

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.

San Joaquin County completed the fifth year (program year 2019) of the five year period for the San Joaquin County Consolidated Plan in June 2020. The outcomes are a result of the ability of the County's existing provider network (grantees and subrecipients) to implement projects and programs to produce results contingent on the amount of Federal, State, County and private dollars available during the fourth year of the Consolidated Plan. The projects, programs and services selected for funding during the last program year of 2019/20 met a majority of goals and objectives identified in the County's Consolidated Plan, as well as helped move forward the County's commitment to meeting the following priorities:

- To provide decent housing by preserving the affordable housing stock, increasing the availability of affordable housing, reducing discriminatory barriers, increasing the supply of supportive housing for those with special needs, and transitioning homeless persons and families into housing;
- To provide a suitable living environment through safer, more livable neighborhoods, greater integration of lower-income residents throughout San Joaquin County communities, increased housing opportunities, and reinvestment in deteriorating neighborhoods;
- To expand economic opportunities through more jobs paying self-sufficiency wages, homeownership opportunities, development activities that promote long-term community viability, and the empowerment of lower-income persons to achieve self-sufficiency.

Some of the specific highlights of the program year included the following:

- Approximately \$3.5 Million was expended in CDBG Entitlement and Program Income monies for PY 19/20
- Nearly \$4.2 Million was expended in HOME Entitlement and Program Income monies for PY 19/20
- This year represents the County's 3rd straight year of meeting its HUD timeliness test which is ran in early May each year. The County had fallen behind in the first two years of this Con Plan cycle. The County made significant changes to their program after missing two years in a row, and those changes have shown to be quite successful in ensuring timeliness is met each year.
- This year marked the 3rd full year of implementing the housing rehab program after many years of it being "on hold" due to

understaffing. Six Rehabilitation projects were completed in the fiscal year.

- Public Service dollars continue to be highly used and productive. Each year the County receives far more requests than what is available. These funds assisted far more persons than originally planned for and continue to be provided to better meet the needs of the community. Over \$400,000 was expended for public service activities during 19/20 PY.
- The County continued to commit and expend funds on public infrastructure and public facilities projects with over \$1.8 million being expended in 19/20 PY.

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
Expand Affordable Housing Opportunities	Affordable Housing	CDBG: \$ / HOME: \$	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	250	445	178.00%			
Expand Affordable Housing Opportunities	Affordable Housing	CDBG: \$ / HOME: \$	Rental units constructed	Household Housing Unit	40	0	0.00%	77	0	0.00%
Expand Affordable Housing Opportunities	Affordable Housing	CDBG: \$ / HOME: \$	Rental units rehabilitated	Household Housing Unit	25	4	16.00%	151	0	0.00%

Expand Affordable Housing Opportunities	Affordable Housing	CDBG: \$ / HOME: \$	Homeowner Housing Added	Household Housing Unit	4	28	700.00%	12	0	0.00%
Expand Affordable Housing Opportunities	Affordable Housing	CDBG: \$ / HOME: \$	Homeowner Housing Rehabilitated	Household Housing Unit	75	13	17.33%	6	4	66.67%
Expand Affordable Housing Opportunities	Affordable Housing	CDBG: \$ / HOME: \$	Direct Financial Assistance to Homebuyers	Households Assisted	100	44	44.00%	18	8	44.44%
Expand Affordable Housing Opportunities	Affordable Housing	CDBG: \$ / HOME: \$	Homeless Person Overnight Shelter	Persons Assisted	250	445	178.00%			
Expand Affordable Housing Opportunities	Affordable Housing	CDBG: \$ / HOME: \$	Overnight/Emergency Shelter/Transitional Housing Beds added	Beds	0	0				
Expand Affordable Housing Opportunities	Affordable Housing	CDBG: \$ / HOME: \$	Housing for Homeless added	Household Housing Unit	0	0		0	0	
Expand Affordable Housing Opportunities	Affordable Housing	CDBG: \$ / HOME: \$	Housing for People with HIV/AIDS added	Household Housing Unit	0	0		0	0	

Fair Housing	Non-Homeless Special Needs Fair Housing	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	20000	6358	31.79%	350	1796	513.14%
Homeless Prevention and Rapid Re- Housing	Homeless	CDBG: \$ / ESG: \$	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	0	101				
Homeless Prevention and Rapid Re- Housing	Homeless	CDBG: \$ / ESG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	180	248	137.78%			
Homeless Prevention and Rapid Re- Housing	Homeless	CDBG: \$ / ESG: \$	Homeless Person Overnight Shelter	Persons Assisted	520	0	0.00%	196	0	0.00%
Homeless Prevention and Rapid Re- Housing	Homeless	CDBG: \$ / ESG: \$	Overnight/Emergency Shelter/Transitional Housing Beds added	Beds	0	0		45	0	0.00%
Homeless Prevention and Rapid Re- Housing	Homeless	CDBG: \$ / ESG: \$	Homelessness Prevention	Persons Assisted	530000	0	0.00%			
Infrastructure Improvements	Non-Housing Community Development	CDBG: \$	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	100000	9053	9.05%	7985	2885	36.13%

