB) for the purposes of Section 8 and Public Housing.

To enhance the quality of HUD Public Housing units, HACSB continued to work towards converting existing HUD Public Housing units under HACSB's management and control to Section 8 units as part of HUD's Rental Assistance Demonstration (RAD) program.

HACSB continues to maintain and expand the supply of affordable housing units in the City and throughout the County through its partnerships with the State of California and San Bernardino County Department of Community Development and Housing.

In the fall of 2017, HACSB celebrated the grand opening of the Olive Meadow Affordable Housing Community, consisting of 62 high-quality affordable homes representing the first phase of the Arrowhead Grove Housing Community Revitalization Project (formerly the Waterman Gardens Affordable Housing Community Project). Construction commenced on the second on site phase of the Arrowhead Grove mixed-income housing development in October 2019. The Arrowhead Grove Housing Community Revitalization Project was awarded \$20 million in Affordable Housing and Sustainable Communities (AHSC) program funds, \$55 million in tax-exempt bond allocations and \$22.5 million in low-income tax credits. The new construction will provide 184 mixed-income family apartments comprised of 147 affordable one- to four-bedroom family units, 35 market-rate units and 2 units for property managers, (HACSB 2019 & 2020 Annual Report).

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

HACSB encourages residents to be actively involved in the community and in the management of public housing developments through resident councils and numerous opportunities for feedback such as community meetings and surveys. HACSB and the City also actively encourage and promote public housing residents to explore homeownership opportunities and programs through HACSB's Homeownership Assistance Program (HAP) targeted at current residents. HACSB also encourages and supports residents in participating in homebuyer counseling programs and recommends residents use the family self-sufficiency escrow account to save money towards homeownership. Under the Family Self-Sufficiency (FSS) Program, participants develop a five-year training and service plan that outlines the steps to become employed,

increase their earnings, and become independent of government assistance. Upon graduation of the FSS Program, graduates are allowed to use the escrow account funds towards homeownership (HACSB 2019 Annual Report).

Under the Housing Authority's HAP program, families are provided mortgage assistance for up to 15 years for working families and up to 30 years for disabled families. A total of 248 families have become homeowners through the program since 2000 (HACSB 2020 Annual Report). In addition, the City also provides a number of resources on services for foreclosure prevention and counseling.

### Actions taken to provide assistance to troubled PHAs

Not applicable. HACSB is considered a High Performing PHA.

### Discussion

HACSB is well-positioned to maintain and expand the supply of affordable housing units in the City and throughout the County through its partnerships with the State of California, San Bernardino County Department of Community Development and Housing, the City of Rialto, and other cities throughout the county.

## 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)

Based on information gathered during the Consolidated Plan community meetings, the Consolidated Plan Needs Assessment Survey, the 2013-2021 Housing Element and market analysis, the primary barriers to affordable housing in Rialto and throughout California were housing affordability and the lack of monetary resources necessary to develop and sustain affordable housing. The two (2) 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 2020-2024 Consolidated Plan and Strategic Plan calls for the investment of a significant portion of CDBG funds for the rehabilitation and preservation of 24 existing affordable housing units over the next five years. 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, including land conveyed to the City for the purpose of affordable housing, to facilitate affordable housing development. This strategy will increase the supply of affordable housing and preserve existing affordable housing in the City.

In the development of the recently adopted 2021-2029 Housing Element, the City evaluated significant public policies affecting affordable housing development such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges and growth limitations. Based on this evaluation, the City determined that it has taken all necessary steps to ameliorate the negative effects of public policies that may have been a barrier to affordable housing. Moreover, the City is actively engaged with affordable housing developers concerning the siting of affordable housing and ensuring that the entitlement process runs smoothly from inception to completion.

### 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 has invested CDBG funds through the 2021-2022 program year in projects that provide grants to low- and moderate-

income homeowners for home improvements and projects that provide public and neighborhood services to low- and moderate-income people. To address underserved needs, the City has allocated 100 percent of its non-administrative CDBG investments (excluding section 108 repayments, and program administration funds) in program year 2021-2022 to projects and activities that benefit low- and moderate-income people.

