



Sunnyvale

***CITY OF SUNNYVALE***

***CONSOLIDATED ANNUAL  
PERFORMANCE EVALUATION REPORT  
(CAPER)***

***For Fiscal Year 2022-23:  
July 1, 2022 - June 30, 2023***

***Community Development Block Grant (CDBG) and  
Home Investment Partnership Program (HOME)***

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## EXECUTIVE SUMMARY

The City of Sunnyvale's FY 2022-2023 *Consolidated Annual Performance Evaluation Report (CAPER)* describes the progress made toward achieving the housing and community development goals identified in the City's *Five-Year (2020-2025) Consolidated Plan*, focusing on the goals and programs identified in the FY 2022-23 Action Plan, and includes activities funded in previous fiscal years with accomplishments reported during FY 2022-23. The FY 2022-23 CAPER covers the period from July 1, 2022 to June 30, 2023 and is the third annual report of this Consolidated Plan period. This CAPER was prepared for the City of Sunnyvale by the Housing Division of its Community Development Department, in compliance with U.S. Department of Housing and Urban Development (HUD) requirements. The document is a tool used by HUD and the City to evaluate accomplishments and actions taken during the previous program year.

### Summary of the Consolidated Plan Process

The City of Sunnyvale receives annual entitlement grants of federal Community Development Block Grant (CDBG) and HOME Investment Partnerships (HOME) funds from HUD. HUD provides these funds to the City for various activities that benefit low-income people and/or areas of the City, such as affordable housing, public services, public improvements, and other community development activities.

As a CDBG/HOME entitlement grantee, the City is required to prepare a five-year strategic plan called a Consolidated Plan or "ConPlan". The ConPlan identifies the housing and community development needs of lower-income people and areas of the City, prioritizes these needs, identifies resources to address them, and establishes annual goals and objectives to meet the priority needs. As part of the ConPlan process, the City is also required to prepare an Action Plan for each year of the ConPlan. The Action Plan establishes the community's objectives for meeting the needs described in the ConPlan; identifies resources available within the community to meet ConPlan goals; and describes a one-year plan and budget for the intended uses of the City's CDBG and HOME funds, and any other HUD funds that may be available. At the end of each fiscal year, the City prepares a CAPER to report on the City's progress in meeting the goals and priorities in its ConPlan.

The FY 2022-23 CAPER was prepared with input from local non-profit agencies, the Housing and Human Services Commission, and interested members of the public. Written comments were encouraged and any comments submitted have been addressed within the CAPER.

### Federal Resources

The City received entitlement grants of \$1,128,312 in CDBG funds and \$477,145 in HOME funds for FY 2022-23. The City also received \$49,589. in CDBG program income (loan payments) in FY 2022-23, of which the balance was allocated to eligible CDBG activities in the City's FY 2022-23 Action Plan. A total of \$217,308 in HOME program income was received during the fiscal year as HOME loan payments.

## **CR-05 - Goals and Outcomes**

*Progress the jurisdiction has made in carrying out its strategic plan and its action plan.*

**91.520(a):** *An overview that includes major initiatives and highlights that were proposed*

*and executed throughout the program year.*

Two of the most important goals in the 2020-2025 ConPlan and the 2022-23 Action Plan were affordable housing and alleviation of homelessness. The initiative described below was designed to address one or both of these goals.

**Highlights:**

Tenant-Based Rental Assistance (TBRA) Program: the City's TBRA program, funded with HOME funds, provides rental assistance similar to a Section 8 voucher but for a maximum term of up to two years. The program is available to homeless clients and very-low-income households at immediate risk of homelessness. Clients must either be working, job-seeking, or have the ability to obtain employment or other sources of income after the two-year period ends, so that they can take over their full rent payment at that time. The clients are provided with case management and housing search assistance by partnering non-profit agencies (referring agencies) that help them find and apply for units to rent, maintain or obtain employment and benefits, and address related needs. The program expanded its capacity from 20-households enrolled during Program year 2021-2022 - to 30-households enrolled currently, with an additional 9-households in "housing search" mode (will be considered enrolled once housing is obtained). The TBRA program has a maximum capacity of 40-households, which it plans to reach by the end of calendar year 2023.

Table 1 below summarizes major accomplishments associated with a single Strategic Plan Goal, and includes FY2022-2023 data.

**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.**

**Table 1: Accomplishments: Strategic Plan (FY 2022-23)**

**Community Development Block Grant and HOME Investment Partnerships Annual  
Accomplishment Summary  
Sunnyvale, 2022**

<b>Program/Project</b>	<b>Priority</b>	<b>Funding Source</b>	<b>Unit of Measure</b>	<b>Expected Outcome</b>	<b>Actual Outcome</b>
Human/Public Services	Other Community Development Efforts	CDBG	Persons Assisted	500	660
Tenant Based Rental Assistance	Homeless	HOME	Households Assisted	40	29
WorkFirst Sunnyvale	Homeless/Expand Economic Opportunities	CDBG	Job Creation and Retention	20	21
Minor Home Improvement Program	Other Community Development Efforts	CDBG	Households Assisted	10	10
Major Rehabilitation Program	Other Community Development Efforts	CDBG	Households Assisted	2	2

**Note:** This table is intended to be a supplement for the HUD Consolidated Plan and Accomplishments report that is typically produced through HUD's Integrated Disbursement and Information System (IDIS).

