Executive Summary

AP-05 Executive Summary - 91.200(c), 91.220(b)

1. Introduction

The Pima County Department of Community & Workforce Development (CWD) distributes local and federal funding to meet human services, housing and community needs. The primary purpose of HUD CPD programs is to develop viable communities by promoting integrated approaches that provide decent housing, a suitable living environment and expanded economic opportunities for low-and-moderate income people, households and neighborhoods. The Consolidated Plan focuses resources on low-and-moderate-income (LMI) households at various income levels including: 1) extremely low-income households that have income at or below 30% of the area median income (AMI); 2) very low-income households that have income 31%-50% of AMI; and 3) low-and moderate-income households that have income 51-80% of AMI. Pima County’s central long-term community development goal is to build healthy communities, focusing resources on community needs, particularly the needs of low and moderate income and other vulnerable residents. The core organizing principle of Pima Prospers (Pima County’s Comprehensive Plan) and of the Consolidated Plan is the creation and maintenance of healthy communities.

Pima County is a series of communities and the principle of healthy communities means that communities provide opportunities for people to thrive - economic growth, social vitality, environmental responsibility, access to healthy food, and to the extent possible access to transportation and housing choices. Pima County recognizes the necessity of acknowledging the different lifestyles of rural, suburban and urban communities, with a focus on the provision of services and intergovernmental and public-private-nonprofit partnerships.

The Annual Action Plan is required by the U.S. Department of Housing and Urban Development (HUD) and serves as the formal application for the use of the Community Development Block Grant (CDBG) and Emergency Solutions Grant (ESG) programs. CWD also receives HUD HOME Investment Partnership Program (HOME) funds through the City of Tucson-Pima County HOME Consortium. CWD is the “lead agency” for CDBG and ESG funds, and the City of Tucson is the “lead agency” for HOME funds. The Annual Action Plan describes planned projects and funded activities for the 2021 program year, in addition to, detailing their relationship respective to Pima County’s five-year priorities, goals and objectives identified in its 2020-2024 HUD Consolidated Plan. The financial impact to the County is a total of $4,234,703 in HUD grant revenue for FY 2021 as detailed below:
2. **Summarize the objectives and outcomes identified in the Plan**

This could be a restatement of items or a table listed elsewhere in the plan or a reference to another location. It may also contain any essential items from the housing and homeless needs assessment, the housing market analysis or the strategic plan.

HUD resources must generally be used to benefit low and moderate income (LMI) households and neighborhoods. A needs assessment and market analysis were conducted for the Consolidated Plan. The needs assessment and market analysis examine conditions and trends in housing, homelessness, community development and vulnerable (special needs) populations. The needs assessment and market analysis are combined with input from residents and stakeholders to define priorities, goals and objectives.

To address infrastructure, facility, housing and services needs using HUD Consolidated Plan resources, Pima County established goals and objectives to address needs in six categories:

1. Community Facilities and Improvements.
2. Public Services.
3. Decent Affordable Housing
4. Homelessness.
5. Economic Development.
6. Program Administration.

In many cases, federal, state and local resources leverage HUD funding.

3. **Evaluation of past performance**

This is an evaluation of past performance that helped lead the grantee to choose its goals or projects.

Pima County’s most recent Consolidated Annual Performance Report demonstrates the County made progress towards 1) providing or improving community facilities and infrastructure, 2) supporting housing and providing services for people with HIV/AIDS, 2) outreaching to and providing services, shelter beds, transitional housing, permanent housing and rapid re-housing for people experiencing
homelessness, 3) providing public services for LMI people, 4) demolishing unsafe vacant structures, 5) rehabilitating owner-occupied housing units, 6) preventing homelessness, and 7) developing or rehabilitating rental housing.

Pima County continues to make significant strides in reducing the number of projects that go into remediation. For the last few years, Pima County has executed and communicated a policy via the Citizen’s Participation Plan not to grant subrecipient term extensions for CDBG public service, housing rehabilitation, or ESG activities effectively recapturing funds and reprogramming to new or performing projects. Pima County makes it clear via its Citizen Participation Plan that any recaptured funds may be used to support or match Pima County initiatives including home repair, brownfields and clearance, demolition, and lead based-paint hazard control activities. All new and existing staff understand the annual process to programmatically administer CDBG and ESG funds are cyclical and—pending sequestration or other legislative delays—typically coincides with the federal fiscal year calendar, October through September. In brief, Pima County’s Year Five HUD Annual Action Plan incorporates significant community outreach and public involvement (aka Citizens Participation Plan); funding priorities and recommendations; extensive public process and approvals; subrecipient monitoring; and finally, contract execution and federal reporting.

4. **Summary of Citizen Participation Process and consultation process**

Summary from citizen participation section of plan.

Due to the various COVID-restrictions in place, technical assistance workshops and sessions were all held virtually. Pima County held a total of 19 Technical Assistance Workshops and individualized Technical Assistance Sessions. Members of the public were invited to attend and participate in workshops, with some agencies requesting additional or individualized technical assistance sessions.

5. **Summary of public comments**

This could be a brief narrative summary or reference an attached document from the Citizen Participation section of the Con Plan.

In addition to the workshops and technical assistance sessions, Pima County also conducted 1 public meeting in conjunction with the City of Tucson; there were no formal public comments for Pima County to address.

