

City of Simi Valley
Staff Report

April 20, 2026

To: City Council

From: Department of Environmental Services
Stratis Perros, Environmental Services Director

Subject: A public hearing to consider the Community Development Block Grant allocations and the Draft Fiscal Year 2026-27 Action Plan

Staff Recommendation

It is recommended that the City Council:

1. Adopt the Community Development Block Grant Advisory Committee funding allocation recommendation;
2. Authorize the submission of the Fiscal Year 2026-27 Action Plan to the United States Department of Housing and Urban Development; and
3. Authorize the City Manager to finalize and execute grant agreements and related documents in connection with the Fiscal Year 2026-27 Community Development Block Grant Action Plan.

Background

The U.S. Department of Housing and Urban Development (HUD) requires the City to prepare an annual Action Plan [Housing and Urban Development, 24 C.F.R. § 91.15(b) (1)] that describes the intended use of Federal and other funding resources on community needs outlined in the City's 2025-2029 Consolidated Plan [24 C.F.R. § 91.220(c)]. The Draft Fiscal Year (FY) 2026-27 Action Plan (Attachment B) contains the preliminary allocations recommended by the City's Community Development Block Grant (CDBG) Advisory Committee (Committee). The Action Plan outlines the actions the City proposes to further its adopted affordable housing and non-housing goals. Per City policy, the City Council makes the final allocations of CDBG funds and authorizes submission of the Action Plan to HUD.

As part of the City Council's direction on June 23, 2014, Public Service applications are funded for a two-year cycle, which creates efficiency for both the applicants and the City. Public Service programs are approved for the second year of the two-year funding cycle, provided that the City is awarded an entitlement from HUD and the subrecipient organization is following HUD and City regulations. Up to 15 percent of the CDBG entitlement may be reserved for Public Service programs [24 C.F.R. § 570.201(e)(1)], and up to 20 percent may be reserved for Planning and Administration [24 C.F.R. § 570.200(g)].

CDBG funds designated for Capital Improvements may be used for projects such as: acquisition of real property, rehabilitation of structures, public facility improvements, removal of architectural barriers, and energy conservation (24 C.F.R. § 570.201). There is no maximum percentage of the CDBG entitlement for Capital Improvement programs.

Public hearing notice requirements for this item have been fully met in accordance with the Simi Valley Development Code and the California Government Code.

Discussion

Notification of HUD Entitlement

The FY 2026-27 CDBG entitlement amount was released by HUD on April 3, 2026. The City is expected to receive \$651,387 for the FY 2026-27 funding cycle. Since this information was not available when the Draft Action Plan was published for review, an estimated amount of \$650,000 was used. This estimate will be updated to the actual entitlement amount and incorporated into the final Action Plan document submitted to HUD. It will also be available at City Hall and the Simi Valley Public Library, and on the City's website.

Anticipated Resources

Estimated FY 2026-27 Entitlement	\$651,387
Unspent Prior Year Resources	\$65,796
Program Income	\$0
Total FY 2026-27 CDBG Funds Available:	\$717,183

CDBG Advisory Committee Public Hearing

The CDBG Advisory Committee is currently comprised of the following members:

Name	Affiliation
Anthony Angelini	Chamber of Commerce
Al Brown	Council on Aging
Sam Cohen	Neighborhood Council
Andy Goitia	Neighborhood Council
John Tolson	Planning Commission

On March 11, 2026, the Committee held a public hearing to review applications for funding and solicit comments on the Draft FY 2026-27 Action Plan. After this public hearing, the Committee evaluated and recommended funding for one application for Upwards Care, Inc., a microenterprise. This program will focus on low- to moderate-income micro-enterprise childcare providers in Simi Valley by providing personalized coaching and digital tools to optimize operations and revenue, enabling them to efficiently manage and grow their business, create local teaching jobs, and expand access to quality childcare for working families.

The Committee recommended that the City Council adopt its preliminary funding recommendation and approve the Draft Action Plan. The final CDBG funding adopted by the City Council for the 2026-27 program year will be incorporated into the FY 2026-27

Action Plan prior to its submission to HUD. The Draft Action Plan was released for the required public review on March 19, 2026. CDBG funding is allocated into three categories: Planning and Administration, Capital Improvement, and Public Service. The Planning and Administration category represents the costs of administering the CDBG Program and providing fair housing services to the public at large. The Committee does not rate this category. The allocation for the Fair Housing Program is based on services rendered by a fair housing provider through a contract with the County of Ventura, as illustrated in Table 1:

Table 1 – Planning and Administration Category

Organization/Program	CDBG Request	Recommended Allocation
Fair Housing Program	\$17,453	\$17,453
CDBG Program Administration	\$112,824	\$112,824
Totals:	\$130,277	\$130,277

The Capital Improvement category includes public facilities and improvements (e.g., infrastructure and energy-efficiency upgrades). A minimum of 50 percent of the CDBG entitlement is programmed for the City's Department of Public Works Annual Minor Streets Rehabilitation Program. The City Council approved this policy direction in July 2013 to allocate a guaranteed portion of this category's funds to offset diminishing government funding for transportation and infrastructure, as well as decreased local tax revenues. If other applications in this category do not receive funding recommendations totaling the other 50 percent of the available funds, any surplus will automatically be awarded to the Minor Streets Rehabilitation Program.

Microenterprise proposals also fall into the Capital Improvement category. Since there is only one Microenterprise application this year, the remaining available funds in this category will be programmed to the Minor Streets Rehabilitation Program. The total amount available in this category, including program income, is \$489,198. Of this amount, the Committee recommends that Upwards Care, Inc. receive \$64,000 and the Minor Streets Rehabilitation Program receive the remaining amount, currently estimated at \$425,198, as illustrated in Table 2.

Table 2 – Capital Improvement Category

Organization/Program	CDBG Request	Recommended Allocation
Upwards Care, Inc./ Boost	\$64,000	\$64,000
Public Works Department/Minor Streets Rehab	\$425,198	\$425,198
Totals:	\$489,198	\$489,198

The Public Service category includes, but is not limited to, activities relating to seniors, youth, health, and homeless services, or programs for persons with special needs. Since this is year two of the funding cycle, organizations awarded funding in FY 2025-26 (Year 1 of 2) are scheduled to receive funding in FY 2026-27 (Year 2 of 2). Table 3 below illustrates the organizations that applied for funding, the program they seek to fund, their funding request, the FY 2025-26 Award, and the preliminary funding recommendation for FY 2026-27.

Table 3 – Public Service Category

Organization and Program	CDBG Request	FY 2025-26 Award	FY 2026-27 Recommendation
Samaritan Center - Case Management	\$45,000	\$34,617	\$40,208
Many Mansions - Supportive Services Program	\$45,000	\$34,000	\$40,000
Conejo Valley Senior Concerns - Senior Advocacy Services/Geriatric Care Management	\$21,424	\$15,000	\$17,500
Livingston Memorial Visiting Nurse Association - Subsidized Care Program	\$18,000	\$15,000*	\$0*
Totals:	\$129,424	\$98,617	\$97,708

*Declined CDBG award

FY 2025-26 HUD Requirements and Program Impacts

On September 15, 2025, the City received the FY 2025-26 agreement from HUD, which included a new addendum (Attachment C) introducing additional reporting requirements. As a result, the execution of subrecipient agreements was delayed while the City evaluated the impact of these requirements. Staff notified the subrecipients of this addendum on October 8, 2025.

The primary concern raised by subrecipients related to HUD's new requirement to verify immigration status, specifically the use of the SAVE system or another federally approved verification method. At this time, the City confirmed that non-profit organizations cannot utilize the SAVE system. Staff contacted HUD to identify other federally approved systems, but have not received further guidance.

In November 2025, HUD's Office of the General Counsel published a notice in the Federal Register (Attachment D). While the notice did not provide implementation guidance, Section IV indicates that HUD intends to issue additional guidelines regarding eligibility verification for benefits under its housing assistance and grant programs. HUD has not established a timeline for issuing this guidance. In the interim, to avoid disruption of community services, the City has elected to proceed with the CDBG Program and reimburse subrecipients upon execution of their agreements.

At the time this staff report was prepared, the City had an executed agreement with Many Mansions. Livingston Memorial Visiting Nurse Association has declined CDBG funding for FY 2025-26 and FY 2026-27. Agreements with the Samaritan Center and Conejo Valley Senior Concerns are pending. If either of these awards is declined, the funds will be reallocated to the remaining organizations, up to the CDBG requested amount.

