#### **Executive Summary**

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

#### 1. Introduction

The Annual Action Plan for this Program Year, October 1, 2019 – September 30, 2020, represents the fifth and final year of Guam's Consolidated Plan for FY2015-2019. The Annual Action Plan is Guam's proposed use of the U.S. Housing and Urban Development's Community Planning & Development (CPD) funds. The overarching purpose of the Action Plan is to address the goals listed in the ConPlan which are a) Public facilities and improvements, b) Sustaining affordable housing stock, and c) Community enhancement.

This year, Guam received an allocation of \$4,343,277 in CPD funds. Guam will use the funds to meet the goals outlined above. These activities include:

<u>Public facilities and improvements</u>: Sinajana Fire Station, Rehabilitation and New Construction – MTM Community Recreational Facility.

<u>Sustaining affordable housing stock:</u> Bilembines Community, Asan New Construction Homebuyer – Phase I.

<u>Community Enhancement:</u> GALA Empowerment Program, The Opportunity Initiative, Lighthouse Recovery Center, Family Services Center, Homeless Management Information System, GHURA Housing Counseling Program.

Guam received an allocation of special Community Development Block grant funding, \$3,567,398 in Community Development Block Grant-Coronavirus (CDBG-CV) and Emergency Solutions Grant-Coronavirus (ESG-CV) funding for activities that address COVID-19 related community needs. This allocation was authorized by the Coronavirus Aid, Relief, and Economic Security Act (CARES Act) in response to the growing effects of the public health crisis. This amendment to the PY 2019 Annual Action Plan describes how these funds will be utilized locally to address urgent needs created by the COVID-19 pandemic.

#### 2. Summarize the objectives and outcomes identified in the Plan

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

Guam intends to use CPD funds to improve the lives of low- and moderate-income persons through various activities that include increasing the inventory of affordable housing, providing ongoing support of activities that benefit eligible low- and moderate-income persons and homeless persons, and supporting new homebuyers through acquisition or new construction of affordable housing. For this Action Plan year, Guam has identified several projects to achieve these outcomes. The list of projects can be found in section AP-35 of this Plan. Section AP-35 includes details on the specific activities paid for through CPD funds; the estimated number of low- and moderate-income persons benefiting from the projects; the amount of CPD funds allocated for the projects; project descriptions; and the location of the projects.

#### <u>The list of projects to prevent, prepare for, and respond to coronavirus are also found in section AP-35</u> <u>of this Plan.</u>

#### 3. Evaluation of past performance

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

In June 2019, Guam completed the Acquisition/Construction of the Central Precinct Command. The project, which began in PY2015, is located in Sinajana and serves several LMA villages in central Guam. Adjacent to the Central Precinct Command is available property for the development of another public safety facility. In PY2019, Guam selected the construction of the Guam Fire Department to be co-located in Sinajana adjacent the police station. The new fire station will also serve several LMA villages in central Guam.

The second PFI project, the Rehabilitation and New Construction of the MTM Recreational Facility, was selected for the populations it will serve. The Mongmong-Toto-Maite recreational facility will be located near the Toto Gardens public housing community and the soon-to-be-completed Villa del Mar, a housing development under the Low-Income Housing Tax Credit (LIHTC) program. Moreover, after allocating funds for a northern and southern sports facility in the past two program years, this project will serve the central region of Guam.

To address the ConPlan goal of providing homeowner education and counseling, Guam will fund the GHURA Housing Counseling Program with the aim of engaging 30 eligible individuals. The Housing Counseling Program also sets the stage for Guam's forthcoming application to become a HUD-certified housing counseling agency in the upcoming Program Year.

In the Program Year, Guam seeks to amend its Citizen Participation Plan to include a stipulation for times of a disaster declaration. The amendment will reference situations when disaster strikes and CPD funds are required to meet an urgent need. In that instance, a substantial amendment in the form of reprogramming of funds can take place without public notice. This exception to the Citizen Participation Plan will be granted under extenuating circumstances, such as in times of a disaster declaration.

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

Summary from citizen participation section of plan.

Guam implemented its Citizen Participation Plan beginning Feb. 1 with an announcement of the funding opportunity and a technical assistance workshop held on Feb. 20. 16 people attended the workshop from nonprofit organizations, faith-based institutions, government agencies and a grant-writing consultancy. Guam published its draft Annual Action Plan on June 3, 2019 online and in the local newspaper.

Due to COVID-19, HUD issued guidance that waives the Citizen Participation Plan requirements, provided that no fewer than five days are provided for public comment and that reasonable notice and opportunity to comment is given through the end of Program Year 2021. As a result, Guam amended its Citizen Participation Plan to include a stipulation for times of urgency. The amendments reference situations when national/local health authorities recommend social distancing and limiting public gatherings for public health reasons, in-person public hearings are not required. In addition, when funds are required to meet an urgent need, GHURA may amend its citizen participation plan to establish expedited procedures to draft, propose, or amend consolidated plans for emergency responses.

#### 5. Summary of public comments

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

Guam received written testimony from three individuals in support of various proposed projects in the AAP. Guam Fire Department wrote in support of funding for a new station in central Guam; Mañelu wrote in support of public service programs that support LMI families both with enrichment activities and jobs assistance; a resident of the village of Mongmong-Toto-Maite (MTM) wrote in support of the rehabilitation of its recreational center.

Additionally, 8 individuals attended the Public Hearing held July 9, 2019, with 6 individuals providing oral testimony. Oral testimony was provided by the following:

1) Rudy Paco, mayor of MTM, endorsed the funding for his village's sports center;

2) Daniel Stone, of GFD, endorsed funding for a central fire station;

3) Gina Campos, of Habitat for Humanity Guam, commended GHURA for promoting the sale of affordable homes;

4) Alicia Aguon, of Habitat for Humanity Guam, acknowledged GHURA for the opportunity to build affordable homes for LMI families;

5) Thomas Stambaugh, of The Salvation Army, spoke in support of past and continued funding for

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2019

homeless programs; he expressed appreciation for the construction of the Women's Treatment Center that was awarded last year; and

6) Tiffany Paulino, of The Salvation Army, expressed support for the funding of homeless programs.

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

Not applicable. All comments and views were accepted.

#### 7. Summary

Overall, Guam received positive support for the proposed plans stated in the AAP from nonprofit organizations, government and private citizens.

#### PR-05 Lead & Responsible Agencies – 91.200(b)

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

Describe the agency/entity responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

Agency Role		Name		Department/Agency	
Lead Agency		GUAM			
CDBG Administrator	GUAM			Guam Housing	and Urban Renewal Authority, GovGuam
HOPWA Administrator					
HOME Administrator	GUAM			Guam Housing	and Urban Renewal Authority, GovGuam
ESG Administrator	GUAM			Guam Housing	and Urban Renewal Authority, GovGuam
HOPWA-C Administrator	GUAM			Research, Plann	ning, and Evaluation Division
				N/A	

Table 1 – Responsible Agencies

#### Narrative (optional)

Guam assumes the lead role in administering the CDBG, HOME and ESG grant programs. Guam's Community Planning and Development Division is responsible for preparing the Consolidated Plan.

#### **Consolidated Plan Public Contact Information**

Guam Housing and Urban Renewal Authority 117 Bien Venida Avenue Sinajana, Guam 96910 Phone: (671) 477-9851 Fax: (671) 300-7565

#### AP-10 Consultation - 91.100, 91.200(b), 91.215(l)

#### 1. Introduction

Guam meets regularly with service providers interested in collaborating on public service or construction projects to provide technical assistance and other requested guidance. Guam responds affirmatively to all requests for meetings to discuss enhanced collaboration between agencies.

The list below represents stakeholders who have discussed community needs with GHURA:

Asosokinamwe Church Guam Behavioral Health and Wellness Center **Guam Crime Stoppers Guam Developmental Disabilities Council** Guam Facilities Foundation Inc. **Guam State Clearinghouse Guam Veterans Affairs Office** Judiciary of Guam Manelu **Oasis Empowerment Center** Ordot-Chalan Pago Mayor's Office Sanctuary, Inc. Salvation Army WeGo Consulting Victim Advocates Reaching Out Yigo Mayor's Office

# 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))

Guam formally participates in various coordinated efforts between housing providers and service agencies. This includes membership in planning councils such as the Guam Behavioral Health Planning Council and the Guam Developmental Disabilities Council, both of which help advise the Government of Guam on improving the quality of services for individuals with disabilities.

Furthermore, Guam is a member of the Guam Homeless Coalition, consisting of governmental housing, health, mental health, and other service providers. Members meet regularly and use the Coordinated Entry System to enhance services for individuals and families experiencing homelessness.

With respect to the Housing Choice Voucher Program, Guam meets monthly with landlords and

Annual Action Plan 2019 property managers for briefings and program updates. This includes housing providers accepting Mainstream and NED participants.

