

**State of California  
2020-24 Federal Consolidated Plan  
Amendment to 2021-22 Annual Action Plan  
HOME Investment Partnerships Program – American Rescue Plan**



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## Executive Summary

To address the need for homelessness assistance and supportive services, the U.S. Congress appropriated \$5 billion in funding from the American Rescue Plan Act of 2021 (ARP) to be administered through the HOME Investment Partnerships Program (HOME). HOME-ARP Program activities must primarily benefit qualifying individuals and families who are homeless, at risk of homelessness, or belong to other vulnerable populations. The State of California (state) HOME-ARP Allocation Plan (Allocation Plan or Plan) describes how the state will use HOME-ARP Program funds for eligible activities to address the unmet needs of the qualifying populations (QPs) in accordance with the U.S. Department of Housing and Urban Development (HUD) requirements for HOME-ARP. The California Department of Housing and Community Development (HCD or Department) is the administrator of the HOME-ARP Program on behalf of the state.

HCD will distribute \$155 million in funding on behalf of “non-entitlement jurisdictions” – jurisdictions and unincorporated areas that do not receive funding directly from HUD. Entitlement cities and counties in California will receive an additional \$512 million directly from HUD. The state’s funding will be used primarily to benefit residents of non-entitlement jurisdictions that do not receive funding directly from HUD. Funding allocated to entitlement jurisdictions that do not submit their allocation plans by HUD’s deadline of March 31, 2023, will revert to the state, and will be reallocated via an amendment to this Plan.

The Plan includes a summary of the state’s consultation activities in developing the Plan, estimates of the size and demographic composition of the QPs within the state, an assessment of unmet needs and service gaps for the QPs, and a description of the planned uses of the state’s HOME-ARP funds for eligible activities. ARP defines qualifying individuals or families as those that are (1) homeless, as defined in section 103 of the McKinney-Vento Homeless Assistance Act, (2) at risk of homelessness, as defined in section 401 of McKinney-Vento; (3) fleeing, or attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking; or (4) in other populations where providing supportive services or assistance would prevent a family’s homelessness or would serve those with the greatest risk of housing instability.

HCD conducted an extensive consultation process between October 2021 and September 2022. This process included one-on-one consultations, three focus groups, and a survey. HCD engaged Continuums of Care (CoCs), homeless service providers, domestic violence service providers, veterans’ services groups, public housing authorities, nonprofit agencies that address the needs of the QPs, and public/private organizations that address fair housing, civil rights, and the needs of persons with disabilities in this outreach. The focus of the outreach was to identify the highest priority needs and critical gaps in shelter, housing, and services among individuals in the QPs in communities across California.

Across all forums, participants consistently reported that a lack of affordable and available housing is among the highest priority needs, especially for persons with extremely low incomes, lived experience of homelessness, and/or were recently released from the criminal justice system. Many participants reported that the lack of affordable housing for individuals in the QPs is most acute in non-entitlement and tribal areas of the state, due to a lack of local funding sources and capacity limitations among nonprofit developers and service providers in these communities. Consultation, focus group and survey participants reported that the largest gaps in their communities' homelessness response systems were in permanent supportive housing services (e.g., intensive case management, support for activities of daily living, and job training) and in behavioral support services (e.g., mental health support, and addiction and recovery services). The two issues reinforce each other – without stable housing, individuals cannot maintain participation in supportive services to improve their health and well-being; and without supportive services, it is difficult for individuals with health, economic and other challenges to maintain stable housing.

It is difficult to provide estimates of the size and demographic composition of each of the four QPs for the state, due to the large number of CoCs, service providers and other local and regional entities in the state. However, this Plan provides these numbers where possible. Over 160,000 people were experiencing homelessness in California during the 2020 Point-in-Time-Count (HUD directed all HOME-ARP participating jurisdictions to use the 2020 Point in Time Count because it was the most current data as of October 2021). An even higher number of people – over 250,000 – received services from California CoCs during 2020, based on data submitted by the CoCs to the California Interagency Council on Homelessness. Many more people are at risk of homelessness (QP 2), fleeing domestic violence or other unsafe situations (QP 3), or are in other populations where providing assistance would prevent homelessness or would serve those with the greatest risk of housing instability (QP 4). The Plan describes in detail estimates of these populations and the demographic characteristics of people in these groups. Individuals identifying as Black, Indigenous and People of Color (BIPOC) and women continue to be overrepresented in these vulnerable populations.

HCD will allocate HOME-ARP funding to the Development of Affordable Rental Housing, Supportive Services, and Administration and Planning in the amounts shown on the chart on the next page:

	Funding Amount	Percent of Grant	Statutory Limit
<b>Development of Affordable Rental Housing</b>	<b>\$110,352,595</b>	<b>71.2%</b>	
Affordable Housing NOFA	\$89,000,000	57.4%	
Northern California Target	\$31,150,000	20.1%	
Southern California Target	\$31,150,000	20.1%	
10% Target for Tribal Entities	\$8,900,000	5.7%	
20% Target for Rural Areas	\$17,800,000	11.5%	
Rental Housing Reserve	\$5,352,595	3.5%	
Re-entry Housing Pilot Project(s)	\$16,000,000	10.3%	
<b>Supportive Services</b>	<b>\$27,000,000</b>	<b>17.4%</b>	
Open Funding	\$24,300,000	15.7%	
10% Target for Tribal Entities	\$2,700,000	1.7%	
<b>Administration and Planning</b>	<b>\$17,650,459</b>	<b>11.4%</b>	<b>15%</b>
HCD Admin & Planning	\$14,950,459	9.6%	
Subrecipient Admin & Planning	\$2,700,000	1.7%	
<b>Total HOME ARP Allocation</b>	<b>\$155,003,054</b>		

The majority of HOME-ARP funding will support the Development of Affordable Rental Housing for the QP. Of the allocation, \$89,000,000 will fund projects in California’s non-entitlement jurisdictions. From these funds, 10 percent will be a target for Tribal Entities, and 20 percent will be a target for projects in rural areas. Of the remaining funds, HCD will target distributing them evenly between Northern and Southern California, which balances to a 35 percent target for each region.

Additionally, \$16,000,000 will fund pilot project(s) developing units for the re-entry population, or those exiting state and federal prisons and local jails. \$5,352,595 will also be held in reserves to account for cost overruns.

HOME-ARP will also fund evidence-based Supportive Services for the QP. There will be \$27,000,000 available for service providers to provide critical services for those exiting homelessness, as well as to prevent vulnerable populations from losing housing. Of these funds, 10 percent will be targeted for Tribal Entities. By supporting households experiencing homelessness, and those at risk of homelessness, to maintain housing stability, the Housing Plus Support Program (HPSP) will provide significant subsidies to the existing and developing affordable housing infrastructure in California, including to existing HCD assisted affordable housing projects. Over \$18 million will support short- and medium-term financial assistance for members of the QP, providing payments on behalf of eligible households directly to the owners and operators of affordable housing. Additionally, up to \$7 million will support case management and housing support services to assist tenants of affordable housing successfully access and maintain housing.