6. **Summary of comments or views not accepted and the reasons for not accepting them**

There were no formal public comments during the window of March 24, 2021 through April 30, 2021. The Annual Action Plan public comment period notice was published in the Daily Territorial on March 17, 2021.
7. Summary

The program administration of HUD CDBG and ESG funds is an annual planning and public process guided by the priorities, goals, and objectives identified Pima County's HUD Five-Year Consolidated Plan; 2020-2024. The Consolidated Plan provides the regulatory framework for funding program or project activities that implement Pima County's existing affordable housing, homeless and community development policies and programs over its five-year period. For FY 2021, Pima County received 83 applications and recommends initial funding for 54 CDBG and ESG program activities, subject to change.
**PR-05 Lead & Responsible Agencies - 91.200(b)**

1. **Agency/entity responsible for preparing/administering the Consolidated Plan**

The following are the agencies/entities responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

<table>
<thead>
<tr>
<th>Agency Role</th>
<th>Name</th>
<th>Department/Agency</th>
</tr>
</thead>
<tbody>
<tr>
<td>Lead Agency</td>
<td>PIMA COUNTY</td>
<td></td>
</tr>
<tr>
<td>CDBG Administrator</td>
<td>PIMA COUNTY</td>
<td>CWD</td>
</tr>
<tr>
<td>HOPWA Administrator</td>
<td></td>
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<tr>
<td>HOME Administrator</td>
<td></td>
<td></td>
</tr>
<tr>
<td>ESG Administrator</td>
<td>PIMA COUNTY</td>
<td>CWD</td>
</tr>
</tbody>
</table>

Table 1 – Responsible Agencies

**Narrative**

Pima County oversees the Annual Action Plan process.

**Consolidated Plan Public Contact Information**

Joel Gastelum, Program Manager  
Pima County Community Development Block Grant Program  
2797 E Ajo Way  
Tucson, AZ 85713  
Phone: 520-724-3777  
Email: Joel.Gastelum@pima.gov
AP-10 Consultation - 91.100, 91.200(b), 91.215(l)

1. Introduction

Due to the various COVID-restrictions in place, technical assistance workshops and sessions were all held virtually. Pima County held a total of 19 Technical Assistance Workshops and Individualized Technical Assistance Sessions. Members of the public were invited to attend and participate in workshops.

Follow-up meetings were held with the Continuum of Care, affordable housing developers, and communities throughout the County. The purpose of the follow-up meetings was to discuss suggested priorities based on the consolidated plans and to receive additional input into priorities. A public meeting was held prior to the public comment period to discuss the draft Annual Action Plan and provide additional opportunity for input.

Provide a concise summary of the jurisdiction’s activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies (91.215(l)).

Pima County and the City of Tucson participate in numerous efforts to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies, including: healthy homes initiatives to integrate health and housing resources; participation in the regional Continuum of Care that brings together public and assisted housing providers and health, mental health and services agencies to address the needs of the region’s most vulnerable populations, including people being discharged from institutions of care; job training and placement services that integrate housing and services; initiatives to provide housing and supportive services for previously-incarcerated individuals; services that coordinate first responders and systems of care; networks that provide access to homelessness prevention resources; preferences for people with disabilities, people experiencing homelessness, and seniors in housing programs; and publication of the “need help” brochure that provides referral information to health, mental health and other services for vulnerable populations.

Describe coordination with the Continuum of Care and efforts to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans, and unaccompanied youth) and persons at risk of homelessness.

Pima County and the City of Tucson are active members of the Continuum of Care (CoC). As the TPCH Collaborative Applicant, the City of Tucson works closely with the 3 governments operating ESG Programs in the region (City of Tucson, Pima County, and AZ Department of Economic Security). Each ESG recipient holds a seat on the CoC Board and engages in regular communication and collaboration with the CoC through its Collaborative Applicant, HMIS Lead, Continuum of Services Committee, and
Emergency Solutions Subcommittee. Pima County and the City coordinate with ADOH through various trainings and conferences when available.

Describe consultation with the Continuum(s) of Care that serves the jurisdiction’s area in determining how to allocate ESG funds, develop performance standards for and evaluate outcomes of projects and activities assisted by ESG funds, and develop funding, policies and procedures for the operation and administration of HMIS.

The CoC provides local data in the form of HIC, PIT, Gaps Analysis, and subrecipient performance reports to each ESG recipient which is used to inform service needs and resource allocation. The Gaps Analysis for the CoC and Comprehensive Needs Assessment for Youth are used to determine priorities for funding and services.

The CoC is represented on each recipients’ funding panel and the CoC’s Emergency Solutions Subcommittee meets monthly with ESG recipients to identify, plan for, and address opportunities to improve system performance through strategic resource allocation. The CoC and ESG recipients routinely engage in collaborative planning co-hosting public, provider, and consumer input forums and feedback sessions.

2. Agencies, groups, organizations and others who participated in the process and consultations.
Identify any Agency Types not consulted and provide rationale for not consulting

Other local/regional/state/federal planning efforts considered when preparing the Plan

<table>
<thead>
<tr>
<th>Name of Plan</th>
<th>Lead Organization</th>
<th>How do the goals of your Strategic Plan overlap with the goals of each plan?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Continuum of Care</td>
<td>Tucson Pima</td>
<td>Goals to address homelessness using ESG funds overlap Continuum of Care goals.</td>
</tr>
<tr>
<td></td>
<td>Collaboration to End</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Homelessness</td>
<td></td>
</tr>
<tr>
<td>PimaProspers Comprehensive Plan</td>
<td>Pima County</td>
<td>PimaProspers is the comprehensive plan that covers most aspects of county services, establishes a vision and overarching principles (notably healthy communities), and focuses on people and the economy in general. It is the product of the realization that most of the development pattern of the unincorporated county is now set and the time to more fully address physical and human services delivery is now.</td>
</tr>
<tr>
<td>Flowing Wells NRSA</td>
<td>Pima County CWD</td>
<td>The HUD Neighborhood Revitalization Strategy Area Plan for the unincorporated community of Flowing Wells. Pima County will be providing either public service or CDBG non-profit organization capacity building funding.</td>
</tr>
<tr>
<td>Community Development Area Booklet (Draft)</td>
<td>Pima County CWD</td>
<td>Department level community profile document which identifies unincorporated communities eligible for CDBG Area Benefit activities.</td>
</tr>
</tbody>
</table>

Table 3 - Other local / regional / federal planning efforts

Narrative
AP-12 Participation - 91.401, 91.105, 91.200(c)