## 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.

GHURA, as the Collaborative Applicant for Guam's Continuum of Care, takes a lead role in submitting for the funding of projects selected by the CoC. GHURA is also responsible for monitoring programs; managing projects; ensuring payment requests are processed and eligible expenses are reimbursed; and ensuring that persons served qualify under HUD's definition of homeless or chronically homeless.

GHURA staff attends regular CoC general meetings and planning meetings, which has led to enhanced coordination among other service providers and increased understanding of gaps and needs. As such, the CoC will fund four new programs in the upcoming year. This includes an expansion program of Housing First, which serves chronically homeless individuals with disabilities; Guma Mami I'nayek, which serves homeless individuals with disabilities who are DV victims; Gai Animas, which serves homeless individuals who are DV victims; and the Coordinated Entry System, which will create a stand-alone HMIS for DV-serving organizations.

Additionally, GHURA staff participate in the Core Leadership Team to Ending Veteran Homelessness. The group convenes regularly to address homeless issues specific to veterans.

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

GHURA's role as the Collaborative Applicant for the CoC allows for ongoing consultation with members of the Guam Homeless Coalition. For example, the Guam Homeless Coalition is organized into several committees that meet regularly to carry out various functions. GHURA staff provide technical assistance to these committees that include the Strategic Planning Committee, which defines the direction of the organization and makes decisions on the allocation of CoC funds; the Review and Ranking Committee, which comprises members who do not receive CoC funds and has the role of ranking proposed projects and arrives at the final ranking proposal; and the IT and Data Committee, which generates reports and provides trainings to users of the HMIS. This group is also responsible for planning the Point-in-Time Count, which engages numerous community partners. GHURA's close involvement in the GHC gives the agency greater insight and knowledge of the ESG and HMIS programs and allows for more nuanced evaluation of programs and development of strategies to address homelessness. Guam's close consultation with CoC members extends to The Salvation Army, which continues to be the lead agency that operates and administers the HMIS. HMIS is used to generate reports on persons who are homeless or at-risk of homelessness and to assess annual performance in meeting goals and objectives. Data from HMIS is also used during the CoC competition for funding. HMIS is used by programs both funded by the CoC, as well as other organizations not in receipt of CoC funds.

2. Describe Agencies, groups, organizations and others who participated in the process and describe the jurisdiction's consultations with housing, social service agencies and other entities

Table 2 – Agencies, groups, organizations who participated

	A sense (Crown (Organizations who participated	Cuere Heuring and Huben Denouvel Authority
1	Agency/Group/Organization	Guam Housing and Urban Renewal Authority
	Agency/Group/Organization Type	Housing
		РНА
	What section of the Plan was addressed by	Housing Need Assessment
	Consultation?	Public Housing Needs
		Lead-based Paint Strategy
	Briefly describe how the Agency/Group/Organization	The Guam Housing and Urban Renewal Authority's (GHURA) Public Housing
	was consulted. What are the anticipated outcomes of	Division provides input on the needs for public housing. Their annual plan
	the consultation or areas for improved coordination?	outlines activities to sustain affordable housing for low, very-low, and extremely
		low-income families. GHURA's Community Planning and Development (CPD)
		Division provides input on needs for public services and public facilities. CPD's
		HOME Program contributes its plans for homebuyers and homeowners.
2	Agency/Group/Organization	Guam Homeless Coalition
	Agency/Group/Organization Type	Services – Housing
		Services-homeless
	What section of the Plan was addressed by	Homeless Needs – Chronically homeless
	Consultation?	Homeless Needs – Families with children
		Homelessness Needs – Veterans
		Homelessness Needs – Unaccompanied youth
		Homelessness Strategy
	Briefly describe how the Agency/Group/Organization	GHURA serves as the Collaborative Applicant for the Continuum of Care program
	was consulted. What are the anticipated outcomes of	and is responsible for administering CoC funds, monitoring programs for HUD
	the consultation or areas for improved coordination?	compliance, and providing technical assistance to CoC project sponsors. GHURA
		consults with the Guam Homeless Coalition on how ESG funds should be spent
		and how to improve Rapid Rehousing and Homeless Prevention services.

3	Agency/Group/Organization	Mayors Council of Guam
	Agency/Group/Organization Type	Regional organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Facilities Planning
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The Mayors Council of Guam provided input via a survey on housing needs and public facilities needs of their respective communities. Additionally, mayors of Yigo, Ordot-Chalan Pago, and Sinajana consulted with GHURA on specific needs of their village. The results of these consultations will help inform Guam's Annual Action Plan and ConPlan.
4	Agency/Group/Organization	Guam Behavioral Health and Wellness Center
	Agency/Group/Organization Type	Services-Persons with Disabilities Other government – Local
	What section of the Plan was addressed by Consultation?	Homeless Needs – Persons with disabilities
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The Guam Behavioral Health and Wellness Center (GBHWC) met with GHURA staff to discuss housing needs and facilities for individuals with disabilities. Moreover, GHURA participates in the Guam Behavioral Health Planning Council, a group convened to improve access to mental health services. As part of this ongoing consultative body, GHURA coordinates with other member organizations to address relevant housing issues such as the lack of programs for individuals exiting correctional facilities with disabilities.

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

Guam responded affirmatively to all requests for consultations.

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

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	Guam Homeless	Guam's Consolidated Plan PY2015-2019 identifies goals that support the CoC's plan of
Continuum of Care	Coalition	addressing homelessness on Guam.
		Guam's Public Housing Authority's goals relating to sustaining and expanding affordable
5-Year PHA Plan	GHURA	housing, empowering PHA tenants, and increasing employment opportunities align with goals
		cited in the ConPlan.

Table 3 – Other local / regional / federal planning efforts

Narrative (optional)

#### AP-12 Participation – 91.105, 91.200(c)

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

Guam implemented its Citizen Participation Plan by engaging the broader community through media outreach, mass email, workshops, public hearing, and one-to-one consultations on eligibility and feasibility. As a result of these efforts, 15 agencies submitted requests for funding, and several others intend to apply in the next cycle after learning about the requirements.

Through ongoing engagement, Guam has been able to assist citizens in preparing their applications. Through continued discussions, subrecipients have often re-submitted applications from prior cycles with improved data, needs assessment, and clarity on how their proposals align with Guam's strategic plan.

Public comment was sought during a public hearing held on July 9, 2019. This meeting served as an opportunity for residents to provide input on the AAP and the funding recommendations for the year. There were 9 attendees at the public hearing; 6 individuals provided oral testimony, and 2 individuals not in attendance submitted written testimony.

#### **Citizen Participation Outreach**

Sort Orde r	Mode of Outreac h	Target of Outreac h	Summary of response/attendan ce	Summary of comments receiv ed	Summary of 13omme nce not accepted and reasons	URL (If applicable)
1	Newspaper Ad	Non- targeted/broad community	Guam published 3 advertisements announcing the Notice of Funding Opportunity in a local news journal on the following dates: Feb. 1, 19, and 27, 2019. The advertisement announced the deadline for submission to be April 5, 2019 at 4PM.	Guam received a total of 15 applications: 13 under CDBG; 1 under HOME; 1 under ESG. HUD announced the following allocations for FY2019: \$3,110,435 for CDBG; \$985,162 for HOME; and \$247,680 for ESG.	Guam accepted all comments during the NOFA announcement period.	www.ghura.org, <u>www.postguam.co</u> <u>m</u>

Sort Orde	Mode of Outreac	Target of Outreac	Summary of	Summary of	Summary of 13omme	URL (If applicable)
r	h	h	response/attendan	comments receiv	nce not accepted	
			се	ed	and reasons	
2	Internet Outreach	Non- targeted/broad community	Guam posted the NOFA on the GHURA website. The ad was also published on the electronic version of the Guam Daily Post. GHURA promoted technical assistance to be available in person, via email and through telephone.	Guam received three requests for technical assistance on the NOFA, and each request was met.	All comments were accepted.	www.ghura.org, <u>www.postguam.co</u> <u>m</u>
3	Public Hearing	Non- targeted/broad community	GHURA scheduled a public briefing and workshop on Feb. 20, 2019. 16 individuals were in attendance. GHURA scheduled a public hearing on July 9, 2019. 8 individuals were in attendance.	All comments from the July 9 public hearing were documented. This includes 6 oral testimonies and 2 written testimonies.	All comments were accepted.	

Table 4 – Citizen Participation Outreach

#### **Expected Resources**

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

#### Introduction

This Action Plan Year, Guam will receive \$4,343,277 in CPD funds, a slight decrease from last year's allocation of \$4,404,817. Of this year's funding, \$3,110,435 are CDBG funds; \$985,162 are HOME funds, and \$247,680 are ESG funds.