Environmental Review

Staff has reviewed the application for CDBG funding and has determined that the proposed uses of the funding for program administration, public service projects, and micro-enterprise project are exempt from the California Environmental Quality Act (CEQA) pursuant to Section 15061(b) (3) of the State CEQA Guidelines, in that they are

“covered by the commonsense exemption that CEQA applies only to projects which have the potential for causing a significant effect on the environment.” In addition, the Public Works Minor Street Rehabilitation proposed project is categorically excluded pursuant to C.F.R. § 58.35 (a)(1). This exclusion applies in that the project consists of the repair and rehabilitation of existing public facilities without change in size or capacity of more than 20 percent (repaving of streets). However, since a portion of the project is located within a Special Flood Hazard Area, the floodplain management procedure required by 24 C.F.R. § 55.20 will be completed. Applicable documentation will be completed prior to the start of each project.

Financial Impact

This action has no impact on the City’s General Fund. Funding for these projects is paid entirely through the CDBG grant entitlement.

City Council Priority

This item supports the City Council’s Thriving Community and Reliable Infrastructure Pillars of Excellence.

Suggested Motion

I move to:

1. Adopt the CDBG Advisory Committee funding recommendations, make the final determination of projects and programs to be funded in FY 2026-27;
2. Authorize the submission of the FY 2026-27 Action Plan to the United States Department of Housing and Urban Development; and
3. Authorize the City Manager to finalize and execute grant agreements and related documents in connection with the FY 2026-27 CDBG Grant Action Plan.

Summary

HUD requires the City to prepare an annual Action Plan that describes the intended use of Federal and other funding resources on community needs outlined in the City’s Consolidated Plan. The Draft FY 2026-27 Action Plan contains the preliminary allocations recommended by the Committee. The Action Plan outlines the actions the City proposes to further its adopted affordable housing and non-housing goals. Per City policy, the City Council makes the final allocations of CDBG funds for FY 2026-27 and authorizes submission of the FY 2026-27 Action Plan to HUD. It is recommended that the City Council adopt the Committee’s funding recommendations and authorize the City Manager to finalize and execute grant agreements and related documents in connection with the FY 2026-27 CDBG Action Plan.

Prepared by: Lindsey Scaringe, Senior Management Analyst

Attachments:

Attachment A - Public Hearing Procedure

Attachment B - Draft FY 2026-27 Action Plan

Attachment C - FY 2025-26 HUD Agreement Addendum 1

Attachment D - Notice published November 26, 2025, by HUD's Office of the General Counsel

PUBLIC HEARING PROCEDUREHEARING DATE: APRIL 20, 2026

1. CITY CLERK This is the time and place set for a public hearing to receive testimony on the Community Development Block Grant Allocations and the Draft FY 2026-27 Action Plan.
2. MAYOR: Before we begin, are there any ex parte communications to report?
3. ANY COUNCIL MEMBER: (Report)
4. MAYOR: Staff may begin with the oral report on this matter.
5. STAFF: (Report)
6. MAYOR: Any questions of staff from City Council Members?
(Questions of staff and staff response)
7. MAYOR: At this time, we would like to open the public hearing for anyone in the City Council Chambers wishing to be heard on this matter?
8. AUDIENCE: Public Testimony and Comments
9. MAYOR: Does Staff desire to respond to any comments or issues raised?
10. STAFF: (Response to comments and additional City Council questions)
11. MAYOR: Any further comments or questions from City Council Members?
12. MAYOR: The hearing is now closed.
13. MAYOR: I will now entertain a motion.

14. ANY COUNCIL
MEMBER:

City Council Actions (by motion of any Council Member):

1. Adopt the CDBG Advisory Committee funding recommendations, make the final determination of projects and programs to be funded in FY 2026-27;
2. Authorize the submission of the FY 2026-27 Action Plan to the United States Department of Housing and Urban Development;
3. Authorize the City Manager to finalize and execute grant agreements and related documents in connection with the FY 2026-27 CDBG Grant Action Plan.

*Any action to refer the matter back to staff or to continue the matter requires a second and a vote.

15. ANY COUNCIL
MEMBER:

Second

16. MAYOR:

(Call for the vote)

17. MAYOR:

Proceed to the next item.



CITY OF SIMI VALLEY

FY 2026-27 DRAFT ACTION PLAN

**Public Review Period
March 19 through April 20, 2026**

City of Simi Valley
Department of Environmental Services
2929 Tapo Canyon Road
Simi Valley, CA 93063

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F. Proof of Publication

****All Appendices will be inserted before this document is submitted to HUD.***

Executive Summary

AP-05 Executive Summary - 24 CFR 91.200(c), 91.220(b)

1. Introduction

Simi Valley is located in southeastern Ventura County. It borders Los Angeles County, unincorporated portions of Ventura County, and the Cities of Moorpark and Thousand Oaks. The City of Simi Valley has a population of approximately 126,356 (as of April 2020). It is the third largest of Ventura County's 10 cities, occupying an area of approximately 42 square miles, and is approximately 37 miles northwest of downtown Los Angeles. The City was incorporated in 1969 under the general laws of the State of California and operates under a General-Law/council-manager form of government.

The Fiscal Year (FY) 2026-27 Draft Action Plan (Action Plan) serves as the official application to the U.S. Department of Housing and Urban Development (HUD) for Community Development Block Grant (CDBG) funds for the City of Simi Valley. This Action Plan is for year two of the Regional Consolidated Plan FY 2025-2029 (RCP), and covers the planning period from July 1, 2025, through June 30, 2030.

The County of Ventura and the Cities of Camarillo, Simi Valley, and Thousand Oaks have formed the Ventura County HOME Consortium, which took effect in FY 2020-21. The HOME Consortium jurisdictions will collaborate to address the housing crisis and increase the annual HOME resources available to our communities to increase the supply of affordable housing.

This Action Plan identifies the housing and community development needs of the City and sets forth specific programs and projects that address these needs. It also satisfies the minimum statutory requirements for CDBG. It was prepared using the eCon Planning Suite system developed by HUD. The system prescribes the structure and contents of this document, following the Federal Consolidated Planning regulations.

2. Summarize the objectives and outcomes identified in the Plan

This Action Plan incorporates outcome measures for activities in accordance with the Federal Register Notice, dated March 7, 2006, which requires the following Performance Measure Objectives/Outcomes to be associated with each activity funded:

General Objective Categories - Activities will provide one of the following:

- Decent Housing (DH)
- Suitable Living Environment (SL)
- Economic Opportunity (EO)

Outcome Categories - Activities will meet one of the following:

- Availability/Accessibility
- Affordability
- Sustainability

Simi Valley has a range of housing and community development needs. CDBG funds alone are not adequate to address the myriads of needs identified during the public outreach process and summarized in the Needs Assessment of the RCP. Recognizing the national objectives of these funding programs and specific program regulations, the City of Simi Valley intends to use these funds to coordinate programs, services, and projects to create decent and suitable living environments to benefit low- and moderate-income households and those with special needs. Needs that have been identified will receive funding during the RCP period. The priorities from the RCP, determined in consultation with residents and community groups, are listed on the following page.

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Regional Consolidated Plan Priorities

High

1. **Development of New Affordable Housing-** There is an acute need for affordable housing for low- and moderate-income households.
2. **Housing Rehabilitation-** There is a need to maintain adequate and quality housing stock, especially for low- and moderate-income households.
3. **Housing Services-** In an effort to support first-time homebuyers and households with children, provide access to financial and non-financial support and assistance to accessing the homeownership market through programs such as down payment and closing cost assistance, homebuyers coaching, and subsidized property inspections.
4. **Housing Stability-** Through tenant-based rental assistance and diversion programs, provide short- and medium-long term rental assistance to extremely low-income and low-income households who are at-risk of homelessness.
5. **Homelessness-** In collaboration with the Ventura County Continuum of Care, provide holistic and complete support to households experiencing or at-risk of experiencing homelessness through the provision of rapid re-housing, emergency shelter, and supportive services.
6. **Supportive Services-** Provide targeted services for youth, elderly, and other higher need populations within the region.
7. **Fair Housing Services-** Provide training to landlords and banking institutions and services to individuals and households experiencing housing discrimination or at-risk of experiencing housing discrimination.
8. **Public Facility Maintenance-** Maintain high-quality public facilities to serve the needs of low- and moderate- income households.

Low

9. **Street Improvements and Infrastructure-** Maintain streetscapes and sidewalks in low- and moderate-income neighborhoods.
10. **Economic Support for Small Businesses and Job Training-** Promote small business development and provide job training to meet the economic needs within the community.
11. **Disaster Planning and Recovery-** Disaster planning and recovery activities after severe weather, fire, and earthquakes.