Finally, \$17,650,459 will go toward Administration and Planning costs for the program. Of these funds, \$14,950,459 will be retained by HCD for the costs of operating the HOME-ARP Program, and \$2,700,000 will be made available to subrecipients of Supportive Services funding to assist with administration and planning costs through program development.

Affordable rental housing funds will be made available via a competitive Notice of Funding Availability (NOFA), while supportive services funds and affordable rental housing for the re-entry population will be allocated through an over-the-counter NOFA on a first come, first served basis.

## **Consultation**

### ***Describe the consultation process including methods used and dates of consultation:***

HCD held a series of one-on-one consultations with organizations across the state including CoCs, homeless service providers, domestic violence service providers, veterans' services groups, public housing authorities, nonprofit agencies that address the needs of the qualifying populations, and public/private organizations that address fair housing, civil rights, and the needs of persons with disabilities. These one-on-one consultations, listed in the table below, were held as virtual meetings between HCD's HOME-ARP staff and representatives of the listed organizations. These consultations were held between October 2021 and September 2022, in advance of developing the Plan. During the meetings, HCD's HOME-ARP staff presented a short overview of the HOME-ARP Program listened to feedback on how HOME-ARP funding might best address the needs of individuals in the qualifying populations served by the organization.

**List the organizations consulted and summarize feedback received from these entities:**

**Table 1: List of Organizations Consulted**

<b>Date</b>	<b>Agency/Org Consulted</b>	<b>Type of Agency/Org</b>	<b>Required Per Section V.A of the Notice</b>	<b>Method of Consultation</b>	<b>Qualified Population Served by Agency/Org</b>	<b>Feedback</b>
10/25/2021	Regional Housing Authority-Sutter, Yuba, Colusa, Nevada Counties	Public Housing Authority	Yes	Remote Meeting	All	There are major gaps in supportive services for permanent supportive housing. More permanent supportive housing with operational cost support is needed.
10/29/2021	Pure 1	Homeless Services Provider	Yes	Remote Meeting	All	Affordable housing and supportive services should be the focus of the HOME-ARP Program.
12/27/2021	California Department of Social Services	Public Agency	Yes	Remote Meeting	All	Coordination between state departments will be important to the success of the HOME-ARP Program.
1/14/2022	Corporation for Supportive Housing	Private Organization Supportive Housing Advocate	No	Remote Meeting	All	Permanent supportive housing should be the HOME-ARP Program priority.
1/21/2022	Board of State and Community Corrections	Public Agency	Yes	Remote Meeting	Homeless; At-risk of homelessness; Other populations	HOME-ARP funds should allocate funding to supportive services for youth who are exiting institutional settings.

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2/3/2022	Share Our Strength	Homeless Services Provider	Yes	Remote Meeting	All	Food insecurity is a real problem for communities in California. The HOME-ARP Program has a unique opportunity to address it.
2/23/2022	Los Angeles Habitat for Humanity	Homeless Services Provider	Yes	Remote Meeting	Homeless; At-risk of homelessness; Other populations	There is need for more supportive services and affordable housing for families.
3/2/2022	Sage Housing Group	Affordable Housing Developer	No	Remote Meeting	All	Mental health supportive services are essential in rural communities.
3/7/2022	Kern County-Community Development Division	Public Agency	Yes	Remote Meeting	All	Resources to create more affordable housing and deliver supportive services are needed.
3/7/2022	Bakersfield-Kern Regional Homeless Collaborative	Continuum of Care	Yes	Remote Meeting	All	Affordable housing and supportive services funding is an excellent way to use HOME-ARP funding.
3/8/2022	All Mission Indian Housing Authority	Indian Housing Authority	Yes	Remote Meeting	All	There is a need for more funding for tribal youth experiencing homelessness via supportive housing and non-congregate shelters.
3/8/2022	Hoop Valley Housing Authority	Indian Housing Authority	Yes	Remote Meeting	All	HOME-ARP funding should have a tribal target so that tribes will have access to the funds for housing and services.



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3/8/2022	Northern Circle Indian Housing Authority	Indian Housing Authority	Yes	Remote Meeting	All	There is a need for more supportive housing opportunities. A tribal target is a must so that tribes have access to the funding.
3/15/2022	Los Angeles County Development Authority	Homeless Services Provider	Yes	Remote Meeting	All	Affordable housing is a real need in the Los Angeles area.
3/24/2022	San Pasqual Band of Mission Indians	Tribal Entity	No	Remote Meeting	All	The Program should focus on Tribal Rental Housing. Money should be set-side for Tribal Governments.
3/28/2022	Tuolumne Band of Me-Wuk Indians	Tribal Entity	No	Remote Meeting	All	Permanent housing on tribal land is the most pressing need. Non-congregate shelters and nonprofit capacity building would also be helpful to tribes.
3/30/2022	California Department of Corrections and Rehabilitation	Public Agency	Yes	Remote Meeting	Homeless; At-risk of homelessness; Other populations	There is a high need to fund affordable housing and supportive services for individuals exiting institutions.

Date	Agency/Org Consulted	Type of Agency/Org	Required Per Section V.A of the Notice	Method of Consultation	Qualified Population Served by Agency/Org	Feedback
3/30/2022	California Partnership to End Domestic Violence	Domestic Violence Service Provider	Yes	Remote Meeting	Fleeing/Attempting to Flee Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking	Supportive housing for those individuals and families experiencing domestic violence is the most pressing need, followed by supportive services (childcare), non-congregate shelters, and nonprofit capacity building.
3/30/2022	Community Overcoming Relationship Abuse	Domestic Violence Service Provider	Yes	Remote Meeting	Fleeing/Attempting to Flee Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking	Supportive housing for individuals and families experiencing domestic violence is the most pressing need, followed by supportive services (childcare), non-congregate shelters, and nonprofit capacity building.
3/30/2022	Human Options	Domestic Violence Service Provider	Yes	Remote Meeting	Fleeing/Attempting to Flee Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking	Supportive housing for individuals and families experiencing domestic violence is the most pressing need, followed by supportive services (childcare), non-congregate shelters, and nonprofit capacity building.

Date	Agency/Org Consulted	Type of Agency/Org	Required Per Section V.A of the Notice	Method of Consultation	Qualified Population Served by Agency/Org	Feedback
3/30/2022	Healthy Alternatives to Violent Environments	Domestic Violence Service Provider	Yes	Remote Meeting	Fleeing/Attempting to Flee Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking	Supportive housing for individuals and families experiencing domestic violence is the most pressing need, followed by supportive services (childcare), non-congregate shelters, and nonprofit capacity building.
3/30/2022	Rainbow Services	Domestic Violence Service Provider	Yes	Remote Meeting	Fleeing/Attempting to Flee Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking	Supportive housing for individuals and families experiencing domestic violence is the most pressing need, followed by supportive services (childcare), non-congregate shelters, and nonprofit capacity building.
4/4/2022	Successful Reentry LLC	Homeless Services Provider	Yes	Remote Meeting	Homeless; At-risk of homelessness; Other populations	Long-term offenders are often left out of the homeless system. This program has a unique opportunity to assist the re-entry population.
4/19/2022	RTHawk Housing Alliance	Affordable Housing Consultant	No	Remote Meeting	All	The HOME-ARP Program can be a resource to provide much needed housing to tribal lands. It would be helpful for HCD to consider ways that allow tribal applications to be competitive. Technical assistance will be needed.