#### **Anticipated Resources**

Program	Source	Uses of Funds	Ехре	ected Amour	nt Available Ye	ear 1	Expected	Narrative Description
	of Funds		Annual	Program	Prior Year	Total:	Amount	
			Allocation: \$	Income:	Resources:	\$	Available	
				\$	\$		Remainder	
							of ConPlan	
CDBG	public – federal	Acquisition Admin and Planning Economic Development Housing Public Improvements						Guam will fund 2 PFI projects this Program Year, 6 public service projects, and administrative and planning activities.
		Public Services	3,110,435	90,000	0	3,200,435	0	

Program	Source	Uses of Funds	Ехре	cted Amour	nt Available Yo	ear 1	Expected	Narrative Description
	of Funds		Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$	Amount Available Remainder of ConPlan \$	
HOME	public –	Acquisition						Guam will fund 2 HOME
	federal	Homebuyer						projects this year, and
		assistance						planning and administrative
		Homeowner rehab						activities.
		Multifamily rental						
		new construction						
		Multifamily rental						
		rehab						
		New construction						
		for ownership						
		TBRA	985,162	620,000	0	1,605,162	0	
ESG	public –	Conversion and						Guam will fund 1 ESG project
	federal	rehab for						this Program Year, and
		transitional housing						administrative activities.
		Financial Assistance						
		Overnight shelter						
		Rapid re-housing						
		(rental assistance)						
		Rental Assistance						
		Services						
		Transitional						
		housing	247,680	0	0	247,680	0	

Source	Uses of Funds	Expected Amount Available Year 1				Expected	Narrative Description
of Funds		Annual	Program	Prior Year	Total:	Amount	
		Allocation: \$	Income:	<b>Resources:</b>	\$	Available	
			\$	\$		Remainder	
						of ConPlan	
						\$	
<mark>public-</mark>	<u>Prevent, prepare</u>						
<mark>federal</mark>	<u>for, and respond to</u>						
	<u>coronavirus</u>	<u>1,925,875.20</u>			<u>1,925,875.20</u>		
<mark>public-</mark>	<mark>Prevent, prepare</mark>						
<mark>federal</mark>	<u>for, and respond to</u>						
	<u>coronavirus</u>	<u>741,944.60</u>			<u>741,944.60</u>		
	of Funds <u>public-</u> <u>federal</u> <u>public-</u>	of FundsPrevent, preparepublic- federalPrevent, prepare for, and respond to coronaviruspublic- federalPrevent, prepare for, and respond to	of FundsAnnual Allocation: \$public- federalPrevent, prepare for, and respond to coronavirus1,925,875.20public- federalPrevent, prepare for, and respond to for, and respond to1,925,875.20	of FundsAnnual Allocation: \$Program Income: \$public- federalPrevent, prepare for, and respond to coronavirus1,925,875.20public- federalPrevent, prepare for, and respond to for, and respond to1,925,875.20	of FundsAnnual Allocation: \$Program Income: \$Prior Year Resources: \$public- federalPrevent, prepare for, and respond to coronavirus1,925,875.20Prior Year Resources: \$public- federalPrevent, prepare for, and respond to1,925,875.20Prior Year Resources: \$	of FundsAnnual Allocation: \$Program Income: \$Prior Year Resources: \$Total: \$public- federalPrevent, prepare for, and respond to coronavirus1,925,875.20Image: Second secon	of FundsAnnual Allocation: \$Program Income: \$Prior Year Resources: \$Total: Awount Available Remainder of ConPlan \$public- federalPrevent, prepare for, and respond to coronavirus1,925,875.20Image: Second

Table 5 - Expected Resources – Priority Table

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

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

N/A

#### Discussion

In the Program Year, Guam plans to use anticipated program income toward the Asan New Construction Homebuyer - Phase I project. In 2017, Guam completed the 40-year redevelopment agreement with the Asan community. Lots which remained undeveloped at the completion of the program are to be developed as affordable housing. Guam's experience executing GHURA's Renewal Homes Program demonstrates a strong preference for units more centrally located, near available jobs more amenities. Asan provides an opportunity to build (in-fill) in a developed residential community, nearer to the island center. Per Guam's 2010 Decennial Census data, the village of Asan's low/mod population is measured at 50.47%.

#### Annual Goals and Objectives

#### **AP-20 Annual Goals and Objectives**

#### **Goals Summary Information**

AP-20 A	nnual Goals an	d Obje	ctives					
ioals Sur	mmary Informatio	n						
Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Public Facilities and Improvement	2015	2019	Non-Housing Community Development	Rehabilitation/Upgrade of the Astumbo Gym	Non-housing Community Development	CDBG: \$2,128,056	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 19260 Persons Assisted
2	Sustain Affordable Housing Stock	2015	2019	Affordable Housing	Rehabilitation/Upgrade of the Astumbo Gym	Affordable Housing	HOME: \$985,162	Homeowner Housing Added: 4 Household Housing Unit
3	Increase Homeowner Education and Counseling	2015	2019	Affordable Housing	Rehabilitation/Upgrade of the Astumbo Gym	Non-housing Community Development	CDBG: \$25,000	Public service activities other than Low/Moderate Income Housing Benefit: 30 Persons Assisted
4	Community Enhancement	2015	2019	Homeless Non-Homeless Special Needs	Rehabilitation/Upgrade of the Astumbo Gym	Non-housing Community Development	CDBG: \$360,292 ESG: \$247,680	Public service activities other than Low/Moderate Income Housing Benefit: 2019 Persons Assisted

Sort	Goal Name	Start	End	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
Order		Year	Year					
5	Promote Fair	2015	2019	Affordable	Rehabilitation/Upgrade	Non-housing	CDBG:	Public service activities
	Housing			Housing	of the Astumbo Gym	Community	\$150,000	other than Low/Moderate
				Public Housing		Development		Income Housing Benefit:
				Homeless				30 Persons Assisted
				Non-Homeless				
				Special Needs				

Table 6 – Goals Summary

#### **Goal Descriptions**

1	Goal Name	Public Facilities and Improvement
	Goal Description	In Program Year 2019, Guam will use \$2,128,056.50 of entitlement funds for the following public facilities projects: 1) Sinajana Fire Station; and 2) Rehabilitation and New Construction - MTM Community Recreational Facility. The fire station will cover 4 villages of Agana Heights, Sinajana, Ordot-Chalan Pago and Mangilao with a total LMI population of 15,041 individuals. The recreational facility to be built in Mongmong-Toto-Maite tri-village area, which is 62.8% LMI, will serve 4219 individuals. The priority need addressed is Non-Housing Community Development.
2	Goal Name	Sustain Affordable Housing Stock
	Goal Description	This Program Year, Guam will utilize \$985,162 in HOME funds to construct 4 homes for low- and moderate-income families. Guam is proposing to construct 2 homes through Habitat for Humanity Guam and 2 homes as part of the Asan New Construction Homebuyer program.
3	Goal Name	Increase Homeowner Education and Counseling
	Goal Description	This Action Plan year, Guam will use \$25,000 in CDBG funds for homeowner education and housing counseling services. The project will target 30 first-time homebuyers in the HOME program and tenants of the Section 8 or Public Housing program.
	•	Annual Action Plan 20

4	Goal Name	Community Enhancement	
Descriptionand LMI individuals. The following projects will meet the goal of Community Enhancement: GALA Empower The Opportunity Initiative, Lighthouse Recovery Center, Family Service Center, Homeless Management In System, GHURA Housing Counseling Program, and the ESG program - Family Services Center. Funds alloce		This Action Plan year, Guam will use CDBG and ESG funds to enhance the lives of homeless persons, special needs persons, and LMI individuals. The following projects will meet the goal of Community Enhancement: GALA Empowerment Program, The Opportunity Initiative, Lighthouse Recovery Center, Family Service Center, Homeless Management Information System, GHURA Housing Counseling Program, and the ESG program - Family Services Center. Funds allocated total \$607,971.50.	
5	Goal Name	Promote Fair Housing	
GoalThrough the Education and Housing Counseling program, Guam will incorporate Fair Housing education. GeDescription30 individuals. Guam will conduct an updated Analysis of Impediments to Fair Housing Choice.		Through the Education and Housing Counseling program, Guam will incorporate Fair Housing education. Guam will target 30 individuals. Guam will conduct an updated Analysis of Impediments to Fair Housing Choice.	

#### **Projects**

### AP-35 Projects - 91.220(d)

#### Introduction

The selection of projects for this Annual Action Plan year was based on the subrecipient's capacity to serve low- and moderate-income individuals; the project's reasonableness of cost, and the ability of organizations to sustain operations. Two projects support the goal of Public Facilities and Improvement; six projects support the goal of Community Enhancement; and two projects support the goal of Sustaining Affordable Housing Stock. The GHURA Housing Counseling Program, a Community Enhancement project, also addresses the goal of Promoting Fair Housing and Homeowner Education and Counseling.

