



2025 Consolidated Annual Performance and Evaluation Report

September 2026



CITY OF
Vancouver
WASHINGTON

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Introduction

The City of Vancouver is pleased to present its 2025 Consolidated Annual Performance and Evaluation Report (CAPER). The CAPER is a requirement for U.S. Department of Housing and Urban Development (HUD) funding.

Each year, the City receives Community Development Block Grant (CDBG) and HOME Investment Partnerships Program (HOME) funding through HUD as an entitlement jurisdiction. This report provides a comprehensive evaluation of the City's progress toward meeting the goals and objectives outlined in the 2024-2028 Consolidated Plan, detailing the use of federal funds to address the identified housing and community development needs during the program year.

In 2025, Vancouver continued to build upon its commitment to enhancing the quality of life for all residents by investing in affordable housing, supporting community development initiatives, and fostering economic opportunities. This CAPER shares the results of those investments and how they respond to the needs and priorities voiced by our community.

This report also provides a snapshot of the challenges encountered over the past year, underscoring the City's dedication to transparency and accountability in the administration of federal resources. Vancouver remains steadfast in its values and continues to use CDBG and HOME funding toward focus areas that align with HUD: supporting economic opportunity, housing and human needs, and vibrant neighborhoods.

This report layout and information provided is determined by HUD and this report will be submitted online through HUD's Integrated Disbursement and Information System (IDIS), which dictates the formatting and structure.

CR-05 - Goals and Outcomes

Progress the jurisdiction has made in carrying out its strategic plan and its action plan. 91.520(a)

The City of Vancouver's Community Development Block Grant (CDBG) and HOME Investment Partnerships (HOME) programs strive to provide a coordinated approach to addressing community needs. The programs are administered by the Economic Prosperity & Housing (EPH) Department, which partners with internal city departments, Clark County, Vancouver Housing Authority, and valuable nonprofit organizations that carry out these activities. This 2025 CAPER represents the second year in the 2024-2028 City of Vancouver Consolidated Plan.

In program year (PY) 2025 (July 1, 2025 - June 30, 2026), City of Vancouver expended \$1,678,783.65 in CDBG funds, and \$723,477.59 in HOME funds. Additionally, \$286,033.93 in HOME American Rescue Plan (HOME ARP) funds, allocated as part of the 2021 Action Plan, were expended for homelessness supportive services.

In addition to CDBG and HOME funding, the City of Vancouver used local funding available through a voter approved property tax levy to construct and preserve affordable housing and provide temporary shelter, rental assistance, and homeownership opportunities for households with low to moderate income. The Affordable Housing Fund (AHF) levy was renewed and increased in 2024 by Vancouver voters and generates \$10 million per year for ten years.

The City also was awarded Washington State Home Electrification and Appliance Rebate (HEAR) funds to boost the outcomes of our HUD-funded Homeowner Rehabilitation program, and Connecting Housing to Infrastructure Program (CHIP) funding to assist with the cost of utility work and system development charges for new affordable housing.

In PY2025, the City of Vancouver made a payment of \$276,286 toward the principal and interest on its 2010 Section 108 loan for the Waterfront Access project. This loan is scheduled to mature on August 1, 2029. The Waterfront Access project is designed to enhance public access to the riverfront, supporting the community's ability to utilize and enjoy waterfront resources.

The City also used 2025 CDBG funds to make principal and interest payments totaling \$312,627.31 on its second Section 108 loan, which was issued for the Fourth Plain Commons Community Center. The loan amount of \$4,199,000 supported the opening of this facility in September 2023. The Fourth Plain Commons provides economic development opportunities with a commercial kitchen, community services and gathering space, which contributes to neighborhood vitality and provides essential resources for residents.

In 2025, the goals and outcomes of the City's programs continue to be impacted by steep inflation, increased cost of labor and materials, and increased interest rates for financing. Many of the City's CDBG and HOME supported projects continued to see slower progress or fewer outcomes as organizations adjust to higher cost of living. The City continued to support its most vulnerable residents during this time.

The CAPER provides a summary of the accomplishments and people assisted with CDBG and HOME funds during PY2025, including activities with funding from prior years.

Comparison of the proposed versus actual outcomes for each outcome measure submitted with the consolidated plan and explain, if applicable, why progress was not made toward meeting goals and objectives. 91.520(g)

Goal	Indicator	Unit of Measure	Expected 5 Year Outcomes	Percent Complete	Actual PY24	Expected PY25	Actual PY25
Affordable Housing*	Rental units constructed	Housing Unit	100	0.00%	0	20	0
	Rental units rehabilitated	Housing Unit	50	0.00%	0	-	-
	Homeowner Housing Added	Housing Unit	10	0.00%	0	-	-
	Homeowner Housing Rehabilitated	Housing Unit	35	40.00%	9	18	5
	Financial Assistance to Homebuyers	Households	10	200.00%	8	0	12
	Tenant-based rental assistance	Households	250	28.40%	39	52	32
Economic Opportunity	Businesses assisted	Businesses Assisted	600	72.33%	194	125	240
Housing Stability, Poverty Reduction	Public service activities	Persons Assisted	20,000	17.89%	3,332	2,455	246
	Homeless Person Overnight Shelter	Persons Assisted	200	0.00%	0	-	-
	New Overnight Shelter/ Transitional Housing	Beds	250	0.00%	0	-	-
	Homelessness Prevention	Persons Assisted	50	0.00%	0	-	-
Neighborhood Equity and Livability	Public Facility or Infrastructure Activities	Persons Assisted	5,000	284.18%	14,209	-	-

Table 1 - Accomplishments – Program Year & Strategic Plan to Date

*This outcome table does not include the number of people who were experiencing homelessness and served through HOME-ARP funding, which was part of the 2021 Consolidated Plan and Annual Action Plan. In PY2025, HOME-ARP assistance served an additional 64 households through coordinated outreach and housing navigation with rental assistance.