**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.**

### **Assessment of One Year Goals – FY 2022-23**

The highest priority in Sunnyvale in recent years has been expanding affordable housing supply and addressing homelessness. Both of these issues are major challenges facing the greater region (Silicon Valley and larger San Francisco Bay Area) as well as in many major metro areas around the U.S. in recent years. Sunnyvale has a long tradition of innovative policies and actions designed to address affordable housing, homelessness, and related priorities. The 2020-2025 Consolidated Plan focuses on expanding and preserving the existing supply of affordable housing, improving neighborhoods and increasing accessibility for persons with disabilities, alleviating homelessness, and supporting programs that help lower-income and special needs residents meet their basic needs in order to thrive in the community. All of these have been identified as priority needs in Sunnyvale. The majority of funding covered by the Action Plan was used to address these affordable housing, homelessness, and related priority needs, as shown in the table above and described below.

### **AFFORDABLE HOUSING**

Funding for housing-related priority needs was provided in accordance with the FY2022-23 Action Plan, as follows:

#### **1. Home Improvement Program (HIP)**

##### Owner-Occupied Housing Rehabilitation Loan Program

Housing rehabilitation is one of the priorities in the five-year Consolidated Plan. The HIP program, available city-wide, provides deferred loans of up to \$80,000 for rehabilitation of owner-occupied, single-family homes and up to \$15,000 for mobile homes. During the reporting period, the City funded two home rehabilitation loans. Continued efforts are underway to increase public awareness about the program in order to increase utilization. These efforts include staff attendance at neighborhood meetings and City events, and marketing the program to likely eligible homeowners through various outreach channels including newsletters, blogs, brochures, flyers, email and website postings, and through non-profit partners. The HIP brochure is translated into Spanish and City staff is available to assist customers in English or Spanish, as well as other languages upon request, consistent with the City's Language Access Plan. Key materials also include a disclosure notice in six languages representative of the community such as Spanish, Vietnamese, Mandarin, Korean, Hindi, and Tagalog.

##### Home Access, Paint, Roof Replacement and Emergency Repair Program

This program assists special needs and very low-income households, and is available city-wide. About \$95,000 was expended to help assist with home emergency repairs including plumbing, roofing and heating. This is an increase in expenditures from the prior year – as the demand for this program has grown – therefore the City is investing more resources into it.

### Energy Efficiency Matching Grant Program

This pilot program began in FY 2010 as an option typically combined with a rehabilitation loan on a single-family home. During the program year, there were no matching grants provided. Staff continues to collaborate with the other City Departments and the County to market this program, in conjunction with similar efforts provided through the CA Energy Upgrade program.

## **2. Fair Housing Services**

### Fair Housing

Project Sentinel provides fair housing services to Sunnyvale residents. These services include fair housing outreach and education, investigation of housing discrimination complaints, conciliation of fair housing disputes, and legal representation for those who need legal redress for harms caused by housing discrimination. A total of 78 Sunnyvale clients received fair housing services funded by the CDBG grant to Project Sentinel during the program year.

The City continues to support fair housing efforts by providing information to the public about fair housing through the Housing Division's website and monthly e-newsletter, by posting flyers and brochures in various public facilities, sharing information with regional community organizations via listservs etc., and by organizing fair housing outreach events in April of each year. Additionally, the City allocates \$45,000 per year in local funds to Project Sentinel to provide Tenant and Landlord Counseling that helps households and property owners in resolve issues prior to involving the court system.

## **ALLEVIATION OF HOMELESSNESS**

Programs designed to address this need aim to help people who are currently homeless or at imminent risk of homelessness to obtain employment or other sources of income, supportive services, and/or transitional rental assistance (TBRA) to obtain housing and achieve stability.

### Actions to Address the Needs of Homeless Persons

In 2017, the City provided \$7.43 million in Housing Mitigation Funds, plus \$600,000 in HOME funds to Benner Plaza, a 66-unit affordable housing development, which includes a 23-unit set aside for the formerly homeless and/or families at-risk of homelessness. Additionally, in 2020, the City awarded \$26 million in local Housing Mitigation Funds to three affordable housing developments (Block 15, Sonora Court and Orchard Gardens), all of which will have units set-aside for the Extremely Low-Income population – and one of which is applying for the County of Santa Clara Measure A Funds, a local housing bond (Orchard Gardens). Lastly, in regards to affordable housing investments – the City, in 2022, conditionally awarded \$16 million in additional local funding to qualified developers for the acquisition, development and rehabilitation of affordable housing.

Funded in FY 2021-22 on a two-year agreement, the City's Tenant Based Rental Assistance (TBRA) Program, administered by Sunnyvale Community Services, expended about \$527,228 in HOME funds during the 2022 program year to assist 29-households currently experiencing or at risk of homelessness, to obtain and maintain rental housing through use of TBRA vouchers. Each tenant is provided up to two years of assistance through this program. The City's TBRA Program, during the 2022 program year, sustained its enrollment and increased its expenditures from the previous year, in an effort to assist more Sunnyvale households experiencing, or at-risk of homelessness. Additionally, the TBRA network is coordinating at a higher-level to continue to ensure compliance with HUD requirements, and most importantly, to promote effective and consistent supportive-service administration to

households enrolled in the TBRA Program. As cited previously, the TBRA program has a new Administrator as of July 1, 2022 (Sunnyvale Community Services) – and the program continues to expand its capacity to serve more low-income individuals and/or families experiencing homelessness.

## COMMUNITY DEVELOPMENT

### Human Services

The City provided CDBG funding for human services (charitable) programs that serve various special needs clients (seniors, at-risk youth, disabled people, homeless people, domestic violence survivors, etc.). The CDBG grants typically represent just a very small portion of these agencies' overall operating budgets, and they serve many other clients (in Sunnyvale or elsewhere) beyond the numbers noted below, which include only the clients served with the City's CDBG grants for the specific services described below.

**The Bill Wilson Center** provides individual, couple, family and group counseling services to assist individual youth and their families with emotional and mental health issues. A CDBG grant of about \$29,585 was provided to this agency to provide counseling sessions to 45 unduplicated clients during the year. Additionally, the Bill Wilson Center operates a youth shelter and provides, care, and transitional housing for at-risk youth using other funding sources.