#### Projects

rojec	ts
#	Project Name
1	Sinajana Fire Station
2	Rehabilitation and New Construction - MTM Community Recreational Facility
3	GALA Empowerment Program
4	The Opportunity Initiative 2019
5	Lighthouse Recovery Center
6	Family Services Center
7	Homeless Management Information Services
8	GHURA Housing Counseling Program
9	CDBG Administration
10	CDBG Planning
11	Bilembines Community
12	Asan New Construction Homebuyer - Phase I
13	HOME Administration
14	ESG19 GUAM
<u>15</u>	<mark>CV – Catholic Social Service (Public Service)</mark>
<u>16</u>	<u>CV – The Salvation Army</u>
<u>17</u>	<mark>CV – Mortgage Relief Program</mark>
<u>18</u>	<u>CV – Catholic Social Service (ESG)</u>
<u>19</u>	<u>CV – GHURA Admin and Planning</u>
<mark>20</mark>	<u>CV – Jobs Program</u>

Table 7 - Project Information

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

#### needs

Allocations are based on an assessment of needs relative to available funding. There are no known obstacles to addressing underserved needs other than limited funding to meet such needs.

AP-38 Project Summary

**Project Summary Information** 

1		
1	Project Name	Sinajana Fire Station
	Target Area	
	Goals Supported	Public Facilities and Improvement
	Needs Addressed	Non-housing Community Development
	Funding	CDBG: \$1,663,489.70
	Description	Funds will pay for the construction of a new fire station in the village of Sinajana that will serve low- and moderate-income communities located in central Guam.
	Target Date	9/30/2024
	Estimate the number and type of families that will benefit from the proposed activities	Four LMI villages, located in central Guam, will benefit from this project. This includes Mangilao, Agana Heights, Sinajana, and Ordot-Chalan Pago bringing the total number of LMI individuals served to 15041.
	Location Description	Although located in the village of Sinajana, the fire station will service multiple LMI communities in central Guam to include Ordot-Chalan Pago, Mangilao and Agana Heights.
	Planned Activities	Funds will go toward the construction of a public facility, which is eligible under 24 CFR 570.201(c). The project qualifies under CDBG's national objective of LMA or area benefit, 24 CFR 570.208(a)(1)(i).
2	Project Name	Rehabilitation and New Construction - MTM Community Recreational Facility
	Target Area	
	Goals Supported	Public Facilities and Improvement
	Needs Addressed	Non-housing Community Development
	Funding	CDBG: \$464,566.80
	Description	Funds will go toward the rehabilitation of the Mongmong-Toto-Maite basketball court that will result in a covered recreational multipurpose court. Project costs will include fencing and lighting. The project will also fund construction of a new restroom facility.

	Estimate the number and type of families that will benefit from the proposed activities	The project will serve the LMI population of the tri-village area of Mongmong-Toto-Maite which is estimated at 4,219 individuals.
	Location Description	The location of the facility is 226 Aragon Street, Toto, Guam 96910.
	Planned Activities	Planned activities include the construction of a new restroom facility, fencing, lighting and the installation of a canopy over the existing basketball court. This project is eligible under 24 CFR 570.201(c). The project qualifies under CDBG's national objective of LMA or area benefit, 24 CFR 570.208(a)(1)(i).
3	Project Name	GALA Empowerment Program
	Target Area	
	Goals Supported	Community Enhancement
	Needs Addressed	Non-housing Community Development
	Funding	CDBG: \$28,000
	Description	Life-skills, wellness education, and suicide and substance-abuse prevention programs will be offered onsite to LMI populations.
	Target Date	9/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	The project will serve an estimated 70 LMI households and 125 LMI individuals.
	Location Description	This site-based project will take place in several locations: Ironwood Estates - Dededo Ironwood Heights - Tamuning GHURA Housing - Agat GHURA Housing - Toto GHURA Housing - Talofofo GHURA Housing - Yona

	Planned Activities	The organization will bring substance abuse and suicide prevention programs to LMI neighborhoods. Activities include employment skills- building, mentorship, and implementation of the Storytelling for Empowerment curriculum. This program aims to improve critical thinking skills and life skills. The project will meet CDBG's regulatory requirements as stated in 24 CFR §570.201(e). This project meets the CDBG national objective of limited clientele, as defined in 24 CFR 570.208(a)(2)(i)(B).
4	Project Name	The Opportunity Initiative 2019
	Target Area	
	Goals Supported	Community Enhancement
	Needs Addressed	Non-housing Community Development
	Funding	CDBG: \$70,437
	Description	The project will assist LMI families with onsite activities that promote improved skills, knowledge and socio-emotional competencies to prepare them for a life in the workforce or further education.
	Target Date	9/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	This project will serve an estimated 35 new households and 75 existing households. An estimated number of 200 individuals will be served.
	Location Description	Service areas of the project include: GHURA AMPS in Agat, Yona and Mongmong-Toto-Maite; Dept of Youth Affairs Centers of Haya, Kattan and Lagu; adults at the Dept. of Corrections; and community partners from the Guam Facilities Foundation who operate the Summer Green, Town and Homes communities. Additionally, work will continue through other NGOs, including the Guam Homeless Coalition, Guahan Academy, VARO and local youth basketball organizations.
	Planned Activities	Planned activities include workplace readiness, financial literacy classes, wellness programs, mentoring, outdoor activities, and family enrichment programs. Additionally, activities will be available in languages other than English. The proposed activities meet the regulatory requirements stated in 24 CFR 570.201(e), Public Services. The project meets the CDBG national objective of limited clientele, as stated in 24 CFR 570.208(a)(2)(i)(B).
	Project Name	Lighthouse Recovery Center

5		
5	Target Area	
	Goals Supported	Community Enhancement
	Needs Addressed	Non-housing Community Development
	Funding	CDBG: \$177,568
	Description	Funds will support The Salvation Army's Lighthouse Recovery's operational costs for transitional and supportive housing programs and outpatient services to homeless, no-to-low income/moderate income and at-risk for homeless men seeking recovery from substance abuse.
	Target Date	9/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	The project proposes to serve 184 eligible individuals.
	Location Description	Services will be offered at The Salvation Army's campus located in 155003 Corsair Avenue, Tiyan, Guam.
	Planned Activities	The project will provide residential and treatment services to 70 LMI men. Out of the 70, between 12-14 will be homeless individuals. Outpatient services will be offered to 114 individuals. Career development and employee referrals and other supportive services will also be offered. The activities proposed for this project meets CDBG's regulatory requirements for Public Services under 24 CFR §570.201(e). This project meets CDBG's national objective of limited clientele or LMC as defined under 24 CFR §570.208(a)(2)(i)(A).
6	Project Name	Family Services Center
	Target Area	
	Goals Supported	Community Enhancement
	Needs Addressed	Homelessness Non-homeless Special Needs
	Funding	CDBG: \$30,000
	Description	Funds will support The Salvation Army's Family Services Center's operational costs to administer programs such as financial assistance, housing relocation, and stabilization. These services are provided to homeless or at-risk of becoming homeless individuals.
	Target Date	9/30/2020

	Estimate the number and type of families that will benefit from the proposed activities	Rapid Rehousing – 133 individuals, 59 households Homeless Prevention – 15 individuals, 13 households
	Location Description	Services will be offered at the Salvation Army campus located at 155003 Corsair Ave., Tiyan, Guam.
	Planned Activities	Programs include temporary rental and utility assistance up to 24 months; supplemental services such as money management classes are also offered. This project is an eligible activity as stated under 24 CFR 570.201(e), Public Services. The project also meets the national objective of limited clientele as defined in 24 CFR 570.208(a)(2)(i)(B), presumed LMI.
7	Project Name	Homeless Management Information Services
	Target Area	
	Goals Supported	Community Enhancement
	Needs Addressed	Homelessness
	Funding	CDBG: \$29,286.50
	Description	Funds will support The Salvation Army's Homeless Management Information System cash match requirement for its Continuum of Care Program grant. HMIS is utilized by various service providers to store client-level information of persons served through homeless programs. HMIS is a mandated program for all CoC-funded programs and is responsible for collecting data used in required reports.
	Target Date	9/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	The HMIS project will benefit 1332 LMI individuals and 558 LMI households.
	Location Description	The HMIS project will be administered by The Salvation Army, located at 155003 Corsair Avenue, Tiyan, Guam. End users of the database, who come from homeless service providers, will be in various locations throughout the island.

