

COMMUNITY DEVELOPMENT BLOCK GRANT – CORONAVIRUS (CDBG-CV)

STAFF REPORT

Organization Name: Legal Aid of Sonoma County (LASC)

Project Name: Housing Justice Program (HJP)

Project Description (*Applicant-Provided Summary Description*):

The Housing Justice Project (HJP) provides legal services to tenants in Urban County zones disproportionately impacted by housing and economic insecurity, including COVID-19. HJP affirmatively furthers fair housing by combatting discriminatory practices in eviction defense matters, Section 8 terminations, and other cases of landlord discrimination, harassment, and retaliation. In a county where high housing costs, limited housing stock, and the lingering effects of the pandemic continue to displace vulnerable residents, housing justice is essential to advancing equity and mitigating health disparities. HJP's services include educating tenants and landlords on housing laws, including remaining COVID protections (CARES Act), and providing direct legal support and in-court representation.

Amount Requested: \$113,295.85

Project Type: Homeless Prevention Services

Proposed Use of Funds: 90% of the requested funds will be used for personnel costs, and the remaining 10% will be used for miscellaneous operational costs.

Total number of beneficiaries served for each population type below:

	<u>Proposed</u> number to be served by project during CDBG-CV Funding Period	Current number served as of the filing of this application (if project is currently in operation)	Number served by project last Fiscal Year
	Jan. 1, 2026 – June 30, 2026	July 1, 2024 to Date of Application Submission	July 1, 2023 - June 30, 2024
Number of <u>households</u> served	50	N/A	58
Number of <u>adults</u> served	75	N/A	82
Number of <u>children</u> served	35	N/A	42
Number of <u>persons</u> served	110	N/A	124

List the total percentage of beneficiaries served for each of the income categories below:

Household Income	List the total estimated percentage of the households served in each of the income categories below	<u>Considering only Urban County residents</u>, list the estimated percentage of households served in each of the income categories below
Extremely Low (Below 30% AMI)	50%	50%
Very Low (Between 31% - 50% AMI)	35%	35%
Low (Between 51% -80% AMI)	15%	15%
Moderate (Over 80% AMI)	0%	0%

If there are substantial changes to the past, current, or proposed number of households to be served, does the applicant provide an explanation for the changes?

Legal Aid was not awarded CDBG-CV funding for FY 2024-25, so there are no values to report for that time period. Legal Aid did receive CDBG-CV funding for FY 2023-24, so the number of households/persons served was included for that year. The organization also reported the proposed number of households/persons to be served by the program during the CDBG-CV funding period of January 1st, 2026 to June 30th, 2026.

All CDBG-funded projects must primarily benefit low-income households. Does the applicant describe the method that will be used to verify income eligibility?

LASC confirms that 100% of their clients are low-income. During the initial intake process, clients undergo extensive screening to ensure income eligibility based upon HUD guidelines. If a client's income level falls within the required parameters, staff ask the client to provide proof of income by submitting recent paystubs, three months of bank statements, a tax return, or other documentation that can be used to certify income. Alternatively, if a client is unable to submit the required documentation, they may complete a self-certification process, during which the client submits a signed attestation confirming their income level under penalty of perjury.

Federal regulations require that 51% of participants are located within the Urban County of Sonoma (excluding the cities of Petaluma and Santa Rosa). Does the applicant describe the method that will be used to track the required demographic and quantitative data?

LASC has received CDBG and CDBG-CV funds in the past, so they are familiar with the Urban County requirements. The initial intake procedure involves income verification, and clients are also asked to provide verification of their current address. Program staff updated the intake process when LASC first started applying for Commission funds in an effort to ensure that CDBG funds are only used to support low-income residents from the Urban County.

SELECTION CRITERIA

Does the applicant describe the primary outcome/s of the activity?

Yes, the applicant notes that homeless prevention and housing retention are the primary outcome of the proposed activity.

How do the proposed outcomes of the project/activity align with the goals of the Five-Year Consolidated Plan?

The Housing Justice Program supports the following priority: 1) promoting effective and proven strategies for homelessness prevention and intervention countywide that align with Continuum of Care Strategic Plan goals. LASC provides legal representation to low-income clients at zero cost, and these services prevent illegal evictions and housing discrimination, which would otherwise lead to housing displacement or homelessness.

Does the applicant demonstrate capacity to effectively deliver the proposed project? Does the applicant have experience providing the proposed services?

LASC has received CDBG funding and CDBG-CV funding from the Commission during previous funding cycles, and the organization continues to administer the awarded funds in accordance

with federal regulations and local policy. Furthermore, Legal Aid has a strong track record of compliance in adhering to reporting requirements mandated by the federal government.

Does the applicant describe how data and other information will be used as a self-evaluation tool or as an outcome measurement?

Legal Aid staff collect a variety of client data during the initial intake process and throughout the provision of legal services. This data includes certain required information, such as income and place of residency documentation, but it also includes more specific details like rental and eviction history, reasonable accommodation requests, and COVID-related impact. This data is especially helpful as it relates to CDBG-CV funds because it allows staff to more closely track beneficiaries that have been most affected by the COVID-19 pandemic.