### 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. This strategy requires the City to implement programs that protect children living in older housing from lead hazards.

Overall, the City has a relatively older housing stock, with 12,020 of the City's total housing units (46.2 percent) built before 1980 according to 2017 ACS data. The remaining 13,993 units primarily constructed after to January 1, 1979, have the least potential risk to contain lead-based paint. In these units, the best way to have reasonable assurance that lead-based paint hazards are not present is to have the painted surfaces tested.

To reduce lead-based paint hazards, the City of Rialto takes the following actions:

- Include lead testing and abatement procedures, if necessary, in all residential rehabilitation activities for units built prior to January 1, 1978.
- Monitor the lead-poisoning data maintained by the San Bernardino County Department of Public Health (SBCDH).
- Educate residents on the health hazards of lead-based paint through the use of brochures and encourage screening children for elevated blood-lead levels.
- Disseminate brochures about lead hazards through organizations such Inland Fair Housing and Mediation Board (IFHMB) and the City's housing rehabilitation programs.

At the time of this performance evaluations writing, the City of Rialto had 0 homes where lead-based hazards were identified. As mentioned above, all required information is provided to homeowners should there be any potential hazards and the proper testing procedures would be conducted to test and address the hazards. The City of Rialto's subrecipient Inland Fair Housing Mediation Board (IFHMB) holds workshops throughout the program year which are open to the public inclusive of the residents of Rialto. The workshops address topics such as, but not limited to, first time home buyer programs, resources for the purchase and rehab of a home, housing rights and responsibilities, living with student loans. These workshops served as resources to the residents of Rialto in understanding the availability and affordability in obtaining and maintaining affordable housing.

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

The implementation of CDBG activities meeting the goals established in the 2020-2024 Consolidated Plan - Strategic Plan and the 2021-2022 Annual Action Plan helped reduce the number of poverty-level families by:

- Supporting activities that expand the supply of housing that is affordable to low- and moderate-income households;
- Supporting activities that preserve the supply of decent housing that is affordable to lowand moderate-income households;
- Supporting housing preservation programs that assure low-income households have a safe, decent and appropriate place to live;
- Supporting public services for low- and moderate-income residents, by nonprofit organizations receiving CDBG Public Service Grants;
- Supporting activities that fulfill the HUD mandate to further fair housing choice through the provision of fair housing education, counseling, anti-discrimination and landlord-tenant mediation.

During the 2021-2022 program year, public service activities such as the Rialto Family Health Services Veteran's Assistance program, Legal Aid society of San Bernardino County Legal Aid Rialto program, Health and Human Services Navigation, and the NCNW Bethune Centers Academic and Job Training programs all contributed to reduce the number of poverty-level families within the City of Rialto. The Veteran's assistance program assisted the City's veterans to begin the process to receive and or even expand the amount of military compensation and benefits that they are entitled to for their service. It allowed for incomes to expand and allow for better housing, transportation, access to resources and funds that were not being received without the assistance. During 2021-2022 they assisted 12 Rialto residents. The Legal Aid Rialto assisted 79 Rialto residents with beginning the process of program guardianships/conservatorships, as well as assisting with prevention of homelessness during 2021-2022. The Health and Human Services Navigation program provided case management services to 14 Rialto residents to aid in obtaining access to health services during the 2021-2022 program year. Lastly, the Academic and job training program assisted Rialto residents in job searches and employment skills trainings to help during the interview process with employers throughout the City and County. During 2021-2022 the program assisted a total of 19 Rialto residents.

In addition to these local efforts, mainstream state and federal resources also contribute to reducing the number of individuals and families in poverty. Federal programs such as the Earned Income Tax Credit and Head Start providing pathways out of poverty for families who are ready

to pursue employment and educational opportunities. Additionally, in California, the primary programs that assist families in poverty are CalWORKs, Cal Fresh and Medi-Cal. Together; these programs provide 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. Other services are available to assist persons suffering from substance abuse, domestic violence and mental illness.

