### CR-05 - Goals and Outcomes

Progress the jurisdiction has made in carrying out its strategic plan and its action plan. 91.520(a)

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

The 2022 Consolidated Annual Performance Evaluation Report (CAPER) is a performance report covering the period of July 1, 2022 through June 30, 2023. This report contains a status update on CDBG and HOME funded projects (i.e. completed or ongoing) as well as information on expenditures and beneficiary data.

During the preparation of the 2020-2024 Consolidated Plan, the City identified the following four community priority needs. When allocating CDBG and HOME funds, the City considered these priority needs.

- Increase the supply of affordable housing through rental assistance, new construction, and acquisition/rehabilitation projects.
- Provide fair housing for all economic segments and special needs households.
- Continue to financially support homeless facilities and agencies that address service needs of the homeless and those at risk of becoming homeless.
- Improve the quality of existing community services, facilities, and infrastructure to serve low and moderate income neighborhoods.

The City allocated its CDBG funds to CDBG Program Administration, Fair Housing Program, public facilities, and public services to address the above priority needs. The following public facilities projects were completed in FY 2022-2023. All of the public services projects funded in FY 2022-2023 were completed during this same fiscal year. See Attachment 1 for the completed projects in FY 2022-2023.

- 1. 2022 ADA Wheelchair Access Ramps Various Locations
- 2. 2022 Street Rehabilitation Various Locations
- 3. Taft Library Restroom ADA Accessibility Project

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	Source / Amount	Indicator	Unit of Measure	Expected - Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected - Program Year	Actual – Program Year	Percent Complete
Affordable Housing	Affordable Housing	HOME: \$	Rental units constructed	Household Housing Unit	150	0	0.00%	11	0	0.00%
Community Development	Non-Housing Community Development	CDBG: \$ / HOME: \$0	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	15000	3000	20.00%	3,305	22,570	682.90%
Community Development	Non-Housing Community Development	CDBG: \$ / HOME: \$0	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	50000	42875	85.75%	10,839	64,688	596.8%%
Homelessness	Homeless	CDBG: \$0 / HOME: \$0	Housing for Homeless added	Household Housing Unit	40	0	0.00%	0	0	0.00%

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

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

The City indentified the following priority needs during the preparation of the 2020-2024 Consolidated Plan. The City allocated funds to projects that meet the high priority needs below.

- 1. CDBG Program Administration
- 2. Orange Fair Housing Program
- 3. ADA Wheelchair Access Ramps
- 4. Various Street Rehabilitation

- 5. Library ADA mprovement Taft Library Restroom
- 6. After-School Community Programs El Camino and Grijalva Parks
- 7. Bike Team Program Community Oriented Policing
- 8. Assistance League of Orange-Operation School Bell
- 9. Friendly Center, Inc. Community Food Orange

The City allocated FY 2022-2023 funds to projects under CDBG Administration, Orange Fair Housing Program, public facilities, and public services. Public services include the After-School Community Programs – El Camino and Grijalva Parks, Bike Team Program – Community Oriented Policing, Assistance League of Orange - Operation School Bell, and Friendly Center - Community Food Orange Program. The City's funding strategy includes allocating funds to projects that meet high priority needs.

Additionally, the City committed HOME funding to two senior affordable housing developments; Katella Terrace a 74-unit independent living housing development and Villa St. Joseph, a 50-unit housing complex.

# 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	HOME
White	7,409	0
Black or African American	7,519	0
Asian	8,608	0
American Indian or American Native	24	0
Native Hawaiian or Other Pacific Islander	865	0
Total	24,425	0
Hispanic	2,554	0
Not Hispanic	6,206	0

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

### Narrative

The City's goal is to allocate CDBG funds to projects that meet the high priority needs identified in the 2020-2024 Consolidated Plan as well as the three national objectives of the CDBG program. The statistics include estimated families assisted through the Bike Team Program based on the American Community Survey (ACS) 20 1-year estimates for race and ethnicity and the percentage of low income households in low income neighborhoods.