	Planned Activities	Planned activities include the following:
		-Providing technical assistance to service providers on HMIS
		requirements for HUD-mandated reports;
		-Providing guidance for all end-users utilizing the Clarity database; - Training of new end-users and current end-users on system-wide changes and upgrades;
		-Hosting the HMIS database; maintenance of the database; backup and updates.
		This project meets CDBG's national objective of limited clientele or LMC as defined under 24 CFR §570.208(a)(2)(i)(A), under presumed LMI. The activities of the HMIS project meet the regulatory requirement for public services under 24 CFR 570.201(e).
8	Project Name	GHURA Housing Counseling Program
	Target Area	
	Goals Supported	Community Enhancement
	Needs Addressed	Non-housing Community Development
	Funding	CDBG: \$25,000
	Description	Housing counseling and homebuyer education services will be offered to eligible participants. Services will be offered in various formats, including group education, one-to-one counseling, and online self-paced education programs.
	Target Date	9/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	The project is estimated to serve 30 LMI households.
	Location Description	Services will be offered primarily at the GHURA Main Office, located at 117 Bien Venida Avenue, Sinajana, Guam 96910. Services will also be offered telephonically, through live chat applications, as well as through online education services.

	Planned Activities	Activities will include one-to-one housing counseling and homebuyer education services. Counseling will include guidance on such topics as buying a home, renting, default, foreclosure avoidance, and credit issues. The project meets the regulatory requirements for a public service as stated in 24 CFR 570.201(e). The project also meets the CDBG national objective of limited clientele as stated in 24 CFR 570.208(a)(2)(i)(A).
9	Project Name	CDBG Administration
	Target Area	
	Goals Supported	
	Needs Addressed	
	Funding	CDBG: \$311,043.50
	Description	Funds will cover administrative activities such as environmental reviews, monitoring, reporting, and processing of sub-recipient payments.
	Target Date	9/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	N/A
	Location Description	General administrative and planning activities will take place in GHURA's Main Office, located at 117 Bien Venida Avenue, Sinajana, Guam 96910 under the Community Development and Planning Division.
	Planned Activities	Guam will administer the activities of the CDBG-funded projects. This includes conducting all necessary studies to determine the feasibility of projects, monitoring the implementation of projects through reports, site visits and payment requests. The activities meet the regulatory requirements stipulated in 24 CFR 570.206, under Program Administrative Costs.
10	Project Name	CDBG Planning
	Target Area	
	Goals Supported	
	Needs Addressed	
	Funding	CDBG: \$311,043.50

	Description	Guam will administer the activities of the CDBG-funded projects. This includes completing the Annual Action Plan, the evaluation and performance reports, the housing and Analysis of Impediments study, and other development and planning activities.
	Target Date	9/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	N/A
	Location Description	General administrative and planning activities will take place in GHURA's Main Office, located at 117 Bien Venida Avenue, Sinajana, Guam 96910 under the Community Development and Planning Division.
	Planned Activities	Funds will pay for general administrative and planning costs of administering the CDBG grant programs. Guam will monitor activities for compliance with HUD requirements. The activities meet the regulatory requirements stipulated in 24 CFR 570.206, under Program Administrative Costs.
11	Project Name	Bilembines Community
	Target Area	
	Goals Supported	Sustain Affordable Housing Stock
	Needs Addressed	Affordable Housing
	Funding	HOME: \$398,000
	Description	The HOME grant will fund the construction of the two homes for eligible families.
	Target Date	9/30/2024
	Estimate the number and type of families that will benefit from the proposed activities	Two income eligible households will benefit from this project.
	Location Description	Tract 3531, Block 2, Lot 47 - 1/2/3/4, Malojloj, Guam 96915
	Planned Activities	
12	Project Name	Asan New Construction Homebuyer - Phase I
	Target Area	

	Goals Supported	Sustain Affordable Housing Stock
	Needs Addressed	Affordable Housing
	Funding	HOME: \$461,553.84
	Description	HOME funds will go toward the construction of two new homes in Asan.
	Target Date	9/30/2024
	Estimate the number and type of families that will benefit from the proposed activities	This project will benefit 2 income eligible families.
	Location Description	Location in Asan is to be determined.
	Planned Activities	The activities proposed meet regulatory requirements as stipulated under 24 CFR 92.205(a)(1) and 24 CFR 92.205(a)(2) under eligible activities.
13	Project Name	HOME Administration
	Target Area	
	Goals Supported	
	Needs Addressed	
	Funding	HOME: \$125,608.16
	Description	Funds will cover the costs of grant management, general administrative oversight and coordination, staff and overhead costs, public information activities and indirect costs.
	Target Date	9/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	N/A
	Location Description	HOME administration will take place in GHURA's Main Office, 117 Bien Venida Ave., Guam 96910.
	Planned Activities	Funds will pay for the general administration and planning costs of HOME projects.
14	Project Name	ESG19 GUAM
	Target Area	
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Goals Supported	Community Enhancement
Needs Addressed	Homelessness
Needs Addressed	Non-homeless Special Needs
Funding	ESG: \$247,680
Description	Funds will be used to provide short-term rental assistance and utility assistance to households eligible to receive homeless prevention and
	rapid rehousing services.
Target Date	9/30/2020
Estimate the number	Rapid Rehousing – 133 individuals, 59 households
and type of families that will benefit from the proposed activities	Homeless Prevention – 15 individuals, 13 households
Location Description	
Planned Activities	Family Services Center proposes to provide up to three months of short- term rental, deposits and utility assistance as well as up to 24 months of medium-term rental and utility assistance to households eligible to receive homelessness prevention and rapid re-housing services. Clients will work closely with a Case Worker to address challenges that led to thehousehold's situation and will work with the household to create an agreeable plan of action to address the challenges. Case workers will address the following: housing search and placement, credit repair, and stability case management. Funds will also support payment of staff salaries providing these services. ESG funds will be used to provide housing relocation and stabilization services such as housing search and placement and other support services. GHURA, which serves as the grants manager, will monitor the project through reports, site visits, and payment requests. It will ensure compliance with ESG requirements. The activities meet the CDBG national objective of limited clientele, or LMC, as defined under 24 CFR 570.208(a)(2)(i)(B). The activities proposed through this project meet the Emergency Solutions Grant's regulatory requirements as stipulated in 24 CFR 576.103. Homeless Prevention Financial Assistance - \$16,662.14 Housing Relocation - \$63,829.47 Homeless Prevention Subtotal: \$80,491.61 Rapid Rehousing Financial Assistance - \$64,316.77 Housing Relocation - \$85,534.02 Rapid Rehousing Subtotal: \$149,850.79. Administration: \$17,337.60
Project Name	CV – Catholic Social Service (Public Service)
<u> </u>	

	Target Area	Island-wide
	Goals Supported	Community Enhancement
	Needs Addressed	Homelessness Non-homeless Special Needs
	<u>Funding</u>	<u>CDBG-CV: \$720,000.00</u>
	Description	Funds will be used to conduct street outreach to provide education and awareness of COVID-19 and provide preventive measures to minimize exposure to the virus, provide navigation services to homeless seeking housing assistance to get them document ready for housing options, and housing assistance
	<u>Target Date</u>	June 2020-June 2021
	Estimate the number and type of families that will benefit from <u>the proposed</u> activities	236 individuals/households
	Location Description	<u>This project is administered by Catholic Social Service, located at 234A</u> U.S. Army Juan C. Fejeran Street., Barrigada, GU 96913.
	<u>Planned Activities</u>	<u>Outreach and case management, direct assistance for rapid re-</u> housing, homeless prevention, emergency sheltering for households that fall below 80% of the area median income
<u>16</u>	<u>Project Name</u>	<u>CV – The Salvation Army</u>
	Target Area	Island-wide
	Goals Supported	Community Enhancement
	Needs Addressed	<mark>Homelessness</mark> Non-homeless Special Needs
	<u>Funding</u>	<u>CDBG-CV: \$153,000.00</u> <u>ESG-CV: \$228,075.00</u>
	Description	<u>Funds will be used for those in need of immediate assistance and are</u> waiting to be permanently housed, as well as for The Family Services <u>Center's Food Pantry</u>
	<mark>Target Date</mark>	June 2020-January 2020