3. Evaluation of past performance

The City reviews all quarterly progress reports for funded activities on an ongoing basis throughout the fiscal year. The reports are collected and compared to each program or project's written agreement, application, and any other formal or informal communication or information available. At fiscal year's end, the City completes the Program Year Review Summary Table and assesses its progress toward meeting its community priorities as established by the RCP. The use of other data, such as the City's Quarterly Development Summaries, which includes the tracking of affordable housing projects; Senior and Affordable Housing Guides; and statistics obtained from the Housing staff, is also considered when analyzing past performances.

The City does not limit the types of programs/projects for which applications will be accepted during the Notice of Funds Available period; however, all proposals must address one of the priorities. Question 21 on the City's CDBG Application specifically inquires about prior CDBG funding and outcomes. If the applicant/program meets the requirements established by HUD, the RCP, and the City's application guidelines, it will be evaluated by staff and submitted to the CDBG Advisory Committee (Committee) for their consideration and funding recommendations to the City Council.

Funding for a variety of community development activities has been allocated, and several activities will be completed during FY 2025-26. Through various programs for special needs, homeless, and low- and moderate-income persons, about 2,920 persons are expected to benefit from block grant funding.

4. Summary of Citizen Participation process and consultation process

The Committee makes funding recommendations to the City Council in response to applications submitted by service providers, community organizations, and City departments. On March 11, 2026, the Committee made preliminary funding recommendations to the City Council. That same night, the Committee entertained comments on the Action Plan and authorized staff to release the document for a required 30-day public review period from March 19 to April 20, 2026. All the Committee's recommendations will be incorporated into the Action Plan. The City Council will conduct another public hearing, tentatively scheduled for April 20, 2026, to receive additional public comments and make final allocations of CDBG funds for FY 2026-27. The final allocations will be provided in Appendix C before this document is submitted to HUD.

5. Summary of public comments

There were no public comments at the March 11, 2026, Committee meeting. A summary of all public comments will be provided before this document is submitted to HUD.

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

There were no public comments at the March 11, 2026, Committee meeting. All comments received will be incorporated before this document is submitted to HUD.

7. Summary

The City of Simi Valley has undertaken diligent and good-faith efforts, conducting outreach to all segments of the community that may benefit from the CDBG Program.

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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 1 – Responsible Agency

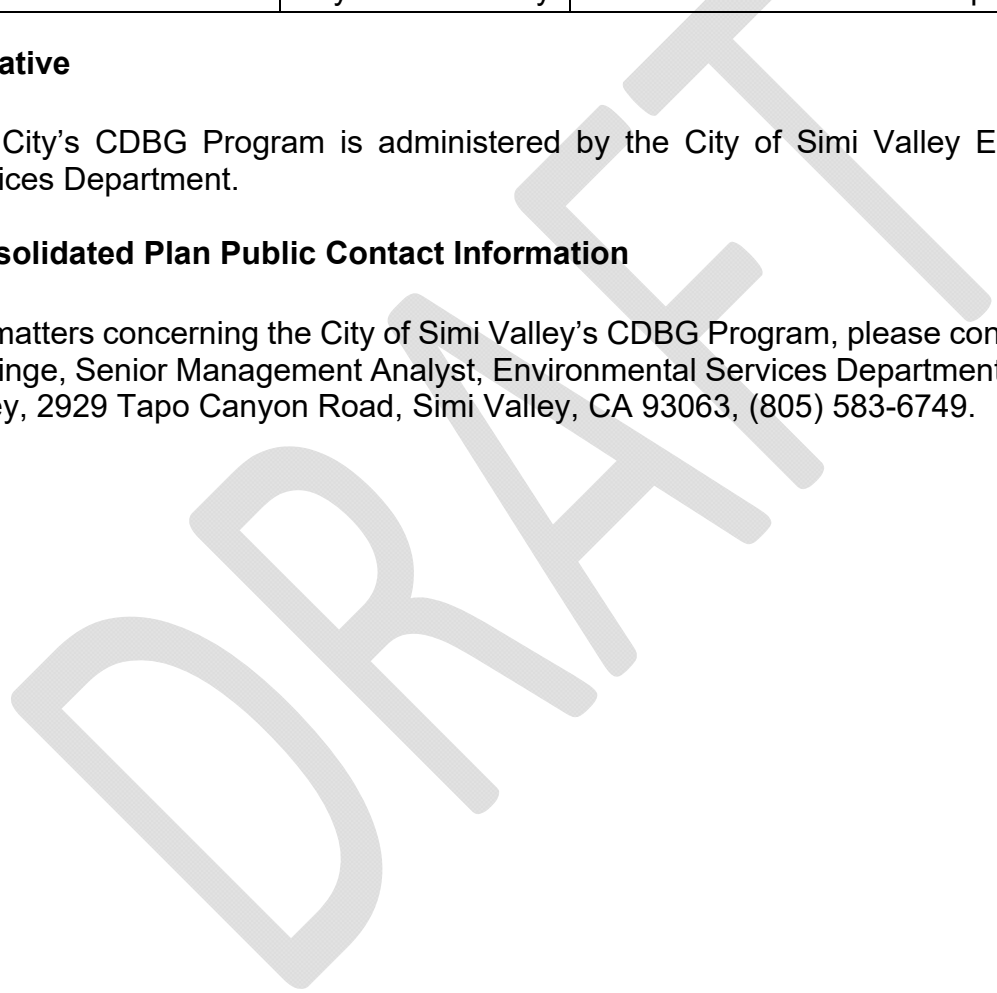
Agency Role	Name	Department/Agency
CDBG Administrator	City of Simi Valley	Environmental Services Department

Narrative

The City’s CDBG Program is administered by the City of Simi Valley Environmental Services Department.

Consolidated Plan Public Contact Information

For matters concerning the City of Simi Valley’s CDBG Program, please contact: Lindsey Scaringe, Senior Management Analyst, Environmental Services Department, City of Simi Valley, 2929 Tapo Canyon Road, Simi Valley, CA 93063, (805) 583-6749.



AP-10 Consultation - 91.100, 91.200(b), 91.215(I)

1. Introduction

As part of the Action Plan development, the City consulted and coordinated with non-profit agencies, affordable housing providers, and government agencies regarding the needs of the low- and moderate-income population. The outreach efforts are further discussed in the Executive Summary and Citizen Participation sections of this Action Plan.

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(I)).

The City will continue to enhance coordination between public housing groups, private developers, and social service agencies that assist low- and moderate-income persons.

To improve communications with these and other community stakeholders, the City established an electronic mechanism (govDelivery) by which individuals and entities can sign up to receive all related CDBG notifications as part of its community outreach. Priority will be given to strengthening coordination efforts between the City and those agency groups that provide assistance to the homeless, persons threatened with homelessness, and persons with special needs in order to improve the delivery of services to those households.

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.

Outreach efforts extend to and include homeless service agencies in the Ventura County Regional Continuum of Care. The City will continue to encourage the development of affordable apartment projects for extremely low- and low-income households. Such developments would provide permanent housing opportunities for homeless persons and increase the availability of low - cost rental units to assist those who are rent burdened or severely rent burdened. The City will also consider allocating a portion of its annual CDBG funds toward the provision of services for the homeless and those with special needs.

The City of Simi Valley is also an active member of the Ventura County Continuum of Care and relies on social service providers to provide many services and housing assistance for its homeless population.

While the City continues to work toward a permanent housing solution for the community's homeless, the City provides funding and assistance to the Samaritan Center of Simi Valley, who offers a wrap-around approach of services to house and support individuals transitioning from living on the street or in their vehicles to permanent housing.

Describe consultation with the Continuum(s) of Care that serves the jurisdiction's area in determining how to allocate Emergency Solutions Grant (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 City's HUD entitlement allocation does not include ESG funds.