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4/22/2022	Life After Next	Homeless Services Provider	Yes	Remote Meeting	Homeless; At-risk of homelessness; Other populations	Funding for supportive services and non-congregate shelters should be HOME-ARP's priority.
5/2/2022	Path Ventures	Homeless Services Provider	Yes	Remote Meeting	All	Permanent supportive housing should be the HOME-ARP Program Priority.
5/11/2022	Amity Foundation	Homeless Services Provider	Yes	Remote Meeting	All	Acquisition and the rehabilitation of affordable housing is a pressing need. Any pre-development assistance HOME-ARP can provide will be very helpful.
5/18/2022	Council on Criminal Justice and Behavioral Health	Public Agency	Yes	Remote Meeting	All	Coordinating housing programs across the Department with the goal of expanding re-entry housing and supportive services should be HCD's priority. The re-entry population is particularly vulnerable immediately leaving prison, as well as when they leave transitional housing.

Date	Agency/Org Consulted	Type of Agency/Org	Required Per Section V.A of the Notice	Method of Consultation	Qualified Population Served by Agency/Org	Feedback
5/18/2022	Public Law Center	Private Organization addressing Fair Housing, Civil Rights and Needs of Persons with Disabilities	Yes	Remote Meeting	All	The HOME-ARP Program needs to make sure it has coordination between Continuums of Care and other referral methods.
5/18/2022	Disability Rights California	Private Organization addressing Fair Housing, Civil Rights and Needs of Persons with Disabilities	Yes	Remote Meeting	All	The HOME-ARP Program needs to make sure it has coordination between Continuums of Care and other referral methods.
5/18/2022	ElderCenter	Private Organization addressing Fair Housing and Civil Rights	Yes	Remote Meeting	All	Many resources are needed for seniors, including accessible affordable housing and supportive services.
5/20/2022	California Rural Legal Assistance, Inc.	Private Organization addressing Fair Housing, Civil Rights and Needs of Persons with Disabilities	Yes	Remote Meeting	All	HOME-ARP should focus on supportive services for the non-English speaking community.

Date	Agency/Org Consulted	Type of Agency/Org	Required Per Section V.A of the Notice	Method of Consultation	Qualified Population Served by Agency/Org	Feedback
5/24/2022	Housing California	Private Org/ Supportive Housing Advocate	Yes	Remote Meeting	All	Affordable housing for the re-entry community should be a program priority. Financial assistance for the re-entry population should always be a priority. The re-entry population is particularly vulnerable immediately leaving prison, as well as when they leave transitional housing.
6/1/2022	Housing Opportunities Mean Everything Cohort	Domestic Violence Service Provider	Yes	Remote Meeting	Yes	Housing Opportunities Mean Everything (HOME) Cohort makes the following recommendations for HOME-ARP funding priorities: housing- financial assistance costs, landlord/tenant liaisons, housing search and counseling services, support for families- childcare, transportation, food, and supportive services- case management, mental health services, legal services, credit repair.
6/13/2022	Community Housing Development Corporation	Homeless Services Provider	Yes	Remote Meeting	Yes	Pre-development funding for affordable housing should be a priority. Operating expenses and supportive services are much needed as well.

<b>Date</b>	<b>Agency/Org Consulted</b>	<b>Type of Agency/Org</b>	<b>Required Per Section V.A of the Notice</b>	<b>Method of Consultation</b>	<b>Qualified Population Served by Agency/Org</b>	<b>Feedback</b>
6/24/2022	Re-Entry Providers Association of California	Homeless Services Provider	Yes	Remote Meeting	Homeless; At-risk of homelessness; Other populations	Permanent supportive housing for the re-entry community should be a program priority.
6/24/2022	Brilliant Corners	Homeless Services Provider	Yes	Remote Meeting	All	Permanent supportive housing for the re-entry community should be a program priority.
6/24/2022	Californians for Safety and Justice	Homeless Services Provider	Yes	Remote Meeting	All	Their clients need access to affordable housing that is reserved for the re-entry community. Due to leasing criteria implemented by many landlords, individuals are often "screened out" because of a history of incarceration. The type and location of housing depends on each individual's specific needs.
7/29/2022	California Interagency Council on Homelessness	Public Agency	Yes	Remote Meeting	All	Resources are needed for affordable housing and supportive services. Coordination between the HOME-ARP Program is going to be important to the success of the program.

<b>Date</b>	<b>Agency/Org Consulted</b>	<b>Type of Agency/Org</b>	<b>Required Per Section V.A of the Notice</b>	<b>Method of Consultation</b>	<b>Qualified Population Served by Agency/Org</b>	<b>Feedback</b>
8/9/2022	Homeless Resource Council of the Sierras	Continuum of Care	Yes	Remote Meeting	All	There are gaps everywhere. There are more gaps in the homeless area as mental illness is a large part of the homeless population.
8/9/2022	Thurmond Consulting	Homeless Services Provider	Yes	Remote Meeting	All	California needs an increase in net new affordable housing units. The program should focus on smaller projects with supportive services.
8/10/2022	Only Kindness	Continuum of Care	Yes	Remote Meeting	All	Many times, HUD Fair Market Rents are too low to make a significant impact in communities. Affordable housing for seniors should also be a priority.
8/10/2022	Housing Authority of the County of Santa Barbara	Public Housing Authority	Yes	Remote Meeting	All	New affordable housing units with operating assistance is the key to successful projects.
8/15/2022	San Diego County	Continuum of Care	Yes	Remote Meeting	All	More resources should be focused on the victims of domestic violence.



Date	Agency/Org Consulted	Type of Agency/Org	Required Per Section V.A of the Notice	Method of Consultation	Qualified Population Served by Agency/Org	Feedback
8/15/2022	Santa Barbara County	Continuum of Care	Yes	Remote Meeting	All	The TBRA model in Santa Barbara is working due to additional funding to engage landlords. Expanding TBRA should be a priority. Supportive services are also very important.
8/29/2022	Swords to Plowshares	Veterans' Group	Yes	Remote Meeting	Homeless; At-risk of homelessness; Other populations	Supportive services and rehabilitation funds should be the program priority, especially for severely disabled veterans. Nonprofit operating expenses and capacity building would be helpful as well.
8/31/2022	US VETS	Veterans' Group	Yes	Remote Meeting	Homeless; At-risk of homelessness; Other populations	More supportive services in projects are needed, especially with the chronically homeless. Disabled veterans sometimes do not qualify for affordable housing based on income. Rental housing, supportive services, and nonprofit capacity building would all assist and serve veterans better.