In 2025, results varied across programs, with some services exceeding expectations and others falling short. The differences often reflect project timing, demand shifts, and program implementation factors.

Affordable Housing & Homelessness

- Rental Units Constructed (0% of goal): One project was expected to use HOME funding for the creation of new rental units, however, the developer returned the award due to federal requirements, particularly around the Build America Buy America Act (BABA).
- Rehabilitated & Homeowner Housing Added: No applications were received for these activities during the 2025 application cycle. These projects typically request local Affordable Housing Funds, which are less restrictive than federal dollars.
- Homeowner Housing Rehabilitated (28% of goal): The goal was to rehabilitate 18 units, but only 5 units were completed. The City prioritized the use of ARPA funds for mobile home rehabilitation in the Fourth Plain area, which delayed the use of HOME funds in this program. While HOME rehabilitation outcomes were lower this year, the City exceeded its rehabilitation goals last year and anticipates making significant progress again in 2026 as HOME-funded projects resume.
- Financial Assistance to Homebuyers (150% of goal): A 2023 subrecipient was delayed due to some of the federal restrictions that required substituting home sales and contract amendments. This resulted in the outcome of 12 households being served this contract year.
- Tenant-Based Rental Assistance (62% of goal): Partners report that households require longer-term support for both rental assistance and case management for housing stability in the current economic environment.

Economic Opportunity

- Businesses Assisted (192% of goal): Performance exceeded expectations. The goal was not met in PY2024 due to a delayed HUD grant agreement and a portion of the outcomes expected in 2024 were achieved in 2025.

Housing Stability & Poverty Reduction

- Public Service Activities (10% of goal): Performance in this category was lower than anticipated due to a revised outcomes methodology for one contract. Staff identified that the subrecipient's proposed outcomes counted people who received no direct service, which significantly overstated the number they expected to serve. Prior to contract execution, staff corrected the scope and outcome targets to count only those who received direct assistance, and the outcomes reflect this corrected count.
- Homeless Person Overnight Shelter, New Beds, Homelessness Prevention: No applications were received for these activities during the 2025 application cycle. These projects typically request local Affordable Housing Funds, which are less restrictive than federal dollars.

Neighborhood Equity & Livability

- Public Facility/Infrastructure Activities: No applications were received during the 2025 application cycle. This goal has been met for the 5-year Consolidated Plan goal through the outcomes achieved by the Fourth Plain Community Commons Section 108 investment.

Assess how the jurisdiction's use of funds, particularly CDBG, addresses the priorities and specific objectives identified in the plan, giving special attention to the highest priority activities identified.

The primary focus of Vancouver's efforts during this cycle has been on activities aimed at supporting individuals with low to moderate income. The City uses CDBG and HOME funding to facilitate access to stable, affordable housing and economic growth. These federal funds have been directed towards various critical areas, including:

- **Affordable Housing:** Investments made to increase the availability and preservation of affordable housing, particularly homeownership. CDBG funding is critical to these activities and is also used toward housing stability case management services to support HOME rental assistance funding, which is used for rapid rehousing programs, to help reduce homelessness.
- **Housing Stability:** Although CDBG allows for a wide range of Public Service activities that serve people with low to moderate income, the City targets this funding toward housing support.
- **Economic Opportunity:** Support for small businesses has been a key area, helping to boost economic stability and growth within the community. These funds also support capacity building for Community Based nonprofits that support local communities.

Overall, these activities are designed to provide essential resources and support to those in need, aligning with Vancouver's commitment to addressing and alleviating issues related to housing stability and economic security.

CR-10 - Racial and Ethnic composition of families assisted

	CDBG	HOME
White	164	48
Black or African American	71	4
Asian	4	0
American Indian or American Native	7	0
Native Hawaiian or Other Pacific Islander	56	4
Total	302	56
Hispanic	40	1
Not Hispanic	262	55

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

Narrative

Beneficiary demographics are accurately updated by City staff in IDIS each quarter based on partner agency reports for CDBG and HOME activities. The numbers in the table above, generated by HUD's IDIS system, continue to inaccurately reflect the individuals served throughout the program year. One discrepancy to note is that the race categories shown in this CAPER reporting template do not include "Multi racial" or "Other" races although this is captured in IDIS.

CR-15 - Resources and Investments 91.520(a)

Source of Funds	Source	Resources Made Available	Amount Expended During Program Year
CDBG	public - federal	\$1,689,308	\$1,678,784
HOME	public - federal	\$1,258,035	\$723,478
HOME ARP	public - federal	\$620,000	\$286,034

Table 2 - Resources Made Available

Narrative

Resources made available in 2025 do not align with the amount expended due to overlapping program years and contract timelines. In addition, expenditures shown include program income, which HUD requires be spent before entitlement funds. HOME-funded homebuyer assistance activities awarded in previous program years had a delayed start while new agency partnerships were established and environmental reviews were completed. Additionally, the 2025 HOME-awarded rental housing development project did not proceed and will return the HOME funds due to Build America, Buy America (BABA) requirements. Two HOME-ARP programs that were scheduled to start PY2025 had a delayed start due to completing previous year's contracts and meeting federal requirements.

Identify the geographic distribution and location of investments

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

Table 3 – Identify the geographic distribution and location of investments

Narrative

The City of Vancouver does not allocate funding on a geographic basis. All activities are provided within city limits.

Leveraging

The City of Vancouver assists partner agencies in applying for available funding to leverage other resources to implement housing strategies and programs. The City has established a network of partners from the private lending community, financial experts, and private and nonprofit housing developers and consultants who can provide technical expertise in packaging development proposals. The City of Vancouver provides letters of support and verification of consistency for partner agency project applications, which support the goals and objectives found in the City's Consolidated Plan.

The City's CDBG and HOME application processes encourage leveraging by awarding competitive points for projects that demonstrate secure matching funds. This approach supports the City's broader strategy of maximizing federal investments through coordinated use of local, state, and private resources.