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

The institutional delivery system in Rialto is high-functioning and collaborative—particularly the relationship between local government and the nonprofit sector comprised of a network of capable non-profit organizations that are delivering a full range of services to residents. Strong City departments anchor the administration of HUD grant programs and the housing and community activities that are implemented in the City. These are supported and enhanced through the City's collaboration with nonprofit agencies receiving CDBG funds by ensuring that the needs of low- and moderate-income residents are met. The institutional delivery system is successfully being implemented as envisioned within the 2020-2024 Consolidated Plan and Strategic Plan.

During the program year, Subrecipient program trainings were held to ensure that all subrecipients were made aware of City's program policies and procedures and to ensure that they were made aware that there is always technical assistance through the City staff and the City's CDBG program consultant to ensure compliance. Regular meetings with City staff (Administrative Services Department, Finance Department, and Public Works) and program consultants were held to ensure that expenditure goals, program accomplishments, and progress on capital improvement projects were being made. If there were, any deficiencies additional meetings and technical assistance would be provided to subrecipients and City staff on how to ensure progress with program compliance.

The City of Rialto also collaborated with the City's Housing Division to ensure affordable housing is maintained and addressed via its CDBG funded Mobile Home Repair Program. The City was unable to assist Mobile Homeowners during this program year due to unavailability of contractors, however, the City received multiple applications and is expected to begin working with 3 homeowners during the next program year.

# 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 of Rialto

City continued to consult with and inviting the participation of a wide variety of agencies and organizations involved in the delivery of housing and supportive services to low- and moderate-income residents in Rialto—particularly the CDBG Target Areas.

The City maintains a contact list of interested nonprofits, public agencies, social services agencies, and private housing developers that have capacity and potential to carry out activities and meet some of the goals described in the Consolidated Plan. Letters or notices announcing the availability of funds are emailed to potential applicants and interested agencies when funding is available. In addition, notices are published in the local newspaper, posted at various locations in the City, and posted on the City website. Staff participates in local and regional meetings, which include service providers, neighboring agencies and elected officials to keep abreast of issues impacting the quality of life for Rialto's low-income residents. When funds are available the City maintains a web presence and it actively provides technical assistance throughout the year to assist interested citizens and agencies applying for CDBG funds. The City will continue to strengthen its coordination and consultation efforts with other agencies, including State and local public agencies, to ensure that needed services and funding for homeless and other services are addressed. The City will also continue to work with agencies and organizations to strengthen coordination, assess gaps in the delivery of services, and develop strategies to overcome the gaps and carry out the goals and objectives of the Action Plan.

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

The 2020 Analysis of Impediments to Fair Housing Choice (AI) adopted by the Rialto City Council included one (1) impediment to fair housing choice in the 2020-2024 Fair Housing Plan. During the 2021-2022 program year, the Inland Fair Housing and Mediation Board assisted over 280 Rialto Residents with fair housing

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### 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 were used efficiently and in compliance with applicable regulations, the City provided technical assistance to all subrecipients at the beginning of the program year and monitored subrecipients throughout the program year.

### **Technical Assistance**

To enhance compliance with federal program regulations, the Rialto Community Services Department made technical assistance available 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 (2021-2022 subrecipient workshop) was provided during the implementation of CDBG funded projects to ensure that appropriate resources are provided in furtherance of compliance with the program regulations. In addition, a second subrecipient workshop was provided during the second quarter of the program year.

### **Activity Monitoring**

All activities were monitored, beginning with a detailed review upon receipt of the application to determine eligibility, conformance with a National Objective and conformance with a Strategic Plan goal. This review also examined the proposed use of funds, eligibility of the service area, eligibility of 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 submit their most recent Financial/Single Audit and other documentation to establish their capacity, and any findings noted in the audit are reviewed. In such instances where Audit findings arise, the agency is required to provide the City documentation resolving the finding. Subsequent to entering into a written agreement, staff and consultants perform periodic desk monitoring including ongoing review of required performance reports and documentation to substantiate CDBG expenditures. The reviews also included both a fiscal and programmatic review of the subrecipient's activities. The reviews determine if the activities are in compliance with the program regulations and City contract and/or MOU. Areas of review included overall administration, financial systems, appropriateness of program expenditures, program delivery, client eligibility determination and documentation, reporting systems, and achievement toward achieving contractual goals. No deficiencies or non-compliance with the program requirements were identified during the 2021-2022 program year.