**The Sunnyvale Senior Nutrition Program**, hosted by the First United Methodist Church, provides high-quality, cost effective, hot nutritious meals in a congregate setting, five days a week to Sunnyvale residents age 60 or older. The Senior Nutrition Program received about \$44,477 in CDBG funds to provide hot meals to 75 Sunnyvale unduplicated older adults. A total of 2,897 meals were distributed.

**Sunnyvale Community Services (SCS)** provides emergency financial assistance to households in crisis, as well as food, clothing, and other assistance. SCS received about \$60,952 in CDBG funds to provide 1,385 bags of healthy, nutritious food to 355 lower-income clients through the Year- Round Food Assistance Program.

**YWCA Support Network** provides crisis counseling and related services to survivors of domestic violence who reside in Sunnyvale. This program received about \$31,040 in CDBG funds from the City to provide individual counseling, group counseling, support groups, and/or children's play therapy to 103 Sunnyvale residents.

## EXPAND ECONOMIC OPPORTUNITIES

### "Work First Sunnyvale" Workforce Development Program (CBDO Activity)

Certified as a Community-Based Development Organization (CBDO), Sunnyvale Community Services (SCS) implements this program with the assistance of the Downtown Streets Team (DST), an organization committed to helping homeless men and women rebuild their lives through a volunteer work-readiness program. During the program year, 20 clients obtained regular paid employment.

## 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)

**Table 2: Assistance provided, by race and ethnicity of household head, and by source of funds**

	CDBG	HOME
White	384	15
Black or African American	16	10
Asian	148	1
American Indian or American Native	5	0
Native Hawaiian or Other Pacific Islander	10	1
Multi-Racial/Other	97	2
<b>Total</b>	<b>660</b>	<b>29</b>
Hispanic	291	10
Not Hispanic	93	5

### Narrative

As reflected in the table above, the City of Sunnyvale's programs served a diverse population generally representative of the Sunnyvale population. The City's outreach materials and agreements with subrecipient agencies require that funded programs be inclusive and accessible to all local populations in a non-discriminatory manner consistent with CDBG and HOME requirements.

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

**Identify the resources made available**

**Table 3: Resources Made Available**

Source of Funds	Resources Made Available	Amount Expended During Program Year
CDBG	\$2,021,126	\$1,203,732
HOME	\$2,315,976	\$674,921

**Narrative**

Table 3 lists the amount of funding available in all CDBG and HOME accounts during FY 2022-23. Of that amount, the amounts shown in the right-hand column were spent during that year. The remaining funds are either being spent currently or will be spent soon on current projects and programs or will be reallocated to new activities as part of the FY 2022-23 Action Plan.

**Identify the geographic distribution and location of investments**

**Table 4: Identify the geographic distribution and location of investments**

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description
N/A	N/A	N/A	See below

**Narrative**

The City does not have any target areas for CDBG/HOME investments, as explained further in the ConPlan and Action Plans. Most of the CDBG and/or HOME-funded programs and services are provided on a city-wide basis to income-eligible and/or special needs households. Certain capital projects are assisted at a specific site, based on the location of the project, but projects may be proposed in any area of the City. There are no parts of the City suffering from “blight” or high poverty/unemployment rates that would warrant targeting efforts. Human services programs are delivered in a number of facilities and locations throughout the City, and in some cases just outside the City, as long as Sunnyvale residents are being served by the program. Affordable housing assistance is generally provided anywhere in the City, as opportunities arise, in order to avoid concentration of poverty, and to ensure fair access to affordable rental housing, rehabilitation assistance, and homeownership opportunities in all neighborhoods.

**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.**

Federal funds are highly leveraged with other sources, as the amount of federal funding available typically constitutes just a small fraction of the total cost of the funded activities. The City encourages non-profit developers to seek private and State sources of funding, both including grants, loans, and/or tax credit financing. Furthermore, as opportunities arise, the City will use its local Housing funds (from impact and in-lieu fee revenues) as appropriate to leverage federal funds and to match HOME funds.

The City continues to support human service agencies with its General Fund, in addition to the CDBG public services funds it provides. This funding is provided through a competitive grant program.

The City of Sunnyvale used various sources to fund affordable and supportive housing activities this past year. The City provided federal funds from the following sources: CDBG, CDBG Revolving Loan Fund, and HOME. A number of non-profit agencies provide housing and supportive services in the City. They are partially funded through CDBG and City General funds, with the remainder of funding provided by private and/or other public sector funders. These activities are described under the Human Services Section of this CAPER.

**Table 5: Fiscal Year Summary HOME Match Report**

<b>Fiscal Year Summary – HOME Match</b>	
1. Excess match from prior Federal fiscal year	\$38,009,019
2. Match contributed during current Federal fiscal year	\$350,000
3 .Total match available for current Federal fiscal year (Line 1 plus Line 2)	\$38,359,019
4. Match liability for current Federal fiscal year	\$0
5. Excess match carried over to next Federal fiscal year (Line 3 minus Line 4)	\$38,359,019

**Table 6: 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
631 (TBRA)	PY2022	\$350,000						\$350,000

**Table 7: HOME Program Income FY 2022-23**

Program Income				
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
\$424,132	\$217,308	\$604,936	\$527,228	\$36,504

HOME MBE/WBE report (next page)

The data for the MBE/WBE report is collected for the federal fiscal year (October 1 through September 30). Since this report was prepared before that period, the data is not yet available, but will be inserted before staff submits the CAPER to HUD.