The City also committed HOME funding to two senior affordable housing developments; Katella Terrace a 74-unit independent living housing development and Villa St. Joseph, a 50-unit housing complex.

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

Source of Funds	Source	Resources Made	Amount Expended	
		Available	During Program Year	
CDBG	public - federal	1,119,937	1,112,320.02	
HOME	public - federal	486,812	119,364.60	

#### Identify the resources made available

Table 3 - Resources Made Available

### Narrative

The City's total FY 2022-2023 CDBG budget was \$1,231,664 including carryover funds. CDBG funds were allocated to planning and administration, public services, fair housing activities, and public facilities. See Attachment 2 for CDBG Financial Summary Report (PR 26) summarizes resources and expenditures.

The City received \$486,812 in 2022 HOME funds. A recent commitment of HOME funds was made to the Katella Terrace Senior Housing Project and Villa St. JosephSenior Housing Project.

### Identify the geographic distribution and location of investments

Target Area	Planned Percentage	Actual Percentage	Narrative Description					
	of Allocation	of Allocation						
Low and Moderate			Low and Moderate Income					
Income Areas	100	100	Areas					

Table 4 – Identify the geographic distribution and location of investments

#### Narrative

The City allocated CDBG funds to projects located within low income neighborhoods based on HUD's census tracts and block groups.

### 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.

The City allocated its CDBG funds to community based projects benefiting low and moderate income households. While there are no match requirements under the CDBG program, the nonprofits in the past have combined local funds with CDBG funds to operate programs or deliver services targeted to low and moderate income households. For example, the Friendly Center used grant funds from other private donors (i.e.- Dhont Family Foundation, Disneyland, Fact Grant) and in-kind food donations as well as CDBG funds to operate the food programs in the City of Orange. The City allocates most of its CDBG funds to street improvement projects including ADA Wheelchair access ramps at locations within low and moderate income neighborhoods.

The City did not meet the 25% HOME Program match requirement due to the HUD waivers for 2020, 2021 and extended through 2022 due to COVID. HOME funds are only expended for administration and monitoring costs only. Therefore, matching funds were not required.

Fiscal Year Summary – HOME Match						
1. Excess match from prior Federal fiscal year	0					
2. Match contributed during current Federal fiscal year	0					
3. Total match available for current Federal fiscal year (Line 1 plus Line 2)						
4. Match liability for current Federal fiscal year	0					
5. Excess match carried over to next Federal fiscal year (Line 3 minus Line 4)	0					
Table E Fiscal Vear Summary LIONE Match Depart						

Table 5 – Fiscal Year Summary - HOME Match Report

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

Table 6 – Match Contribution for the Federal Fiscal Year

### HOME MBE/WBE report

Program Income – Enter the program amounts for the reporting period								
Balance on hand at	Amount received during	Total amount expended	Amount expended for	Balance on hand at end				
begin-ning of reporting	reporting period	during reporting period	TBRA	of reporting period				
period	\$	\$	\$	\$				
\$								
0	0	0	0	0				

Table 7 – Program Income

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

	Total	I	<b>Minority Busin</b>	ess Enterprises		White Non-
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non- Hispanic	Hispanic	Hispanic
Contracts						
Dollar						
Amount	0	0	0	0	0	0
Number	0	0	0	0	0	0
Sub-Contracts						
Number	0	0	0	0	0	0
Dollar						
Amount	0	0	0	0	0	0
	Total	Women Business Enterprises	Male			
Contracts						
Dollar						
Amount	0	0	0			
Number	0	0	0			
Sub-Contracts						
Number	0	0	0			
Dollar						

0 Table 8 - Minority Business and Women Business Enterprises

Amount

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

0

0

Table 9 – Minority Owners of Rental Property

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								
Parcels Acquire	b			0		0		
Businesses Disp	laced			0		0		
Nonprofit Orgar	nizations							
Displaced				0		0		
Households Ten	nporarily							
Relocated, not [	Displaced			0		0		
Households	Total			Minority P	y Property Enterprises			White Non-
Displaced		Alas	kan	Asian c	or	Black Non-	Hispanic	Hispanic
		Nativ	'e or	Pacific	;	Hispanic		
	Amei		rican Islande		er			
Ind		an						
Number	0		0		0	0	0	0
	Ű		•		Ũ	•		
Cost	0		0		0	0	0	0