Planning and Administration	Administration	CDBG: \$ / HOME: \$	Other	Other	1	1	100.00%	1	1	100.00%
Public Facilities	Non-Homeless Special Needs Non-Housing Community Development	CDBG: \$	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	530000	39067	7.37%	3746	33345	890.15%
Public Facilities	Non-Homeless Special Needs Non-Housing Community Development	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	0	8				
Public Facilities	Non-Homeless Special Needs Non-Housing Community Development	CDBG: \$	Homeowner Housing Rehabilitated	Household Housing Unit	0	8		0	8	
Public Facilities	Non-Homeless Special Needs Non-Housing Community Development	CDBG: \$	Homeless Person Overnight Shelter	Persons Assisted	175	178	101.71%			
Public Facilities	Non-Homeless Special Needs Non-Housing Community Development	CDBG: \$	Overnight/Emergency Shelter/Transitional Housing Beds added	Beds	0	0				

Public Services	Public Services	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	315000	210575	66.85%	9818	66642	678.77%
Public Services	Public Services	CDBG: \$	Homeless Person Overnight Shelter	Persons Assisted	0	0		0	0	
Public Services	Public Services	CDBG: \$	Overnight/Emergency Shelter/Transitional Housing Beds added	Beds	0	0		0	0	
Self-Sufficiency through Economic Development	Non-Housing Community Development	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	400	0	0.00%			
Self-Sufficiency through Economic Development	Non-Housing Community Development	CDBG: \$	Facade treatment/business building rehabilitation	Business	50	2	4.00%	0	2	
Self-Sufficiency through Economic Development	Non-Housing Community Development	CDBG: \$	Businesses assisted	Businesses Assisted	250	37	14.80%	0	2	

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.

San Joaquin County has a long tradition of innovative policies and actions designed to provide a healthy environment in the urban county which supports, develops, and maintains viable communities by providing decent and affordable housing, suitable living environments, and expanded

economic opportunities for low- and moderate-income persons and special populations. The County continued to concentrate on improving neighborhoods and increasing accessibility for persons with disabilities, as well as supporting human service agencies that provide needed public service to lower-income and special needs residents countywide.

During FY 2019-20, San Joaquin County administered its Federal grant funds in a manner consistent with the National Objectives of the Housing and Community Development Act of 1974, as amended. According to the PR26 report which has been attached to this CAPER, 97.71% of CDBG funds were spent on activities that benefited low- and moderate-income persons - a significant accomplishment when compared to the statute that requires this to be 70% overall. Income data from the 2011-2015 ACS was used to identify areas throughout the County where at least 51 percent of the population met the HUD established moderate income criteria. In order to maximize the benefit to low- and moderate-income persons, project activities have been and continue to be located predominately within these areas of the highest needs. Exceptions to projects being located in only low/mod areas are public services, as they provided a direct benefit to a limited clientele or presumed benefit clientele.

One area to note that fell short of our goal was affordable housing opportunities. Although rehab and homebuyer activities were successful, the large scale projects where units were to be constructed or rehabbed have not come to fruition yet. These projects are moving forward but take significant time and almost always take longer than the 12 months that the CAPER reports on.

Each program, project or activity undertaken in the 2019 program year with funds available through CDBG, HOME and ESG met and addressed a specific priority or objective outlined in the five year Consolidated Plan or Annual Plan. All funds expended were aimed at providing a direct benefit to low-income persons and/or households.

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	ESG
White	73,765	16	0
Black or African American	11,861	0	0
Asian	9,494	4	0
American Indian or American Native	712	0	0
Native Hawaiian or Other Pacific Islander	2,541	0	0
Total	98,373	20	0
Hispanic	42,921	8	0
Not Hispanic	55,452	12	0

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

Narrative

Each year, the County assesses the extent to which minority groups utilize and access the projects and program administered by the County and its sub-recipients. Under-representation is defined as any group that is not represented within a whole percentage point of that group's representation in the population as a whole. The evaluation is conducted for racial and ethnic minorities, persons with disabilities and female-heads of household. According to the American Fact Finder Census Data, San Joaquin County continues to become more racially and ethnically diverse. The data shown in the table above does not raise any significant concerns when cross referenced with the Census data - which would qualify as an under representation. The County will continue to monitor the assisted beneficiaries to ensure no races or ethnicities are being specifically excluded with these funds.

CR-15 - Resources and Investments 91.520(a)

Identify the resources made available

Source of Funds	Source	Resources Made Available	Amount Expended During Program Year
CDBG	public - federal	3,551,540	3,494,751
HOME	public - federal	3,340,262	4,158,194
ESG	public - federal	227,808	203,133

Table 3 - Resources Made Available

Narrative

In 2019, an excess of \$3.5 million was made available for the CDBG program based on a higher than anticipated amount of Program Income being receipted. The County is very pleased to report that over nearly that same dollar amount was expended this past Program Year on CDBG projects/programs. 2019 marked the 3rd straight year that the County was successful in meeting its 1.5 expenditure ratio requirement (after failing to meet it the first two years of the Con Plan). The HOME program also received a higher amount of Program Income than expected, thus more dollars were expended than originally planned for, with over \$4.1 million being expended. Lastly, ESG had another successful year with \$203,133 being expended. In total, the County expended nearly \$8 million with CDBG, HOME and ESG funds.

Identify the geographic distribution and location of investments

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description
Urban County	100	100	Urban County

Table 4 – Identify the geographic distribution and location of investments

Narrative

The County of San Joaquin's funds were distributed within the urban county, which is defined as the unincorporated areas of the County as well as the following cities: Escalon, Lathrop, Manteca, Ripon, and Tracy. For annual grant dollars, the County utilizes a formula based distribution system which divides the funds to each jurisdiction based on population, poverty and need factors.

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.