In PY2025, the City's HOME Program continued to comply with 24 CFR 92.218. The IDIS PR33 report identifies a match liability of \$112,028, reflecting the annual 25 percent matching requirement. TBRA and homeownership activities also leverage state and private resources that support tenants and homebuyers, including contributions toward program operations.

During PY2025, activities were removed and closed out from previous years, resulting in leverage totals that differed from initial expectations. A 20-unit rental housing project awarded HOME funds was withdrawn by the developer due to added costs associated with BABA compliance requirements. Additionally, a PY2023 HOME funded homebuyer assistance activity experienced delays while partnerships were established and required environmental reviews were completed; however, the activity was successfully completed and recorded in PY2025.

HOME funds were also awarded to two tenant based rental assistance (TBRA) programs that generated eligible match contributions. Because the City continues to maintain substantial excess match, no additional HOME match will be documented for the current program year.

Fiscal Year Summary – HOME Match	
1. Excess match from prior Federal fiscal year	\$2,246,476
2. Match contributed during current Federal fiscal year	0
3. Total match available for current Federal fiscal year (Line 1 plus Line 2)	\$2,246,476
4. Match liability for current Federal fiscal year	\$112,028
5. Excess match carried over to next Federal fiscal year (Line 3 minus Line 4)	\$2,134,448

Table 4 – Fiscal Year Summary - HOME Match Report

Match Contribution for the Federal Fiscal Year								
Project No. or Other ID	Date	Cash (non-Federal)	Foregone Taxes, Fees, Charges	Appraised Land/Real Property	Required Infrastructure	Site Prep, Material, Donated labor	Bond Financing	Total Match
N/A	N/A	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00

Table 5 – Match Contribution for the Federal Fiscal Year

Program Income				
Balance on hand at beginning of reporting period	Amount received during reporting period	Total amount expended during reporting period*	Amount expended for TBRA*	Balance on hand at end of reporting period
\$49,174.73	\$68,503.09	\$117,751.26	\$117,751.26	\$0

Table 7 – Program Income

*The expenditure totals in this report include three reimbursements from August 3, 2026, in the amounts of \$73.44, \$21,128.04 and \$20,688.78. Although these draws occurred after the close of the program year (June 30, 2026), all costs were incurred and reimbursed within PY2025, which makes including them the most accurate representation of actual PY2025 project activity. IDIS does not allow the selection of a prior program year for HOME draws, so the system-generated IDIS reports will not perfectly align with this program income report. The amounts shown here reflect the full set of HOME-eligible expenses reimbursed for PY2025, including draws processed after the program year closed.

Table 6 - Minority Business and Women Business Enterprises.

Since HOME funding was only invested in TBRA and homebuyer assistance, there are no Minority Business nor Women Business Enterprises contracts or dollar amounts to report for construction projects completed during the program year.

Table 7 – Minority Owners of Rental Property.

Information on rental property owner demographics is not collected through the TBRA programs so there is no data to present for the Minority Owners of Rental Property table.

Relocation and Real Property Acquisition		
	Number	Cost
Parcels Acquired	12	\$254,966
Businesses Displaced	0	\$0
Nonprofit Organizations Displaced	0	\$0
Households Temporarily Relocated, not Displaced	0	\$0

Table 8 – Relocation and Real Property Acquisition

HOME funds were used in 2025 to assist 12 first-time homebuyers in purchasing an affordable residence. All homes were purchased from the Vancouver Housing Authority transitioning their scattered site rental homes to ownership. No households nor businesses were displaced by these purchases.

CR-20 - Affordable Housing 91.520(b)

Evaluation of the jurisdiction's progress in providing affordable housing, including the number and types of families served, the number of extremely low-income, low-income, moderate-income, and middle-income persons served.

	One-Year Goal	Actual
Number of Homeless households to be provided affordable housing units	72	32
Number of Non-Homeless households to be provided affordable housing units	18	17
Number of Special-Needs households to be provided affordable housing units	0	0
Total	90	49

Table 9 – Number of Households

	One-Year Goal	Actual
Number of households supported through Rental Assistance	52	32
Number of households supported through The Production of New Units	20	0
Number of households supported through Rehab of Existing Units	18	5
Number of households supported through Acquisition of Existing Units	0	12
Total	90	49

Table 10 – Number of Households Supported

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

In PY2025, some programs did not meet their established goals due to a combination of market challenges, regulatory barriers, and shifts in funding availability.

For Rental Assistance, the goal was to support 52 households, however, only 32 households were assisted. All households served in the TBRA program are experiencing homelessness at time of enrollment. Providers report that rent costs continue to rise and households are requiring longer periods of support to maintain housing stability. As a result, funds that were expected to serve additional households were instead used to extend assistance for existing clients, reducing overall throughput.

For the Production of New Units, the goal was to produce 20 units, but 0 units were completed. Community Roots chose not to move forward with using HOME funds for the Mill Plain project due to Build America, Buy America (BABA) requirements. This compliance barrier directly limited progress toward production goals and prevented HOME-funded unit creation in PY2025.

For Rehabilitation of Existing Units, the goal was to rehabilitate 18 units, but only 5 units were completed. The City prioritized the use of ARPA funds for mobile home rehabilitation in the Fourth Plain area, which delayed the use of HOME funds in this program. While HOME rehabilitation outcomes were lower this year, the City exceeded its rehabilitation goals last year and anticipates making significant progress again in 2026 as HOME-funded projects resume.

For Acquisition of Existing Units, a PY2023 subrecipient was delayed due to some of the federal restrictions that required substituting home sales and contract amendments. This resulted in the outcome of 12 households being served during PY2025.

Overall, the primary barriers affecting program performance included rising costs, increased support for households, federal compliance requirements, and shifts in funding sources that changed the timing of HOME expenditures.

Discuss how these outcomes will impact future annual action plans.