Table 10 – Relocation and Real Property Acquisition

# 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		
provided affordable housing units	0	0
Number of Non-Homeless households to be		
provided affordable housing units	0	0
Number of Special-Needs households to be		
provided affordable housing units	0	0
Total	0	0

Table 11 – Ni	umber of Households

	One-Year Goal	Actual
Number of households supported through		
Rental Assistance	0	0
Number of households supported through		
The Production of New Units	13	0
Number of households supported through		
Rehab of Existing Units	0	0
Number of households supported through		
Acquisition of Existing Units	0	0
Total	13	0

Table 12 – Number of Households Supported

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

As previously noted in Section CR-15 Resources and Investments, the City allocated HOME funds for HOME Program Administration only in FY 2022-2023. The City receives limited annual HOME allocations (i.e., \$486,812 in FY 2022-23). The limited grant amount and stringent HOME Program regulations impact the City's ability to commit and expend HOME funds.

OCHA administers the HCV Program for the majority of Orange County jurisdictions including Orange. This program increases affordable housing opportunities by providing rent subsidies to low income tenants. Discuss how these outcomes will impact future annual action plans.

Future Annual Action Plans will include goals for the provision of affordable housing including rental assistance. The City will continue to collaborate with affordable housing developers to facilitate the production of affordable housing units for low income families. The City will continue its partnership with OCHA and support OCHA applications for additional funds to enable the agency to administer the HCV Program and related programs for Orange residents.

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	HOME Actual
Extremely Low-income	0	0
Low-income	0	0
Moderate-income	0	0
Total	0	0

Table 13 – Number of Households Served

#### Narrative Information

The City is working with affordable housing developers to finalize funding commitments for projects for 2022 HOME funds. The City will be allocating these HOME funds to affordable housing projects that have secured other funding sources. The City conducts a subsidy layering analysis and underwriting analysis to determine funding gaps and the appropriate amount of HOME funds for allocation purposes.

# 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 County of Orange is the lead agency that coordinates the Continuum of Care for the entire County. The City of Orange continues to support the County's efforts to develop effective programs to address the needs of homeless persons including the 10-Year Plan to End Homelessness.

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

The City continues to support the County's Continuum of Care approach to address homelessness including the Orange County Commission to End Homelessness. This City is also a member of a coalition of local governments (i.e.- The County or Orange and other cities) called the North Orange County Service Planning Area to address homelessness in northern area of Orange County. The City provided local and state funds for the construction and operation of two new navigation centers in North Orange County (cities of Buena Park and Placentia). Both emergency shelters began operating this past spring and the City continues to fund a portion of their operating costs through the PLHA grant. Additionally, the City provided PLHA funding to the Family Care Center, a family emergency center, to assist with operational expenses.

Furthermore, the City allocated CDBG-CV funding towards the Hub Resource Center (HRC) that provides basic needs, such as food and water, and facilitates continuum of care services for those experiencing homelessness and other vunerable populations. Through this program, the HRC has been successful in connecting unhoused individuals with shelters and assistance towards permanent housing through job development and assistance with employment applications.

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

The City continues to supportOCHA applications for the Rental Assistance for Non-Elderly Persons with Disabilities (NED) Program, which provides incremental Section 8 vouchers. The goal of the Program is to enable non-elderly, disabled households to transition from health care institutions or skilled nursing care to independent living with appropriate services.

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

The City supported OCHA applications for the Continuum of Care Program Permanent Supportive Housing Program. As of June 30, 2023, over 36 Orange households had received certificates for this Program.

The City supported OCHA applications for the Housing and Urban Development-Veterans Affairs Supportive Housing (HUD-VASH) Program, which combines rental assistance with case management and clinical services for homeless veterans. As of June 30, 2023, over 28 Orange households were participating in the HUD/VASH Program.