CDBG and HOME funds are distributed to the County to each jurisdiction within the County, using the same formula basis that HUD uses to allocate the funding to the County. Those jurisdictions participating in the urban county are as follows: Escalon, Lathrop, Manteca Tracy, and Ripon. Each urban county jurisdiction conducts a separate public participation process within their jurisdictions to determine what local community needs should be addressed with available resources within their communities.

Federal match requirements apply to the County's HOME funds. The HOME program requires that for every HOME dollar spent, the County must provide 25 percent match with non-federal dollars. Currently, the County still maintains an excess in match requirements from previous fiscal years of nearly \$5 million. This excess match will fulfill the County's HOME match requirements for many years at the current level of HOME funding.

The County did not use any public owned land or property to address the needs identified in the Plan.

Fiscal Year Summary – HOME Match	
1. Excess match from prior Federal fiscal year	5,068,135
2. Match contributed during current Federal fiscal year	80,323
3. Total match available for current Federal fiscal year (Line 1 plus Line 2)	5,148,458
4. Match liability for current Federal fiscal year	214,647
5. Excess match carried over to next Federal fiscal year (Line 3 minus Line 4)	4,933,811

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
2463	02/14/2020	37,058	0	0	0	0	0	37,058
2672	04/30/2020	27,504	0	0	0	0	0	27,504
2675	05/14/2020	15,761	0	0	0	0	0	15,761

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 beginning of reporting period \$	Amount received during reporting period \$	Total amount expended during reporting period \$	Amount expended for TBRA \$	Balance on hand at end of reporting period \$
3,067,555	3,060,224	3,073,174	0	3,054,605

Table 7 – Program Income

Minority Business Enterprises and Women Business Enterprises – Indicate the number and dollar value of contracts for HOME projects completed during the reporting period						
	Total	Minority Business Enterprises				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
Contracts						
Dollar Amount	59,594	0	0	0	0	59,594
Number	2	0	0	0	0	2
Sub-Contracts						
Number	1	0	0	0	1	0
Dollar Amount	26,667	0	0	0	26,667	0
	Total	Women Business Enterprises	Male			
Contracts						
Dollar Amount	59,594	0	59,594			
Number	2	0	2			
Sub-Contracts						
Number	1	0	1			
Dollar Amount	26,667	0	26,667			

Table 8 - Minority Business and Women Business Enterprises

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 Property Owners				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
Number	0	0	0	0	0	0
Dollar Amount	0	0	0	0	0	0

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 Acquired		0		0		
Businesses Displaced		0		0		
Nonprofit Organizations Displaced		0		0		
Households Temporarily Relocated, not Displaced		0		0		
Households Displaced	Total	Minority Property Enterprises				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
Number	0	0	0	0	0	0
Cost	0	0	0	0	0	0

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	77	0
Number of Non-Homeless households to be provided affordable housing units	187	12
Number of Special-Needs households to be provided affordable housing units	0	0
Total	264	12

Table 11 – Number 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	89	0
Number of households supported through Rehab of Existing Units	157	4
Number of households supported through Acquisition of Existing Units	18	8
Total	264	12

Table 12 – Number of Households Supported

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

As with every program year, the County does its best to estimate one-year goals that will be accomplished through various programs and projects. Unfortunately, as shown in the table above, some fared better than others. This year marked the third full year of the County's owner-occupied rehab program being offered. The County is pleased with its progress as it assisted 4 homeowners in addressing health/safety issues and code violations. Since "re-introducing" the rehab program, the

County has now assisted 14 low income homeowners with correct health and safety issues over the past 3 years.

The County continued to use HOME monies to fund its GAP loan program in FY 19/20. A total of 8 loans were closed during this last year, while we had proposed a one year goal of 10 in our Annual Action Plan, so again, a very strong showing for this program. It should also be noted that the County utilizes additional HOME monies to fund their CHDO that actually purchases these units, rehabs them and then they then turn into homebuyer assistance loans. The County has operated this program since 1994, and this marks its 26th year of successfully assisting first time homebuyers in the County. Over these 25 years, the County is pleased to report that approximately 562 low income buyers have received financial assistance through this program.

The shortfall in the tables above stems from "projects" that are in progress and have not been completed yet due to a variety of reasons. We do anticipate some of these projects being reported in the next program year; however, as of this date no accomplishments can be reported as they have not been completed. Those projects include Stone Meadows Housing project which is currently rehabbing approximatey 72 affordable housing units, Tracy Housing Authority which is rehabbing 79 affordable housing units, Victory Gardens which is constructing 77 new rental units for the homeless, and 12 new single family units by the City's CHDO for the Vista Subdivision.

Discuss how these outcomes will impact future annual action plans.

The County maintains committed to affordable housing opportunities and providing safe and decent housing for all its residents. The outcomes above show that the County can operate successful programs for both owner occupied rehab and first time homebuyers. Staff will continue to focus on improving the function of these programs as there seems to be a high need for these funds, and moving money faster will be a goal for future action plans.

Additionally, the County recognizes that affordable projects take a significant amount of time and up-front planning, and it can be very difficult to see these projects come to fruition within 12 months. It is imperative that projects are vetted fully in the funding process to ensure timelines and estimates are correct and reliable. As stated above, the County expects two projects to be completed this coming program year that will be reported on in the next CAPER.