**Table 8: Minority Business Enterprises and Women Business Enterprises:  
FFY: 10/01/22-09/30/23**

Contracts	Total	Minority Business Enterprises				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
Number	10	0		0	4	4
Dollar Amount	\$474,152	\$0	\$0	\$0	\$76,500	\$397,652
<b>Sub-Contracts</b>						
Number	0	0	0	0	0	0
Dollar Amount	\$0	\$0	\$0	\$0	\$0	\$0
Contracts	Total	Women Business Enterprises	Male			
Number	0	0	10			
Dollar Amount	\$0	\$0	\$474,152			
<b>Sub-Contracts</b>						
Number	0	0	0			
Dollar Amount	\$0	\$0	\$0			

**Table 9: Minority Owners of Rental Property [N/A]**

<b>Minority Owners of Rental Property: Number of HOME-assisted rental property owners and the total amount of HOME funds in these rental properties assisted</b>						
	Total	Minority Property Owners				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
Number	0	n/a	n/a	n/a	n/a	n/a
Dollar Amount	\$0	n/a	n/a	n/a	n/a	n/a

Not Applicable. All of the HOME funds used by the City to assist affordable rental developments was provided to properties owned and managed by non-profit entities, not individual investors.

**Table 10: Relocation and Real Property Acquisition**

Not Applicable. None of the projects funded with CDBG or HOME funds during this program year involved any tenant relocation or 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.

**Table 11: Number of Households**

	<b>One-Year Goal</b>	<b>Actual</b>
Number of homeless households to be provided affordable housing units	40	29
Number of non-homeless households to be provided affordable housing units	0	0
Number of special-needs households to be provided affordable housing units	0	0
<b>Total</b>	<b>40</b>	<b>29</b>

**Table 12: Number of Households Supported**

	<b>One-Year Goal</b>	<b>Actual</b>
Number of households supported through rental assistance	40	29
Number of households supported through the production of new units	0	0
Number of households supported through the rehab of existing units	0	0
Number of households supported through the acquisition of existing units	0	0
<b>Total</b>	<b>40</b>	<b>29</b>

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

The City did not meet its goal, specific to its TBRA program by serving 29-households throughout the program year, as the goal was to serve 40-households.

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

These outcomes show that the City met most of its goals in the 2020-2025 Consolidated Plan.

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.

**Table 13: Number of Households Served**

<b>Number of Households Served</b>	<b>CDBG Actual</b>	<b>HOME Actual</b>
Extremely Low Income (up to 30% of Area Median)	468	29
Very Low Income (30% - 50% of AMI)	178	0
“Moderate” Income (51% - 80% of AMI, generally referred to as “Low Income” in California)	14	0
<b>Total</b>	<b>660</b>	<b>29</b>

**Narrative Information**

In total, the CDBG and HOME funds expended by the City during the program year assisted 660 households. Of those households, 468 had extremely-low-incomes and 178 had very-low-incomes.

**CR-25 - Homeless and Other Special Needs 91.220(d, e); 91.320(d, e); 91.520(c)**

**Evaluate the jurisdiction's progress in meeting its specific objectives for reducing and ending homelessness through:**

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

The WorkFirst Sunnyvale program includes outreach to homeless clients and assessment of their needs. The program partners with the Sunnyvale Shelter (operated by HomeFirst) to initiate discussions with the unhoused community – and Downtown Streets team, a subcontractor for the WorkFirst Program operates programming out of a local church and has mobile outreach units to maximize its outreach efforts to the unhoused community. The program facilitates a vulnerability assessment on each client if they are willing and seeking linkages to supportive services.

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

Two of the human services grants (to YWCA and Bill Wilson Center) helped these agencies provide shelter, transitional housing, and services to homeless clients and victims of domestic violence. In addition, the TBRA is a transitional housing program for homeless households, providing assistance for up to two years.

**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**

Several of the Human Services grants supported the provision of services intended to prevent homelessness of Sunnyvale residents including the grants to Sunnyvale Community Services, YWCA, and Bill Wilson Center. In addition, the fair housing services provided also helped tenants avoid eviction and/or homelessness by addressing discrimination practices. In addition to the activities funded with CDBG, the City also provided assistance to other programs that aim to prevent homelessness using local funds. These include grants to Senior Adults Legal Services, and funding for tenant-landlord mediation programs.

**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**

Several of the activities funded helped homeless clients and families transition to permanent housing, including: WorkFirst Sunnyvale, TBRA and the human services grants to the YWCA and Bill Wilson Center.

During the program year, the City provided a significant amount of funding for activities that helped homeless people obtain housing and jobs (TBRA). In addition, the City continues to participate in the county-wide efforts, such as the CoC and Destination Home, to end homelessness throughout the County.

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

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

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

**Actions taken to provide assistance to troubled PHAs**

This section is not applicable as there is currently no official public housing in Sunnyvale. The City collaborates with the Santa Clara County Housing Authority (SCCHA) on its efforts to provide Section 8 vouchers, mortgage credit certificates, supportive services and other assistance to Sunnyvale residents. The City also supports the SCCHA in its efforts to increase federal appropriations for Section 8 and other affordable housing programs in Sunnyvale and in the County.

The City partnered with the Housing Authority on several efforts in recent years - as several Sunnyvale housing projects which were awarded project-based vouchers, including the Fair Oaks Senior Housing project, two senior group homes, and two new affordable rental projects (Parkside Studios and Onizuka Crossing).

### **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 City does not impose any public policies that unreasonably constrain housing development. There are no growth limitations or rent control policies, and property tax policies are largely set by the State. The City's land use designations and zoning are supportive of development of a wide variety of housing types, including single- and multi-family housing, ownership and rental, mobile homes, manufactured/modular housing, and so on. The City follows the State building code, and its fees and charges are reasonable and consistent with prevailing prices in the region. Between 2006 and 2015, a total of 4,933 new housing units were issued building permits by the City, for an average of 493 new units per year. Fifty-six percent of these units were multi-family rental units. Since 2015, 2,557 residential units have been constructed with 342 of those affordable to very low, low-or-moderate income households.