### 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 San Bernardino Sun in English and in Spanish on September 13, 2022, notifying the public of the availability of the draft Consolidated Annual Performance and Evaluation Report for a 15-day public review and comment period. A copy of the public notices is included in Appendix A.

The CAPER was also made available at the following locations:

City Hall: Office of the City Clerk 290 W. Rialto Avenue Rialto, California 92376

### **Rialto Community Service Department**

214 N. Palm Avenue Rialto, California 92376

**Rialto Public Library** 251 W. 1<sup>st</sup> Street Rialto, California 92376

A public hearing will be conducted before the City Council on Tuesday, September 27, 2022, to solicit comments from residents and interested parties. A summary of any written or oral comments received during the public hearing will be included as Appendix B of this document when submitted to the U.S. Department of Housing and Urban Development.

### 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.

CDBG funds are making a significant impact on strategies to address the high priority needs identified in the 2020-2024 Consolidated Plan – Strategic Plan. As shown in **Figure 1** in section CR-05 of this document, CDBG funds are contributing to all of the Strategic Plan goals including Fair Housing Services, Housing Preservation, Public Services for Low-income residents, Public Facilities and Infrastructure Improvements and Planning and Administration.

### **Fair Housing Services**

For the implementation of the City's Fair Housing Services, the City funded Inland Fair Housing and Mediation Board in the amount of \$32,478. The funds were to be used for the provision of fair housing outreach, education and enforcement activities, including landlord-tenant matters. During the program year, this activity had a goal of servicing 500 people, a total of 283 people were served people.

### **Housing Preservation**

To support the City's vision of housing preservation, CBDG funds that were awarded to the City's Development Services Department (Housing Division) for the implementation of a Mobile Home Repair Program in program year 2021-2022. The department had a goal of rehabilitating 5 mobile homes, however, there was little success in obtaining contractors during the program year, therefore there were zero homes rehabilitated.

#### **Public Services for Low-income Residents**

To support the City's initiative for Public Services for Low-income residents, CDBG funds were awarded to (9) nine agencies (8 non-profits and one City department) that provided different public services for the residents of Rialto. Ranging from youth services, senior services, health services, legal services, to housing for veterans, pre-employment and job training skills. In total, the agencies provided public service assistance to 163 primarily low- and moderate-income residents.

During the second quarter of the program year, the City was made aware that the non-profit Veterans Partnering with Communities, requested to terminate their agreement with the City due to unforeseen circumstances, the non-profit chose not to move forward with utilizing their allocation of \$13,244.67 of CDBG funds.

In addition, the non-profit Get Better Through Hoops program did not execute the agreement with the City and therefore did not utilize their allocation of \$13,244.66 of CDBG funds.

### **Public Facilities and Infrastructure**

To improve City of Rialto public facilities and infrastructure to benefit primarily low- and moderate- income people, the City invested the vast majority of its CDBG resources to address this Strategic Plan goal. The Sidewalk, Curb and Gutter project was awarded a construction contract. Construction started in May 2022. This CDBG funded project will consist of installation of new, removal, repair and/or replacement of curbs, gutters, driveway approaches, sidewalks, curb ramps, and alley intersections. The project is set to be completed December 2022.

The Community Center ADA Improvement project building 300 Alternative Bid 1 was approved and construction started December 2021. This CDBG funded project will be updating the facilities wing 300 to Building Code and Americans with Disabilities Act (ADA) requirements. The project is set to be completed fall 2022.