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	3	1
Moderate-income	1	7
Total	4	8

Table 13 – Number of Households Served

Narrative Information

As shown in the above tables, a total of 4 housing rehabilitation projects were completed with CDBG funds in the last Program Year with others in process or in the queue. All homeowners were either low or moderate income, and were in need of necessary Housing Quality Standards property improvements. This was the third full year for the housing rehab program in the last 7 years. The County has hired additional staff to assist with these projects and continues to gain capacity in moving these funds and projects forward. A waiting list is maintained for the program while projects are completed as the County is only able to assist one or two homeowners at a time.

8 GAP loans (First Time Homebuyer) were completed in this reporting period housing HOME funds. All 8 clients that received assistance were in the low/moderate income category. The clients were required to take a HUD approved Homebuyer Course and provide a certificate of completion. Almost all of the homebuyer loans started as a purchase by a local non-profit that the County works with to rehab the homes to a better standard, and then roll them into a GAP loan for first-time homebuyers looking to purchase their first home. The GAP program is offered Countywide and will continue to be operated in the coming program year.

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

San Joaquin County Continuum of Care is the lead agency of a collaborative effort that has resulted in the receipt of grant funds under HUD's Continuum of Care (CoC), which is a comprehensive approach to assist individuals and families move from homelessness to self-sufficiency. San Joaquin County Community Development Department (CDD) is designated as the administrative entity for the administration of the CoC project grant funds. CoC is designed to provide permanent supportive housing opportunities for homeless people with disabilities (primarily those who are seriously mentally ill), have chronic alcohol and drug problems, or have HIV/AIDS.

CoC specifically helps homeless people live as independently as possible by facilitating the development of housing and related supportive services for people moving from homelessness to independent living. Services typically include mental health services, substance abuse treatment, health care, educational assistance, parenting classes, and employment training. There are currently eight CoC programs underway, which are being operated by Central Valley Low Income Housing and Lutheran Social Services.

The County conducts an annual count and survey of the sheltered homeless population. In addition, surveys of the unsheltered homeless population are conducted on a bi-annual basis. These surveys allow the County to reach as many of the homeless population to better understand their needs and if any improvements are being made to the overall baseline.

Addressing the emergency shelter and transitional housing needs of homeless persons

The County received \$227,808 from HUD for the 2019-209 ESG Program and distributed these funds to ten (10) homeless shelters and service providers. Agencies receiving ESG assistance are: Stockton Shelter for the Homeless, St. Mary's Interfaith Community Services, Women's Center Family and Youth Services, and Gospel Center Rescue Mission, all in Stockton; Haven of Peace in French Camp; McHenry House in Tracy; Lodi House and Hope Harbor Archway Shelter in Lodi; and HOPE Ministries in Manteca. Central Valley Low Income Housing Corporation (CVLIHC) uses funds for HMIS, rapid re-housing and homeless prevention. During the reporting period, \$203,133 ESG funding was expended. Funding was used to offset expenses for HMIS, shelter operations, essential services, rapid re-housing, and homeless prevention services. All ESG funds have been matched with private funds that were received by the individual organizations through donations and fundraising activities.

Additionally, the County provided multiple non-profits and shelters with CDBG funding aimed at

offsetting the operational costs of their shelters to ensure they remain open and beds are being supplied to those who need it the most. In the program year, these shelters with public service dollars expended over \$1,129,049 in funds aimed at public improvements and services to those needing emergency shelter (families, individuals, abused women, children, etc.).

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 County administers the ESG grants from HUD. A portion of the funds are used to provide rent assistance to homeless persons through programs operated by Central Valley Low Income Housing Corporation (CVLIHC) to prevent homelessness.

The CoC has been coordinating in local discharge planning efforts with several agencies to ensure those who are discharged from a system of care are not released directly to the streets or emergency shelters. To date, discussions and plans are being made with several agencies, which include foster care, mental health, substance abuse, health care services and jails to implement a discharge policy.

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

San Joaquin County currently oversees the implementation of the CoC Program. The CoC Programs promote the development of permanent housing and supportive services that help participants transition from homelessness to independent living. Current programs are operated by Central Valley Low Income Housing Corporation (CVLIHC) and Lutheran Social Services. The CoC programs have been funded through HUD's Homeless Assistance Continuum of Care process. Through HUD's application process, the County has successfully secured annual funding since 1996.

The program requires that all rent assistance be matched with an equal amount of supportive services. Supportive services received by the program participants include case management, health care, mental health services, substance abuse services, HIV/AIDS services, education and job training. These programs are running concurrently and are at or near capacity.

During FY 2019-20, permanent supportive housing for persons with disabilities were provided to 356

persons per month through the CoC Program. A total of \$2,284,245 of rental assistance and administration funds were spent during this reporting period.

During FY 2019-20, rapid rehousing programs provided permanent housing to 308 persons per month through the CoC Program. A total of \$2,161,665 of rent assistance, supportive services and administration funds were spent during this reporting period. Also, \$138,000 was spent on a CoC Planning grant to facilitate the CoC programs and projects.

The Continuum of Care has identified the following homeless and homeless prevention strategies:

1. Continue to develop strong working partnerships between existing network of support service providers to maintain the percentage of homeless persons remaining in permanent supportive housing for at least six months.
2. Maintain and improve current employment support practices and services and developing continuing strategies to implement and build on elements identified in the 12-month plan.
3. Focus support service strategies on improving education and skill sets of program participants while still emphasizing the importance of immediate employment even if at entry level positions.
4. Use available HPRR funds to prevent households with children from becoming homeless and to identify households with children who need minimal assistance to obtain and maintain permanent housing.