In 2014-15, the City updated the Constraints Analysis of its Housing Element, as required under California Housing Element law (Government Code 65580), to analyze city policies and land use regulations to determine if they had any negative effects on development. The State determined, with its certification of the City's 2015-2023 Housing Element, that the City does not currently implement policies that create barriers to affordable housing. Additional detail is available in the City's Housing Element <sup>1</sup>, which is provided in its entirety on the City's website and in the Library. As noted above, thousands of new dwelling units of various types and price points have been developed and additional units renovated in recent years, in most cases without any direct assistance from the City. This provides evidence that the City's policies do not unduly constrain residential development. In addition, the City has successfully assisted a number of affordable housing developments in recent years, which demonstrates that City policies do not have negative effects on assisted housing production.

Non-governmental barriers, primarily market factors such as high land costs, construction costs, and high prevailing market prices for housing, have been the primary challenges facing jurisdictions in the region, including Sunnyvale, in recent years, not public policies. These barriers are addressed, within the City's limited ability to address them, through the housing activities listed in the City's Action Plan and through the goals and policies listed in the Housing Element.

**Actions taken to address obstacles to meeting underserved needs. 91.220(k); 91.320(j)** The City continues to seek opportunities to provide housing in the community for underserved residents. These opportunities include local policies and funding commitments that support the development, maintenance, and improvement of affordable housing in Sunnyvale. In addition to Benner Plaza, which is described in section CR-25 above -- in 2020, the City allocated \$26 million in local housing funds to assist the development of new affordable rental housing in Sunnyvale.

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<sup>1</sup> <https://sunnyvale.ca.gov/civicax/filebank/blobdload.aspx?BlobID=23978>

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

The City continues to provide lead-based paint testing and assessment services on all housing built before 1978 that receives CDBG or HOME funding for rehabilitation and/or acquisition. The City ensures that the requirements for notification, evaluation and reduction of lead-based paint hazards in projects receiving federal assistance are met. Information about lead-based paint hazards is given to all property owners and residents before any rehabilitation work begins. The City also requires that all participating contractors and owner participants view the “Safe Work Practices” video developed by the City and read the “Lead Paint Safety” field guide prior to participating in the Paint Program. Staff continues to keep abreast of any new developments in lead-safe housing regulations. During the program year, there were no homes tested for lead, as there were no projects that required testing.

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

In April 2016, the City adopted a new minimum wage ordinance to increase the minimum wage to \$15 by 2018. The ordinance includes an annual adjustment based on inflation, and starting on January 1, 2023, the minimum wage adjusted up to \$17.95. This action has helped many workers increase their household incomes.

**Employment Development Efforts**

NOVA (North Valley Job Training Consortium)

Sunnyvale residents have access to employment development and training services provided by NOVA (North Valley Job Training Consortium). NOVA is funded entirely through federal, state, and foundation grants, with the primary resources coming from the Workforce Innovation and Opportunity Act (WIOA). NOVA serves a consortium of seven cities in northern Santa Clara County (Cupertino, Los Altos, Milpitas, Mountain View, Palo Alto, Santa Clara, and Sunnyvale), as well as all of San Mateo County. Many of the services and programs provided by NOVA target disadvantaged youth and adults who may have limited education or barriers to employment.

Work First Sunnyvale

As noted above, the City provided CDBG funding through the FY 2022-23 Action Plan to continue operating the WorkFirst Sunnyvale workforce development program that aims to reduce poverty, primarily serving homeless people, by helping them gain employment and/or increase earned income, and helping them move into housing. The program helps homeless clients obtain employment and/or other sources of income, and adequate support services/networks to obtain housing and achieve stability. Activities included job readiness training, job search skills training, development of employer networks, job coaching, and job placement.

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

The institutional structure includes private industry, non-profit organizations, and public institutions that deliver the programs outlined in the Consolidated Plan.

The institutional structure for carrying out the City’s housing and community development activities consists of the City’s cooperative relationships within its departments and other government agencies, non-profit organizations, and other institutions involved in the activities described herein.

The City works with the State, neighboring cities, the Santa Clara County Housing Authority (SCCHA) and the County of Santa Clara, the Housing Trust of Silicon Valley, and other private and/or non-profit agencies to coordinate efforts and use resources strategically. Collaboration with industry groups is accomplished through an ongoing relationship with the Silicon Valley Leadership Group’s Housing Action Coalition (HAC), which focuses on regional housing policy,

and any other interested industry partners, such as lenders, builders, and real estate industry associations.

The City works with the above-mentioned entities in an effort to provide adequate and affordable housing for residents of Santa Clara County, particularly for those who live and/or work in Sunnyvale. The City participates in regional efforts to leverage private and local government resources with federal resources for the provision of affordable housing and human services for residents of the region. In late 2016, voters of Santa Clara County passed Measure A

affordable housing bond, that will provide nearly a billion dollars over ten years to support affordable housing production and related housing programs throughout the county. The City has been actively collaborating with staff of the County and other cities in planning programs and projects that will be able to utilize the Measure A bond funds, and the Sunnyvale Mayor is one of the members on the County's Measure A Bond Oversight Board, to further strengthen the City's role in this important regional housing effort.

Most human service agencies and affordable housing developers that receive funding through the City's entitlement grants serve either the entire county or several counties in the South Bay region, or even larger areas. Sunnyvale cooperates with the other jurisdictions to avoid duplication of services and to ensure that an efficient delivery system is in place. The City continues to cooperate with the County and the County Housing Authority on various programs and projects.

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

**Coordination**

The City and other community development organizations in the County coordinate frequently on a variety of initiatives. The City Housing Division staff participates in a collaborative of HUD entitlement grantees within the County which holds quarterly meetings to discuss activities, technical assistance issues, and identify future opportunities for coordination and cooperation between local governments, housing providers, social service agencies, and the Housing Authority.