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2. **Agencies, groups, organizations, and others who participated in the process and consultations**

Table 2 – Agencies, groups, organizations who participated

1	Agency/Group/Organization	UPWARDS
	Agency/Group/Organization Type	Services - For Profit Services - Economic Development
	What section of the Plan was addressed by Consultation?	Economic Development
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Agency attended Application Workshop on January 22, 2026, and discussed a proposed project to assist microenterprise childcare businesses in Simi Valley.
2	Agency/Group/Organization	SAMARITAN CENTER
	Agency/Group/Organization Type	Services - Families with Children Services - Homeless Individuals Services - Education
	What section of the Plan was addressed by Consultation?	Housing Need Assessment
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Agency attended Application Workshop on January 22, 2026, and discussed a proposed project to assist people needing help with temporary housing.
3	Agency/Group/Organization	GiGi's Playhouse
	Agency/Group/Organization Type	Services - Education Services - Families with Children Services - Persons with Disabilities
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Agency attended Application Workshop on January 22, 2026, and discussed a proposed project to provide an accessible bathroom.
4	Agency/Group/Organization	BOYS AND GIRLS CLUB OF MOORPARK AND SIMI VALLEY
	Agency/Group/Organization Type	Services - Families with Children Services - Education

	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Agency attended Application Workshop on January 22, 2026, and discussed a proposed project to assist people in the east portion of Ventura County.
5	Agency/Group/Organization	MANY MANSIONS
	Agency/Group/Organization Type	Services - Education Services - Families with Children Services - Persons with Disabilities
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Agency attended Application Workshop on January 22, 2026, and explored potential of projects that would benefit on-site tenants at their facilities.
6	Agency/Group/Organization	BIG BROTHERS BIG SISTERS OF VENTURA COUNTY
	Agency/Group/Organization Type	Services - Families with Children Services - Education
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Agency attended Application Workshop on January 22, 2026, and discussed a proposed project to assist people in the east portion of Ventura County.
7	Agency/Group/Organization	SIMI AT THE GARDEN
	Agency/Group/Organization Type	Services - Education Services - Families with Children Services - Persons with Disabilities
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Agency attended Application Workshop on January 22, 2026, and discussed a proposed project to construct raised garden beds for accessibility.

8	Agency/Group/Organization	SIMI SUNRISE ROTARY
	Agency/Group/Organization Type	Services - Families with Children Services - Education
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Agency attended Application Workshop on January 22, 2026, and discussed a proposed project to assist people in the east portion of Ventura County.

Identify any Agency Types not consulted and provide rationale for not consulting

The City contacted and consulted with all interested regional agencies as part of the outreach process for this Action Plan. All applicable organizations and agency types were consulted.

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

Table 3 – Other local / regional / federal planning efforts

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	Ventura County Housing and Homeless Coalition	As part of the outreach process, the City has identified homeless and homeless prevention services as a priority for the CDBG Program. These services complement the Continuum of Care Strategy for transitioning the homeless to permanent housing.

AP-12 Participation - 91.105, 91.200(c)

1. Summary of citizen participation process/Efforts made to broaden citizen participation

Citizen participation is one of the most important elements of the Action Plan process. To solicit public input during the development of the Action Plan, the City holds two public hearings and makes available a draft of the Action Plan for public review.

Public Hearings: The City of Simi Valley held a public hearing before the CDBG Advisory Committee, an appointed body who makes recommendations to the City Council, on March 11, 2026, to solicit public input on FY 2026-27 community needs and proposed projects. In addition, a second public hearing is tentatively scheduled for April 20, 2026, to receive additional public comments on the Action Plan. The City Council will consider the Action Plan at the April 2026 public hearing.

Public Review of Draft Action Plan: A 30-day public review period will be held from March 19 through April 20, 2026. The Action Plan, amendments to the Plan, and annual performance reports will be available for five years at City Hall.

A complete summary of the citizen participation process will be inserted in Appendix E before this document is sent to HUD. A list of speakers and comments received at the above-mentioned public hearings will be included on the following page before this document is sent to HUD.

**Citizen Participation Comments –
Public Hearing #1, March 11, 2026**

Applicant speakers:

Ms. Melanie Faure, Community Impact Manager for Upwards Care, Inc.

Citizen Comments:

None

**Citizen Participation Comments –
Public Hearing #2, April 20, 2026**

Applicant speakers:

Citizen Comments:

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Expected Resources

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

Introduction

Several Housing and Community Development funding resources are currently available in the City of Simi Valley, including:

- Community Development Block Grant (CDBG)
- California Home Investment Partnership (HOME) Program repayment of grant funds and Housing Successor Agency funds
- CalHome
- Local Housing funds
- Permanent Local Housing Allocation Program (PLHA)

Anticipated Resources

Table 4 - Expected Resources – Priority Table

Program	Source of Funds	Uses of Funds	Amount Available Year 2				Expected Amount Available Remainder of RCP	Narrative Description
			Annual Allocation	Program Income	Prior Year Resources	Total:		
CDBG	Public - Federal	-Housing Services -Homelessness -Supportive Services -Fair Housing Services -Street Improvements and Infrastructure -Economic Support for Small Businesses and Job Training	\$650,000	\$0	\$65,796.39	\$715,796.39	\$1,950,000	Annual allocation estimate of \$650,000 is used for determining expected amount available remainder of RCP years (\$650,000 x 3 = \$1,950,000)

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

The City of Simi Valley has access to several Federal, State, and local resources to achieve its housing and community development priorities. One funding source for the City is CBDG. Through this program, a grant is awarded to the City on a formula basis for housing and community development activities. The City has not yet been notified by HUD of its CBDG entitlement for FY 2026-27. For planning purposes, the allocation amount of \$650,000 is being used. This estimated amount of \$650,000, plus the unspent prior year funds of \$65,796.39, will be available for programs and services during the 2026-27 program year. When HUD announces the actual grant allocation, staff will adjust the allocations for the Public Service category based on the percentage of their preliminary allocations to the total amount available in each category. The final allocations will be incorporated into the final Action

Plan document before it is submitted to HUD. The City's goal for the CDBG funds is to leverage Federal, State, and local funds to maximize the number of households that can be assisted. The City is not a recipient of Emergency Solutions Grants (ESG) or Housing Opportunities for Persons with AIDS (HOPWA) funds; therefore, those funding sources will not be discussed further in this document.

Other funding sources available to the City are program income from the repayment of grant funds derived from the California Home Investment Partnership Program (HOME) and Housing Successor Agency; State CalHome Program and Permanent Local Housing Allocation Program grant funds derived from a competitive grant application; and Local Housing funds received from certain loan repayments and affordable unit resale fees. Match requirements for the HOME Program are not applicable to the use of program income.

Budget development activities in recent years have required substantial expenditure reductions to counteract downward revenue trends at the local, State, and Federal levels. Since redevelopment funds are no longer available for most eligible low- and moderate-income activities outlined in this document, such housing and non-housing activities can no longer be funded through the City's former Community Development Agency (CDA). Any continuation of these programs would be dependent upon the City's General Fund or other revenue sources. These budgetary issues have established a new category of challenges in addition to those already existing that will require difficult decisions regarding expenditures and the continuation of former CDA-funded programs.

The City will provide \$175,000 to non-profit organizations for various projects and programs serving Simi Valley to be conducted in FY 2026-27. This funding is derived from the Simi Valley Community Projects Grant Program, scheduled to receive \$150,000 per year until 2061 from Waste Management and \$25,000 from the Special Event Support Program.

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

The City does not have any publicly owned land or property that may be used to address the needs identified in the Action Plan.

Annual Goals and Objectives

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

Goals Summary Information

Table 5 – Goals Summary

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Preliminary Funding Allocation	Goal Outcome Indicator
1	Effective Administration	2026	2027	Planning and Administration	Citywide	Program Development and Equal Housing Opportunity	CDBG: \$130,000	N/A for Program Management/ 150 Residents Assisted
2	Create Quality Neighborhoods	2026	2027	Non-Housing Community Development	Census Tract 80.051	Streets and Streetscapes	CDBG: \$424,296	Public Facility/Infrastructure Activities other than Low/Moderate-Income Housing Benefit: 1,940 Persons Assisted
3	Work to End Homelessness	2026	2027	Homeless	Citywide	Homelessness	CDBG: \$40,000	Public Service Activities for Homelessness Prevention: 88 Persons Assisted
4	Increase Social Services	2026	2027	Non-Homeless Special Needs	Citywide	Social Services	CDBG: \$57,500	Public Service Activities other than Low/Moderate-Income Housing Benefit: 80 Persons Assisted, and 32 Households Assisted
5	Promote Economic Development	2026	2027	Economic Development	Citywide	Economic Development	CDBG: \$64,000	Promote Economic Development: Eight Low/Moderate Income Persons Assisted

Goal Descriptions

Table 6 – Goal Descriptions

1	Goal Name	Effective Administration
	Goal Description	This goal provides for the administration of the City's CDBG Program, including program development, implementation, monitoring, fiscal responsibilities, and development of HUD-mandated reports and documents. This goal also provides for the contracted services of fair housing, education, counseling, enforcement, and landlord/tenant dispute resolution.
2	Goal Name	Create Quality Neighborhoods
	Goal Description	This goal will improve or construct infrastructure that will benefit low- and moderate-income residents and persons with special needs.
3	Goal Name	Work to End Homelessness
	Goal Description	This goal provides supportive services for the homeless and persons at risk of homelessness.
4	Goal Name	Increase Social Services
	Goal Description	This goal provides supportive services for low- and moderate-income residents, persons with disabilities, seniors, youth, and other special needs populations.
5	Goal Name	Promote Economic Development
	Goal Description	This goal promotes small business development and provide job training to meet the economic needs within the community.