The outcomes achieved in PY2025 and the Consolidated Plan will directly inform future Annual Action Plans and the strategies used to implement housing goals more effectively. While affordable housing remains a top priority for the City of Vancouver, this year's performance highlights several areas where adjustments are needed.

Rising rental costs and longer durations of assistance reduced the number of households served through Rental Assistance. Future plans will account for these market conditions by reassessing outcome goals, working closely with providers to refine cost assumptions, and ensuring funding levels more accurately reflect the extended support many households require. Starting PY2026, the City will also award 10 points in the application process to activities that help meet any unmet Consolidated Plan goals.

The lack of progress in the Production of New Units, due largely to BABA compliance barriers, demonstrates the importance of aligning funding sources with project feasibility. As a result, the City will continue to emphasize the use of local funding, particularly the Affordable Housing Fund (AHF), for housing development. AHF's flexibility and higher funding capacity remain essential tools for advancing affordable housing production without delays caused by complex federal requirements.

For Rehabilitation of Existing Units, the shift to ARPA funding created delays in HOME-funded rehabilitation outcomes. Based on strong performance in the prior year, the City anticipates returning to higher rehabilitation output in 2026.

Overall, future Annual Action Plans will reflect the need to balance federal and local resources, incorporate realistic production expectations, and proactively address regulatory barriers. The City will continue prioritizing affordable housing construction and preservation, homelessness assistance, and homebuyer/homeowner support. The Affordable Housing Fund will remain central to this strategy, as it accelerates local development, leverages significant outside investment, and reduces reliance on federal funds when they create timing or compliance challenges. This approach will support more efficient project delivery and help the City address its housing needs more effectively in the future.

Include the number of extremely low-income, low-income, and moderate-income persons served by each activity where information on income by family size is required to determine the eligibility of the activity.

Number of Households Served	CDBG Actual	HOME Actual
Extremely Low-income	301	31
Low-income	118	3
Moderate-income	67	10
Total	486	44

Table 11 – Number of Households Served

Narrative Information

The City of Vancouver prioritizes services for households with low to moderate income (LMI), and income information is collected for eligibility in activities such as public services, microenterprise business assistance, tenant based rental assistance, homeowner rehabilitation, and homebuyer assistance. Under CDBG funded activities, public services supported 193 individuals with extremely low income and 53 with low income, and an additional 5 homeowners received housing preservation assistance through the rehabilitation program, all of whom qualified as low income. Business owners included 108 with extremely low income, 60 with low income, and 67 with moderate income.

Under HOME funded activities, 31 households with extremely low income were assisted with exiting homelessness through tenant based rental assistance, with one additional household qualifying as low income. HOME also supported 12 first-time homebuyers: 2 with low income and 10 earning moderate income. These combined outcomes illustrate the City's continued commitment to serving residents with extremely low income through public services and rental assistance, while also supporting households with low to moderate income through housing rehabilitation and homebuyer programs.

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

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

The City's Homeless Assistance and Resource Team (HART), made up of nine full-time employees from the City Manager's Office, Vancouver Police Department, Public Works, and the City Attorney's Office, provides regular, direct engagement with people living outdoors, conducts individual needs assessments, and connects residents to essential services, shelter options, and housing programs. Complementing HART's work, the City partners with Share, Janus Youth, Thrive 2 Survive and the Council for the Homeless (CFTH) to expand outreach capacity and support households experiencing or at risk of homelessness. CFTH administers the coordinated entry system for more than 40 local service providers and operates the Housing Solutions Center and Housing Hotline, offering streamlined access to emergency shelter, diversion services, housing assessments, and rental assistance. CFTH also coordinates the annual HUD-required Point in Time (PIT) Count, which identified 1,260 people experiencing homelessness in 2026, a 18% decrease from 2025. The City provides CDBG, HOME, and AHF funds to support people experiencing homelessness. These resources expand shelters, improve outreach, and offer emergency rental assistance to maintain household stability and continue to reduce homelessness.

Despite these efforts, several barriers continue to affect progress. Limited availability of affordable housing and rising rental costs constrain the number of placements available for individuals who are ready to exit homelessness. Growing numbers of unsheltered households increase demand for outreach staffing, behavioral health services, and low barrier shelter options. Individuals discharged from publicly funded institutions without sufficient transition planning also face heightened risk of homelessness, increasing the need for outreach and emergency response systems. Additionally, staffing shortages and capacity limitations among service providers affect the scale and frequency of outreach activities. To advance progress more effectively, the City will continue investing in shelter, homelessness prevention, diversion, and affordable housing programs.

Addressing the emergency shelter and transitional housing needs of homeless persons

The City of Vancouver continues to make progress in addressing the emergency shelter and transitional housing needs of individuals experiencing homelessness through a combination of City operated facilities and strong partnerships with local nonprofits. HART manages four Safe Stay Communities, each consisting of 20 non-congregate pallet shelters that provide short term accommodations for unsheltered residents. In addition, the City operates a Safe Park site offering more than 80 designated parking spaces for people living in vehicles, which has become an essential alternative for households that can't access traditional shelter. The City is also opening a 150 bed Bridge Shelter, currently under construction, which will serve as a critical resource for individuals needing safe shelter while accessing treatment, case management, and housing navigation services. Together, these interventions expand the emergency shelter options and offer structured pathways toward stability.

The City also supports a range of nonprofit partners through federal funds and the local AHF to deliver emergency and transitional housing. Share operates shelters for men, women, and families, providing essential services and case management that help residents transition toward permanent housing. Janus Youth manages a youth shelter and provides case management and rental assistance for young people experiencing homelessness or housing instability. YWCA Clark County operates the SafeChoice Domestic Violence Shelter, ensuring survivors have access to safe and confidential shelter options. Council for the Homeless (CFTH) coordinates service delivery across providers and supports shelter operations through coordinated entry, diversion strategies, and system wide data management.

Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: likely to become homeless after being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); and, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs

The City of Vancouver continues to strengthen efforts to help individuals and families experiencing homelessness, particularly those who are chronically homeless, families with children, veterans, and unaccompanied youth, transition to permanent housing and achieve independent living. Vancouver participates actively in the Coalition of Service Providers, a consortium of nonprofit organizations, businesses, faith-based groups, community members, and people with lived experience of homelessness. This collaborative group evaluates system performance, identifies service gaps, prioritizes community needs, and develops coordinated solutions aimed at reducing the length of and returns to homelessness. Prevention, diversion, and discharge planning strategies are embedded within the Clark County Homeless Action Plan, helping households resolve housing crises before entering the homeless system. The Housing Solutions Center and 211Info play a critical role in connecting individuals and families with agencies providing housing, health care, employment services, education, and youth supports. As the region's coordinated entry, Council for the Homeless assesses household needs, determines vulnerability, and prioritizes housing placements so that those at greatest risk receive timely support to prevent or end homelessness.

Youth and young adults continue to benefit from targeted interventions. Janus Youth utilizes emergency shelter, intensive case management, and rental assistance to help assist foster youth and other young people stabilize, access supportive services, and transition successfully to permanent housing. Vancouver has also expanded housing options for individuals exiting the justice system through a recent investment of AHF in the Hazelwood Reentry Housing project, developed in partnership with the Vancouver Housing Authority and The Foundation. Hazelwood will provide seven transitional housing units, supporting approximately 14 individuals reentering the community. The City's funding enabled renovation of the units, and The Foundation will deliver wraparound services, case management, and support groups to ensure residents have structured pathways to permanent housing and long-term stability.

Although the City has made substantial progress, several barriers continue to affect the pace and effectiveness of housing transitions. The limited supply of affordable units across the region slows movement from shelter or transitional housing into permanent homes, extending the time individuals remain homeless. Households with complex behavioral health or substance-use challenges often require intensive support and longer stabilization periods, delaying housing placement. Additionally, people exiting institutions may struggle to secure housing quickly due to limited income, rental barriers, and the absence of robust discharge planning in some systems of care.

To address these challenges, the City will continue partnerships with service agencies, institutional systems, and housing providers, and invest in prevention and diversion strategies designed to reduce inflow into homelessness and shorten the time households spend without stable housing.

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 Continuum of Care (CoC) Program is designed to promote a community wide commitment to ending homelessness by quickly rehousing people experiencing homelessness, including those fleeing domestic violence and unaccompanied youth, while minimizing the trauma and dislocation caused by homelessness and increasing access to mainstream services and supports. In 2025, the Clark County CoC, representing the City of Vancouver, was eligible to apply for \$2,190,876 in renewal and new project funding. Programs that received 2025 CoC funding include:

Council for the Homeless HMIS Renewal Project Application FY2024 (\$174,355): Homeless Management Information System (HMIS) data system management and reporting for all homeless service providers in Clark County.

Council for the Homeless CoC Planning Project Application FY2024 (\$67,680): Planning, coordination, and support for the local CoC, Point in Time count, system performance reporting and annual CoC application.

Janus Connections (\$229,609): Permanent supportive housing program serving youth between the ages of 18 and 25 who have a disability and multiple complex needs.

Council for the Homeless DV Bonus Renewal Project Application FY2024 (\$151,787): Integrates domestic violence resources and supports into the coordinated entry system.

Impact NW Permanent Supportive Housing (\$259,633): Serves households that are chronically homeless through leasing assistance to provide stable housing.

Share Story Street (\$992,961): Permanent supportive housing through rental subsidies and case management for individuals and families who are experiencing homelessness and have high and complex needs.

Council for the Homeless Way Home Too 2024 (\$398,946): Housing assistance and case management for people with a disability who are chronically homeless and are high utilizers of psychiatric, medical, and other community system resources.

The CoC continued strengthening its systemwide approach to helping chronically homeless individuals and families, families with children, veterans, and unaccompanied youth transition to permanent housing and achieve independent living. Through Coordinated Entry, diversion, and targeted case management, households with the highest needs were prioritized for rapid connections to housing resources, supportive services, and housing programs. The CoC also strengthened partnerships with hospitals, behavioral health facilities, foster care programs, youth serving agencies, and corrections institutions to improve discharge coordination practices, reducing how often individuals exited publicly funded systems into homelessness. Prevention and diversion strategies supported households with extremely low income in avoiding shelter entry, while supportive housing and wraparound case management helped recently housed individuals maintain stability and prevent returns to homelessness.

The City's Affordable Housing Fund (AHF) supported these efforts through the Everybody In program, delivered in partnership with the Council for the Homeless and Safe Stay Community providers. Everybody In provides rental assistance, flexible financial support, and wraparound case management to help Safe Stay and Safe Park residents transition from temporary shelter to permanent rental housing. By expanding case management capacity at each Safe Stay site, the program increases the number of residents who can stabilize, secure housing, and maintain long term tenancy. The TBRA program also supports households experiencing homelessness by offering rental subsidies and housing navigation services to help households secure units and remain stably housed.

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

Actions taken to address the needs of public housing

The Vancouver Housing Authority (VHA) does not have any Public Housing. VHA manages and/or owns a portfolio of about 4,000 apartments across approximately 50 buildings. VHA partners with the City of Vancouver and its Affordable Housing Fund to help with needed renovations as well as new construction and acquisition. VHA also administers about 3,500 rental assistance vouchers.

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

VHA does not have any Public Housing. VHA does have a very active Resident Advisory Board (RAB) and is currently working with the RAB to design an input structure that also includes residents of VHA's affordable housing that do not have vouchers. VHA offers a homeownership program for its voucher residents and has partnered with a local nonprofit to provide credit and housing counseling. VHA also has a Supportive Services Department that provides service coordination, care coordination and a family self-sufficiency program across its housing and voucher portfolio. VHA is currently converting its single-family home rental portfolio to permanently affordable homeownership in partnership with two nonprofit organizations.

Actions taken to provide assistance to troubled PHAs

Not applicable. The VHA is not a troubled PHA.