To supplement information received in the one-on-one consultations, HCD also held three virtual focus groups on March 15, 16, and 17, 2022. These focus groups, which were open to all, gave organizations and community members across the state the opportunity to provide feedback on needs among the QPs in their communities, and how the HOME-ARP Program might best address these needs. HCD recruited participants for the focus groups using announcements emailed to the Federal Programs listserv. Focus Group A’s target audience was Continuums of Care, homeless service providers and victim service providers. Focus Group B’s target audience was public housing authorities, fair housing advocates, civil rights organizations, disability rights organizations, and organizations serving the needs of people experiencing homelessness. Focus Group C’s target audience was multifamily housing developers, non-congregate shelter developers, and public housing authorities. The focus groups’ questions were developed to identify unmet needs and gaps in housing and service delivery systems, to prioritize activities for HCD’s HOME-ARP Program among the HOME-ARP eligible activities, and to solicit suggestions for HOME-ARP Program design and implementation.

**Focus Group A (March 15, 2022) Participants:**

<b>Organization Name</b>	<b>Organization Type</b>
City of Soledad	Local Jurisdiction
Lake County	County Jurisdiction
Making Hope Happen Foundation	Nonprofit Organization
Covered California	State Agency
San Diego Housing Commission	Public Housing Authority
Tahoe Coalition for the Homeless	Homeless Service Provider
Calaveras County	County Jurisdiction
Adjoin	Veterans/IDD Service Provider
Operation Dignity, Inc.	Veterans Service Provider
Father Joe’s Villages (St. Vincent de Paul Village, Inc.)	Homeless Service Provider
California Department of Corrections and Rehabilitation	State Agency
Sacramento Housing and Redevelopment Agency	Public Housing Authority
Tahoe Youth and Family Services	Nonprofit Organization
Family Services of Tulare County	Domestic Violence Service Provider
St. Mary’s Center (Oakland)	Homeless Service Provider
Del Norte County	County Jurisdiction
Tony Gardner Consulting	Consultant
Dry Creek Rancheria Band of Pomo Indians	Tribal Community/Tribal Nation
Placer County	County Jurisdiction
West Oakland Neighbors	Neighborhood Association
Equity Community Builders	For-profit Developer
Human Options	Domestic Violence Service Provider

First Step Communities	Homeless Service Provider
WestCare Foundation	Behavioral Health Service Provider
Merced County	County Jurisdiction
United Way of Orange County	Nonprofit Organization
California Partnership to End Domestic Violence	Domestic Violence Service Provider Network
Orange County Continuum of Care	Continuum of Care

**Focus Group B (March 16, 2022) Participants:**

<b>Organization Name</b>	<b>Organization Type</b>
Livermore Housing Authority	Public Housing Authority
San Diego Housing Commission	Public Housing Authority
Universal Café	Homeless Service Provider
Council on Criminal Justice and Behavioral Health	State Agency
City of Burbank, CA	City Jurisdiction
Disability Rights CA	Nonprofit Organization
Hallmark Building and Design	For-profit Developer
City of Covina, CA	City Jurisdiction
New Directions for Veterans	Veterans Service Provider
Lake County	County Jurisdiction
Hagerty Consulting	Consultant
Neighborhood Housing Services of Southern Nevada	Homeless/Housing Services Provider
California State Council on Developmental Disabilities	State Agency
Law Foundation of Silicon Valley	Legal Services Provider
Los Angeles Clergy Development Council	Nonprofit Organization
San Diego Community College District	Local Jurisdiction
National Coalition for Homeless Veterans	Nonprofit Organization
Orange County Health Care Agency	County Jurisdiction

**Focus Group C (March 17, 2022) Participants:**

<b>Organization Name</b>	<b>Organization Type</b>
Orange County Housing Finance Trust	Local Jurisdiction
PATH (People Assisting the Homeless) Ventures	Affordable Housing Developer
Heyward Consulting	Consultant
Mary Erickson Community Housing	Affordable Housing Developer
City of Santa Clarita, CA	City Jurisdiction
Christian Church Homes	Affordable Housing Developer/Manager
City of Porterville, CA	City Jurisdiction

WestCare	Homeless/Behavioral Health Service Provider
Black Men Speak, Inc.	Nonprofit Organization
National Equity Fund	Affordable Housing Investor
California Department of Corrections and Rehabilitation	State Agency
Monterey County	County Jurisdiction
San Diego Housing Commission	Public Housing Authority
Orum Capital	For-profit Developer
Dry Creek Rancheria Band of Pomo Indians	Tribal Community/Tribal Nation
California Human Development	Nonprofit Organization
Kevin Ma	Community Member (Palo Alto, CA)
Hagerty Consulting	Consultant
NeighborWorks, Sacramento Region	Nonprofit Organization
Marjaree Mason Center	Domestic Violence Service Provider
Integrity Housing	Affordable Housing Developer/Manager
Santa Cruz County	County Jurisdiction
City of Moorpark, CA	City Jurisdiction
Housing Authority of the City of Alameda	Public Housing Authority
Brilliant Corners	Affordable Housing Developer/Manager Homeless Service Provider
Linc Housing	Affordable Housing Developer/Manager Homeless Service Provider

**Table 2: List of Focus Group Participants**

***Summarize feedback received and results of upfront consultation with these entities:***

In our consultations and focus groups, we asked participants to identify and discuss the biggest gaps in their communities' current shelter and housing inventory, and in their service delivery systems. We also asked them what people who are experiencing homelessness or at risk of homelessness say they need most, based on their direct relationships with these individuals through their work. The participants' feedback can be categorized in the following areas:

**Affordable Rental Housing:** While there is a lack of affordable and available housing in California for households of all income levels, the problem is especially acute among individuals with extremely low incomes and lived experience of homelessness or housing instability. Many of these individuals lack the capacity to earn enough income to obtain permanent housing due to disabilities or other chronic health conditions. Annual Supplemental Security Income (SSI) payments, which are set by the federal government and supplemented by the state, are below 30 percent of Area Median Income (AMI) in all areas of the state. Most individuals with disabilities who are experiencing chronic homelessness need permanent housing subsidies and ongoing supportive services to remain stably housed.

There also is a gap in affordable housing that is accessible to individuals with physical disabilities. Consultation and focus group participants reported that sometimes housing voucher holders felt pressured to accept housing that did not meet their accessibility needs because they were worried about losing their voucher due to limitations on the time available to find housing.

HCD and other state agencies provide significant funding to develop affordable housing across the state. However, consultation and focus group participants reported that it is difficult to build or rehabilitate units that are restricted to households earning below 30 percent of AMI due to the high cost of development in California. To secure financing from unsubsidized sources, affordable housing developers must demonstrate that the rental income from the property can cover its operating expenses and debt service costs. Participants reported that without guaranteed rental vouchers (e.g., from project-based rental assistance) or significant operating subsidies from HCD, potential housing developments restricted to extremely low-income households are not financially feasible in California.

**Shelter and Transitional Housing:** Participants in one-on-one consultations and focus groups reported that emergency shelters often fill the gap created by limited availability of beds in skilled nursing facilities, assisted living facilities for individuals with intellectual and developmental disabilities, and affordable housing for people with physical disabilities. Participants described that individuals in shelters and transitional housing need flexible program arrangements that are able to meet individualized needs; for example, some individuals with substance use disorders need low-barrier shelters, while others who are trying to maintain sobriety prefer alcohol- and drug-free shelters. Individuals with complex health challenges (such as physical and mental health conditions, or substance use disorders) need services provided on-site because it is challenging for them to coordinate meetings and appointments in many different locations.