1. Summary of citizen participation process/Efforts made to broaden citizen participation
   Summarize citizen participation process and how it impacted goal-setting

Pima County prioritizes its CDBG and ESG resources to fund activities primarily in unincorporated communities and within units of general local government (UGLG’s) per HUD Urban County Cooperative Agreements. Due to Covid restrictions and in conformance with CDC guidelines, the citizen participation process was bit different this year. Pima County CWD staff held a total of 19 technical assistance workshops and individualized technical assistance meetings for rural and urban unincorporated communities throughout Pima County to discuss available funding and identify local goals and objectives. Pima County also held virtual meetings with the Town of Marana and City of South Tucson whom are active CDBG subrecipients. Each community is unique with its own set of needs that are directly taken into consideration when subsequent projects are submitted for ESG and CDBG funding. Many of the organizations provided with consultations also applied for CDBG and ESG funding in each respective community. Listed below are the main technical assistance workshops that were advertised and attached is CDBG ESG Community Participation Schedule.
### Citizen Participation Outreach

<table>
<thead>
<tr>
<th>Sort Order</th>
<th>Mode of Outreach</th>
<th>Target of Outreach</th>
<th>Summary of response/attendance</th>
<th>Summary of comments received</th>
<th>Summary of comments not accepted and reasons</th>
<th>URL (If applicable)</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Public Meeting</td>
<td>Minorities, Non-English Speaking - Specify other language: Spanish, Persons with disabilities, Non-targeted/broad community, Nonprofit Agencies</td>
<td>Public meeting was held on April 1, 2021 in conjunction with the City of Tucson to update the public on the current Five-Year Consolidated Plan and input on the 2021 Annual Action Plan. The meeting was held virtually. Various stakeholders attended.</td>
<td>None</td>
<td>None</td>
<td>None</td>
</tr>
<tr>
<td>Sort Order</td>
<td>Mode of Outreach</td>
<td>Target of Outreach</td>
<td>Summary of response/attendance</td>
<td>Summary of comments received</td>
<td>Summary of comments not accepted and reasons</td>
<td>URL (If applicable)</td>
</tr>
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<td>---------------------</td>
</tr>
<tr>
<td>2</td>
<td>Public Meeting</td>
<td>Minorities</td>
<td>Technical Assistance session held virtually on October 27, 2020. Staff provided TA on CDBG and ESG application process- eligibility, guidelines, and ZoomGrants application process</td>
<td>None</td>
<td>None</td>
<td>None</td>
</tr>
<tr>
<td>Sort Order</td>
<td>Mode of Outreach</td>
<td>Target of Outreach</td>
<td>Summary of response/attendance</td>
<td>Summary of comments received</td>
<td>Summary of comments not accepted and reasons</td>
<td>URL (If applicable)</td>
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</tr>
<tr>
<td>3</td>
<td>Public Meeting</td>
<td>Minorities&lt;br&gt;Non-English Speaking - Specify other language: Spanish&lt;br&gt;Persons with disabilities&lt;br&gt;Non-targeted/broad community&lt;br&gt;Nonprofit Agencies</td>
<td>Technical Assistance session held virtually on November 9, 2020. Staff provided TA on CDBG and ESG application process-eligibility, guidelines, and ZoomGrants application process</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Table 4 – Citizen Participation Outreach
Expected Resources

AP-15 Expected Resources - 91.420(b), 91.220(c)(1,2)

Introduction

Pima County CWD funds numerous nonprofit organizations, units of general local government, and other Pima County departments. For most programs, organizations and activities are selected annually through a competitive request for proposals process, the Community Planning Application referenced in the Citizen’s Participation Plan. CWD anticipates the following resources will be made available to address needs and market conditions.

Anticipated Resources

<table>
<thead>
<tr>
<th>Program</th>
<th>Source of Funds</th>
<th>Uses of Funds</th>
<th>Expected Amount Available Year 1</th>
<th>Expected Amount Available Remainder of ConPlan $</th>
<th>Narrative Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>CDBG</td>
<td>public - federal</td>
<td>Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services</td>
<td>2,956,649 0 0 2,956,649 0</td>
<td>Community Development Block Grant (CDBG) funds may be used for a variety of activities that meet the needs of LMI residents and communities. Eligible activities include public services, economic development, and capital improvements such as infrastructure, facilities, housing, and Section 108 loan guarantee. Each activity must meet a CDBG national objective.</td>
<td></td>
</tr>
</tbody>
</table>
### Program | Source of Funds | Uses of Funds | Expected Amount Available Year 1 | Expected Amount Available Remainder of ConPlan |
<table>
<thead>
<tr>
<th></th>
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<th></th>
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<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>ESG</td>
<td>public - federal</td>
<td>Conversion and rehab for transitional housing, Financial Assistance, Overnight shelter, Rapid re-housing (rental assistance), Rental Assistance Services, Transitional housing</td>
<td>$253,427</td>
<td>0</td>
</tr>
</tbody>
</table>

**Table 5 - Expected Resources – Priority Table**

The Emergency Solutions Grant (ESG) program provides funding to: 1) engage homeless individuals and families living on the street; 2) improve the number and quality of emergency shelters; 3) help operate shelters; 4) provide essential services to shelter residents; 5) rapidly re-house individuals and families experiencing homelessness; and 6) prevent families and individuals from becoming homeless.