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

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

In June 2026, the City Council adopted the *Our Vancouver 2026-2045 Comprehensive Plan* along with an updated Zoning Map and Code, which directly addresses several of the barriers named in this question. The update eliminated single-family-only zoning citywide, removed parking minimums, removed density maximums, and reformed impact fees to be based on unit size rather than a flat charge. These changes are aimed at land use controls, zoning ordinances, and fees that have historically constrained housing supply and raised per-unit development costs.

The City also acted on the building code and fee/timing side of the barrier list. Single-stair and six-story wood construction (Type III-A) code alternatives, approved in February and June 2026 respectively, give developers more flexibility in floor plans and unit sizes and can reduce construction costs for multifamily projects. On fees and charges, the City continues to defer System Development Charges and impact fees until late in construction, has eliminated parking minimums for affordable projects where at least half the units serve households at or below AMI, and adopted a Construction Sales Tax Deferral program that forgives sales and use taxes on qualifying affordable projects built on underutilized land after a 10-year affordability period.

To address barriers affecting the return on residential investment, the City expanded Multifamily Tax Exemption incentives for market-rate projects, including waived application fees and deferred fee-in-lieu payments, and continues to pair Affordable Housing Fund resources with federal investments to help affordable developers secure the local funding commitment many other funders require for a competitive application. Together, these actions target the regulatory, fiscal, and financing-side barriers identified in this section while supporting continued housing production across the city.

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

While the City has employed a range of strategies to address the identified needs within the community, the primary challenge remains the lack of financial resources. To overcome this obstacle, the City will continue to plan and fund housing and supportive service programs tailored for underserved populations, including the elderly, youth, and individuals with disabilities.

The AHF levy plays a crucial role in advancing these efforts, providing resources that extend beyond the capabilities of CDBG and HOME funds. The AHF supports a diverse array of activities, including new construction, operation and rehabilitation of shelters, preservation of existing housing, homeownership assistance, rental assistance, and eviction prevention.

By leveraging these funds, the City aims to enhance its ability to meet the needs of its most vulnerable residents and improve overall housing stability within the community.

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

The City of Vancouver conducts lead-based paint screening on all rehabilitation activities. This screening determines whether a property was built before 1978 and, if so, whether planned rehabilitation work will disturb painted surfaces containing lead. When lead hazards are identified, the City follows procedures to ensure hazards are properly mitigated.

TBRA activities also incorporate HUD's lead-based paint requirements. For any TBRA assisted household residing in pre 1978 housing, agencies must provide the EPA approved lead hazard information pamphlet, ensure landlords disclose known lead-based paint hazards, and obtain any available records or reports regarding potential hazards. TBRA units built before 1978 must undergo a visual assessment during the inspection process prior to move in. If hazards are identified, agencies must follow Safe Work Practices and implement clearance procedures. These requirements ensure that TBRA participants, especially pregnant individuals and households with children under age six, are protected from potential exposure to lead based paint.

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

Vancouver works with Clark County to alleviate poverty. Clark County receives the majority of state and federal funding to help people in need and performs a Community Needs Assessment (CNA) every 3 years in compliance with Community Service Block Grant (CSBG) requirements. The CNA includes a survey of needs and is an important part of developing community-wide policies, practices and services to respond to the needs prioritized by people with low income.

The following actions were taken to achieve this goal:

- Supported outreach and diversion programs of the Council for the Homeless and other nonprofits providing emergency and transitional shelter and services for people who are homeless or at risk of becoming homeless;
- Council members and staff participate on the county's Community Action Advisory Board which recommends CSBG and other funding to nonprofit agencies for homelessness prevention and other basic services;
- Continued to support nonprofits in the delivery of basic services through CDBG, HOME, HOME ARP, and AHF funding for emergency shelter, transitional housing, case management, youth programs, and resource connection;
- Continued CDBG support for microenterprise assistance through the Hispanic Metropolitan Chamber, Northwest Native Chamber, Fourth Plain Forward, and Microenterprise Services of Oregon (MESO). These programs provide technical support to business owners or entrepreneurs with low to moderate income; and
- Continued use of the Affordable Housing Fund to provide income-restricted units and rental assistance for households earning up to 50% AMI.

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

Vancouver works with a variety of organizations to plan and implement activities. Staff are responsible for managing day-to-day operations of CDBG and HOME programs. Key partners in the planning and implementation of activities include nonprofit organizations, other City departments, Clark County, housing developers, and the VHA. The primary strength of the institutional system for delivering programs is the interdepartmental coordination at the City as well as the collaboration of community partners. The primary weakness of the delivery system is a lack of financial resources to meet needs.

Commissioners of the VHA are appointed by the City Council. Once appointed they have no further direct relationship with the City. However, there is close cooperation between the City and VHA through the City's award of funding for housing activities operated by VHA. In addition, the City and VHA cooperate in reviewing the capital needs of VHA.

In partnership with Clark County, Vancouver hosts a quarterly TBRA providers workgroup. This regular meeting is a chance for case managers and other staff from TBRA providers to hear HUD updates, ask questions, review policies and ask staffing questions to other providers. Staff maintain a library of documents and best practices, as well as FAQs in a central location and this resource, as well as the meetings, have strengthened the ability of TBRA providers to carry out the complex HUD requirements for the program.

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

Vancouver participates with Council for the Homeless and Clark County to enhance the community's Continuum of Care system to end homelessness. This partnership includes a variety of community groups, government agencies and a coalition of more than 40 homeless service providers.

Vancouver enhances coordination with public, private, and nonprofit housing providers, social service providers and faith-based communities through the following actions:

- Working with partners, including Clark County, Washington State, and the VHA, to prioritize housing needs, provide services, and maximize the use of federal, state, and local funds for affordable housing, community development, and related services;
- Participation in coordinated efforts for shelter and services assisting homeless individuals and families through the Continuum of Care; and
- Participation in Ending Community Homelessness Organization (ECHO), a collaboration between Clark County and its cities' elected leadership, as well as the VHA and homeless agency directors, discussing collaboration and homeless needs on a monthly basis.