### Planning & Administration - Section 108 Loan Repayment Activities

The City's Section 108 loan repayment activities utilized CDBG funds to repay the loans that were used to complete the Rialto Bud Bender Park Renovation Project and the construction of the Rialto Senior Center. The Rialto Bud Bender Park Renovation Project was completed in June of 2016 which included the grading, irrigation improvements, concreate walkways, installation of lighting, bleacher & bench upgrades and signage. The City will continue to report its loan repayments in each program year that are accomplished until the loan has been fully repaid.

The Rialto Senior Center's Construction Project utilized Section 108 loan funds to construct the City's 17,000 square foot senior center. The facility is currently being used by the City's senior population (who are presumed to be low-and moderate-income persons by HUD) that now have access to various social and physical activities provided to by the City such as social hours, meals for seniors, dancing, exercise, and education on current news and scams that are targeting senior populations nationwide just to name a few. Construction of the center was completed, and the Rialto Senior Center was open for operation in September 2004. There is no program income to report under the repayments of the City's Section 108 loan activities at this current time. The City fully paid back this loan during the 2021-2022 Fiscal Year.

The City's residents continue to face challenges during the COVID-19 pandemic including job loss, food insecurity, housing insecurity, and continued disruption of normal in-person public services. Nonprofit subrecipients and 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 some activities that were impacted during the early months of the program year.

The addition of \$1,339,584 of supplemental CDBG funds, known as CDBG-CV, fueled a significant increase in the City's capacity to address the challenges residents faced as a result of the COVID 19 pandemic. The City continues to work towards their goals of assisting residents with Rental, Mortgage, and Utility assistance and business owners with the Small Business assistance programs.

# CR-58 - Section 3

# Identify the number of individuals assisted and the types of assistance provided

Total Labor Hours	CDBG
Total Number of Activities	2
Total Labor Hours	250
Total Section 3 Worker Hours	0
Total Targeted Section 3 Worker Hours	0

**Table 8 – Total Labor Hours** 

Qualitative Efforts - Number of Activities by Program	CDBG
Outreach efforts to generate job applicants who are Public Housing Targeted	0
Workers	
Outreach efforts to generate job applicants who are Other Funding Targeted	0
Workers.	Ü
Direct, on-the job training (including apprenticeships).	1
Indirect training such as arranging for, contracting for, or paying tuition for,	0
off-site training.	U
Technical assistance to help Section 3 workers compete for jobs (e.g., resume	0
assistance, coaching).	U
Outreach efforts to identify and secure bids from Section 3 business concerns.	1
Technical assistance to help Section 3 business concerns understand and bid	0
on contracts.	U
Division of contracts into smaller jobs to facilitate participation by Section 3	0
business concerns.	U
Provided or connected residents with assistance in seeking employment	
including: drafting resumes, preparing for interviews, finding job	0
opportunities, connecting residents to job placement services.	
Held one or more job fairs.	0
Provided or connected residents with supportive services that can provide	0
direct services or referrals.	U
Provided or connected residents with supportive services that provide one or	
more of the following: work readiness health screenings, interview clothing,	0
uniforms, test fees, transportation.	
Assisted residents with finding child care.	0
Assisted residents to apply for, or attend community college or a four year	0
educational institution.	U

Assisted residents to apply for, or attend vocational/technical training.	0
Assisted residents to obtain financial literacy training and/or coaching.	0
Bonding assistance, guaranties, or other efforts to support viable bids from	0
Section 3 business concerns.	0
Provided or connected residents with training on computer use or online	0
technologies.	0
Promoting the use of a business registry designed to create opportunities for	0
disadvantaged and small businesses.	
Outreach, engagement, or referrals with the state one-stop system, as	
designed in Section 121(e)(2) of the Workforce Innovation and Opportunity	0
Act.	
Other.	0

Table 9 – Qualitative Efforts - Number of Activities by Program

### Narrative

Currently there have not been any completed projects, therefore it is still undetermined how many labor hours were completed by Section 3 workers and targeted Section 3 workers. The contractors working on the Community Center Building and the Street, Curb, and Gutter project have complied with qualitative methods by getting apprentices. The City has conducted technical assistance during the pre-bid meetings to ensure contractor understands benchmark requirements and what must be submitted.