Consultation and focus group participants identified housing and service gaps of particular concern for two groups among the qualifying populations: individuals exiting from correctional facilities (the “re-entry population”) and tribal communities.

Individuals in the re-entry population face numerous barriers to housing, including a lack of income, disruptions to individual relationships and community connections, and discrimination in housing and employment. Often, these individuals do not qualify for transitional or permanent housing programs that require participants to be “literally homeless” under the McKinney-Vento definition. A person exiting a correctional facility would need to have been homeless within the 90 days prior to entering the institution to be included under this definition. Participants reported that a lack of housing programs and supportive services for the re-entry population contributes to homelessness and recidivism among these persons.

There also is a need for culturally competent supportive services for members of tribal communities. These services include housing navigation, mental and behavioral health and substance use disorder services, domestic violence prevention and survivor services, and other services associated with preventing homelessness and supporting housing stability. Not only is there a lack of service providers overall in rural areas where many tribal communities are located, the service providers who are present frequently lack culturally and linguistically competent staff. This can create barriers to Native and Indigenous persons receiving the care they need.

**Service Delivery System:** Many consultation and focus group participants reported that the people they serve need access to services at the locations where they are residing. For example, shelter guests need health services and housing navigation services located at the shelter, and supportive housing residents need ongoing services located at their housing project. Persons who are experiencing homelessness or housing insecurity may have difficulty traveling to and from appointments with case managers, particularly if they do not have a vehicle and are in an area that is not served by public transit. It also is difficult for these individuals to manage a full schedule of meetings and appointments in different locations as they transition back to housing, employment or training, and health care services.

Individuals receiving social services also would like to continue working with the same case managers and social workers, if possible, since it is particularly difficult for individuals with recent experiences of trauma to build and maintain trusting personal relationships with care providers. One model that focus group participants suggested was to have project-based housing navigators who do outreach in shelters, connect with clients, and continue to work with them once they are housed in the project and continuing for a short while after they exit the housing project.

## Public Participation

*Describe the public participation process, including information about and the dates of the public comment period and public hearing(s) held during the development of the plan:*

- ***Date(s) of public notice:*** January 30, 2022
- ***Public comment period:*** February 7, 2023 – February 23, 2023
- ***Date(s) of public hearing:*** February 15, 2023

*Describe the public participation process:*

In accordance with Section V of the HOME-ARP Notice and HCD's current citizen participation plan (available at <https://www.hcd.ca.gov/policy-research/plans-reports/docs/Amended-Citizen-Participation-Requirements-for-the-States-Annually-Appropriated-Federal-Programs-Plans-and-Reports-ADA.pdf>), HCD gave reasonable notice and multiple opportunities to comment on the Plan during the public comment period. HCD published a notice of opportunity for public comment on the Plan – in English and Spanish – in a newspaper of general circulation on February 1, 2023. The notice included a description of the purpose and contents of the Plan, the dates of the

public comment period, a web URL where the Plan is available, and contact information for submitting questions and comments via email and snail mail. The notice also included the date of the public hearing and instructions on how to attend, and the contact email for requests for accommodation, translation services and other supportive services to allow non-English speaking persons and persons with sensory and mobility disabling conditions to access the contents of the Plan and the virtual public hearing ([HOMEARP@hcd.ca.gov](mailto:HOMEARP@hcd.ca.gov)).

To solicit additional public comment on the Plan, HCD posted the Plan on its website and issued a notice of opportunity for public comment on the Plan via its Multifamily and Federal Programs listservs. Additionally, all 109 federally recognized tribes were contacted and made aware of the notice of opportunity for public comment on the Plan.

The public comment period was held from February 7, 2023, to February 23, 2023. A public hearing reviewing the Plan was held on February 15, 2023, via webinar. HCD addressed questions and comments received during the webinar as they were asked. These questions, and HCD's responses, are included in the public comment summary table and in the Public Comment appendix to the Plan.

HCD also distributed a survey to HOME-ARP stakeholders via the Multifamily and Federal Programs listservs. The survey was designed to gather information from a broad statewide population, providing a fast and simple way for respondents to provide feedback on unmet needs and gaps in their community's homelessness response and affordable housing placement system for members of the qualifying populations. The 530 survey respondents represented members of the community beyond HCD's traditional stakeholders. A plurality of survey respondents identified as members of the public, and a significant share of survey respondents (14 percent) identified as people experiencing homelessness or with lived experience of homelessness or severe housing insecurity.

***Describe efforts to broaden public participation:***

Throughout the Plan's public participation process, HCD followed the requirements and procedures for effective communication, accessibility, and reasonable accommodation for persons with disabilities and providing meaningful access to participation by Limited English Proficiency (LEP) residents that are in its current citizen participation plan. The details of these accommodations will depend on the nature of the requests received. HCD did not receive any requests for accommodation, translation services, and other supportive services to allow non-English speaking persons and persons with sensory and mobility disabling conditions to access the contents of the Plan and the virtual public hearing.

***Summarize the comments and recommendations received through the public participation process either in writing, or orally at a public hearing:***

Please refer to Table 3 for a summary of the comments and recommendations received through the public participation process, both in writing and orally at the public hearing. The complete text of comments and responses is included in the Public Comment appendix to the Plan.

***Summarize any comments or recommendations not accepted and state the reasons why:***

Please refer to Table 3 for a summary of the comments and recommendations not accepted, and the reasons why they were not accepted. The complete text of comments and responses is included in the Public Comment appendix to the Plan.



<b>Commenter</b>	<b>Jurisdiction/ Organization</b>	<b>Comment Type</b>	<b>Comment Summary</b>	<b>Accept/ Reject</b>	<b>Why Rejected</b>
Brenda Grealish	Executive Officer, CA Council on Criminal Justice and Behavioral Health (CCJBH)	Letter: HOME-ARP Activities	CCJBH commends HCD for proposing to allocate \$16 million of the HOME-ARP funds for a Re-entry Housing Pilot Project(s), as well as the reserve cost overrun funding, and is in full support for the partnership between HCD and CDCR to work collaboratively to develop and establish linkages to affordable rental units for the individuals transitioning from prison to their communities.	Accept	
Lucia Choi, Esq.	Senior Attorney - Civil Rights Practice Group, Disability Rights California	Letter: HOME-ARP Activities and Regional Set-Asides	Disability Rights California suggests HCD commit to providing funding for rental housing rehabilitation, data collection, activities in areas disproportionately impacted by COVID-19, and in trauma-informed services.	Reject	HCD is committed to funding a broad range of affordable rental housing development and supportive services projects to serve the needs of members of all four of the qualifying populations as required by HUD.