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

The last analysis of impediments (AI) report was issued in 2012. The 2012 AI assessed the impact of the City's laws, regulations, policies and practices on the availability and accessibility of housing as well as an assessment of public and private sector conditions that affect fair housing choice.

The 2012 AI identified the following strategies to reduce impediments to fair housing:

- Support nonprofit and private sector efforts to increase the stock of affordable housing, especially deeply subsidized rentals;
- Monitor potential areas of racial/ethnic concentrations and high mortgage loan denials; and
- Improve access to and dissemination of fair housing information

The City began updating this plan in 2019 when HUD's requirements changed, but new guidance from HUD was never issued and the City's planned update has been on hold. The strategies identified in 2012 are still relevant to the City in 2025. Vancouver has addressed the strategies through the Affordable Housing Fund levy, a significant resource to support 50% AMI affordable units.

The Home Mortgage Disclosure Act (HMDA) data for Clark County in 2025 showed 12,788 mortgage loans originated. For these loans, the following racial and demographic data was provided by the Consumer Financial Protection Bureau. The number of loans originated by Hispanic or Latino households is far below the population in Vancouver according to the latest census data.

Records by Ethnicity in CLARK COUNTY, WA	Action Taken Loan Originated - Count	Action Taken Loan Originated – Percent	Vancouver 5 year ACS Data 2023 – Percent
Hispanic or Latino	623	4.87%	17.2%
Not Hispanic or Latino	9,815	76.75%	82.8%
Joint	431	3.37%	Not available
Ethnicity Not Available	1m918	15.00%	Not available
Total	12,788		

Table 14: Records by Ethnicity in Clark County

Records by Race in CLARK COUNTY, WA	Action Taken Loan Originated - Count	Action Taken Loan Originated – Percent	Vancouver 5 year ACS Data 2023 – Percent
American Indian or Alaska Native	83	0.65%	0.7%
Asian	756	5.91%	5.3%
Black or African American	236	1.85%	3.1%
Native Hawaiian or Other Pacific Islander	79	0.62%	1.8%
White	9,085	71.04%	70.6%
Joint	585	4.57%	Not available
Race Not Available	1,935	15.13%	Not available
Total	12,788		

Table 15: Records by Race in Clark County

Lastly, Vancouver is improving access to and distribution of fair housing information and resources through its new Rental Habitability program that was launched January 2026. This program will help the City identify rental housing concerns and communicate with landlords and tenants about Fair Housing requirements and resources.

CR-40 - Monitoring 91.220 and 91.230

Describe the standards and procedures used to monitor activities carried out in furtherance of the plan and used to ensure long-term compliance with requirements of the programs involved, including minority business outreach and the comprehensive planning requirements

All applications received are evaluated to determine eligibility and priority based on program policies, local, state, and federal regulations, consolidated plan goals, and local need. Vancouver utilizes four tools for monitoring to ensure program compliance:

1. clear policies and procedures,
2. agency risk assessments,
3. contract reporting requirements, and
4. program-specific monitoring.

Prior to contracting, staff review all documents required through the application process and conduct a risk assessment of each agency and program. Staff review contract requirements with each agency and discuss needed documentation and reports. As part of the quarterly reporting, agencies submit data that is reviewed by staff and input in IDIS.

Agency risk assessments are based on a range of risk factors. The scoring is used as a basis to determine which agencies to monitor each year. Vancouver ensures that all records are complete, and agencies comply with applicable rules and regulations including Political Activity, Davis Bacon and Related Acts, Civil Rights, Cash Management, Federal Financial Reports, Allowable Costs and Cost Principles, Drug Free Workplace Act, and other administrative requirements.

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

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

Vancouver follows a detailed community participation plan. All community members are encouraged to participate in the Action Plan development and implementation process including people with low to moderate income, non-English-speaking persons, people with disabilities, social service agencies, and residents of public and assisted housing developments.

The draft 2025 CAPER is advertised in The Columbian newspaper at least 15 days prior to the submission to HUD, posted on the City's website (www.cityofvancouver.us/cdbg) and social media and e-mailed to service providers to encourage comments on the proposed funding awards.

A public hearing notice and request for comment will be published in the Columbian newspaper on September 4, 2026. The draft CAPER and request for comments are also posted on the City's website (www.cityofvancouver.us/cdbg) and published through social media. The request for comments will expire on September 21, 2026.

Prior to the City Council meeting, City Council will receive a staff report that outlines the information provided in the CAPER. A City Council public hearing is scheduled for September 21, 2026, at 6:30 p.m. All City Council meetings are broadcast on CVTV cable channels 23 / HD 323, and online at www.cvtv.org or on the City's Facebook page. City Hall is accessible and served by C-TRAN. Anyone who needs language interpretation services or accommodations with a disability may request it. Assistive listening devices and live Closed Captioning are available for the deaf, hard of hearing and general public use.

CR-45 - CDBG 91.520(c)

Specify the nature of, and reasons for, any changes in the jurisdiction's program objectives and indications of how the jurisdiction would change its programs as a result of its experiences.

In PY2025, Vancouver did not substantially change its overarching program objectives, which remain focused on expanding affordable housing, preventing homelessness, supporting neighborhood revitalization, and fostering economic opportunity. However, based on implementation experience, the City adjusted strategies within those objectives to improve effectiveness.

Housing Rehabilitation Program policies were formalized to provide clearer, plain-language guidance and targeted outreach, ensuring the program operates under consistent, documented standards accessible to all eligible households.

The City also rearranged its CDBG application timeline and scoring process, at Council's request, so that the public comment period closes prior to Council review, allowing Council to consider community input before final funding decisions are made.

In addition, the City created a new CDBG set-aside for childcare business support, responding to an identified gap in childcare availability affecting the local workforce and households with low to moderate income.