	<u>Estimate the number</u>	<u>500 individuals/households</u>
	<mark>and type of families</mark>	
	<u>that will benefit from</u>	
	<u>the proposed</u>	
	activities	
	Location Description	Island-wide
	Planned Activities	Food procurement, warehouse operations, and food distribution,
		rental assistance, case management and homeless prevention for
		individuals/households that fall between 31-80% area median income
		to include bi-weekly assessments
<mark>17</mark>		
<u> </u>	<u>Project Name</u>	<u>CV – Mortgage Relief Program</u>
	<u>Target Area</u>	<u>Island-wide</u>
	Goals Supported	Low/Mod Housing
	Needs Addressed	Homeownership Assistance
	<u>Funding</u>	<u>CDBG-CV: \$714,321</u>
	<b>Description</b>	Funds will be used for direct assistance funding and administrative
		expenses for the mortgage relief program for COVID-19.
	Target Date	June 2020 – December 2020
	Estimate the number	169 individuals/households
	and type of families	
	that will benefit from	
	the proposed	
	<u>activities</u>	
	Location Description	Activities will take place in the Guam Housing Corporation Office,
		located at 590 S. Marine Corps Drive. Ste. 535 ITC Building, 5 <sup>th</sup> Floor,
		Tamuning, GU 96931.
	Discussed A stimitize	
	<u>Planned Activities</u>	Administrative duties to include program management, outreach
		activities, procurement, application review, and direct assistance for
		mortgage payments for qualified households
<u>18</u>	<mark>Project Name</mark>	<mark>CV – Catholic Social Service (ESG)</mark>
	Target Area	Island-wide
	Goals Supported	Community Enhancement
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	Needs Addressed	Rapid Re-housing
		Homeless Prevention
	<u>Funding</u>	<u>ESG-CV: \$425,000.00</u>
	<b>Description</b>	Funds will be used to implement rapid re-housing for up to six months while securing permanent housing options
	Target Date	June 2020-June 2021
	Target Date	<u>June 2020-June 2021</u>
	<u>Estimate the number</u> and type of families that will benefit from the proposed activities	<u>236 individuals/households</u>
	Location Description	This project is administered by Catholic Social Service, located at 234A U.S. Army Juan C. Fejeran Street., Barrigada, GU 96913.
	Planned Activities	<u>Outreach and case management, direct assistance for rapid re-</u> housing, homeless prevention, emergency sheltering for households that fall below 50% of the area median income
<u>19</u>	Project Name	GHURA CV Planning and Administration
	Target Area	Island-wide
	Goals Supported	N/A
	Needs Addressed	<u>General Program Admin</u>
	Funding	<u>CDBG-CV: \$276,870.20</u> <u>ESG-CV: \$88,869.60</u>
	Description	Funds will cover administrative activities such monitoring, reporting, and processing of sub-recipient payments, as well as completing the Annual Action Plan, the evaluation and performance reports, and other development and planning activities related to COVID-19 projects.
	<u>Target Date</u>	March 2020-December 2021
	Estimate the number and type of families that will benefit from the proposed activities	<u>N/A</u>

	Location Description	General administrative and planning activities will take place in GHURA's Main Office, located at 117 Bien Venida Avenue, Sinajana, Guam 96910 under the Community Development and Planning Division. Guam will administer the activities of the CDBG-CV and ESG-CV funded projects. This includes conducting all necessary studies to determine
<u>20</u>	Project Name	the feasibility of projects, monitoring the implementation of projects through reports, site visits and payment requests. CV – Jobs Program
	Target Area	Island-wide
	Goals Supported	Community Enhancement
	Needs Addressed	Employment Training
	<u>Funding</u>	<u>CDBG-CV: \$61,684.00</u>
	<u>Description</u>	Funds will be used to assist low- and moderate-income individuals newly employed as a result of the COVID-19 pandemic through workshops, classes, and case management.
	Target Date	
	<u>Estimate the number</u> and type of families that will benefit from the proposed activities	
	Location Description	This project will be administered by Mañelu. Service areas include
	<u>Planned Activities</u>	<u>Provide multilingual workshops, work readiness workshops, resume</u> building, individualized career guidance, youth programs, adult work- <mark>readiness workshops</mark>

## 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

Census tracts in the Appendix indicate the locations of the proposed CPD-funded projects and activities that will take place this Program Year. The projects meet the eligibility requirement of serving 51% LMI. Both Public Facilities and Improvement projects qualify as an area benefit. The projects proposed under HOME does not target a specific area, but will allow for the construction of affordable homes for income-eligible families. The ESG program will assist LMI persons throughout the territory who are homeless or at-risk of becoming homeless.

### **Geographic Distribution**

Target Area	Percentage of Funds
Rehabilitation/Upgrade of the Astumbo Gym	
Rehabilitation/Upgrade of the Yigo Gym	

Table 8 - Geographic Distribution

### Rationale for the priorities for allocating investments geographically

A project is funded if it meets the minimum threshold of being a 51% low- and moderate-income area. Projects must also demonstrate that they will have a positive impact to the neighborhood and/or show opportunities for economic development. Additionally, a project is also evaluated based on the sub-recipient's ability to maintain the project or facility, once completed.

### Discussion

Through Citizen Participation, strong institutional networks, and enhanced coordination between housing and social service agencies, Guam will continue the process of evaluating needs to best determine how to allocate federal and local resources.

## **Affordable Housing**

## AP-55 Affordable Housing – 91.220(g)

## Introduction

The HOME program will add 4 newly constructed units to the inventory of affordable housing in PY2019. Through the ESG program, Guam will serve 59 homeless and 13 non-homeless households by providing rental assistance. Guam will serve an additional 10 Special Needs households with rental assistance through the Guma Hinemlo Program.

One Year Goals for the Number of Households to be Supported	
Homeless	59
Non-Homeless	17
Special-Needs	10
Total	86

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

One Year Goals for the Number of Households Supported Through	
Rental Assistance	82
The Production of New Units	4
Rehab of Existing Units	0
Acquisition of Existing Units	0
Total	86

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

## Discussion

In PY2018, Guam requested a Change of Use from HUD for a program that no longer needed a facility. In July 2019, the facility, called Guma Serenidad, was leased to Guam Behavioral Health and Wellness Center to house homeless adults with severe mental illness. The facility provides permanent housing for 10 individuals.

## AP-60 Public Housing – 91.220(h)

## Introduction

Guam's public housing program provides safe, decent and affordable housing for our community's low-, very-low, and extremely-low income families. Plans for the upcoming year include undertaking efforts to improve the physical condition of existing housing stock and engaging the families of public housing in meaningful ways to empower them to improve their socio-economic conditions.

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

The following activities are planned for the next year:

- Use Capital Fund Program funds to address the modernization of aging, vacant units.
- Continue to promote employment opportunities for eligible and qualified residents under Section 3 of the HUD Act of 1968. The A/E Division continues to mandate the compliance of the Section 3 regulations in any construction contract entered into between GHURA and the contractor. GHURA educates contractors on the Section 3 regulations and links Public Housing residents as well as other federally assisted individuals with construction companies funded with HUD monies.
- Through the CDBG Program, fund public service programs will engage public housing residents. This includes youth and family programs, education and career readiness workshops, substance abuse and suicide prevention programs, and family wellness activities.
- Increase the participation of HCV and PH families in Housing Counseling.
- Sustain programs that improve the quality of life for PHA residents. This includes enhancing existing programs, such as the Family Self-Sufficiency and Resident Opportunities and Self-Sufficiency programs.
- Continue to partner with nonprofit organizations to bring programs and services into public housing neighborhoods.
- Implement the provisions of the Violence Against Women Act (VAWA) that were incorporated as policy in September 2018.

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

With respect to increased involvement in management, GHURA continues to engage the Resident Advisory Board (RAB) for review and input on the Public Housing Agency Annual Plan, Capital Fund Plan, and any significant amendments or modifications to those plans. The Public Housing Property Site Managers (PSMs) continue to recruit for more increased involvement by the residents.

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

N/A

## Discussion

Sustaining the existing stock of affordable housing managed by the Guam PHA is a priority. Capital Fund Program allocations alone are insufficient to address the physical repair needs in their entirety. Thus, the PHA plans to seek additional and alternative funding for the renovation and rehabilitation of public housing. Guam plans to train staff on the Rental Assistance Demonstration (RAD) program in the upcoming year. The PHA is examining the eligibility and potential benefit of a public-private partnership to rebuild public housing utilizing a higher density profile. The use of mixed income and mixed-use properties are also under consideration for the beneficial impacts on the PHA's target population.

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

### Introduction

Guam's sole DV shelter is often at full capacity. In response, the Guam Homeless Coalition sought to expand services to homeless individuals fleeing domestic violence. Through the DV Bonus offered by the CoC, two new programs serving victims of DV commenced in 2019. Collectively, the programs add 32 beds in the community. 25 beds are designated for DV victims, while 7 beds prioritize DV victims with disabilities.

Guam also sought to improve the Coordinated Entry system by expanding the program to include additional end-users, specifically from DV-serving organizations. With DV Bonus funding, a stand-alone Homeless Management Information System will be created for DV survivors. Moreover, Guam provided comprehensive training to first-time users as well as refresher courses for seasoned users. The 3-day training took place May 13-15, 2019.