<b>Commenter</b>	<b>Jurisdiction/ Organization</b>	<b>Comment Type</b>	<b>Comment Summary</b>	<b>Accept/ Reject</b>	<b>Why Rejected</b>
Jessica Hoff-Berzac	President, UPholdings California, LLC	Letter: HOME-ARP Activities and Regional Set-Asides	UPholdings suggests including regional set-asides for the development of affordable housing.	Accept	
Patricia Hanzo	N/A	Email: HOME-ARP Activities and Qualifying Populations	The State of California HOME-ARP Program should make benefits available to a wide variety of communities (e.g., students, seniors, and public sector employees) and should include a wide variety of activities (e.g., health care and child care subsidies, tuition payments).	Reject	As a condition of receiving HOME-ARP funds, HCD must comply with HUD's HOME-ARP Program requirements.  Some of the populations and activities identified in the comment are eligible based on HUD requirements, and others are not.
Michael Pisano	N/A	Email: HOME-ARP Activities	Can HOME-ARP activities serve students living in their cars?  Can HOME-ARP funding assist with mobilehome space rent?	Accept	

<b>Commenter</b>	<b>Jurisdiction/ Organization</b>	<b>Comment Type</b>	<b>Comment Summary</b>	<b>Accept/ Reject</b>	<b>Why Rejected</b>
Robert McConnell	N/A	Email: HOME-ARP Activities	HCD's planned HOME-ARP activities do not include local land use decisions, street clearing activities, safe parking sites, or tiny home villages. The provision of housing will not be contingent on participation in mental health, addiction, and job training programs.	Reject	As a condition of receiving HOME-ARP funds, HCD must comply with HUD's HOME-ARP Program requirements.
Kimberley Harvey	N/A	Email: Eligibility for HOME-ARP projects	Will seniors at risk of homelessness be eligible for HOME-ARP benefits?  Will prioritization in a local CES be a requirement for participation in HOME-ARP projects?	Accept	
Anonymous	N/A	Public Hearing: HOME-ARP Activities	Will HCD be providing more funding to cover those gaps that were identified?	Accept	
Kim Coontz	CA Center for Cooperative Development	Public Hearing: Eligibility for HOME-ARP projects	Do low-income people with severe housing cost burden (also at-risk of homelessness) include people in a mobilehome park whose parks have been purchased by investors qualify?	Accept	

<b>Commenter</b>	<b>Jurisdiction/ Organization</b>	<b>Comment Type</b>	<b>Comment Summary</b>	<b>Accept/ Reject</b>	<b>Why Rejected</b>
Jennifer Savage	N/A	Public Hearing: HOME-ARP Activities	Rather than requiring affordable housing projects to piecemeal funding together, is there an opportunity to fund one full or whole project?	Accept	
Jennifer Savage	N/A	Public Hearing: HOME-ARP Activities	Any opportunity for technical assistance to help assess whether we will qualify?	Accept	

**Table 3: Summary of Public Comments Received, Accepted/Rejected, and Reasons Why Rejected**

## Needs Assessment and Gaps Analysis

*Describe the size and demographic composition of qualifying populations within the PJ's boundaries:*

### *Homeless as defined in 24 CFR 91.5*

The Point-in-Time (PIT) Count provides estimates of the number of sheltered and unsheltered people meeting the definition of homelessness as defined in 24 CFR 91.5 on a single night in January. Each Continuum of Care in California submitted to HUD the required data for counts conducted in January 2020 of sheltered and unsheltered homelessness. This report uses data from the 2020 PIT Count in accordance with HUD guidance issued in October 2021 directing all HOME-ARP participating jurisdictions to use the 2020 Point in Time Count as the most current data available as of the drafting of this Plan. Moreover, California CoCs faced extraordinary pandemic-related challenges in conducting the PIT Count in 2021. According to the U.S. Interagency Council on Homelessness (USICH), 40 percent of communities – including almost every CoC in California – did not conduct a full unsheltered count of people living in tents, cars, or streets. Of the 20 CoCs with the highest unsheltered counts in 2020, only one completed an unsheltered count in 2021. As a result, USICH's report does not draw conclusions on how the population experiencing homelessness changed between 2020 and 2021.<sup>i</sup>

Table 4 summarizes the demographic information collected in these surveys for all CoCs in California. Table 5 summarizes the demographic information for persons located in HOME non-entitlement areas in California by weighting each CoC's PIT Count estimates by the share of persons residing in the non-entitlement areas of the CoC. Since most CoCs do not report the geographic location within the CoC of PIT Count survey respondents, this approach is the best means of estimating the population experiencing homelessness in non-entitlement areas.

As of the drafting of this Plan, PIT Count data for 2022 was not yet available in a machine-readable format facilitating the non-entitlement statistical analysis. Analytic (Excel) versions of these files were released by HUD in February 2023.

**Table 4: Demographic Summary of Population Experiencing Homelessness, PIT Count 2020 - Statewide**

	Sheltered		Unsheltered		Total	
	# of People	Percent of Sheltered	# of People	Percent of Unsheltered	# of People	Percent of Total

**Race:**

White	26,133	55%	61,306	54%	87,439	54%
Black or African American	16,492	34%	33,118	29%	49,610	31%
Asian	948	2%	2,292	2%	3,240	2%
American Indian or Alaska Native	1,417	3%	4,969	4%	6,386	4%
Native Hawaiian or Other Pacific Islander	520	1%	1,264	1%	1,784	1%
Multiple Races	2,378	5%	10,711	9%	13,089	8%
<b>Total</b>	<b>47,888</b>		<b>113,660</b>		<b>161,548</b>	

**Ethnicity:**

Hispanic or Latino/a/x	16,216	34%	35,750	31%	51,966	32%
Not Hispanic or Latino/a/x	31,672	66%	77,910	69%	109,582	68%

**Gender:**

Female	20,943	44%	32,562	29%	53,505	33%
Male	26,502	55%	79,235	70%	105,737	66%
Transgender	330	1%	1,271	1%	1,601	1%
Gender nonconforming	113	0%	592	1%	705	0%

**Table 5: Demographic Summary of Population Experiencing Homelessness, PIT Count 2020 - Non-Entitlement Areas**

Sheltered		Unsheltered		Total	
# of People	Percent of Sheltered	# of People	Percent of Unsheltered	# of People	Percent of Total

5,658	69%	14,492	69%	20,150	69%
1,412	17%	2,909	14%	4,321	15%
137	2%	286	1%	423	1%
438	5%	1,202	6%	1,640	6%
74	1%	244	1%	318	1%
446	5%	1,857	9%	2,303	8%
8,165		20,990		29,155	

2,734	33%	5,456	26%	8,190	28%
5,431	67%	15,534	74%	20,965	72%

3,650	45%	6,046	29%	9,697	33%
4,473	55%	14,796	70%	19,268	66%
33	0%	78	0%	111	0%
9	0%	70	0%	79	0%

Source: 2020 Point-in-Time Count. <https://www.hudexchange.info/programs/hdx/pit-hic/>.

Non-entitlement population share: American Community Survey 5-Year Estimates, 2015-2019. <https://data.census.gov/cedsci/>.