The City also participates in the County's Continuum of Care (CoC), comprised of governmental agencies, homeless service and shelter providers, homeless persons, housing advocates, affordable housing developers, and various private parties, including businesses and foundations. The CoC prepares the Countywide Homelessness Continuum of Care Plan, which seeks to create a comprehensive and coordinated system of affordable housing and supportive services for the prevention, reduction, and eventual end of homelessness. The Plan provides a common guide for the County, cities, service providers, the faith community, the business sector, philanthropy, and the broader community to follow in addressing local housing and the goals and services needs for homeless people. The actions included in the City's FY 2022-23 Action Plan to address housing needs and homelessness are consistent with the CoC's plans and policies.

The City also coordinates with other regional agencies, such as the Housing Trust of Silicon Valley, Joint Venture Silicon Valley, NOVA, the county-wide Fair Housing Task Force, the Valley Transportation Authority, and a number of other non-profit or public agencies, to achieve the goals described in the City's FY 2022-23 Action Plan.

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

Analysis of Impediments to Fair Housing Choice (AI)

The City's Analysis of Impediments to Fair Housing (AI) meets the requirements of 24 CFR 570.904(c)(1) for entitlement jurisdictions under the CDBG program administered by the U.S. Department of Housing and Urban Development (HUD).

The Housing Division continues to follow updates related to the new Fair Housing Rule. The City worked with the County to finalize its Assessment of Fair Housing during FY 2022-23 – and also worked with the County to complete a regional, and City specific Consolidated Plan. The AFH was approved by the Housing and Human Services Commission on August 24, 2022 - and City Council subsequently adopted the AFH on October 11, 2022.

Staff continues to make efforts to improve access to services, programs, and activities, including affordable housing opportunities, for all residents, including persons and households with Limited English Proficiency (LEP). The AI includes recommendations to: expand awareness of LEP clients, educate service providers on their obligations to LEP clients, and assess housing and service providers to evaluate the ability of LEP clients to access sponsored services, programs, and activities.

Actions to Affirmatively Further Fair Housing

Sunnyvale was involved in the following activities to affirmatively further fair housing during FY 2022-23:

- Provided translation and interpretation services for the City's housing and community development programs.
- Provided information on foreclosure prevention, tenancy rights, financial education, and other fair housing related topics.
- Provided about \$28,000 in funding to Project Sentinel for Fair Housing services.
- Provided about \$45,000 in funding to Project Sentinel for Tenant/Landlord Mediation services.

The Fair Housing page on the City's website provides a link for residents to report discrimination complaints directly to HUD.

The City actively implements an affirmative marketing plan to inform the public about all housing programs and new housing opportunities, such as the up-coming Benner Plaza development. Housing programs are available to those who live or work in the City and the county, and minority and LEP participants are actively sought by reaching out to community organizations serving these communities. A number of program brochures are translated into Spanish. Last year, staff marketed housing programs online and via various electronic media. Staff also distributed housing brochures to the Sunnyvale Senior Center, Sunnyvale Public Library, Sunnyvale City Hall and the Sunnyvale Community Center.

## **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**

### Monitoring

The City reviews its progress toward the goals of the Consolidated Plan, and continues to monitor all federally funded activities as required by HUD and OMB. All reporting requirements were met this program year.

At the beginning of each program year, agreements are prepared with subrecipients outlining the responsibilities involved with the receipt of federal funds, and the performance standards to be met. During the program year, subrecipients are required to submit quarterly performance reports describing which program goals have been achieved on a quarterly basis. At least every two years, City staff conducts on-site programmatic and internal control monitoring, and visits its funding recipients to review the fiscal and program management of their federally funded programs. The subrecipient agencies maintain documentation of performance indicators available for inspection, with an audit trail from source documents to reports. At year's end, the City prepares biennial evaluations of these agencies. These evaluations are submitted to the Housing and Humans Services Commission for review during the grant application process.

### Outreach to Minority and Women-owned Business Enterprises (MBE/WBE)

The City continues to endeavor to contract with and/or hire MBE/WBE firms for its HOME-assisted projects. The City encourages City staff and CDBG/HOME sub-recipients to actively solicit minority and women-owned businesses in their procurement of goods and services related to HOME-funded projects.

## **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.**

A notice informing the public of the availability of the CAPER was published in the Sunnyvale Sun on September 1, 2023.

The draft CAPER was available for public review and comment for a 15-day period, beginning September 1, 2023 - and concluding after a public hearing and comment on, September 19, 2023 at the City's Housing and Human Services Commission meeting. Copies of the draft report were available on the City's website: <https://www.sunnyvale.ca.gov/homes-streets-and-property/housing> - and residents could request a hard-copy or electronic version by contacting City staff via email or by telephone.

**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.**

Not Applicable

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

Not Applicable

**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 weren't inspected, please indicate the reason and how you will remedy the situation.

<b>Property</b>	<b>Units Inspected</b>
Aster Park	20
Carroll Street Inn	10
Garland Plaza	3
Homestead Park	3
Fair Oaks Plaza	3
Moulton Plaza	3
Onizuka Crossing	3
Posolmi Place	2

During the 2022-23 HOME unit site visit and HQS inspection process – there were minimal issues in several units inspected, which were promptly addressed by property management. The City did not encounter any significant issues with any HOME units during its HQS inspection process for 2022-23. The City maintains an inspection schedule, based on total HOME units at a property, that aligns with the required HOME unit inspection schedule (i.e., annual, biennial, etc.).

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

The City's Analysis of Impediments to Fair Housing Choice includes Appendix A, *Affirmative Marketing Policies and Procedures for Affordable Housing*, which includes a detailed list of special outreach resources to ensure that outreach and marketing efforts will reach groups "least likely to apply," and to provide information to households with limited English proficiency, and/or "linguistically isolated" households. The City will continue to provide the Appendix to assisted housing developers for inclusion in their Marketing Plans.