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

HUD Annual Action Plan resources are leveraged with numerous federal, state, local and private resources to address the needs identified in this plan.
Federal leverage resources from the US Department of Housing and Urban Development, Federal Emergency Management Agency, and Environmental Protection Agency include:

1. Continuum of Care funding (Supportive Housing Program) received by the County for people moving from homelessness to independent, supportive living.
2. Section 8 Housing Choice Voucher funds for rent subsidies to low-income households in Pima County. Section 8 resources are managed by the City of Tucson PHA.
3. Shelter Plus Care funds for permanent supportive housing for individuals and families with disabilities experiencing homelessness, including individuals and families with serious mental illness, physical disabilities, and/or chronic substance use problems.
4. Housing Opportunities for People with AIDS – Competitive (HOPWA-C). The Positive Directions program is a collaborative effort of Pima County, the Southern Arizona AIDS Foundation and the City of Tucson that provides a continuum of care for people who are low-income and HIV positive. The goals of Positive Directions are to increase independence through subsidized, supportive housing and to maximize self-sufficiency through intensive personalized services. These goals are met by providing needed housing and support and referral services through intensive case management.
5. Neighborhood Stabilization Program 2 (NSP2) Program Income for acquisition and rehabilitation, down-payment assistance, demolition and land-banking, and redevelopment of vacant land.
6. FEMA Emergency Food & Shelter Program (EFSP). The EFSP helps nonprofit and local government agencies feed the hungry, shelter people experiencing homelessness, and prevent hunger and homelessness for people facing non-disaster emergencies. The local EFSP board annually reviews and funds applications for programs that supplement and expand current available resources for food, shelter, and rent, mortgage and utility assistance.
7. Brownfields Program. Funded by the Environment Protection Agency, the Brownfields Program assesses, safely cleans up and sustainably reuses brownfields. Brownfields are sites that are difficult to expand, redevelop or reuse due to the presence or potential presence of a hazardous substance, pollutant, or contaminant.

State and local leverage sources are described in the discussion section below.

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

Pima County does own surplus property; however, we have not identified a specific property that would be appropriate for HUD funds through Annual Action Plan 2021.
CDBG or HOME. In the future, Pima County may be able to identify an appropriate site for HOME or CDBG.

**Discussion**

State leverage resources from the Arizona Departments of Housing and Economic Security include:

1. Low-income Housing Tax Credit financing for developers of affordable rental housing serving households with income below 60% of the area median income.
2. Homelessness prevention funding targeted to preventing eviction and maintaining housing stability.
3. Emergency Shelter Grant resources for street outreach, services, emergency/transitional shelter improvements and operating, addition of emergency/transitional housing beds, rapid rehousing (rental assistance), homelessness prevention, HMIS data collection and reporting, and administration.
4. HOME funds for housing development.
5. National Housing Trust Funds for rental housing serving extremely low-income households.

Local and private leverage resources include:

1. Outside Agency Program. Funded by the Pima County General Fund, the Outside Agency Program allocates funds to nonprofit agencies that provide overarching services, emergency food and clothing, senior support, services for vulnerable and at-risk children, youth and families, temporary shelter, support services, and homelessness prevention programs.
2. Department of Community and Workforce Development (CWD) programs. A division of CWD administers workforce investment and other programs to improve the economic and social sustainability of the County. These programs develop skilled workers for quality jobs, assist employers to address workforce and recruitment needs, mitigate the impact of layoffs, assist households in financial crisis, and help persons with barriers, such as homelessness and lack of literacy, to transition in the County’s economic talent pool.
3. Community Health programs. The Pima County Health Department is dedicated to helping residents of Pima County achieve and maintain an optimal level of wellness. The Department operates public health clinics, oversees consumer health and food safety, develops partnerships and collaborations to promote education and outreach on matters of public health and preventive health, and invests in supports for the behavioral health system.
4. Federal Home Loan Bank resources that support savings for homeownership and provide financing for affordable housing development and preservation.
5. General Obligation Bonds, should they be voter approved, to expand homeownership opportunities and provide access to affordable housing for low-income residents.

6. HOME matching funds from the County General Fund, project partners, and private resources, including sweat equity, third-party in-kind contributions, and below-market interest rate financing.

ESG matching funds from allowable costs incurred by sub-grantees, cash donations, and the value of third-party in-kind contributions. These resources fund 100% of the ESG match requirement.
# Annual Goals and Objectives

**AP-20 Annual Goals and Objectives - 91.420, 91.220(c)(3)&(e)**

## Goals Summary Information

<table>
<thead>
<tr>
<th>Sort Order</th>
<th>Goal Name</th>
<th>Start Year</th>
<th>End Year</th>
<th>Category</th>
<th>Geographic Area</th>
<th>Needs Addressed</th>
<th>Funding</th>
<th>Goal Outcome Indicator</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Community Facilities and Improvements</td>
<td>2020</td>
<td>2024</td>
<td>Non-Housing Community Development</td>
<td>2020 Countywide</td>
<td>Community Facilities and Improvements</td>
<td>Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 100000 Persons Assisted</td>
<td>Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit: 40 Households Assisted Buildings Demolished: 2 Buildings Housing Code Enforcement/Foreclosed Property Care: 20 Household Housing Unit</td>
</tr>
<tr>
<td>2</td>
<td>Public Services</td>
<td>2020</td>
<td>2024</td>
<td>Non-Housing Community Development</td>
<td>2020 Countywide</td>
<td>Public Services</td>
<td>Public service activities other than Low/Moderate Income Housing Benefit: 20000 Persons Assisted</td>
<td></td>
</tr>
<tr>
<td>3</td>
<td>Decent Affordable Homeowner Housing</td>
<td>2020</td>
<td>2024</td>
<td>Affordable Housing</td>
<td>2020 Town of Marana 2020 Countywide 2020 Ajo CDTA</td>
<td>Decent Affordable Housing</td>
<td>Homeowner Housing Rehabilitated: 160 Household Housing Unit</td>
<td></td>
</tr>
<tr>
<td>Sort Order</td>
<td>Goal Name</td>
<td>Start Year</td>
<td>End Year</td>
<td>Category</td>
<td>Geographic Area</td>
<td>Needs Addressed</td>
<td>Funding</td>
<td>Goal Outcome Indicator</td>
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<td>----------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>5</td>
<td>Program Administration</td>
<td>2020</td>
<td>2024</td>
<td>Program Administration</td>
<td>2020 Countywide</td>
<td>Program Administration</td>
<td>CDBG: $591,330</td>
<td>Other: 1 Other</td>
</tr>
</tbody>
</table>