California CoCs identified the following demographic characteristics among the 161,548 people counted as meeting HUD’s definition of homeless during the 2020 PIT Count. The majority of people identified as White – 54 percent followed by Black or African American (31 percent), multiple races (8 percent), American Indian or Alaska Native (4 percent), Asian (2 percent) and Native Hawaiian or Other Pacific Islander (1 percent). Thirty-two percent of people experiencing homelessness identified as Hispanic or Latino/a/x. Sixty-six percent of people identified as male, 33 percent identified as female, and 1 percent identified as transgender or gender nonconforming.

Notably, Californians identifying as American Indian or Alaska Native, and Californians identifying as Black or African American, were five times more likely to experience homelessness than Californians identifying as White. Californians identifying as Native Hawaiian or Other Pacific Islander were three times more likely to experience homelessness than Californians identifying as White.

An estimated 29,153 people were experiencing homelessness in non-entitlement areas of the state during the 2020 PIT Count, 18 percent of the state’s total. People identifying as Black or African American were a smaller share (15 percent, versus 31 percent) and people identifying as American Indian or Alaska Native were a larger share (6 percent, versus 4 percent) of the PIT Count in non-entitlement areas than in the state as a whole.

The PIT Count provides a snapshot of the number of people experiencing homelessness on a single night. Each CoC also tracks the number of people experiencing homelessness who receive services within the CoC in its Homeless Management Information System (HMIS). California aggregates this data for all CoCs in the state to estimate the size and demographic composition of the population experiencing homelessness annually statewide. California’s statewide HMIS data are reported in the California Interagency Council on Homelessness’ (Cal ICH) Homeless Data Integration System (HDIS).

The demographic characteristics of the 255,188 persons experiencing homelessness who received services from California CoCs in 2020 are similar to the population enumerated in the 2020 PIT Count, with a few differences. A larger share of people in the statewide HMIS data identified as female – 41 percent – than in the PIT Count data (33 percent). Nine percent of people (17,575 people) in the statewide HMIS data identified as veterans, 42 percent (108,013 people) reported at least one disabling condition, and 18 percent (34,843 people) reported having experienced domestic violence.

Cal ICH released its first Statewide Homelessness Assessment – a comprehensive assessment of state-administered programs that served people experiencing or at risk of homelessness in fiscal years 2018 through 2020 – in February 2023. This report includes additional descriptive demographic analysis of the population served by California CoCs during the years included.<sup>ii</sup> Notably, among persons identifying as Hispanic, a larger share of the population was in households with adults and children (“family” households as defined by HUD) compared to other racial and ethnic groups. Among persons identifying as white non-Hispanic, a larger share of these people were older adult individuals (ages 50 and above).

**Table 6: Demographic Summary of People Experiencing Homelessness Served in California, HDIS 2020 - Statewide**

	# of People	Percent of People
<b>Total</b>	255,188	
<b>Race:</b>		
White	139,558	55%
Black or African American	73,875	29%
Asian	4,595	2%
American Indian or Alaska Native	6,924	3%
Native Hawaiian or Other Pacific Islander	3,126	1%
Multiple Races	10,677	4%
<b>Ethnicity:</b>		
Hispanic or Latino/a/x	87,947	34%
Not Hispanic or Latino/a/x	157,562	62%
<b>Gender:</b>		
Female	105,191	41%
Male	145,811	57%
Gender nonconforming	364	0.1%
<b>Veterans:</b>	17,575	9%
<b>Disabling condition reported:</b>	108,013	42%
<b>Domestic Violence survivors:</b>	34,843	18%

Source: Cal ICH Homeless Data Integration System 2020.

<https://bcsh.ca.gov/calich/hdis.html>.



### *At Risk of Homelessness as defined in 24 CFR 91.5*

The population at risk of homelessness as defined in 24 CFR 91.5 includes individuals and families who have an annual income below 30 percent of area median family income, do not have sufficient resources or support networks to prevent homelessness, and who meet at least one of a number of additional criteria. These additional criteria include severe overcrowding and living in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in California's Consolidated Plan. The Consolidated Plan identified the following housing characteristics as linked to housing instability and an increased risk of homelessness<sup>iii</sup>:

- Rental housing cost burden, where housing costs exceed 30 percent of a household's total income, and severe housing cost burden, where costs exceed 50 percent of income.
- Housing located in neighborhoods undergoing gentrification or in areas affected by natural disasters.
- Physically substandard or unsafe housing.

As stated in the Consolidated Plan, the State of California does not provide a numerical estimate of the at-risk population, due to the lack of data available on the number of people who meet the conditions and lack resources or support networks to prevent homelessness. Our consultation, focus group and outreach participants also were not able to provide numerical estimates of the population at risk of homelessness in their jurisdictions or statewide. However, data is available on the size and demographic composition of the population living in rental housing whose household income is less than or equal to 30 percent of the household area median family income and who have one or more severe housing problems (severe overcrowding, severe housing cost burden, or lacking complete kitchen or plumbing). These households meet the state's criteria for living in housing that has characteristics associated with an increased risk of homelessness.

<b>Table 7: Demographic Summary of Renter Households Earning 0-30% HAMFI with 1 or more Severe Housing Problems, 2014-2018</b>			
	# of Households	Percent of At-Risk Households	Percent of Households Statewide
<b>Total</b>	976,940		
<b>Race:</b>			
White alone, non-Hispanic	293,170	30%	38%
Black or African-American alone, non-Hispanic	120,450	12%	6%
Asian alone, non-Hispanic	111,110	11%	14%
American Indian or Alaska Native alone, non-Hispanic	4,890	1%	0.4%
Pacific Islander alone, non-Hispanic	2,775	0.3%	0.4%
Hispanic, any race	416,690	43%	39%
Some other race/Race unreported	27,855	3%	2%

**Source: HUD Consolidated Planning/CHAS Data, 2014-2018. American Community Survey 5-Year Estimates, 2014-2018.**

Statewide, there are nearly one million renter households with incomes below 30 percent of the area median with one or more severe housing problems. Households identifying as Black or African American are disproportionately represented among these households relative to their share of the overall population of California, and relative to the percent of Black/African American households living in poverty in the state. Statewide, 12 percent of households with incomes below 30 percent of AMI and with one or more severe housing problems are identified as Black/African American, compared to 6 percent of the population of California overall and 9 percent of California's population in poverty.

***Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking, as defined by HUD in the Notice***

The CoC PIT Count surveys ask respondents about their experience with domestic violence (using this term to include domestic violence, dating violence, sexual assault, stalking and human trafficking). In 2020, 6.8 percent of persons experiencing homelessness and included in California CoC's PIT Counts (10,913 persons) reported experiencing domestic violence. Of these persons, just over 2,000 (2,079 persons) were located in non-entitlement areas of the state - 7.1 percent of those experiencing homelessness in non-entitlement areas.

The HOME-ARP QPs also include persons who are at risk of homelessness because they are trying to escape domestic violence. According to data collected by the California Department of Justice from local law enforcement agencies, there were 160,646 domestic violence-related calls for assistance to law enforcement agencies in California in 2020.<sup>iv</sup> Not all people who are fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking or human trafficking contact law enforcement, however. The National Crime Victimization Survey (NCVS) interviews people nationwide annually on their experience of crime. In this survey, there were approximately 450,000 people who experienced domestic violence nationwide and 850,000 domestic violence incidents nationwide in 2020, 41 percent of which were reported to police.<sup>v</sup> Applying these ratios to California’s incident report data, there were approximately 200,000 people who experienced domestic violence in California in 2020.