The waiting lists of local affordable housing developments indicate that affirmative outreach efforts have been very successful in reaching various minority communities, as well as a broad range of household types. MidPen ensures that each of their projects perform outreach marketing in order to affirmatively further fair housing, pursuant to its commitment to non-discrimination and providing equal opportunity in housing, and the requirements and expectations of various regulatory and/or funding agencies. Local housing developers receiving City HOME funds follow a marketing plan that includes contacting local civic and community organizations representative of the ethnic and cultural diversity of the entire County in order to disseminate information about their projects. Both Charities Housing and MidPen Housing implemented a comprehensive affirmative marketing plan to lease the units available at Parkside Studios, Onizuka Crossing, and Benner Plaza. Groups representing disabled and elderly clients are also contacted.

**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**

A total of \$217,208 was received in HOME program income. During the program year, about \$527,228 was drawn to fund expenditures for the TBRA program.

**Describe other actions taken to foster and maintain affordable housing. 91.220(k)**

Please see the activities described under the Actions to Address the Needs of Homeless Persons (TBRA) of this report.



PART I: SUMMARY OF CDBG RESOURCES

01 UNEXPENDED CDBG FUNDS AT END OF PREVIOUS PROGRAM YEAR	635,246.87
02 ENTITLEMENT GRANT	1,128,312.00
03 SURPLUS URBAN RENEWAL	0.00
04 SECTION 108 GUARANTEED LOAN FUNDS	0.00
05 CURRENT YEAR PROGRAM INCOME	256,540.97
05a CURRENT YEAR SECTION 108 PROGRAM INCOME (FOR SI TYPE)	0.00
06 FUNDS RETURNED TO THE LINE-OF-CREDIT	1,026.96
06a FUNDS RETURNED TO THE LOCAL CDBG ACCOUNT	0.00
07 ADJUSTMENT TO COMPUTE TOTAL AVAILABLE	0.00
08 TOTAL AVAILABLE (SUM, LINES 01-07)	2,021,126.80

PART II: SUMMARY OF CDBG EXPENDITURES

09 DISBURSEMENTS OTHER THAN SECTION 108 REPAYMENTS AND PLANNING/ADMINISTRATION	1,203,732.06
10 ADJUSTMENT TO COMPUTE TOTAL AMOUNT SUBJECT TO LOW/MOD BENEFIT	0.00
11 AMOUNT SUBJECT TO LOW/MOD BENEFIT (LINE 09 + LINE 10)	1,203,732.06
12 DISBURSED IN IDIS FOR PLANNING/ADMINISTRATION	269,268.18
13 DISBURSED IN IDIS FOR SECTION 108 REPAYMENTS	0.00
14 ADJUSTMENT TO COMPUTE TOTAL EXPENDITURES	0.00
15 TOTAL EXPENDITURES (SUM, LINES 11-14)	1,473,000.24
16 UNEXPENDED BALANCE (LINE 08 - LINE 15)	548,126.56

PART III: LOWMOD BENEFIT THIS REPORTING PERIOD

17 EXPENDED FOR LOW/MOD HOUSING IN SPECIAL AREAS	0.00
18 EXPENDED FOR LOW/MOD MULTI-UNIT HOUSING	0.00
19 DISBURSED FOR OTHER LOW/MOD ACTIVITIES	1,203,732.06
20 ADJUSTMENT TO COMPUTE TOTAL LOW/MOD CREDIT	0.00
21 TOTAL LOW/MOD CREDIT (SUM, LINES 17-20)	1,203,732.06
22 PERCENT LOW/MOD CREDIT (LINE 21/LINE 11)	100.00%

LOW/MOD BENEFIT FOR MULTI-YEAR CERTIFICATIONS

23 PROGRAM YEARS(PY) COVERED IN CERTIFICATION	PY: 2020 PY: 2021 PY: 2022
24 CUMULATIVE NET EXPENDITURES SUBJECT TO LOW/MOD BENEFIT CALCULATION	0.00
25 CUMULATIVE EXPENDITURES BENEFITING LOW/MOD PERSONS	0.00
26 PERCENT BENEFIT TO LOW/MOD PERSONS (LINE 25/LINE 24)	0.00%

PART IV: PUBLIC SERVICE (PS) CAP CALCULATIONS

27 DISBURSED IN IDIS FOR PUBLIC SERVICES	637,859.11
28 PS UNLIQUIDATED OBLIGATIONS AT END OF CURRENT PROGRAM YEAR	0.00
29 PS UNLIQUIDATED OBLIGATIONS AT END OF PREVIOUS PROGRAM YEAR	0.00
30 ADJUSTMENT TO COMPUTE TOTAL PS OBLIGATIONS	(453,787.26)
31 TOTAL PS OBLIGATIONS (LINE 27 + LINE 28 - LINE 29 + LINE 30)	184,071.85
32 ENTITLEMENT GRANT	1,128,312.00
33 PRIOR YEAR PROGRAM INCOME	167,597.07
34 ADJUSTMENT TO COMPUTE TOTAL SUBJECT TO PS CAP	0.00
35 TOTAL SUBJECT TO PS CAP (SUM, LINES 32-34)	1,295,909.07
36 PERCENT FUNDS OBLIGATED FOR PS ACTIVITIES (LINE 31/LINE 35)	14.20%