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

Actions taken to address the needs of public housing

Public Housing is a program that provides rental assistance to low-income residents of the San Joaquin area, available to those eligible households who qualify. The Housing Authority of San Joaquin County uses income limits developed by HUD to approve participants in their programs. HUD sets the lower income limits at 80% and very low income limits at 50% of the median income for the County. The Housing Authority manages and maintains 1,376 units in a mixture of single-family and multi-family buildings, which are located throughout San Joaquin County. The County did not take any direct actions with CDBG, HOME or ESG funds towards public housing, but is always interested in the creation and maintenance of public housing to ensure all community residents are served.

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

The County encourages its public housing residents to become involved in their communities and further their ability to participate in homeownership. Throughout the course of the program year, Homebuyer workshops at the Housing Authority and non-profit sites were offered on a variety of days and times, and open to all interested participants. Public housing units were notified of such classes to encourage a high level of participation. These workshops provide invaluable information on the buying process, financial planning, red flags to watch out for and more. Additionally, the County's Community Development staff conducts presentations for their GAP program throughout the course of the year.

Actions taken to provide assistance to troubled PHAs

No action taken. No troubled PHA's have been identified in the County.

CR-35 - Other Actions 91.220(j)-(k); 91.320(i)-(j)

Actions taken to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment. 91.220 (j); 91.320 (i)

The County is committed to removing barriers that restrict the ability of affordable housing projects and programs to be implemented. No specific obstacles were identified in this Program Year, thus no action to be reported.

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

One of the greatest challenges in meeting the underserved needs of low- and moderate-income persons is having limited financial resources. The Urban County will continue to use its CDBG, HOME, and ESG funding to support the development of affordable housing and public service agencies that address the special needs of the underserved. The County also proactively seeks additional resources to better meet the underserved needs. The County will be pursuing grant dollars through the National Housing Trust Fund which will be principally used to expand affordable housing opportunities through new construction and acquisition/rehabilitation for the underserved.

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

No obstacles have been identified to reduce lead based paint hazards thus no new specific actions have been implemented. The County has designed its various housing programs to comply with 24 CFR Part 35. In addition, County housing rehabilitation programs allow for the abatement of lead-based paint as an eligible activity for assistance. A lead based paint procedure has been created and added to the rehabilitation policies and procedures manual.

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

NEARLY 20% of the County's residents live at or below the poverty line according to the American Fact Finder (US Census). Poverty impacts all aspects of an individual's life that are caused by a myriad of complex factors but primarily, it is a function of income, which is related to opportunity, education, job training, and employment. Therefore, the County's primary anti-poverty strategy is to create and foster employment and economic opportunities for low income residents.

The Urban County will continue to support organizations that specialize in bringing jobs to the County and organizations that provide job training. In addition, the County's funding (through CDBG and ESG funds) of human service programs for basic needs, food distribution, and case management for homeless and those at risk of homelessness support the overall goal of reducing the number of families living in poverty.

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

The San Joaquin County Board of Supervisors delegated the responsibility of preparing and implementing the County's Consolidated Plan to the Community Development Department, which has been administering HUD programs in San Joaquin County since 1985. In maintaining the objectives identified in the 2015-19 Consolidated Plan, the County continues to take further action to address the gaps that presently exist in their operations. They are as follows:

- Coordinate Decision Making: County staff is continuing to work with each City in the County to determine what needs are most needed for each area to ensure coordination and the same goals are being met across the board.
- Expansion of Outreach: County staff is attempting to market the available programs on a broader level to ensure not just the same organizations access the funds to assist with a wider net of beneficiaries.
- Improve timely implementation of projects: Staff has met with sub-recipients to better explain the expenditure requirements and encouraging applications for funds that have the best chance of actually completing a project or program within the program year.

Currently, we are working with HUD, the County Administrators Office (CAO) and the Homelessness Task Force to transition and incorporate the Task Force into the CoC structure in order to increase cooperation and collaboration among the County, all the cities, and the various non-profits to have a more robust and coordinated effort in helping the homeless population throughout the County and cities. As part of the reorganization, we are creating a new position of Program Administrator - Homeless Initiatives through the CAO's Office to oversee and coordinate the homeless programs among the County, cities and non-profits.

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

The Housing Authority of the County of San Joaquin (HACSJ), established by state legislation, plays a significant role in providing decent, safe, affordable housing and support services to lower-income households, elderly, and disabled persons of San Joaquin County since 1942. The Housing Authority manages, maintains, and improves public housing, provides supportive services, and offers opportunities for economic advancement to public housing residents.

The Housing Authority maintains programs to assist the low- to moderate income community with their housing costs. These Assisted Housing Programs consist of the Housing Choice Voucher Program (HCVP) and Public Housing Program. The Housing Authority's Section 8 Housing Choice Voucher Program provides assisted families an incentive for employment opportunities through its Family Self Sufficiency (FSS) Program. The FSS Program participants receive resources and are taught job skills that enable them to gain employment and become self-sufficient over a five year period.

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

As a recipient of Community Development Block Grant (CDBG) and HOME funds from HUD, the County must certify and maintain their ability to affirmatively further fairness and equal opportunity in housing for individuals and groups protected by the federal Fair Housing Act of 1968 and its amendments. The County of San Joaquin is committed to Fair Housing and has updated their Impediments Analysis of their Plan. Any noted impediments will be scrutinized and reviewed to best determine the actions needed to further fair housing.

The 2015-2019 Analysis of Impediments stated that in general, discrimination based on race/ethnicity is not a significant impediment to fair housing choice in the county. However, persons with disabilities may face barriers to housing choice and independent living because there is generally a lack of housing with accessibility features (e.g., hallways wide enough for wheelchair access). Additional outreach and educational material on fair housing and fair housing services are needed to better inform the public of their rights.