Does the activity require participation in Coordinated Entry? If yes, provide an overview of the organization's ability, knowledge, and potential challenges related to participation in Coordinated Entry.

This program does not require participation in Coordinated Entry. However, the proposed project is still aligned with the Strategic Plan goals set by Sonoma County because it helps to reduce the inflow of people into homelessness by preventing unlawful evictions.

FUNDING POLICIES (Funding Goals and Objectives):

Does the project address one of the following funding priorities?

- 1) Creating or preserving affordable housing,**
- 2) Building infrastructure or public facilities that support creation or preservation of affordable housing,**
- 3) Building infrastructure or public facilities that support low-income communities,**
- 4) Promoting effective and proven strategies for homelessness prevention and intervention county-wide that align with Continuum of Care Strategic Plan goals,**
- 5) Emphasizing self-sufficiency of agencies and or life skills for beneficiaries?**

The project supports the preservation of affordable housing in the Urban County by providing legal representation to low-income clients facing eviction or fair housing discrimination. The legal services provided by LASC enable clients to remain in their homes, and in some cases, clients may even be able to improve their housing situation. These services also promote housing stabilization, which prevents housing disruption and lowers the risk of homelessness for clients served. These services preserve housing for low-income households while addressing a critical need for pro-bono legal representation within Sonoma County.

THRESHOLD CRITERIA

Does the proposed project or activity meet the eligibility requirements of the program funding source requested? (If not, provide the specific reason)

This program meets the eligibility requirements associated with CDBG-CV funds. The HJP responds to the COVID-19 pandemic by helping to prevent COVID-related housing displacement through the enforcement of specific housing protections authorized by the Coronavirus Aid, Relief, and Economic Security Act (CARES) Act. Program staff will also educate tenants and landlords on the COVID-era protections that are still valid.

Does the project Affirmatively Further Fair Housing?

This project serves a variety of vulnerable, low-income populations, and many clients are members of one or more protected classes. These beneficiaries will have the opportunity to learn about their housing rights, and they will have access to full legal representation, further empowering clients to understand and enforce their fair housing rights. Project staff will also assist with cases against property owners who violate fair housing laws, thereby helping to reduce discrimination. Additionally, many of Legal Aid's eviction defense cases involve requests for reasonable accommodations under the Americans with Disabilities Act.

PROJECT BUDGET

Total Organization Budget	\$ 4,820,457.00
Total program budget	\$ 997,985.00
Percent of program budget to organization budget	20.7%
Percent of funds requested to program budget	11.4%
Total proposed number of households to be served by program	50
Total proposed number of beneficiaries to be served by program	110
Program cost per person	\$9,072.59
Program cost per household	\$19,959.70

Describe the long-term financial sustainability of the proposed project AND the applicant organization.

This project has received funding from the Commission for over a decade, and the organization will continue to submit applications during future funding cycles for available funds administered by the Commission and County. While acknowledging the current precarious nature of certain federal funding, LASC notes that this project utilizes additional grants from the State Bar of California's Interest on Lawyers' Trust Accounts (IOLTA) program, the City of Santa Rosa, and the "Keeping People Housed" collaborative hosted by the Committee on the Shelterless (COTS). In conclusion, the organization will continue to pursue federal, state, and local funding programs to maintain the financial sustainability of the project. As for the organization itself, LASC receives funding from a wide variety of sources, including some private foundations and individual donations from members of the community. LASC has created strong, lasting funding partnerships and is confident that the organization will continue to be financially sustainable by leveraging new funding streams, receiving in-kind support, and improving service delivery to ensure the maximum impact while conserving financial resources.

Additional Information:

Members of the committee have previously expressed some concern about the high cost per person/household associated with this program. However, due to the expensive nature of legal services, the cost per person/household for this program is reasonable. Additionally, CDBG-CV funds must be spent within a 6-month period, and serving over 100 beneficiaries within this time period will have a significant, positive impact. Furthermore, organizations that provide similar services and receive direct or indirect federal funding, are currently experiencing a cut to their budgets, thereby reducing their pool of funding resources.

Potential Impacts Due to Lack of Funding:

LASC requested \$248,683 of CDBG funding for fiscal year 2025-26, but the agency was only granted about half of the requested funds, with an award totaling approximately \$123,936, due to limited funding available. However, if the agency receives all of the requested CDBG-CV funds, the additional financial resources will allow the organization to maintain the same level of staffing and service delivery for the upcoming fiscal year.

STAFF RECOMMENDATION:

Staff recommend awarding the full funding request of \$113,295.85. Legal Aid has demonstrated a high level of competence and efficiency in disbursing previous funding awards from the Commission. Additionally, the agency is facing significant federal funding cuts, so these funds will help to sustain this vital program as LASC continues to pursue additional funds as they become available.

Preliminary Condition(s) of Approval

Allocated funding will be a grant ☒ a loan ☐

1. A NEPA environmental review must be completed before applicant can be offered a Funding Agreement. The Sonoma County Community Development Commission staff will prepare the NEPA.
2. CDBG-CV funding awarded must be used for eligible expenses and all funds must be expended by June 30, 2026. Specific terms will be included in a Funding Agreement, and no costs can be incurred prior to a fully executed funding agreement.