PART V: PLANNING AND ADMINISTRATION (PA) CAP

37 DISBURSED IN IDIS FOR PLANNING/ADMINISTRATION	269,268.18
38 PA UNLIQUIDATED OBLIGATIONS AT END OF CURRENT PROGRAM YEAR	0.00
39 PA UNLIQUIDATED OBLIGATIONS AT END OF PREVIOUS PROGRAM YEAR	0.00
40 ADJUSTMENT TO COMPUTE TOTAL PA OBLIGATIONS	0.00
41 TOTAL PA OBLIGATIONS (LINE 37 + LINE 38 - LINE 39 +LINE 40)	269,268.18
42 ENTITLEMENT GRANT	1,128,312.00
43 CURRENT YEAR PROGRAM INCOME	256,540.97
44 ADJUSTMENT TO COMPUTE TOTAL SUBJECT TO PA CAP	0.00
45 TOTAL SUBJECT TO PA CAP (SUM, LINES 42-44)	1,384,852.97
46 PERCENT FUNDS OBLIGATED FOR PA ACTIVITIES (LINE 41/LINE 45)	19.44%



Office of Community Planning and Development  
 U.S. Department of Housing and Urban Development  
 Integrated Disbursement and Information System  
 PR26 - CDBG Financial Summary Report  
 Program Year 2022  
 SUNNYVALE , CA

LINE 17 DETAIL: ACTIVITIES TO CONSIDER IN DETERMINING THE AMOUNT TO ENTER ON LINE 17

No data returned for this view. This might be because the applied filter excludes all data.

LINE 18 DETAIL: ACTIVITIES TO CONSIDER IN DETERMINING THE AMOUNT TO ENTER ON LINE 18

No data returned for this view. This might be because the applied filter excludes all data.

LINE 19 DETAIL: ACTIVITIES INCLUDED IN THE COMPUTATION OF LINE 19

Plan Year	IDIS Project	IDIS Activity	Voucher Number	Activity Name	Matrix Code	National Objective	Drawn Amount
2022	11	638	6731786	ADA Curb Ramps (2022)	03L	LMC	\$381.00
2022	11	638	6758871	ADA Curb Ramps (2022)	03L	LMC	\$78.46
2022	11	638	6786036	ADA Curb Ramps (2022)	03L	LMC	\$184,218.77
2022	11	638	6802164	ADA Curb Ramps (2022)	03L	LMC	\$154.20
2022	11	638	6809440	ADA Curb Ramps (2022)	03L	LMC	\$179,557.84
					03L	Matrix Code	\$364,390.27
2022	6	634	6731786	Child Advocates of Silicon Valley (CASA)	05D	LMC	\$7,274.19
2022	6	634	6758871	Child Advocates of Silicon Valley (CASA)	05D	LMC	\$8,114.00
2022	6	634	6786036	Child Advocates of Silicon Valley (CASA)	05D	LMC	\$7,989.17
2022	6	634	6802164	Child Advocates of Silicon Valley (CASA)	05D	LMC	\$4,752.64
					05D	Matrix Code	\$28,130.00
2022	5	629	6731786	WorkFirst Sunnyvale	05H	LMC	\$164,927.36
2022	5	629	6758871	WorkFirst Sunnyvale	05H	LMC	\$57,743.23
2022	5	629	6786036	WorkFirst Sunnyvale	05H	LMC	\$84,882.23
2022	5	629	6802164	WorkFirst Sunnyvale	05H	LMC	\$146,234.44
					05H	Matrix Code	\$453,787.26
2022	6	633	6731786	Bill Wilson Center	05O	LMC	\$6,900.00
2022	6	633	6758871	Bill Wilson Center	05O	LMC	\$8,050.00
2022	6	633	6786036	Bill Wilson Center	05O	LMC	\$6,900.00
2022	6	633	6802164	Bill Wilson Center	05O	LMC	\$7,735.00
2022	6	637	6731786	YWCA Domestic Violence Support Network	05O	LMC	\$7,114.12
2022	6	637	6758871	YWCA Domestic Violence Support Network	05O	LMC	\$5,909.47
2022	6	637	6802164	YWCA Domestic Violence Support Network	05O	LMC	\$7,904.26
					05O	Matrix Code	\$50,512.85
2022	6	635	6731786	First United Methodist Church Senior Nutrition Program	05W	LMC	\$11,120.00
2022	6	635	6758871	First United Methodist Church Senior Nutrition Program	05W	LMC	\$11,119.00
2022	6	635	6786036	First United Methodist Church Senior Nutrition Program	05W	LMC	\$11,119.00
2022	6	635	6802164	First United Methodist Church Senior Nutrition Program	05W	LMC	\$11,119.00
2022	6	636	6731786	Sunnyvale Community Services Food Program	05W	LMC	\$5,050.05
2022	6	636	6758871	Sunnyvale Community Services Food Program	05W	LMC	\$55,901.95
					05W	Matrix Code	\$105,429.00
2022	2	627	6685772	HIP Program	14A	LMH	\$33,648.86
2022	2	627	6731786	HIP Program	14A	LMH	\$31,712.54
2022	2	627	6758871	HIP Program	14A	LMH	\$2,850.00
2022	2	627	6786036	HIP Program	14A	LMH	\$22,907.25
2022	2	627	6802164	HIP Program	14A	LMH	\$3,235.00
2022	3	630	6731786	Major Housing Rehab Loans (RLF)	14A	LMH	\$27,721.42
2022	3	630	6802164	Major Housing Rehab Loans (RLF)	14A	LMH	\$350.00
					14A	Matrix Code	\$122,425.07
2022	3	640	6731786	Housing Rehab Program Admin (RLF)	14H	LMC	\$31,604.23
2022	3	640	6758871	Housing Rehab Program Admin (RLF)	14H	LMC	\$8,817.32
2022	3	640	6786036	Housing Rehab Program Admin (RLF)	14H	LMC	\$38,636.06
					14H	Matrix Code	\$79,057.61
Total							\$1,203,732.06

LINE 27 DETAIL: ACTIVITIES INCLUDED IN THE COMPUTATION OF LINE 27