AP-35 Projects - 91.220(d)

Introduction

This plan outlines the actions the City of Simi Valley proposes to take to address housing and community development needs in the City. The plan includes a list of activities the City will undertake during FY 2026-27 utilizing CDBG funding.

Table 7 – Project Information

#	Project Name
1	CDBG Program Administration (City of Simi Valley)
2	Fair Housing Program (County of Ventura - Housing Rights Center)
3	Annual Minor Streets Rehabilitation Program (City of Simi Valley - Public Works Dept.)
4	Case Management (The Samaritan Center)
5	Senior Advocacy Services/Geriatric Care (Conejo Valley Senior Concerns)
6	Supportive Services Program (Many Mansions)
7	Boost (Upwards Care, Inc.)

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

For FY 2026-27, the City of Simi Valley will have a total CDBG budget of approximately \$715,796. The City anticipates allocating 20 percent of its entitlement funds to program administration and approximately 15 percent to public service programs. The remaining funds will go to a capital improvement project that assists low- and moderate-income persons and a microenterprise program.

Meeting the needs of underserved low- and moderate-income persons is challenging when faced with limited financial resources. The City will continue to use CDBG funds to support public service programs that assist the homeless, seniors, youth, and the disabled populations. To better meet the needs of the underserved, the City proactively seeks additional and alternative resources.

AP-38 Project Summary

Project Summary Information

Table 8 – Project Summary

1	Project Name	CDBG Program Administration (The City of Simi Valley)
	Target Area	N/A
	Goals Supported	Effective Administration
	Needs Addressed	Program Development
	Funding	\$112,000
	Description	This funding is for the direct administration of the City's CDBG Program, including: program development, implementation, monitoring, and fiscal responsibilities.
	Target Date	6/30/2027
	Estimate the number and type of families that will benefit from the proposed activities	N/A
	Location Description	N/A
	Planned Activities	<ul style="list-style-type: none"> • Program development; • Implementation; • Monitoring; and • Fiscal oversight.
2	Project Name	Fair Housing Program (County of Ventura-Housing Rights Center)
	Target Area	N/A
	Goals Supported	Effective Administration
	Needs Addressed	Fair Housing Services
	Funding	\$18,000
	Description	This funding will provide for the contracted services of a fair housing program consultant for City staff and residents.
	Target Date	6/30/2027

	Estimate the number and type of families that will benefit from the proposed activities	This program will benefit approximately 150 City residents.
	Location Description	Citywide
	Planned Activities	<ul style="list-style-type: none"> • Counseling; • Paired Testing; • Enforcement; and • Landlord/tenant dispute resolution.
3	Project Name	City of Simi Valley Annual Minor Streets Rehabilitation Program
	Target Area	N/A
	Goals Supported	Create Quality Neighborhoods
	Needs Addressed	Streets Improvements and Infrastructure
	Funding	\$424,296
	Description	This project will improve minor streets in low- and moderate-income census tract areas.
	Target Date	6/30/2027
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 1,940 persons are expected to benefit from this project (1,135 of whom are Low-/Moderate-Income).
	Location Description	This project will take place in low- to moderate-income Census Tract 80.051
Planned Activities	Rehabilitation of minor streets in specified areas.	
4	Project Name	Case Management (The Samaritan Center)
	Target Area	N/A
	Goals Supported	Work to End Homelessness
	Needs Addressed	Homelessness
	Funding	\$40,000
	Description	This program will provide case management to assist homeless persons in becoming self-sustainable and move into housing.
	Target Date	6/30/2027

	Estimate the number and type of families that will benefit from the proposed activities	A total of 88 homeless individuals are expected to be served by this project.
	Location Description	280 Royal Avenue, Simi Valley, CA 93065
	Planned Activities	The project will include street outreach, case management, and following clients through recovery programs, job searches, benefits, etc.
5	Project Name	Senior Advocacy Services/Geriatric Care Management (Conejo Valley Senior Concerns)
	Target Area	N/A
	Goals Supported	Increase and Improve Social Services
	Needs Addressed	Supportive Services
	Funding	\$17,500
	Description	This program will offer supportive and educational services to elderly persons and their families, including one-on-one advocacy and referrals.
	Target Date	6/30/2027
	Estimate the number and type of families that will benefit from the proposed activities	A total of 80 individuals are expected to be served by this project.
	Location Description	Citywide
Planned Activities	<ul style="list-style-type: none"> • One-on-one counseling; • Support meetings; and • Classes and workshops. 	
6	Project Name	Boost
	Target Area	N/A
	Goals Supported	Promote Economic Development
	Needs Addressed	Economic Support for Small Businesses
	Funding	\$64,000
	Description	This project will assist eight small childcare operators and work toward job creation.
	Target Date	6/30/2027
	Estimate the number and type of families that will benefit from the proposed activities	A total of eight childcare operators will be assisted with technical guidance and have the opportunity for job creation.

	Location Description	Citywide
	Planned Activities	Assist eight childcare operators become profitable and self-sufficient with the opportunity to create a job position each.
7	Project Name	Many Mansions
	Target Area	N/A
	Goals Supported	Increase and Improve Social Services
	Needs Addressed	Supportive Services
	Funding	\$40,000
	Description	Provide support on-site tenants with case management services to 32 households.
	Target Date	6/30/2027
	Estimate the number and type of families that will benefit from the proposed activities	The program will benefit 32 extremely low-income households who have experienced chronic homelessness and/or severe disability.
	Location Description	Casa de Paz; Peppertree, and La Rahada Apartments in Simi Valley
	Planned Activities	Case management services to 32 households

AP-50 Geographic Distribution - 91.220(f)

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

Geographic distribution of funding is predicated somewhat on the nature of the activity to be funded. It is the City's intent to fund activities in areas most directly impacted by the needs of low- and moderate-income residents and those with special needs. Individual project locations may be found in the List of Proposed Projects (Appendix C) and illustrated in the Map of Proposed Projects (Appendix D). A map illustrating the location of low- and moderate-income areas will also be included in Appendix D. CDBG-funded supportive services are provided to low- and moderate-income residents throughout the community. Fair housing services are available on a citywide basis.

Rationale for the priorities for allocating investments geographically

The priority needs identified in the RCP form the basis for allocating resources geographically during FY 2026-27 within the City of Simi Valley.

Affordable Housing

AP-55 Affordable Housing - 91.220(g)

Introduction

The City’s Home Rehabilitation Program offers low-interest loans with deferred payments to low- and moderate-income homeowners. Qualified owners of detached single-family residences are eligible for loans. This ensures that income-qualified homeowners can bring their homes into compliance with current building codes while maintaining their homes to a livable standard, thus preserving their housing affordability and the integrity of the housing stock in Simi Valley. CDBG funds will not be used in service deliverance of this program to support households; therefore, the goals nor accomplishments will be discussed in this section. This Program utilizes CalHome and HOME award funds.

Table 9 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households to be Supported	
Homeless	0
Non-Homeless	0
Special-Needs	0
Total	0

Table 10 - One Year Goals for Affordable Housing by Support Type

One Year Goals for the Number of Households Supported Through	
Rental Assistance	0
The Production of New Units	0
Rehab of Existing Units	0
Acquisition of Existing Units	0
Total	0

AP-60 Public Housing - 91.220(h)

Introduction

The City of Simi Valley currently does not have any public housing developments within its corporate limits. The City will continue to support Section 8 Housing Choice Vouchers to low-income households.

Actions planned during the next year to address the needs to public housing

The City will continue to work with the Area Housing Authority of the County of Ventura to assist Simi Valley's low-income households. Section 8 requires a very low-income renter to pay up to 40 percent of their gross monthly income towards rent and subsidizes the balance on the renter's behalf, up to published Payment Standards.

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

The City offers assistance through the Ventura County Mortgage Credit Certification (MCC) Program to low- and moderate-income first-time homebuyers who wish to purchase a home in Simi Valley. The property may be an attached or detached single-family home, a condominium, or a townhome. The MCC Program is available to those who have not owned a home in the last three years.