Table 6 – Goals Summary

Goal Descriptions
<table>
<thead>
<tr>
<th>Goal Name</th>
<th>Goal Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>Community Facilities and Improvements</td>
<td>CDBG funds for development of or improvements to facilities for seniors, youth, persons with disabilities, abused and neglected children, neighborhood facilities, parks/recreation facilities, child care centers, fire stations/equipment, health facilities, nonprofit facilities, bus shelters, emergency/transitional shelters, parking facilities, non-residential historic preservation, including energy efficiency and disability accessibility improvements; development of or improvements to flood drainage, water/sewer systems, streets, and sidewalks in LMI areas, or for economic or housing development, including broadband, disability accessibility improvements; development of or improvements to group homes, emergency shelter/transitional housing facilities (that add beds); clearance and demolition or movement of buildings to other sites; acquisition of real property that will be developed for a public purpose; nonprofit organization capacity building; and cleanup of contaminated sites.</td>
</tr>
<tr>
<td>Public Services</td>
<td>CDBG funding for services to LMI individuals, including persons experiencing homelessness, seniors, persons with disabilities, youth, domestic violence survivors, people with serious mental illness, people with alcohol/substance use disorders, refugees, previously-incarcerated individuals, abused/neglected children, domestic violence survivors, improvements to or operating support for emergency/transitional shelter.</td>
</tr>
<tr>
<td>Decent Affordable Homeowner Housing</td>
<td>CDBG funding for rehabilitation, emergency repairs (and septic), including energy-efficiency and disability accessibility improvements for low and moderate income homeowners. Other federal, state, and local utility weatherization funding will also be incorporated into most of the CDBG Owner-occupied Housing Rehabilitation funded activities as available and appropriate.</td>
</tr>
<tr>
<td>Prevent and Reduce Homelessness</td>
<td>ESG funding for rent, mortgage, utility and related assistance to maintain housing stability and prevent homelessness; essential services including street outreach; operating support for emergency/transitional shelter; and monthly rental assistance for households experiencing homelessness (rapid rehousing).</td>
</tr>
<tr>
<td>5</td>
<td><strong>Goal Name</strong></td>
</tr>
<tr>
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<td>---------------</td>
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<tr>
<td></td>
<td><strong>Goal Description</strong></td>
</tr>
</tbody>
</table>
AP-35 Projects - 91.420, 91.220(d)

Introduction

The following projects are recommended to the Pima County Board of Supervisors through a competitive Community Planning Application process administered via the County’s Citizen’s Participation Plan

<table>
<thead>
<tr>
<th>#</th>
<th>Project Name</th>
</tr>
</thead>
</table>

Table 7 – Project Information

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

Pima County prioritizes its HUD entitlement funding in unincorporated and designated Community Development Target Areas (CDTA). In order for an area to be designated as a CDTA, at least 51% of the population in a Census Block Group must be LMI to meet the LMA CDBG National Objective.

Pima County provides direct technical assistance and guidance to its municipalities that participate in the HUD Urban County Program, which includes the Towns of Marana, Oro Valley, Sahuarita, and the City of South Tucson. Additionally, Pima County directly assists the Flowing Wells Neighborhood Association and Community Coalition (FWNACC) in the implementation if the HUD designated Flowing Wells Neighborhood Revitalization Strategy Area (NRSA).

Per 2 CFR 200, Pima County conducts annual risk assessments for all HUD funded Subrecipients; identifies agencies for on-site monitoring during the fiscal year; and provides justification to fund smaller, more rural community entities where HUD and Pima County resources may be the only potential funding opportunity for community improvement projects and programs. For ESG funds, direct consultation and coordination with the local Continuum of Care, Tucson Planning Council for the Homeless (TPCH), is incorporated into Pima County’s – and the City of Tucson’s – final recommendation for HUD-funded activities.
AP-38 Project Summary

Project Summary Information
AP-50 Geographic Distribution - 91.420, 91.220(f)

Description of the geographic areas of the entitlement (including areas of low-income and minority concentration) where assistance will be directed

Assistance will be directed to areas outside the City of Tucson, with particular emphasis on areas that qualify as Community Development Target Areas.

Geographic Distribution

<table>
<thead>
<tr>
<th>Target Area</th>
<th>Percentage of Funds</th>
</tr>
</thead>
<tbody>
<tr>
<td>2020 Catalina CDTA</td>
<td></td>
</tr>
<tr>
<td>2020 City of South Tucson CDTA (Future NRSA)</td>
<td>10</td>
</tr>
<tr>
<td>2020 Town of Marana</td>
<td>2</td>
</tr>
<tr>
<td>2020 Drexel Heights CDTA</td>
<td>1</td>
</tr>
<tr>
<td>2020 Arivaca CDTA</td>
<td>1</td>
</tr>
<tr>
<td>2020 Continental CDTA</td>
<td></td>
</tr>
<tr>
<td>2020 Countywide</td>
<td>73</td>
</tr>
<tr>
<td>2020 Ajo CDTA</td>
<td>7</td>
</tr>
<tr>
<td>2020 Avra Valley CDTA</td>
<td>1</td>
</tr>
<tr>
<td>2020 Cardinal/Valencia CDTA</td>
<td></td>
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<tr>
<td>2020 Kleindale CDTA</td>
<td></td>
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<tr>
<td>2020 Rillito CDTA</td>
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<tr>
<td>2020 Three Points CDTA</td>
<td>1</td>
</tr>
<tr>
<td>2020 Amado/Arivaca Junction CDTA</td>
<td>1</td>
</tr>
<tr>
<td>2020 Kinney/Bopp CDTA</td>
<td></td>
</tr>
<tr>
<td>2020 Sandario CDTA</td>
<td></td>
</tr>
<tr>
<td>2020 Flowing Well CDTA (Future NRSA)</td>
<td>2</td>
</tr>
<tr>
<td>2020 J-Six Ranchettes CDTA</td>
<td></td>
</tr>
<tr>
<td>2020 Benson Highway Corridor</td>
<td></td>
</tr>
</tbody>
</table>

Table 8 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

Pima County consists of 9,189 square miles - an area larger than the States of Rhode Island, Delaware and Connecticut combined. There are 5 incorporated cities and towns in Pima County, yet much of the County is unincorporated.