San Joaquin County has identified the following actions as priorities:

1. Provide website links to housing services and resources, fair housing, and consumer information.
2. Provide education on fair housing to County and City staff members who administer and oversee housing programs and code enforcement activities.
3. Support fair housing service providers and other housing service agencies in providing credit counseling, homebuyer counseling, and education on tenant rights and responsibilities for households entering or re-entering the rental market.
4. Work with San Joaquin Fair Housing to develop and implement a comprehensive testing program to identify the extent of fair housing problems in the county.
5. Provide information on fair housing rights and responsibilities to landlords and managers of smaller rental properties.

The County is currently in the process of developing and adopting a new Analysis of Impediments that will coincide with the next 5 year cycle. The Analysis of Impediments is set to be adopted in 2020 and will be addressed in the next CAPER.

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 standards governing the monitoring of activities are those set forth in the various HUD monitoring guidebooks for each covered program (i.e. CDBG, HOME, ESG, HOPWA, and CoC Programs). In addition to reviewing program progress, effectiveness and overall management systems, basic monitoring is performed to ensure compliance with statutory and regulatory requirements for property management, subrecipient and third party contracting, financial management and audits, allowable costs based on cost principles, program income and program disbursements, records maintenance and activity status reporting. Monitoring reviews are also conducted to ensure compliance with federal labor standards, the reversion of assets, real property inventory and reporting, anti-discrimination and equal opportunity, affirmative action, conflict of interest, procurement methods and standards, environmental standards and others.

Monitoring visits assist in determining if the subrecipient is carrying out its program and activities within the timeline denoted in the subrecipient agreement. It also ensures that the required records are maintained to demonstrate compliance with applicable regulations. To ensure compliance with the various funding regulations and to manage effective CDBG, HOME, and ESG programs, administrative staff conduct monitoring reviews of each subrecipient every one to three years to ensure program compliance with HUD regulations.

County staff, in tandem with participating City staff, conducted on-site monitorings for the following projects/programs:

- Disability Resource Agency for Independent Living (DRAIL): July 2019
- Monitoring training for all grantees: July 2019
- Staff was set to begin another cycle of monitoring visits in March of 2020 however due to COVID-19 those were delayed until further notice. Desk monitoring will occur moving forward.

All monitorings were initiated with a letter identifying when the monitoring would occur, the purpose and what documents would be reviewed. Staff met with each organization to review their files and perform a monitoring using HUD checklists. Overall, the monitoring visits went well and staff was able to use the time to further train these grantees. Staff worked with the organizations to correct any

findings and concerns that were found in the files. Staff will continue to monitor its sub-recipients/grantees each year based on a risk analysis.

The County was not visited by HUD staff this year for a monitoring. The most recent audit was completed by HUD staff in PY 17/18. CDBG and NSP Programs were both monitored at the time, and both went very well overall.

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

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

In accordance with the public notification requirements of the San Joaquin County Citizen Participation Plan, notice of the availability of the draft CAPER was published in the local newspaper of general circulation - "The Record". Performance reports are noticed in the local newspaper to give as much advance notification as possible for citizens to review and comment on the reports. The public notice appeared in The Record on November 9, 2020 and allowed for comments to be submitted until November 23, 2020. Due to COVID-19 restrictions at the County level, the draft plan was placed on the City's website for view. Comments were encouraged to be submitted via mail, telephone or email to garner the most public participation as possible. No comments were received by the County regarding this Plan.

In order to meet citizen participation requirements, the CAPER, Action Plan, Consolidated Plan, and other reporting items are circulated in both English and Spanish.

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 County's CDBG Program has gone through significant changes over the past 5 years of this current five year consolidated plan period. After failing to meet expenditure requirements for 2 years in a row, the County got extremely proactive with its CDBG program and implemented significant changes to the administration and objectives of the CDBG Program. A few of the highlights included:

- Additional staff being hired
- Housing Rehab program re-opened
- Minimum/maximum application amounts
- Expenditure requirements for sub-recipients
- Higher level of readiness required for projects to be funded
- Program Income NOFA for shelter projects and public improvements
- Overall communication with sub-recipients and participating jurisdictions in the Urban County.

The County is proud to report that they have now met their expenditure ratio 3 years in a row, including nearly \$3.5 million spent in CDBG funds in the last program year. The above changes that have now had a few years to take shape are definitely starting to take hold and show positive results. The County will continue to monitor its program so that it is able to recognize early when changes may need to be made in order to meet program objectives.

The County does not have an existing Section 108 guaranteed loan program.

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.

San Joaquin County currently has twelve (12) rental projects that require annual monitoring and compliance. The units are as follows:

- Loel Senior Center and Gardens, LODI / 5 units
- Loel Senior Center and Gardens, LODI / 4 units
- Housing Authority / 4 units
- Mountain View Townhomes, Tracy / 11 units
- Lodi Hotel / 11 units
- Stone Pine Meadows, Tracy / 4 units
- Union Court Apartments, Manteca / 3 units
- Almond Terrace Apartments, Manteca / 4 units
- Tracy Village Apartments, Tracy / 11 Units
- Valle Del Sol, Stockton / 9 units
- Church Street Triplex / 3 units
- Casa de Oasis / 37 NSP Units
- Sienna Terrace / 42 NSP Units

All units listed above were monitored by the County in 2019/2020 Program Year. The monitoring consists of an Annual Monitoring Report questionnaire and Project Compliance Report, which asks about project financial condition and compliance with other federal HOME requirements, a copy of the project's utility allowance schedule (form HUD-52667); a copy of the long term monitoring Summary

Letter and Clearance Letter to the project's owner/manager, a copy of Physical Conditions report, and a copy of the project's Annual Affirmative Marketing Analysis Report. The County has continued contracting with a consultant to assist County staff in file reviews and on-site monitorings for these units, as they had not been occurring in the most recent years due to staff reduction.