The City also supported OCHA applications for the Family Unification Program (FUP). FUP provides rental assistance to eligible families whose lack of adequate housing is a primary factor in the separation or threat of imminent separation of children from their families. The Program also provides vouchers for up to 18 months to emancipated youth (18 to 21 year old children that left foster care at age 16 or older and lack adequate housing). As of June 30, 2023, over 19 Orange households were FUP participants. In addition, the City supported local nonprofits agencies' applications for Continuum of Care/SuperNOFA funds from the County of Orange.

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

Actions taken to address the needs of public housing

There is no public housing in the City of Orange.

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

N/A

Actions taken to provide assistance to troubled PHAs

N/A

# 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)

In compliance with local and state laws, the City continues to be proactive by enacting public policy and programs that serve to encourage affordable housing development by allowing higher density zoning in addition to allowing accessory dwelling units by right.

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

The City's Zoning Ordinance provides flexible criteria for density bonuses and accessory dwelling units to encourage the development of affordable housing for low income households. The City is taking on a few new initiatives to address housing shortages for various income levels through the update of its Housing Element.

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

The City did allocate HOME funds for housing projects during FY 2021-22 and continues to actively strategize for the use of its funds to assist in the development of an affordable housing project.

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

Given the limited availability of CDBG funds and the elimination of redevelopment agencies, the City no longer directly fund lead-based paint evaluation and reduction. To expand lead hazard education in the community, the City has supported Orange County's efforts.

The City will support the County's future applications to reduce lead-based paint hazards in the City. If funding is granted in the future, the City and County plan to intensify their efforts to reduce the risk of lead poisoning for young, low income children that reside in El Modena, a low income, largely Hispanic older neighborhood located in the City and unincorporated County area.

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

The Community Development Department includes the following Divisions: Code Enforcement, Building and Safety, Planning, and Housing. This enables the City to effectively coordinate its housing activities. The Planning Division performs functions that directly affect the development and rehabilitation of housing including preparation of the State-mandated Housing Element. The Planning Division also oversees the permit process, regulates compliance with zoning and building codes, and implements administers the Density Bonus Program required by State law.

The Housing Division administers the CDBG and HOME programs and works closely with the following City departments that carry out CDBG-funded activities to minimize gaps in the institutional structure: Community Services Department - After-School Community Programs; Police Department the Bike Team Program; and Public Works Department - public improvements and infrastructure projects in low and moderate income neighborhoods. Staff provided a technical assistance as needed to City departments before the FY 2022-23 CDBG application process began. The purpose of the meeting was to offer guidance and answer questions regarding CDBG eligibility. One-on-one assistance was provided during the application process and throughout the year to ensure compliance as well as ongoing monitoring.

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

The City continued its coordination efforts with outside agencies including Orange Housing Development Corporation (OHDC), the City's designated HOME Community Housing Development Organizations (CHDO), nonprofit agencies that primarily serve low and moderate income residents, emergency shelter and transitional housing providers, and private developers and builders. The City continues to collaborate with affordable housing developers to provide housing affordable to low income families. City staff is represented on the OCHA Cities Advisory Committee, which provides input on housing issues that affect the City, County, and other participating jurisdictions. Staff also maintains close contact with the social service organizations funded by the City as well as other local service providers and the affordable housing development community

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 City allocated 2022 CDBG funds to Fair Housing Foundation (FHF) to address fair housing issues and provide landlord and tenant educational programs. FHF promoted fair housing practices on behalf of the City to assure that Orange residents were afforded equal housing opportunity. The agency provided direct client services to over 170 Orange residents and operators of rental properties. Of those assisted, 15 were fair housing inquiries.

### CR-40 - Monitoring 91.220 and 91.230

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

The City requires the subrecipients to submit quarterly financial and performance reports including beneficiary data. This helps the City to monitor projects and programs and ensure that the subrecipients are on schedule with deliverables and expenditures. Under the COVID-19 pandemic conditions and to follow public health measures, the City was unable to conduct on-site monitoring visits of CDBG subrecipients to provide one on one guidance as needed.

The City continues to require developers of HOME-funded projects to submit documents to confirm that they are complying with the income and rent restrictions and affordability covenants under the HOME program.