Each year CWD follows a Community Planning Process for projects, combining CDBG, Emergency Solutions Grant and Outside Agency Program funds (every other year). The Town of Marana and the City of South Tucson, the County’s two subrecipients, also followed a community planning process and
submit funding recommendations to CWD for activities in their jurisdictions.

All areas of unincorporated Pima County and incorporated jurisdictions outside the City of Tucson are eligible to apply for CDBG funds from Pima County. Some areas are eligible for designation as a Community Development Target Area (CDTA). CDTA designation allows a community to apply for CDBG funds using the CDBG areawide benefit objective without conducting special surveys to determine whether there are sufficient LMI households to meet CDBG requirements.

In general, to be designated as a CDTA at least 51% of the population in a Census Block Group must be LMI according to HUD LMISD data. Analysis of the LMISD data identified 18 Community Development Target Areas. Not all CDTAs will submit projects each year, nor will all CDTAs have projects that are funded each year.

Discussion

Application forms were posted on ZoomGrants and discussed with area agencies or residents attending one the Technical Assistance Workshops or individual technical assistance sessions; email notice was also provided to contacts on Pima County’s distribution list.

Proposals were reviewed using the following criteria. Staff will make funding recommendations to the Board of Supervisors in May:

- Eligibility of project
- Leverage of other funds
- Geographic distribution of projects
- Total cost and cost feasibility
- Urgency of the project
- Capacity for project to achieve objectives and be successful
- Capacity of project to clearly link to HUD statutory objectives and goals
- Coordination with other community development efforts
- Evidence of substantial neighborhood or public support
- Benefit to a high number of low/moderate income people
- Plan for permanent funding
- Ability to spend funds in timely manner

For awarded agencies, Pima County staff conducts a post award training to provide programmatic and financial direction to ensure grant compliance. Also, in a continued departmental effort to build agency capacity, staff is developing and will make available a technical assistance meeting for agencies not recommended funding.
AP-65 Homeless and Other Special Needs Activities - 91.420, 91.220(i)

Introduction

This section describes how Pima County will reach out to and assess the needs of people experiencing homelessness, address their emergency and transitional housing needs, help them to transition to permanent housing and independent living, prevent repeat homelessness, and prevent homelessness.

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

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

The CoC currently coordinates outreach activities through partnerships between the City of Tucson, Pima County, behavioral health entities, and local non-profit outreach programs. These efforts have proven effective in reaching out to unsheltered homeless people. Outreach workers are trained to conduct VI-SPDAT screening in the field and use progressive engagement strategies with unsheltered individuals toward the aim of engaging them in shelter, supportive housing, and/or other available housing subsidies.

Additionally, the City of Tucson has applied for SSO-Coordinated Entry funds through the CoC Program to expand outreach/assessment into rural and tribal communities, to increase assessment opportunities, and to expand currently limited navigation services. If approved, this will allow the CoC to better and more quickly bridge people experiencing unsheltered homelessness to housing resources.

Addressing the emergency shelter and transitional housing needs of homeless persons

ESG funds will be used to support emergency and transitional housing for people experiencing homelessness. Funds will provide essential services, including operations and maintenance for facilities assisting people experiencing homelessness, including particularly vulnerable populations.

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 CoC has an active by-name list approach that removes individuals/families from the housing referral list after 90 days with no contact. This reduces the frequency at which housing referrals are
made for households that cannot be located or that have self-resolved through other resources. The CoC is also assessing progressive engagement strategies and changes to its case conferencing procedures to increase on-going contact with people awaiting housing referral and to obtain necessary documents so that move-ins can occur swiftly upon housing referral. Increased aftercare and follow-up activities are being piloted by multiple State-funded projects serving families with the aim of quickly identifying and addressing issues that could result in repeat homelessness. Training for CoC case managers and project staff related to homelessness prevention and eviction assistance resources is taking place and resources have been developed to share with participants at exit and as needed during follow-up.

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

Individuals and families are able to access homelessness prevention resources across a continuum based on the immediacy of their risk, current housing situation, and family resources. The type of services varies by funding source ranging from rent/utility assistance only to a broad range of prevention assistance (transportation, vehicle repair, daycare, etc.) designed to help people remain stably housed. People being discharged from a publicly-funded institution of care also have access to these resources along with specialized coordination of services through nonprofit agencies that address the risk of homelessness among the re-entry population. Additionally, families are able to receive assistance from their child(ren)’s school through McKinney-Vento funds providing transportation, school supplies, free breakfast and lunch, case management/advocacy, and other services.

Pima County’s Housing First pilot program is a collaborative effort of the Pima County and City of Tucson Criminal Justice systems, the City of Tucson Housing and Community Development Department and Old Pueblo Community Services. The program is designed to coordinate housing and services for people that cycle between shelters, hospitals, jails, treatment programs, and the streets and may be overlooked by traditional approaches. The program accepts referrals from the collaborating organizations and provides employment services, parenting/coaching life skills, health and behavioral health services, substance use treatment and case management services. The program addresses the underlying systemic problems that result from criminalization of homelessness, arrests and rearrests for minor infractions, and other barriers that limit access to housing and increase the likelihood of recidivism.