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

The County requires all agencies receiving HOME funds for projects with five or more HOME-assisted units, to have plans to affirmatively market housing to eligible populations. The affirmative marketing plan must include information on: 1) how the sponsor will inform the public and potential residents about fair housing laws; 2) how the sponsor will affirmatively market the units and inform persons who might not normally apply for housing through special outreach; 3) how the sponsor will document affirmative marketing efforts and evaluate their success. Housing projects must display the Equal Housing Opportunity information and logo in an area that is accessible to eligible households. In total, there are 15-assisted rental projects to date that have or will have marketing plans. The marketing plans are based on affirmative marketing and involve outreach efforts to the Housing authority and local ethnic organizations. News articles are run in local newspapers, ads are included in monthly and weekly periodicals, all designed to reach non-mainstream families and ethnic groups. Ads in Spanish and Southeastern Asian languages are designed to attract interested minority families.

For smaller homeownership project involving less than four units per project, San Joaquin County is generally not involved in funding construction prior to down payment assistance. On this type of project, as well as outreach efforts for housing rehabilitation clients, affirmative marketing is accomplished by placing ads in local newspapers, both in Spanish and English, to locate prospective buyers.

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

Down payment assistance and rehabilitation loan payments and payoffs, construction loan payoffs, as well as payments from a joint project with the Housing Authority of the County of San Joaquin, contribute to the flow of HOME program income funding. As required by HOME program regulations, program income is utilized for the next available project in the same budgeting category in which it is earned and is expensed before additional funds are drawn from the HOME line of credit.

The County received and receipted \$3,060,224 in HOME Program Income and successfully expended \$3,073,174 of this Program Income. The entirety of this Program Income was used to benefit eligible low-income beneficiaries. These funds were used to rehabilitate existing dilapidated homes and sell them to low income buyers through the County's GAP program. The program has been extremely successful and provided 8 households the ability to afford and purchase their first home, whom otherwise would not have been able to.

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)

Specific activities to foster and maintain affordable housing undertaken in the current program year included:

- GAP Loans for Homebuyers
- Funds provided to nonprofit CHDO to acquire dilapidated homes for rehabilitation and re-sale.

CR-60 - ESG 91.520(g) (ESG Recipients only)

ESG Supplement to the CAPER in *e-snaps*

For Paperwork Reduction Act

1. Recipient Information—All Recipients Complete

Basic Grant Information

Recipient Name	SAN JOAQUIN COUNTY
Organizational DUNS Number	112235184
EIN/TIN Number	946000531
Identify the Field Office	SAN FRANCISCO
Identify CoC(s) in which the recipient or subrecipient(s) will provide ESG assistance	Stockton/San Joaquin County CoC

ESG Contact Name

Prefix	Mr
First Name	Raymond
Middle Name	0
Last Name	Hoo
Suffix	0
Title	Deputy Director

ESG Contact Address

Street Address 1	1810 E. Hazelton Avenue
Street Address 2	0
City	Stockton
State	CA
ZIP Code	-
Phone Number	2094683164
Extension	0
Fax Number	2094683163
Email Address	rhoo@sjgov.org

ESG Secondary Contact

Prefix	Ms
First Name	Christine
Last Name	Becerra
Suffix	0
Title	Management Analyst III
Phone Number	2094683157
Extension	0
Email Address	cbecerra@sjgov.org

2. Reporting Period—All Recipients Complete

Program Year Start Date 07/01/2019
Program Year End Date 06/30/2020

3a. Subrecipient Form – Complete one form for each subrecipient

Subrecipient or Contractor Name: SAN JOAQUIN COUNTY

City: Stockton

State: CA

Zip Code: 95205, 6232

DUNS Number: 112235184

Is subrecipient a victim services provider: N

Subrecipient Organization Type: Unit of Government

ESG Subgrant or Contract Award Amount: 17085

Subrecipient or Contractor Name: Central Valley Low Income Housing Corp.

City: Stockton

State: CA

Zip Code: 95207, 8211

DUNS Number: 158901178

Is subrecipient a victim services provider: N

Subrecipient Organization Type: Other Non-Profit Organization

ESG Subgrant or Contract Award Amount: 57113

Subrecipient or Contractor Name: Stockton Shelter for the Homeless

City: Stockton

State: CA

Zip Code: 95203, 3332

DUNS Number: 188171904

Is subrecipient a victim services provider: N

Subrecipient Organization Type: Other Non-Profit Organization

ESG Subgrant or Contract Award Amount: 31367

Subrecipient or Contractor Name: Haven of Peace
City: French Camp
State: CA
Zip Code: 95231, 9629
DUNS Number: 167323500
Is subrecipient a victim services provider: N
Subrecipient Organization Type: Other Non-Profit Organization
ESG Subgrant or Contract Award Amount: 12316

Subrecipient or Contractor Name: Lodi House
City: Lodi
State: CA
Zip Code: 95240, 4821
DUNS Number: 017422515
Is subrecipient a victim services provider: N
Subrecipient Organization Type: Other Non-Profit Organization
ESG Subgrant or Contract Award Amount: 8396