The Ventura County Community Development Corporation (VCCDC), located in the west end of Ventura County, offers homebuyer readiness workshops and financing/lending products for first-time homebuyers, assisting qualifying households with gap financing and grants to increase lender confidence and encourage approval of loans. Recently, the City, in partnership with VCCDC, is attempting to enhance outreach to encourage homeownership by facilitating the Homebuyer's Education Workshop at the east end of Ventura County, covering the Cities of Simi Valley, Thousand Oaks, Moorpark, and parts of west San Fernando Valley.

VCCDC also offers Home Preservation Counseling, which is their foreclosure prevention assistance to homeowners throughout the County. VCCDC counselors assist local homeowners with counseling, leading to action plans to avoid foreclosure or offering alternatives to foreclosure if homeownership cannot be maintained.

The Area Housing Authority is an independent, non-profit agency serving the Ventura County region. It sponsors educational home-buying workshops throughout the year. The workshops are provided through a mutual agreement with experts in local, state, and Federal funding resources. The workshops cover tax benefits, raising FICO scores, and various loan options for first-time buyers available through the state of California.

SurePath Financial Solutions is approved by HUD and provides foreclosure, debt, and bankruptcy counseling.

California Department of Real Estate is the state department in charge of real estate broker licensing and consumer complaints with respect to real estate transactions. It offers license checks of mortgage brokers and lenders, and a consumer complaint form. It also provides additional links for foreclosure prevention information and avoiding mortgage foreclosure scams.

If the PHA is designated as troubled, describe the manner in which financial assistance will be provided, or other assistance

The Area Housing Authority of the County of Ventura routinely inspects, repairs, and maintains units under its control on a regular basis.

DRAFT

AP-65 Homeless and Other Special Needs Activities - 91.220(i)

Introduction

The City supports the efforts of the Samaritan Center by providing funding and collaboration to help address the needs of the homeless population.

Describe the jurisdiction's 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 City uses CDBG funds to support programs that assist at-risk populations, including the homeless. For FY 2026-27, the City anticipates allocating \$40,000 to an organization that administers programs that address homeless needs within the City:

The Samaritan Center - Case Management: This program provides case management to assist homeless individuals in becoming self-sustainable and move into housing. It provides access to the services, life skills, and resources they need to secure and retain housing.

Addressing the emergency shelter and transitional housing needs of homeless persons

The City, in partnership with non-profit and governmental service providers, coordinates awareness and access to services to assist with resources, including housing stability.

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

The City will consider allocating a portion of its annual CDBG funds toward the provision of services for the homeless. In FY 2026-27, the City anticipates funding an organization that assists the chronically homeless and at-risk of homelessness populations (The Samaritan Center). The Samaritan Center offers a wrap-around approach of services to houses and supports individuals transitioning from living on the street or in their vehicles to permanent housing.

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

The following program addresses homelessness prevention:

- The Samaritan Center provides support services to persons who are at risk of becoming homeless and helps fund transportation costs to reunite these persons with their families.

The City of Simi Valley does not have a formalized Discharge Coordination Policy in place at this time. However, for those persons released from corrections facilities, the City has a Post Release Offender Supervision (PROS) Officer that is funded by the State's Realignment Initiative. In addition, the City's Community Liaison Officers are tasked with assisting homeless persons in order to connect them with appropriate social services.

AP-75 Action Plan Barriers to Affordable Housing - 91.220(j)

Introduction

During the next fiscal year, the City of Simi Valley proposes to address the following obstacles to affordable housing:

Lack of Affordable Housing Funds: The City currently does not use CDBG funds for the development of affordable housing. However, the City uses other tools such as density bonuses, zoning concessions, and local housing fund assistance. The City will continue to seek new financial resources to enhance existing resources for addressing the affordable housing needs of residents. An impediment to providing affordable housing programs is the recent elimination of redevelopment funds.

Planning and Development Fees: The City periodically evaluates its development fees, zoning regulations, and permit processing procedures to ensure that they are consistent with other communities in the area and with applicable State and Federal regulations. The Rancho Simi Recreation and Park District's fees are substantially lower for affordable housing units compared to units that are not income restricted, which serves as an incentive for the development of new affordable housing units. In addition, the City's Sanitation District and Simi Valley Unified School District fees are reduced for senior housing projects. The City will continue to actively encourage new affordable housing opportunities through density bonuses, incentives, and zoning concessions for developers who include affordable housing units as part of their housing development. Incentives/concessions include reduced building setbacks, increase in allowed building height, and reduced minimum lot sizes, all of which could allow for greater economic return on the property. The more affordable units provided, the higher the number of incentives offered. The City will also consider deferring the payment of development fees to later in the construction process in order to reduce the financial impact from the production of new affordable housing units, and will continue to evaluate methods to remove financial barriers to the production of new affordable housing units in the community.

State Prevailing Wage Requirements: The State Department of Industrial Relations (DIR) expanded the types of projects that require the payment of prevailing wages. Prevailing wage compliance adds to the overall cost of housing construction.

Davis-Bacon Prevailing Wages: A prevailing wage must be paid to laborers when Federal funds are used to pay labor costs for any project over \$2,000 or on any multi-family project over eight units. The prevailing wage is usually higher than competitive wages, raising the cost of housing production and rehabilitation activities. Davis-Bacon also adds to housing costs by requiring documentation of prevailing wage compliance.

Actions 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

The City of Simi Valley works with both non-profit and for-profit developers to produce quality affordable housing. Through the Analysis of Impediments to Fair Housing Choice (AI), the City establishes a Fair Housing Action Plan that outlines steps the City will take to overcome these impediments.

AP-85 Other Actions - 91.220(k)

Introduction

The Priority Needs proposed in the RCP, which form the basis for establishing objectives and outcomes in the Action Plan, are as follows:

High

1. **Development of New Affordable Housing-** There is an acute need for affordable housing for low- and moderate-income households.
2. **Housing Rehabilitation-** There is a need to maintain adequate and quality housing stock, especially for low- and moderate-income households.
3. **Housing Services-** In an effort to support first-time homebuyers and households with children, provide access to financial and non-financial support and assistance to accessing the homeownership market through programs such as down payment and closing cost assistance, homebuyers coaching, and subsidized property inspections.
4. **Housing Stability-** Through tenant-based rental assistance and diversion programs, provide short- and medium-long term rental assistance to extremely low-income and low-income households who are at-risk of homelessness.
5. **Homelessness-** In collaboration with the Ventura County Continuum of Care, provide holistic and complete support to households experiencing or at-risk of experiencing homelessness through the provision of rapid re-housing, emergency shelter, and supportive services.
6. **Supportive Services-** Provide targeted services for youth, elderly, and other higher need populations within the region.
7. **Fair Housing Services-** Provide training to landlords and banking institutions and services to individuals and households experiencing housing discrimination or at-risk of experiencing housing discrimination.
8. **Public Facility Maintenance-** Maintain high-quality public facilities to serve the needs of low- and moderate- income households.

Low

9. **Street Improvements and Infrastructure-** Maintain streetscapes and sidewalks in low- and moderate-income neighborhoods.
10. **Economic Support for Small Businesses and Job Training-** Promote small business development and provide job training to meet the economic needs within the community
11. **Disaster Planning and Recovery-** Disaster planning and recovery activities after severe weather, fire, and earthquakes.

Actions planned to address obstacles to meeting underserved needs

One of the greatest challenges in meeting the needs of underserved persons is having limited financial resources. The City will continue to encourage the development of affordable apartment projects for extremely low- and low-income households. Such developments would provide permanent housing opportunities for homeless persons and increase the availability of low-cost rental units to assist those who are rent burdened or severely rent burdened. The City will also consider allocating a portion of its annual CDBG funds to support public service agencies that address the special needs of the underserved, including the homeless, those at risk of homelessness, youth, seniors, female-headed households, victims of domestic violence, and the disabled.

Actions planned to foster and maintain affordable housing

Increasing and improving affordable housing is identified as a Priority in the RCP. The City continues to work to preserve its existing affordable housing stock. CalHome, and HOME funds continue to support the City's Home Rehabilitation Program. The City's General Plan Housing Element for the 2021-2029 planning period incorporates the 6th cycle of the Regional Housing Needs Allocation (RHNA), and fair housing goals and policies continue to affirm the City's position on furthering fair housing choice. The current Housing Element, as adopted by the City Council on October 25, 2021, was submitted to the State's Department of Housing and Community Development (HCD) for certification in October 2021. The City approved modifications to the Housing Element at the direction of HCD and approved the amended Housing Element on February 27, 2023, and certification from HCD was received in May 2023.