**Discussion**

Pima County is an active member of the Tucson Pima Collaboration to End Homelessness. ESG and leverage funding, including several pilot programs and activities are directed towards preventing and reducing homelessness.
AP-75 Barriers to affordable housing -91.420, 91.220(j)

Introduction

Numerous barriers to affordable housing exist and still impact low-income persons in Pima County, including impeding public policies such as land use controls, tax policies, zoning ordinances, building codes, fees and charges, growth limitations and those affecting the return on residential investment. Pima County, in coordinated efforts as outlined in the 5-year Consolidated Plan with the City of Tucson will increase administrative efficiency, as well as delivery system of internal application review and funding. In doing so, these enhancements will positively impact affordable housing development, as well as other planned activities.

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

Pima County and the City of Tucson are working with the University of Arizona and others to prepare a Housing Study that will examine the existing housing stock, development trends and gaps to support a variety of housing options to meet the needs of the full range of household types in both the County and the City. The objectives of the study will help support greater understanding of the current and future demand for housing, and the need for housing for households at various income levels. Potential policies will be developed to support the development of new housing serve current and projected needs, allow central neighborhoods to maintain affordability, encourage homeownership, and direct housing development appropriately.

The City of Tucson is working with the University of Arizona to prepare a Vulnerable Neighborhood Index to provide greater information on communities that are vulnerable to displacement and gentrification. The study will be done in phases. The first phase is a heat map identifying vulnerable neighborhoods.

To further encourage affordable housing development, the consortium will:

1. Provide HOME funds to Low-income Housing Tax Credit projects, subject to underwriting and subsidy layering analyses.
2. Provide infrastructure, where practical, in support of affordable housing development.
3. Make HOME funds available for non-LIHTC projects.
4. Invest in neighborhood and community improvements.
5. Examine HOME program underwriting criteria.

Discussion
Introduction

This section discusses Pima County’s efforts to address underserved needs, expand and preserve affordable housing, reduce lead-based paint hazards, develop institutional structure for delivering housing and community development activities, and address identified impediments to fair housing choice.

Actions planned to address obstacles to meeting underserved needs

Pima County’s central long-term community development goal is to build healthy communities, focusing resources on community needs, particularly the needs of low and moderate income and other vulnerable residents. The principle of healthy communities means that communities provide the opportunities for people to thrive - economic growth, social vitality, environmental responsibility, access to healthy food, and to the extent possible access to transportation and housing choices.

Annual Action Plan resources are combined with other federal and local resources to address underserved needs, generally in five categories:

1. Community Services: overarching services for the entire County.
2. Emergency Food and Clothing: attending to the immediate needs of food & clothing.
3. Senior Support: services for the vulnerable elderly (meals, socialization, recreation, and volunteer coordination).
4. Support Services, Shelter and Domestic Violence Services: temporary shelter (for people experiencing homelessness, domestic violence survivors, youth, etc.); support services (case management, legal assistance, housing location assistance, etc.); and preventing homelessness among all vulnerable populations (identify, intervene and transition to permanent affordable housing).
5. Youth, Young Adults and Family Support: services for vulnerable and at-risk children, youth, young adults and families.

Actions planned to foster and maintain affordable housing

During the coming year, the County will:

- Promote homeownership by providing down payment and closing cost assistance to LMI households in partnership with the City of Tucson, local HUD-approved housing counseling agencies and locally-approved Community Housing Development Organizations.
- Promote the development of affordable housing to serve low-income homebuyers and renters.
- Coordinate resources with the Pima County Community Land Trust to provide affordable
housing units.
- Prioritize projects that maximize leveraged funding from other public and private resources such as the Low-income Housing Tax Credit Program; Federal Home Loan Bank Affordable Housing, WISH and IDEA Programs; and land and resources donated by municipalities.
- Continue to provide affordable housing referral and information access, including web-based listings of affordable rental housing choices and service resources.
- Continue monitoring of previously funded affordable housing activities for compliance with federal and local regulations.

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

Any structure built before 1978 that is proposed for rehabilitation under federal programs is tested for lead-based paint. Notices and requirements regarding testing and removal of lead-based paint are provided to program participants, contractors and project sponsors. Licensed contractors are available to perform appropriate abatement and/or removal procedures if lead-based paint is present.

The Consortium follows strict HUD guidelines for testing and abatement of lead-based paint and other hazardous substances, requiring contractor and subcontractor compliance with guidelines. Rehabilitation activities are procured through a bidding process and contracted to licensed contractors. All contractors and subcontractors are required to comply with HUD Lead Safe Housing requirements and federal National Environmental Policy Act environmental review procedures. In addition, the Consortium follows a multi-pronged approach to reduce lead hazards:

1. **Section 8 Housing Choice Vouchers.** The PHA inspects prospective dwellings constructed prior to 1978 that will be occupied by households that have a child under the age of six for compliance with EPA and HUD Lead Based Paint rules and regulations. The inspection includes visual inspections for chipped, peeling, chalking and deteriorated interior and exterior paint. Clearance testing may be performed after remediation by the property owner, to assure a lead-safe environment.
2. **Public Education.** Lead Hazard Information is distributed to participants in homeownership and rental programs.

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

Pima County will take multiple efforts that combined will reduce the incidence of poverty and help people move from crisis to stability. Most activities undertaken with CDBG, HOME, and ESG funds are efforts to reduce the number of persons living in poverty and improve the quality of life for city residents.

The County will continue its economic development efforts, working cooperatively with employers, workforce investment agencies, and education agencies to promote jobs-based education and services
to help lower-income households attain higher-wage employment.

In addition, the County will continue to support emergency assistance programs, and a variety of other support services needed by low-income households to obtain basic necessities and avert crisis and homelessness, including:

1. Community Services: overarching services for the entire County.
2. Emergency Food and Clothing: attending to the immediate needs of food & clothing.
3. Senior Support: services for the vulnerable elderly (meals, socialization, recreation, and volunteer coordination).
4. Support Services, Shelter and Domestic Violence Services: temporary shelter (for homeless, victims of domestic violence, teens, etc.); support services (case management, legal assistance, housing location assistance, etc.); and preventing homelessness among all vulnerable populations (identify, intervene and transition to permanent affordable housing).
5. Youth, Young Adults and Family Support: services for vulnerable and at-risk children, youth, young adults and families.