Subrecipient or Contractor Name: Women's Center Family & Youth Services
City: Stockton
State: CA
Zip Code: 95202, 2030
DUNS Number: 165458852
Is subrecipient a victim services provider: Y
Subrecipient Organization Type: Other Non-Profit Organization
ESG Subgrant or Contract Award Amount: 17167

Subrecipient or Contractor Name: Gospel Center Rescue Mission
City: Stockton
State: CA
Zip Code: 95203, 3537
DUNS Number: 788079044
Is subrecipient a victim services provider: N
Subrecipient Organization Type: Faith-Based Organization
ESG Subgrant or Contract Award Amount: 14567

Subrecipient or Contractor Name: Salvation Army
City: Lodi
State: CA
Zip Code: 95240, 1946
DUNS Number: 074629360
Is subrecipient a victim services provider: N
Subrecipient Organization Type: Other Non-Profit Organization
ESG Subgrant or Contract Award Amount: 5967

Subrecipient or Contractor Name: HOPE Ministries
City: Manteca
State: CA
Zip Code: 95336, 5826
DUNS Number: 966409740
Is subrecipient a victim services provider: N
Subrecipient Organization Type: Other Non-Profit Organization
ESG Subgrant or Contract Award Amount: 8367

Subrecipient or Contractor Name: St. Mary's Dining Room
City: Stockton
State: CA
Zip Code: 95203, 3329
DUNS Number: 617744610
Is subrecipient a victim services provider: N
Subrecipient Organization Type: Other Non-Profit Organization
ESG Subgrant or Contract Award Amount: 30167

Subrecipient or Contractor Name: McHenry House
City: Tracy
State: CA
Zip Code: 95376, 3924
DUNS Number: 847114824
Is subrecipient a victim services provider: N
Subrecipient Organization Type: Other Non-Profit Organization
ESG Subgrant or Contract Award Amount: 8367

Table 23 – Special Population Served

CR-70 – ESG 91.520(g) - Assistance Provided and Outcomes

10. Shelter Utilization

Number of New Units - Rehabbed	0
Number of New Units - Conversion	0
Total Number of bed-nights available	749
Total Number of bed-nights provided	613
Capacity Utilization	81.84%

Table 24 – Shelter Capacity

11. Project Outcomes Data measured under the performance standards developed in consultation with the CoC(s)

Housing Stability: during the project year, 28 persons (adults and children) were assisted in the Rapid-Re-housing project. As of 6-30-20, 19 exited to permanent housing situations. During the project year, 20 persons (adults and children) were assisted in the Homeless Prevention project. As of 6-30-20, 20 had exited, all remaining in a permanent housing situation.

Recidivism: Of the 19 persons exiting Rapid Re-housing, none returned to homelessness within six months. Of the 20 exiting Homeless Prevention, none experienced homelessness in six months.

CR-75 – Expenditures

11. Expenditures

11a. ESG Expenditures for Homelessness Prevention

	Dollar Amount of Expenditures in Program Year		
	2017	2018	2019
Expenditures for Rental Assistance	0	0	5,923
Expenditures for Housing Relocation and Stabilization Services - Financial Assistance	0	0	0
Expenditures for Housing Relocation & Stabilization Services - Services	0	0	0
Expenditures for Homeless Prevention under Emergency Shelter Grants Program	0	0	0
Subtotal Homelessness Prevention	0	0	5,923

Table 25 – ESG Expenditures for Homelessness Prevention

11b. ESG Expenditures for Rapid Re-Housing

	Dollar Amount of Expenditures in Program Year		
	2017	2018	2019
Expenditures for Rental Assistance	0	0	47,235
Expenditures for Housing Relocation and Stabilization Services - Financial Assistance	0	0	0
Expenditures for Housing Relocation & Stabilization Services - Services	0	0	0
Expenditures for Homeless Assistance under Emergency Shelter Grants Program	0	0	0
Subtotal Rapid Re-Housing	0	0	47,235

Table 26 – ESG Expenditures for Rapid Re-Housing

11c. ESG Expenditures for Emergency Shelter

	Dollar Amount of Expenditures in Program Year		
	2017	2018	2019
Essential Services	0	0	17,167
Operations	0	0	116,204
Renovation	0	0	0
Major Rehab	0	0	0
Conversion	0	0	0
Subtotal	0	0	133,371

Table 27 – ESG Expenditures for Emergency Shelter

11d. Other Grant Expenditures

	Dollar Amount of Expenditures in Program Year		
	2017	2018	2019
Street Outreach	0	0	0
HMIS	0	0	0
Administration	0	0	16,604

Table 28 - Other Grant Expenditures

11e. Total ESG Grant Funds

Total ESG Funds Expended	2017	2018	2019
	0	0	203,133

Table 29 - Total ESG Funds Expended

11f. Match Source

	2017	2018	2019
Other Non-ESG HUD Funds	0	0	0
Other Federal Funds	0	0	0
State Government	0	0	0
Local Government	0	0	16,604
Private Funds	0	0	186,529
Other	0	0	0
Fees	0	0	0
Program Income	0	0	0
Total Match Amount	0	0	203,133

Table 30 - Other Funds Expended on Eligible ESG Activities

11g. Total

Total Amount of Funds Expended on ESG Activities	2017	2018	2019
	0	0	406,266

Table 31 - Total Amount of Funds Expended on ESG Activities