Actions planned to reduce lead-based paint hazards

The City proposes to take the following actions during FY 2026-27 in an effort to identify and reduce potential lead-based paint hazards in the community:

- Continue to incorporate lead-based paint hazard information in the City's Home Rehabilitation Program information flyer.
- Continue to make printed information (HUD information pamphlet from the Office of Lead-Based Paint Abatement and Poisoning Prevention) available to the public at several locations, including City Hall, the Chamber of Commerce, and the Conejo Simi Moorpark Association of Realtors office.
- Continue to inform prospective home rehabilitation loan applicants during their initial interview about the potential hazards of lead-based paint and any abatement measures necessary to eliminate the hazard. If the applicant's home was built prior to 1978, City staff will inspect the dwelling to see if potential hazards may exist as a result of the deterioration of lead-based paint. If children aged seven or younger are present in the home, and if a potential hazard from lead-based paint is identified, City staff will advise the parents about screening their children for elevated levels of lead in the blood and follow any prescribed abatement requirements resulting from the screening.

- Continue testing for the presence of lead-based paint in homes that were built prior to 1978 and are subject to the City's Home Rehabilitation Program.
- Continue the lead-based paint risk assessment and abatement program when lead-based paint tests indicate a hazardous concentration of lead (equal to or higher than 1 mg/cm²) for homes that are involved in the City's Home Rehabilitation Program.

Actions planned to reduce the number of poverty-level families

The City has established goals and policies designed to improve the local economy and reduce the level of poverty within the community. The City will continue to pursue the following programs and activities during FY 2026-27, which are expected to help reduce the number of families at the poverty level:

- Actively encourage commercial and industrial development in order to increase local employment opportunities for its residents and to better serve the business community.
- Recruit and retain an industry based upon its environmental impact, the number of jobs per acre provided, the percentage of jobs from entry level to executive level, and its ability to utilize the skills of the City's residents.
- Cooperate with the State Employment and Development Department and research the job skills in the community, giving special attention to attracting industries that utilize these skills.
- Promote Affordable Housing Programs designed to provide assistance primarily to extremely low-, low-, and moderate-income households within the community. A variety of housing assistance programs throughout the County are available to help various low- and moderate-income groups in need of assistance, including renters, first-time homebuyers, existing homeowners, homeless persons, and persons at risk of homelessness.
- Actively encourage new affordable housing opportunities through density bonuses and zoning concessions.

City staff will continue to integrate existing social service and housing activities for extremely low- and low-income households by working with and providing referrals to local social service agencies.

Actions planned to develop institutional structure

The City will endeavor to improve communications with other local governmental agencies, as well as area non-profit organizations, to meet and address the needs of the community. For FY 2026-27, City staff will continue to collaborate internally, as well as with local advocacy groups and other County, State, and Federal organizations.

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

The City will work to enhance coordination between public and private housing and social service agencies through the following:

- Improving communications (network) with private housing developers, non-profit organizations, and public agencies. Priority will be given to strengthening coordination efforts between the City and those agencies and groups that provide assistance to the homeless, persons threatened with homelessness, and persons with special needs in order to improve the delivery of services to those households.
- The City, in partnership with non-profit and governmental service providers, coordinates awareness and access to resources to assist with housing stability, food insecurities, health care, and mental health services. Through this coordination, the community can identify gaps in services and lack of awareness of services available to assist those in need, while assisting non-profits and service providers to stay abreast of current developments available to meet community needs.

DRAFT

AP-90 Program Specific Requirements - 91.220(I) (1,2,4)

Introduction

The following describes other program-specific requirements:

Community Development Block Grant Program (CDBG) Reference 24 CFR 91.220(I)(1)

Projects planned with all CDBG funds available during the year are identified in the Projects Table. The following identifies potential program income that may become available to assist with funding 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 |

Discussion: The City does not anticipate generating significant amounts of program income during the RCP period. Should program income funds become available, they will be added to the expected entitlement amount, along with prior year unspent funds, to calculate the total anticipated available funding.

U.S. Department of Housing and Urban Development — Federal Award Agreement

ADDENDUM 1. POLICY REQUIREMENTS

If applicable:

1. The Recipient shall not use grant funds to promote “gender ideology,” as defined in Executive Order (E.O.) 14168, Defending Women from Gender Ideology Extremism and Restoring Biological Truth to the Federal Government;
2. The Recipient agrees that its compliance in all respects with all applicable Federal anti-discrimination laws is material to the U.S. Government’s payment decisions for purposes of section 3729(b)(4) of title 31, United States Code;
3. The Recipient certifies that it does not operate any programs that violate any applicable Federal anti-discrimination laws, including Title VI of the Civil Rights Act of 1964;
4. The Recipient shall not use any grant funds to fund or promote elective abortions, as required by E.O. 14182, Enforcing the Hyde Amendment; and that,
5. Notwithstanding anything in the NOFO or Application, this Grant shall not be governed by Executive Orders revoked by E.O. 14154, including E.O. 14008, or NOFO requirements implementing Executive Orders that have been revoked.
6. The Recipient must administer its grant in accordance with all applicable immigration restrictions and requirements, including the eligibility and verification requirements that apply under title IV of the Personal Responsibility and Work Opportunity Reconciliation Act of 1996, as amended ([8 U.S.C. 1601-1646](#)) (PRWORA) and any applicable requirements that HUD, the Attorney General, or the U.S. Citizenship and Immigration Services may establish from time to time to comply with PRWORA, [Executive Order 14218](#), or other Executive Orders or immigration laws.
7. No state or unit of general local government that receives funding under this grant may use that funding in a manner that by design or effect facilitates the subsidization or promotion of illegal immigration or shields illegal aliens from deportation, including by maintaining policies or practices that materially impede enforcement of federal immigration statutes and regulations.
8. The Recipient must use SAVE, or an equivalent verification system approved by the Federal government, to prevent any Federal public benefit from being provided to an ineligible alien who entered the United States illegally or is otherwise unlawfully present in the United States.
9. Faith-based organizations may be subrecipients for funds on the same basis as any other organization. Recipients may not, in the selection of subrecipients, discriminate against an organization based on the organization’s religious character, affiliation, or exercise.



DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT

[DOCKET No. FR-6573-N-01]

Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (PRWORA); Interpretation of “Federal Public Benefit”

AGENCY: Office of the General Counsel, HUD.

ACTION: Notice.

SUMMARY: This notice sets forth the interpretation that the U.S. Department of Housing and Development (HUD) uses for the term “Federal public benefit” as used in Title IV of the Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (PRWORA), and its exceptions. In doing so, this notice supersedes any prior interpretation in any notice or other document issued by any HUD program or office.

FOR FURTHER INFORMATION CONTACT:

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<https://www.fcc.gov/consumers/guides/telecommunications-relay-service-trs>.

SUPPLEMENTARY INFORMATION:

I. Background

According to Section 401 of PRWORA, 8 U.S.C. 1611(a), aliens who are not “qualified aliens” are not eligible for any “Federal public benefit” as defined in 8 U.S.C. 1611(c). The prohibition set forth in § 1611(a) is subject to certain exceptions set forth in § 1611(b).

Section 401(c) of PRWORA, defines “Federal public benefit” as “(A) any grant, contract, loan, professional license, or commercial license provided by an agency of the United

States or by appropriated funds of the United States” and “(B) any retirement, welfare, health, disability, public or assisted housing, postsecondary education, food assistance, unemployment benefit, or any other similar benefit for which payments or assistance are provided to an individual, household, or family eligibility unit by an agency of the United States or by appropriated funds of the United States.” 8 U.S.C. 1611(c)(1). This definition, too, is subject to certain exceptions. *See id.* (c)(2) (setting forth certain exceptions to the definition of “Federal public benefit”).

In addition, under Section 432 of PRWORA, as amended, to the extent required by law, providers of a nonexempt “Federal public benefit” must verify that a person applying for the benefit is a qualified alien and is eligible to receive the benefit. 8 U.S.C. 1642. While the verification requirement is necessary for proper enforcement of PRWORA, it is conceptually distinct from the meaning of the term “Federal public benefit” and this notice is not intended to address the application of such requirement. Neither does this notice speak to “Federal public benefits” that may be subject to other statutory authority besides PRWORA regarding citizenship and alien eligibility.