Pima County will also continue its efforts to attain HUD’s Section 3 goals:

- Distribute Section 3 employment, training and contracting information through the Pima County One-Stop, other County departments and employment agencies;
- Conduct pre-bid and pre-construction meetings for Section 3 covered projects to inform contractors of Section 3 employment, contracting, and training opportunities goals and requirements;
- Collect Section 3 reporting information on a quarterly basis from sub-recipients and submit an annual report to HUD.

Actions planned to develop institutional structure

Pima County and the City of Tucson recognize the benefits of increasing administrative efficiencies to improve the delivery system. During the next year the Consortium members will:

1. Reestablish their respective Housing Commissions to address the need for affordable housing.
2. Work with program partners to:
   - Increase and coordinate homelessness prevention resources; and
   - Examine approaches to developing additional permanent supportive housing, family shelter and low demand shelter.
3. Evaluate a first-come, first-served process for allocating HOME rental housing funds to quickly address the need for rental housing.
2. Examine alternate methods of fair housing outreach and education to reach a broad range of individuals and organizations.
3. Develop resources to reach landlords and encourage participation in tenant-based rental assistance and acceptance of households with unique backgrounds.
4. Examine methods of increasing homelessness outreach in rural areas.

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

Pima County and the City will continue to work together and with public and private housing and social service agencies to build trust, and expand a collaborative mindset that honors the contributions, needs and perspectives of local service providers. The County and City will also continue to examine methods to allocate funds to a flexible funding pool to address unique issues or pilot new initiatives on a small scale. Actions that may allow for co-funding of highly effective projects at significant levels, alignment of funding application processes that allow for a single application to both entities, and coordinated contract requirements will also be examined. As a participant in the Continuum of Care, the County will continue to work with public and private housing and social service agencies to improve coordination between workforce development resources and Section 8 Housing Choice Voucher and public housing programs for people experiencing homelessness.

**Discussion**

To address identified impediments to fair housing choice, Pima County will:

- Continue funding for fair housing education, outreach and enforcement activities throughout Pima County. Housing professionals from the nonprofit and for-profit sectors (i.e. property managers, developers; realtors; mortgage lenders; mortgage insurers; and others) and consumers will be encouraged to attend fair housing and/or affirmative marketing training.
- Monitor trainings to housing consumers about fair housing rights and responsibilities.
- Provide fair housing literature at the Pima County Housing Center.
- Require robust affirmative marketing by recipients of CWD funds.
- Affirmatively further fair housing by encouraging the investment funds in projects and programs that invest in areas of racial and ethnic concentrations or assist residents to relocate to areas of high opportunity.
- Celebrate Fair Housing Month by organizing a community event (in conformance with CDC guidelines)
Program Specific Requirements
AP-90 Program Specific Requirements - 91.420, 91.220(l)(1,2,4)

Introduction

Community Development Block Grant Program (CDBG)
Reference 24 CFR 91.220(l)(1)
Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out.

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

Other CDBG Requirements

1. The amount of urgent need activities 0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan. 70.00%

Emergency Solutions Grant (ESG)

Annual Action Plan 2021

OMB Control No: 2506-0117 (exp. 09/30/2021)
Reference 91.220(l)(4)

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

The Emergency Solutions Grant Policy Manual is attached

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

The Tucson Pima Collaboration to End Homelessness has Coordinated Entry Policies and Procedures. Coordinated Entry is both a standardized access and assessment model and a coordinated referral and housing placement process. The goal is to ensure that people experiencing homelessness receive appropriate housing assistance and services.

The Coordinated Entry process is a "no wrong door" approach that uses a standardized process from initial engagement to successful housing placement. In summary, the policies and procedures include:

- Trained homeless service providers use the Vulnerability Index and Service Prioritization Decision Assistance Tool (VI-SPDAT) as the common assessment unless the assessor believes the depth of the individual’s vulnerability warrants a full SPDAT.
- If an individual agrees to participate in the coordinated entry process, they are asked to sign the release of information before proceeding with the assessment. The information is entered into HMIS.
- Each housing program serves as the primary point of contact to assist a matched client with navigating their matched housing program. The navigator works with outreach teams to locate the client and help collect any documentation needed for a voucher. Housing navigators are those who currently work for agencies participating in Coordinated Entry.

A uniform process is used across the community for assessing individuals, matching them to an intervention, and within each category, prioritizing placement into housing.

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

Pima County and the City of Tucson receive an ESG formula grant. To promote consistent standards and avoid duplicate and unnecessary assistance, the County and the City collaborate in the development of policies and procedures regarding the disbursement of funds and data collection. There are differences between the jurisdictional requirements and procedures due to jurisdictional target area differences. Pima County is focused on unincorporated areas whereas the City of Tucson is focused on the population within city limits.
Funds are awarded by the ESG Grantees (County and City) on a competitive basis. A Community Planning Application/Request for Proposal (RFP) Notice is released through the Continuum of Care as well as through the City Participation Process. Pima County also solicits the Community Planning Application through public meetings throughout the Planning/RFP period. Pima County and the City of Tucson jointly make funding allocations through an allocation committee. Members of the allocation committee are selected for their knowledge of services and participation in the Continuum. Committee members first review and rank proposals individually. Proposals are then reviewed and ranked by the committee, which makes the final funding recommendations.

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

The Tucson Pima Collaboration to End Homelessness reaches out to and consults with individuals currently and formerly experiencing homelessness in considering policies and funding decisions regarding facilities and services funded with ESG resources.

5. Describe performance standards for evaluating ESG.

The Tucson Pima Collaboration to End Homelessness ESG Written and Performance Standards provide measures to evaluate the effectiveness of:

1. Targeting resources to those most in need of assistance;
2. Reducing the number of people living on the streets and in emergency shelters;
3. Shortening the time people spend homeless; and
4. Reducing program participants’ housing barriers or housing stability risks

Discussion