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

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

Beginning in June 2019, the CoC funded the following programs that serve unsheltered persons: Housing First, Housing First Expansion, Y'Jahame, DV Bonus, and Guma Mami Bonus. The CoC also funded HMIS and the HMIS Expansion project, which provides a secure, centralized database for service providers including a stand-alone HMIS for DV-serving organizations. An improved coordinated entry system will utilize assessment tools such as VI-SPDAT, as well as conferences among service providers. The programs will continue into the upcoming year.

Members of the CoC routinely conduct street outreach to unsheltered persons. While some outreaches target youth, others target the general unsheltered populations. During intake of unsheltered clients, an assessment is conducted to determine if the client is eligible for mainstream benefits. Caseworkers assist in the application, submission and follow-up process. Once housed, clients receive support services that continues as needed, even after clients exit permanent housing or are discharged from an emergency shelter. Referrals and coordination of services will be made to appropriate service providers within the community. The outcome of these activities is to provide sufficient resources to the individual or family to address obstacles that impact the ability to maintain permanent housing. Additional supports will be provided to the individual or families in the form of bus passes, child care, or other allowable assistance to enable participation in employment-related activities, education, and

medical assistance.

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

With only one DV emergency shelter in Guam, the CoC identified the lack of emergency shelters for DV survivors as a critical need. The short duration of stay in an emergency shelter also served as a barrier facing DV survivors in need of assistance. To address these concerns, Guam added additional beds in transitional programs to the inventory.

This year, Guam substantially amended the 2017 Annual Action Plan to include the Rehabilitation for Affordable Housing project. Guam anticipates the project to be completed in PY2019, and will add 14 affordable units to be used as transitional housing for homeless individuals and families.

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

The CoC-funded programs adopt a strategy that incorporates a "Phased Approach" when aiming to increase the rate of exit to permanent housing and retention in permanent housing. This essentially means that aftercare for individuals discharged from programs such as the emergency shelter continues as needed. For example, support services offered by Guma San Jose (emergency homeless shelter), Alee (women's shelter for survivors of domestic violence), and Lighthouse Recovery Center (in-house substance abuse treatment center) may continue even after individuals have exited shelter.

Service providers may extend stays as necessary for the benefit of their clients. The strategy is to move clients out of emergency shelter into permanent housing upon completion of their case plan, which could include job readiness training and successful enrollment in other mainstream services. The strategy involves completing these tasks in under 60 days, while addressing high barriers of completion such as limited English proficiency, lack of proper government identification, and lack of transportation.

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.

Recent HMIS data reported a 5.5% reduction in the number of first-time homeless in FY2017 compared **Annual Action Plan** 44 with the prior year. 496 were first-time homeless in FY17, compared with 525 in FY16. The CoC determined the main risk factors affecting first-time homeless to be a) evictions for failure to pay rent or failure to conform to tenant rules, and b) failure to pay rent due to unemployment. The CoC determined these risk factors through intake procedures conducted by member agencies. To address this, the CoC and ESG programs prevent first-time homelessness by offering cash assistance for rent and/or utilities arrears. If individuals or families become homeless, referrals are made for re-housing under ESG and emergency sheltering. To provide further assistance, clients are encouraged to continue with case management services even after discharge from shelters.

### Discussion

HMIS data reveals that the average length of time individuals are homeless in emergency shelters increased from 60 days in FY16 to 66 days in FY17, while the average length of time persons are homeless in emergency shelters and transitional housing decreased from 67 days in FY16 to 66 days in FY17. Before programs can move clients out of emergency shelter into permanent housing, clients must first complete their case plan. However, many individuals experiencing homelessness face barriers that prevent them from moving on. These barriers often include lack of documentation, high arrears, and lack of transportation.

## AP-75 Barriers to affordable housing – 91.220(j)

## Introduction:

Many of the barriers to affordable housing cited in the previous action plan continue to be relevant today. Most of Guam's current housing stock was built from the mid-1970s (after Typhoon Pamela in 1976) through the 1990s.

First, aging homes built in between the 1970s through the early 1990s require modernization. Such units often must be vacated to make the necessary upgrades. Second, Guam remains a high cost living area and a recognized difficult-to-develop area. The cost of single-family homes continues to rise. The median price of a home in 2018 is \$265,000, up from \$240,000 in 2017, an increase of 10% in a single year. Contributing to this situation is a tight construction labor market and the lack of skilled laborers as a result in the near-abolishment of the federal H-2 B waiver program for construction projects unrelated to military development. Third, Guam is facing a shortage of rental properties accepting Housing Choice vouchers. Part of this situation is attributable to fewer affordably-priced units in the market. The rise in popularity of short-term rentals (bed-and-breakfast operations, or B&Bs) has seen long-term affordable units converted to this new use as B&B's cater to a visitor population.

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

Guam issued an RFP for a Housing Study and Needs Assessment to include a local Fair Market Rents study in May 2019. The study, which will be due in October 2019, will shed light on some of the barriers to affordable housing. This study will replace the previous report published in 2009.

Guam also issued an RFP for the Analysis of Impediments to Fair Housing in June 2019. The study, which will be due in December 2019, will provide an update on fair housing issues. This AI study will replace the previous report published in 2011.

In April 2019, Guam provided comment in support of the proposed bill, *Homeless Youth and Families Identification Act.* The bill aims to ease the process for individuals experiencing homelessness to obtain Guam identification cards through the Department of Revenue and Taxation. By removing some costsassociated barriers to accessing government-issued identification, homeless individuals can more readily access housing and supportive services.

### **Discussion:**

Guam is planning to conduct a local Fair Market Rent study in the upcoming year as part of its Housing Study. The FMR currently established for Guam is a 2010 HUD-estimated amount that covers rent and essential utilities in the 40th percentile of the rental housing units. The 2010 rate is considered outdated, and poses a barrier for families seeking affordable housing in the Guam area rental market. Guam's Chief Planner, Katherine Taitano, is the Fair Housing coordinator for the area and responds to inquiries or fair housing complaints from the general public.

## AP-85 Other Actions – 91.220(k)

## Introduction:

This Program Year, Guam will continue to conduct activities toward achieving the goals set forth in the ConPlan. To that end, Guam will continue to engage community partners that serve LMI populations; deepen our institutional structures to keep pace with the latest developments in housing and community planning, and ensure the availability of affordable and safe housing.

## Actions planned to address obstacles to meeting underserved needs

The following CDBG, ESG, and HOME programs address obstacles to meeting underserved needs:

Support for organizations that provide services that sustain suitable living environments and enhance the quality of life of very-low and low-income individuals, and special needs populations will be addressed with the funding of the following public services programs: GALA Empowerment Program, The Opportunity Initiative 2019, Lighthouse Recovery Center, Homeless Management Information System, and Family Services Center.

Public Facilities and Improvements that will benefit LMI areas include the following projects: the New Construction of the MTM Covered Court and ADA Restrooms, which aims to sustain access to suitable living environments serving LMI and special needs population; and the construction of the Sinajana Fire Station.

With respect to Section 8, the following actions are planned:

Guam will continue to respond to funding opportunities for additional Housing Vouchers. In the past year, Guam added 11 additional Mainstream vouchers and 6 additional VASH vouchers. While Guam was not successful with increasing its number of FUP vouchers, it will continue to explore opportunities to expand its programs.

## Actions planned to foster and maintain affordable housing

Guam will foster and maintain affordable housing through several programs offered under HUD and other agencies. This includes the following:

- Construction of 4 new affordable homes under the HOME homebuyer program.
- Issuing a Qualified Allocation Plan, estimated at \$3M, for the Low Income Housing Tax Credit

program.

- Continuation of homeless housing programs under the Continuum of Care.
- Administering the Renewal Affordable Homes rental program.

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

A re-testing for the presence of Lead Based Paint (LBP) was conducted from July to August 2018 on 145 Public Housing units in the Agana Heights, Mongmong, Sinajana, Toto and Yona developments. Out of the 145 units a total of 67 units came back positive for lead. GHURA has identified funding under the Capital Fund Program (CFP) to address abatement. GHURA will continue to notify the residents of the presence of LBP in those units identified as positive until abatement is completed. GHURA will begin its plans to address this in PY2019.

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

Guam supports efforts of reducing poverty through various CDBG Public Service programs aimed at providing job readiness and workplace skills trainings. Additionally, Guam supports the work of organization that aim to reduce homelessness through the CoC and ESG. Finally, to comply with Section 3 requirements, the Guam's Architecture/Engineering Division will work with public housing managers to increase the promotion of job opportunities among its residents.