The City continues to encourage subrecipients to provide jobs to low income residents for federally funded construction projects as required by Section 3.

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

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

The City took the following steps to ensure that the public had a reasonable opportunity to review and comment on the FY 2022-23 Draft CAPER. A notice was published as a display advertisement in the August 24, 2023 edition of the Orange City News. The notice described the purpose of the CAPER, identified three locations for public inspection of the document as well as online publication web link, requested written comments, and provided the name, address, telephone number, and e-mail address of the contact person to whom inquiries and comments could be submitted. The notice stated that copies of the Draft CAPER would be available for public review and comments from Friday, August 24, 2023 through Friday, September 8, 2023 and that all written comments received by the deadline would be addressed in the final CAPER. There were no public comments received.

### 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.

The City did experience challenges brought on by the unprecedented coronavirus pandemic that impacted the community and local businesses. The City continues to be committed to allocating CDBG funds to high priority projects identified during the preparation of the 2020-2024 Consolidated Plan.

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

No

[BEDI grantees] Describe accomplishments and program outcomes during the last year.

### CR-50 - HOME 91.520(d)

Include the results of on-site inspections of affordable rental housing assisted under the program to determine compliance with housing codes and other applicable regulations

Please list those projects that should have been inspected on-site this program year based upon the schedule in §92.504(d). Indicate which of these were inspected and a summary of issues that were detected during the inspection. For those that were not inspected, please indicate the reason and how you will remedy the situation.

The following properties were inspected in 2022-2023

Adams I Apartments - 3 Units

Adams II Apartments - 3 Units

Harmony Creek Senior Apartments – 10 units

Hoover II Apartments - 2 Units

Lemon Street Apartments - 6 units

OHDC/Rotary Apartments – 6 Units

Orange Garden Apartments – 24 units

Rose Avenue Apartments – 6

Serrano Woods – 11 units

Villa Modena Apartments – 5 units

Wilson Avenue Apartments II – 4

Wilson Avenue Apartments III - 9

The issues were minimal with corrections made on-site by maintenance.

Provide an assessment of the jurisdiction's affirmative marketing actions for HOME units. 92.351(b)

As condition of receiving HOME funding, the City has complied with this Section and Executive Orders 11625 and 12432 concerning Minority Business Enterprise (MBE), and Executive Order 12138

concerning Women's Business Enterprise (WBE). To assure that such businesses are utilized as sources of supplies, equipment, construction, and services when possible, the City agreed to:

1. Include qualified Minority Business Enterprise MBEs and Women's Business Enterprise WBEs on solicitation lists.

2. Solicit MBEs and WBEs whenever they are potential sources.

3. When economically feasible, divide total requirements into smaller tasks or quantities to permit maximum MBE and WBE participation.

4. Establish delivery schedules, which will encourage MBE and WBE participation where the requirement permits.

5. Use the services and assistance of the Small Business Administration and Minority Business Development Agency of the Department of Commerce.

6. If subcontracts are to be awarded, require the prime contractor to take the affirmative steps in 1 through 5 above.

The City's Conditions, Covenants, and Restrictions recorded against all HOME-funded projects obligate developers to comply with these requirements.

Refer to IDIS reports to describe the amount and use of program income for projects, including the number of projects and owner and tenant characteristics

The City did use program income for the Katella Terrace Project in FY 2022-2023.

Describe other actions taken to foster and maintain affordable housing. 91.220(k) (STATES ONLY: Including the coordination of LIHTC with the development of affordable housing). 91.320(j)

During FY 2022-2023, the City committed HOME funds towards the Katella Terrace Affordable Housing Project, as well as the Villa St. Joseph Project and Valencia Gardens development projects.

# CR-58 – Section 3

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

Total Labor Hours	CDBG	HOME	ESG	HOPWA	HTF
Table 14 – Total Labor Hours					

Qualitative Efforts - Number of Activities by Program	CDBG	HOME	ESG	HOPWA	HTF
Table 15 – Qualitative Efforts - Number of Activities by Program					

Narrative