Looking ahead, the City is evaluating potential CDBG support for its Rental Registration and Habitability Program, which currently operates on locally controlled funds. Experience with the program to date, including its role in identifying substandard rental conditions before they result in displacement, has highlighted an opportunity to expand its reach that may benefit from CDBG resources, particularly for units serving tenants with lower income.

The City is also monitoring emerging state climate resiliency resources that could support decarbonization of older residential housing stock, improving comfort, safety, and energy efficiency while lowering utility costs for vulnerable households, particularly seniors on fixed incomes.

Together, these changes reflect a continued effort to align CDBG program design with community input, documented standards, and emerging housing needs identified through direct program experience, including the intersection of housing preservation, affordability, and resiliency for the community's most vulnerable residents.

Does this Jurisdiction have any open Brownfields Economic Development Initiative (BEDI) grants?

No

CR-50 - HOME 24 CFR 91.520(d)

Include the results of on-site inspections of affordable rental housing assisted under the program to determine compliance with housing codes and other applicable regulations

In 2026, Mercy Housing NW Columbia Heights, Community for Veterans Freedom's Path, Vaughn Bay Grand Pacific, REACH CDC Isabella Court Phase 1 and 2, and REACH CDC McCallister Village were due for inspection using Housing Quality Standards checklists.

On July 8, 2026, unit C42 and D47 were inspected at Columbia Heights. On July 15, 2026, unit 12 and 42 were inspected at McCallister Village. On July 8, 2026, unit 301 was inspected at Grand Pacific. All units at these properties passed their HQS inspections.

The City coordinated with the County to share inspections. The City inspected the County's units for them at Columbia Heights and Grand Pacific. The County was responsible for inspecting the City's units at Freedom's Path and Isabella Court Phase 1 and 2. The City is still waiting to receive these inspection reports from the County.

Provide an assessment of the jurisdiction's affirmative marketing actions for HOME units. 24 CFR 91.520(e) and 24 CFR 92.351(a)

The City requires owners of housing projects with five or more HOME assisted units to use affirmative fair housing marketing practices in soliciting renters or buyers, determining their eligibility, and concluding all transactions. Although there are no HOME projects with 5 or more HOME assisted units, the City recommends affirmative marketing efforts for any and all affordable housing projects.

Affirmative Marketing requires the following for the duration of the compliance period:

Advertising: The Equal Opportunity logo or slogan must be used in all ads, brochures, and written communications to owners and potential tenants. Advertising media may include The Columbian (or any other local newspaper), radio, television, social media, housing organizations, brochures, leaflets, or may simply involve a sign in the window.

Fair Housing Poster: Owners must display the HUD's fair housing poster in rental offices or other appropriate locations.

Special Outreach: Owners are encouraged to solicit applications for vacant units from persons in the housing market who are least likely to apply for HOME-assisted housing without the benefit of special outreach efforts. Vancouver recommends the following methods to reach this objective:

- Posting informational flyers in lower opportunity neighborhoods, including social service agencies and housing agencies serving these areas.
- Use of culturally specific traditional and social media: HOME-assisted housing opportunities may be advertised in specific newspapers (i.e., The Skanner, Portland Observer, El Hispanic News, The Asian Reporter).
- Record Keeping: Owners must maintain a file containing documentation of all marketing efforts (copies of newspaper ads, memos of phone calls, copies of letters, etc.). These records must be available for inspection by Vancouver staff. Owners must maintain a listing of all tenants residing in each unit.

Refer to IDIS reports to describe the amount and use of program income for projects, including the number of projects and owner and tenant characteristics

The City received \$68,503.09 in HOME program income during PY2025, as reported in IDIS PR-09. PR-09 shows total program income expenditures of \$26,686.27 for the reporting period. In addition to these expenditures, three TBRA invoices were processed and drawn down on August 3, 2026, in the amounts of \$73.44, \$21,128.04, and \$21,128.04. While these drawdowns occurred in PY2026, they were for expenses/services delivered prior to July 1, 2026, making them PY2025 expenses. These expenses utilized PY2025 program income, expending the full balance of PI receipted in PY2025.

When combined with the beginning program income balance of \$49,174.73, a total of \$117,751.26 in program income was available during PY2025, all of which was expended on tenant-based rental assistance. Share was the only TBRA agency that utilized HOME program income, serving individuals and households experiencing homelessness, including households referred through coordinated entry.

At year-end, all program income had been fully expended, leaving no remaining balance to carry forward into PY2026.

Program income is used in conjunction with annual entitlement funding and has not been split out from the overall outcomes for reporting purposes, except for the Council for the Housing, Housing Solutions Center project, who maintains their own program income, which is reported to the City on an annual basis. During the reporting period, the Council for the Homeless generated \$7,342.76 in rent revenue from a CDBG-funded project. The agency invested this income into the Dynamic Diversion program (\$9,052.90), a CDBG-eligible service. With a starting balance of \$1,927.13, the PI fund ended at \$216.99 for PY2025.

Describe other actions taken to foster and maintain affordable housing. 24 CFR 91.220(k)

This is a primary focus for Vancouver and actions taken this year have been discussed throughout the CAPER. Actions in 2025 include Affordable Housing Fund and ARPA investments, pursuing state grants for affordable housing, eliminating parking minimums and deferring fees, providing density bonuses and fee waivers, providing housing preservation funding, Multifamily Tax Exemption, Construction Use and Sales Tax Deferral and waiver program, and the new habitability program to maintain affordable housing. Vancouver has also provided vacant land near City Hall downtown and in the Heights Redevelopment area to build affordable rental and homeowner housing.

CR-58 – Section 3

Identify the number of individuals assisted and the types of assistance provided

Section 3 requirements apply to construction projects receiving more than \$200,000 in HUD housing and community development financial assistance. Because the City's homeowner rehabilitation projects are individually assisted properties and each project falls below the applicable Section 3 threshold, Section 3 reporting is not required for these activities.