### Actions planned to develop institutional structure

The various divisions within GHURA work closely together to increase Guam's capacity to carry out HUD programs and complete the programs outlined in the Annual Action Plan. Strong internal institutional structures can be attributed to the resources dedicated to training and professional development. To that end, the following learning opportunities took place during the program year:

National Service Coordinator Training Homeless Management Information Systems Coordinated Entry Training

> Annual Action Plan 2019

Environmental Review Training Procurement Mandated Pesticide Training (PL 29-26) – Core Class Review and Exam Active Shooter Training Conflict of Interest

Externally, Guam has cultivated strong relationships with outside agencies and institutions to support the goals of the Annual Action Plan. Partners include village mayors, landlords, real estate agents, and government agencies including the Dept. of Parks and Recreation, Guam Behavioral Health and Wellness Center and the Division of Integrated Services for Individuals with Disabilities. Guam also works with agencies that serve homeless populations that include The Salvation Army and Catholic Social Service.

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

Guam plans to continue its collaborations with other agencies involved in carrying out the goals and objectives stated in the ConPlan. Guam staff will continue to participate in task forces, committees, and planning councils that discuss issues relating to housing, social services and economic development. The CoC's *No Wrong Door* policy is an example of how enhanced coordination between service providers results in more efficient service delivery.

## **Discussion:**

Guam looks forward to working collaboratively with other agencies such as the Guam Housing Corporation, which has been planning to open a facility to assist individuals experiencing homelessness.

In the Program Year, Guam seeks to amend its Citizen Participation Plan to include a stipulation for times of a disaster declaration. In situations when disaster strikes and CPD funds are required to meet an urgent need, a substantial amendment in the form of reprogramming of funds can take place without public notice. This exception to the Citizen Participation Plan is granted under extenuating circumstances, such as in times of a disaster declaration.

## **Program Specific Requirements**

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

## Introduction:

Specific program requirements for CDBG, HOME, and ESG are provided below. Guam does not participate in HOPWA.

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

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out.

1. The total amount of program income that will have been received before the start of the	
next program year and that has not yet been reprogrammed	710,000
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:	710,000

## **Other CDBG Requirements**

2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income Overall Benefit - A consecutive period	1. The amount of urgent need activities	0
of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan. 80.00%	benefit persons of low and moderate income.Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate	80.00%

## HOME Investment Partnership Program (HOME) Reference 24 CFR 91.220(I)(2)

1. A description of other forms of investment being used beyond those identified in Section 92.205 is

as follows:

As in years past, Guam does not intend to utilize other forms of investment beyond those identified in Section 92.205. For PY2019, funds will be utilized to support affordable housing through new construction and acquisition to assist first time homebuyers. Funding for four new units has been proposed.

2. A description of the guidelines that will be used for resale or recapture of HOME funds when used for homebuyer activities as required in 92.254, is as follows:

Guam continues to use existing guidelines for resale or recapture of HOME funds. Resale provisions for the Homebuyer program activities will be documented and recorded against each property sold to an eligible low/mod homebuyer through the recordation of a Declaration of Restrictive Covenant and the execution of a property specific HOME Agreement with each homebuyer. In accordance with 24 CFR 92.254, the homebuyer will acknowledge and agree that, if sale of the property occurs before the end of the affordability period, the home must be sold to another HOME eligible homebuyer at an affordable price. Under this provision, the affordable price will be stated to reflect that no more than 33% of the buyer's annual income be used for housing. The property shall only be used to provide affordable housing to a First Time Homebuyer who is a low to moderate income person, which is a person or a family that has a total Annual Gross Income that does not exceed eighty percent (80%) of the area's median income adjusted for family size as published by the U.S. Department of Housing and Urban Development (HUD), who occupies the Property as their principal residence. The original HOME assisted owner will be provided a fair return on investment. The investment is defined as the homeowner's original investment (i.e. down payment) plus any capital improvements, less the amount of deferred maintenance that does not meet HUD UPCS (Uniform Physical Condition Standards). The fair return on investment is the total of (1) homeowner's investment at time of sale (2) homeowner's investment multiplied by the percentage change in the Guam CPI from date of original purchase to date of sale.

3. A description of the guidelines for resale or recapture that ensures the affordability of units acquired with HOME funds? See 24 CFR 92.254(a)(4) are as follows:

Affordability will be substantiated and the duration for affordability compliance enforced via resale provisions to be recorded against each of the properties sold under the Homebuyer program. The documentation method includes the recordation of a Deed Restriction and the executed of a property specific HOME Agreement with each homebuyer. Resale guidelines included in this document will dictate that, as set forth in 24 CFR §92.254(a)(4), the homebuyer shall agree to occupy the property as his/her principal residence for the affordability period imposed as apply to the resale provisions of the transaction.

4. Plans for using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds along with a description of the refinancing guidelines required that will be used under 24 CFR 92.206(b), are as follows:

Guam does not intend to use HOME funds to refinance existing debt of any kind.

## Emergency Solutions Grant (ESG) Reference 91.220(I)(4)

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

Guam has existing Standard Operating Procedures (SOP) for providing services through the Emergency Solutions Grant. The Salvation Army who has been the recipient of ESG funds since the inception of the program, has utilized this SOP as guidance for outlining the intake assessment process, determining eligibility for services, identifying the types of services available, and program requirements for duration of assistance provided.

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

Guam continues to operate under its established Coordinated Entry System Policy and Procedures. The Coordinated Entry system simplifies the process for homeless persons to access services, assess their needs, and prioritize their housing and service needs. The Coordinated Entry System Policy and Procedures is developed for all local CoC programs and the Emergency Solutions Grant (ESG) Rapid Re-Housing to be participants of this process and to adhere to the coordinated entry system set in place. CoC and ESG programs must utilize the Vulnerability Index (VI), the Service Prioritization Decision Assistance Tool (SPDAT), Version 2, to determine the level of chronic status as well as the medical vulnerability faced by homeless individuals and families. It also serves as an intake and case management tool. This standardized tool will identify the severity of needs rather than determining prioritization of housing and services by a specific diagnosis or disability type. Households assessed with the greatest of needs are prioritized for any type of housing and homeless assistance available in the CoC, including transitional housing, permanent supportive housing, rapid re-housing, and other services.

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

A public notice is issued on the funding opportunity for the ESG, as well as a workshop to explain the program and the needs of Homelessness Prevention and Rapid Re-Housing within our community. A panel of Community Planning and Development staff serve on the selection panel, and evaluate applicants using established criteria. The criteria is as follows:

- The applicant's history of providing effective supportive services to the homeless, and of successfully operating performance based grant-funded programs.
- The applicant's effective coordination with organizations with the local continuum of care, to address identified gaps in services for the homeless and improve outcomes for participants.
- The applicant's ability to move street or unsheltered homeless participants or shelter residents to permanent housing, and/or prevent homelessness for families and individuals who are at risk of homelessness.
- 4. If the jurisdiction is unable to meet the homeless participation requirement in 24 CFR 576.405(a), the jurisdiction must specify its plan for reaching out to and consulting with homeless or formerly homeless individuals in considering policies and funding decisions regarding facilities and services funded under ESG.

The Grantee is a State and, therefore, not subject to 576.405(a). However, Guam's Continuum of Care, the Guam Homeless Coalition, regularly consults with homeless or formerly individuals. As part of its mandate, at least one person on the Board of Directors must represent the homeless or formerly homeless population. This current board member is an active member, and participates in policy and funding decisions. CoC-funded programs are also required to establish a homeless or formerly homeless participant in the policy and funding decisions as it pertains to the CoC-funded homeless program. These programs are monitored for compliance.

5. Describe performance standards for evaluating ESG.

GHURA confers with the Guam Homeless Coalition regarding the performance standards for activities funded under ESG.

Assessments include how well the ESG programs use the HMIS system to produce uniform reports for all prime recipients; its consistency with the Consolidated Plan, Annual Progress Report, and Annual Action Plan. The CAPER also provides a framework to track ESG performance.

Other general performance standards are documented such as the unduplicated number of persons or households prevented from becoming homeless, the unduplicated number of persons or households assisted from emergency shelters/streets into permanent housing, race, ethnicity, age, amount spent per sub-recipient and their timeliness of expenditure will be reported by HMIS and GHURA.

Also reported are other assessments such as: what worked using HUD funds, the most pressing needs for clients, barriers to housing, the connection to other mainstream resources and outcomes of families and individuals upon completion of a program.

Additionally, the Coordinated Entry System (CES) provides insight into determining the ESG and CoC's effectiveness in addressing the waitlist for homeless who are seeking housing. Guam utilizes

the ESG to assist homeless families who may not qualify for any of the CoC-funded programs. One of the conditions of CoC-funded programs is the requirement for a head of household to have a disability. Persons fleeing domestic violence, however, are exempt from the disability requirement. Under the ESG program, homeless persons do not have to meet any disability requirements. However, households who are assisted must show reasonable efforts to maintain their housing after their assistance has ended.

Guam consults regularly with The Salvation Army, the sole subrecipient of ESG funds, on program compliance and performance standards.