In the list of substantive exceptions under 8 U.S.C. 1611(b)(1) Congress provided that the prohibition against providing non-qualified aliens with any federal public benefit “shall not apply with respect to the following Federal public benefits:

(B) Short-term, non-cash, in-kind emergency disaster relief [. . .] “(D) Programs, services, or assistance (such as soup kitchens, crisis counseling and intervention, and short-term shelter) specified by the Attorney General, in the Attorney General’s sole and unreviewable discretion after consultation with appropriate Federal agencies and departments, which (i) deliver in-kind services at the community level, including through public or private nonprofit agencies; (ii) do not condition the provision of assistance, the amount of assistance provided, or the cost of assistance provided on the individual recipient’s income or resources; and (iii) are necessary for the protection of life or safety

II. Interpretation

Statutory construction “must begin, and often should end as well, with the language of the statute itself.” *United States v. Steele*, 147 F.3d 1316, 1318 (11th Cir. 1998) (quoting *Merritt v. Dillard*, 120 F.3d 1181, 1185 (11th Cir. 1997)). “The plain meaning controls.” *United States v. Robinson*, 94 F.3d 1325, 1328 (9th Cir. 1996) (citation omitted). The statutory language is clear: if a HUD program falls into either § 1611(c)(1)(A) or (c)(1)(B), such benefits are not available to individuals who are aliens, unless (i) that individual is a qualified alien, or (ii) some other exception applies to the HUD program, either under § 1611(b) or via the definitional limits on “Federal public benefit” set forth in (c)(2). Thus, the task is simple: construe the plain language of (c)(1)(A) and (c)(1)(B). Those provisions state that “Federal public benefit” means:

(A) any grant, contract, loan, professional license, or commercial license provided by an agency of the United States or by appropriated funds of the United States; and

(B) any retirement, welfare, health, disability, *public or assisted housing (emphasis added)*, postsecondary education, food assistance, unemployment benefit, or any other similar benefit for which payments or assistance are provided to an individual, household, or family eligibility unit by an agency of the United States or by appropriated funds of the United States.

If HUD “provide[s]” the (i) “grant, contract, loan, professional license, or commercial license,” or if the “grant, contract, loan, professional license, or commercial license” is “provided by” “appropriated funds of the United States,” then such item is a “Federal public benefit.”

Similarly, if HUD “provide[s]” the “retirement, welfare, health, disability, public or assisted housing, postsecondary education, food assistance, unemployment benefit, or any other similar benefit,” or such “benefit” is “provided” “by appropriated funds of the United States,” then such benefit is a “Federal public benefit,” as long as the benefit is “provided to” one of three types of recipients: (i) “an individual,” (ii) a “household,” or (iii) a “family eligibility unit.”

1. Grant

Section 1611(c)(1)(A) applies to “any grant, contract, loan, professional license, or commercial license” provided by HUD. For purposes of PRWORA, a grant means the award of funding for an individual or entity to carry out specified activities without the direct involvement of HUD.

HUD administers a multitude of grant programs, including those in which the grants go to individuals, private entities, and institutions (such as building or services grants) and those in which the grants go to States, units of local government as well as non-profit organizations. The grant “recipient” may carry out the activity supported by the grant, but sometimes the recipient may issue a subgrant to an individual or entity. For PRWORA purposes, the term “grant” includes any “subgrant” derivative of a grant. Sometimes the activity supported by the grant is carried out by the recipient and sometimes the recipient acts as a "pass-through entity" "that provides a subaward to a subrecipient to carry out part of a Federal program," 2 CFR 200.1 (definitions for uniform grants guidance for all Federal financial assistance), under which the obligations and requirements on the recipient flow down to the subrecipient.

Section 1611 (c)(1) of PRWORA defines a “Federal public benefit” to mean *“any grant”* (emphasis added). "Read naturally, the word `any' has an expansive meaning, that is, one or some indiscriminately of whatever kind." *Ali v Fed. Bureau of Prisons*, 552 U.S. 214, 219 (2008) (cleaned up). The statutory text does not distinguish between grants "to individuals" and grants "provided to states or localities." *Contra* 63 FR at 41659. And so, HUD must apply the plain meaning of the statutory text. *E.g., Pub. Serv. Elec. & Gas Co. v. F.E.R.C.*, 989 F.3d 10, 19 (D.C. Cir. 2021) (“[A] regulation can never trump the plain meaning of a statute.”) (quotes omitted).

It is HUD’s position that any grants it administers that are not explicitly governed by another statute are federal public benefits related to housing assistance and are subject to the eligibility requirements under PRWORA. HUD intends to revise its guidance as to which grant programs are deemed covered by PRWORA or by another statute.

2. “Any Other Similar Benefit”

To determine whether a HUD program provides “any other similar benefit(s)” under 8 U.S.C. 1611(c)(1)(B), it is instructive to look not just to the enumerated benefits within 8 U.S.C. 1611(c)(1), but also to the exempted Federal public benefits under 8 U.S.C. 1611(b)(1). Here, Congress specified under subparagraphs (B) and (D) that there are exemptions from the general alien restrictions of 8 U.S.C. 1611(a) for certain types of Federal public benefits, including non-cash benefits or in-kind services. In-kind is defined as “in the same manner or with something equivalent” Webster’s II: New Riverside University Dictionary (1994). In the context of the statute, “in-kind” means some sort of non-cash benefit that provides goods or services directly, rather than providing cash to procure those goods or services. The exception under subparagraph (D) applies more specifically to in-kind services that are delivered “at the community level, including through public or private nonprofit agencies.” It would not make sense for Congress to exclude these limited non-cash or in-kind services explicitly in 8 U.S.C. 1611(b)(1)(B) and (D) if at least some of those benefits were not already captured under the operative definition of “Federal public benefit” under 8 U.S.C. 1611(c). Congress would have no need to carve something out that would not otherwise be covered in the first instance under the “Federal public benefit” definition. As such, the general definition of “Federal public benefit” is best understood to include “assistance” similar to the “deliver[y] [of] in-kind services at the community level, including through public or private nonprofit agencies” where such benefits have not been specifically excluded by 8 U.S.C. 1611(b)(1).

III. Application to HUD Programs

HUD interprets PRWORA to apply to all HUD programs related to public or assisted housing as they are “public or assisted housing” for which payments or assistance are “provided to an individual, household, or family eligibility unit by an agency of the United States or by appropriated funds of the United States” unless a more specific federal statute applies, e.g. Section 214 of the Housing and Community Development Act of 1980, as amended.

HUD has applied the provisions of PRWORA to its Community Planning and Development programs and grants which include Homeless Assistance Programs, particularly the Emergency Solutions Grants (ESG) and Continuum of Care (CoC) programs (*see* 24 CFR parts 576 and 578). HUD considers these programs to award “grants” as defined in PRWORA and therefore covered by the definition of “Federal public benefit” under the statute. As a result, these grant programs are subject to the eligibility and verification provisions under PRWORA.

The covered grant programs include, but are limited to, grants to governments (state and local) or to other organizations. Covered grant programs with governmental grantees include HOME, HOME Investment Partnerships American Rescue Plan (HOME-ARP), National Housing Trust Fund, Community Development Block Grant (CDBG), Community Development Block Grant Disaster Recovery (CDBG-DR), Housing Opportunities for Persons with AIDS (HOPWA) formula, and ESG, but also include Pathways to Removing Obstacles to Housing (PRO Housing) and Preservation and Reinvestment Initiative for Community Enhancement (PRICE) (both competitive). Programs that award grants to non-profit organizations include the CoC program, Congressional earmarks, the HOPWA competitive program, PRO Housing, PRICE and the Self-Help Homeownership Opportunity Program (SHOP).

IV. Verification and Economic Impact

HUD will undertake a review and revised guidance in order to determine the means of verification of immigration status as they affect those programs not exempt under Section 1611(b)(1). These will address those program recipients (such as States and government actors) who have access to the Systemic Alien Verification for Entitlements (SAVE) program as well as non-government recipients. Under PRWORA, although nonprofit charitable organizations that administer “Federal public benefits” are not required to conduct eligibility verification under 8 U.S.C. 1642(d), it does not relieve states or other governmental from the requirements to ensure that all relevant programs are in compliance with PWRORA. As a result, HUD will be issuing new guidelines related to the verification for benefits provided through its housing assistance and

grant programs, including for benefits distributed by charitable non-profit organizations. HUD will be relying in guidance issued by the Department of Homeland Security once that is published.

Due to the multitude of HUD programs that are available to tens of millions of individuals, HUD will continue to evaluate the manner in which it will verify compliance with PRWORA. HUD will, to the maximum extent possible, minimize the imposition of reporting and information and information collection requirements. Similarly, HUD continues to analyze the economic impact of this interpretation, but at this time, has not found there to be significant economic impact. HUD will issue subsequent guidance on verification actions and a final determination regarding the economic impact of this interpretation.

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