Data on the demographic characteristics of individuals currently fleeing or attempting to flee domestic violence in a year are limited due to the intermittent nature of data collection in this area. Most data collected from persons currently fleeing domestic violence is not shared with researchers and reporting programs due to confidentiality restrictions. However, there is data available on the demographic characteristics of persons with any lifetime experience of domestic violence. The Centers for Disease Control and Prevention’s National Intimate Partner and Sexual Violence Survey reports data on the national and state level on intimate partner violence, sexual violence and stalking. The most recent state-level data, from the 2010-2012 survey, was released in 2017.<sup>vi</sup> Statistically reliable results for California were available only for survivors identifying as women.

<b>Table 8: Lifetime Prevalence of Domestic Violence among persons identifying as Women</b>			
	Contact Sexual Violence	Rape (Attempted or Completed)	Non-contact Unwanted Sexual Experiences
<b>Total</b>	<b>35.0%</b>	<b>17.4%</b>	<b>34.4%</b>
<b>Race:</b>			
White alone, non-Hispanic	42.7%	21.2%	44.6%
Black or African-American alone, non-Hispanic	33.5%	--	32.1%
Asian alone, non-Hispanic	--	--	--
American Indian or Alaska Native alone, non-Hispanic	--	--	--
Pacific Islander alone, non-Hispanic	--	--	--
Hispanic, any race	24.7%	14.1%	21.2%

**Source: NISVS 2010-2012 Average Annual Estimates.**  
**“--” indicates estimate not reported due to insufficient data.**

Estimates for the lifetime incidence of domestic violence among Asian, American Indian, Alaska Native and Pacific Islander women were not available for California due to insufficient survey data. According to this survey, White women were most likely to report having experienced all types of domestic violence and unwanted sexual experiences. Over 40 percent of White women reported experiencing contact sexual violence, compared to a third (34 percent) of Black/African American women and a quarter (25 percent) of Hispanic/Latina women.

These data are reinforced by a more recent survey, conducted in 2017, by the Blue Shield of California Foundation.<sup>vii</sup> According to this survey, 34 percent of women and 11 percent of men reported ever experiencing domestic violence. Among the racial and ethnic populations for which information is available, 32 percent of Hispanic/Latina women and 42 percent of White women reported experiencing domestic violence.

***Other populations requiring services or housing assistance to prevent homelessness and other populations at greatest risk of housing instability, as defined by HUD in the Notice***

Other populations requiring services or housing assistance to prevent homelessness include a subset of the 255,188 people identified in California CoC's HMIS data in 2020 (Table 6). This subset includes people in rapid rehousing, permanent supportive housing and homeless prevention programs who may need additional housing assistance or supportive services to avoid a return to homelessness. Currently, HDIS does not report counts of people by service type, but this disaggregation may be available in the future.

Other populations at greatest risk of housing instability, as defined in the HOME-ARP Notice, include households who do not qualify under any of the prior criteria, but who have an annual income below 50 percent of area median family income and who meet at least one of a number of additional criteria. These additional criteria include severe overcrowding and living in housing that has characteristics associated with instability and an increased risk of homelessness, as identified above. Data is also available on the population living in rental housing whose household income is between 30 and 50 percent of the household area median family income and who have one or more severe housing problems.

<b>Table 9: Demographic Summary of Renter Households Earning 30-50% HAMFI with 1 or more Severe Housing Problems, 2014-2018</b>		
	# of Households	Percent of Households
<b>Total</b>	592,235	
<b>Race:</b>		
White alone, non-Hispanic	180,825	31%
Black or African-American alone, non-Hispanic	47,740	8%
Asian alone, non-Hispanic	57,035	10%
American Indian or Alaska Native alone, non-Hispanic	2,040	0.3%
Pacific Islander alone, non-Hispanic	2,080	0.4%
Hispanic, any race	287,535	49%
Race unreported	14,980	3%

*Source: HUD Consolidated Planning/CHAS Data, 2014-2018.*

Statewide, there are approximately an additional 600,000 renter households with incomes between 30 percent and 50 percent of the area median with one or more severe housing problems. Households identifying as Hispanic are a larger share of this population, and households identifying as Black or African American are a smaller share than of the population in households below 30 percent of area median income with one or more severe housing problems.

***Identify and consider the current resources available to assist qualifying populations, including congregate and non-congregate shelter units, supportive services, TBRA, and affordable and permanent supportive rental housing (Optional):***

Based on data reported in the 2020 Housing Inventory Count (HIC California has 38,241 emergency shelter beds, 264 safe haven beds, and 14,760 transitional housing beds, for a total of 53,265 year-round temporary beds. There were 65,872 beds of permanent supportive housing – 6,517 family units with beds for 20,342 people, and 45,515 adult-only beds; and 8,695 beds in other permanent housing – 2,684 beds in 849 family units, and 6,011 adult-only beds.

The state does not track the total number of people receiving supportive housing services and tenant-based rental assistance, due to the large number of jurisdictions administering various federal, state, and local funds for supportive services and rental assistance. There were 22,611 people receiving rapid rehousing support as of the date of the HIC, but it is likely that more rapid rehousing resources were available throughout the year. In fiscal year 2020-21, state-administered HUD CPD funding supported 2,708 households with tenant-based rental assistance in the state ESG, HOME and HOPWA programs.<sup>viii</sup> In our one-on-one consultations and focus groups, participants indicated that more beds and units are needed in all types of shelter and housing, and especially in affordable permanent supportive housing.

***Describe the unmet housing and service needs of qualifying populations:***

***Homeless as defined in 24 CFR 91.5***

The HIC is a count of emergency shelter, short-term, and permanent housing beds and units provided to persons experiencing homelessness, recorded on the same date as the Point-in-Time (PIT) Count. Tables 8 and 9 use this data to estimate the gap in available shelter and short-term housing available to people experiencing homelessness. The unmet shelter and housing need for these persons is calculated as the difference between the number of persons in each category (persons in family households with children and adult-only households) currently experiencing homelessness and the number of emergency shelter and transitional housing beds in the HIC. (Permanent housing is included in the current housing inventory but is excluded from the number of available beds and units because this housing typically is occupied on a long-term basis, meaning that the majority of these beds/units will not be made available for currently homeless persons.) Table 10 summarizes this data for all CoCs in California. Table 11 estimates the number of these persons located in HOME non-entitlement areas in California by weighting each CoC's PIT Count by the share of persons residing in the non-entitlement areas of the CoC.

**Table 10: Homelessness Needs Inventory and Gap Analysis Table - Statewide**

	Current Inventory					Population Experiencing Homelessness				Gap Analysis			
	Family		Adults Only		Vets	Family HH (at least 1 child)	Adult HH (w/o children)	Veterans	Victims of DV	Family		Adults Only	
	# of Beds	# of Units	# of Beds	# of Units	# of Beds					# of Beds	# of Units	# of Beds	# of Units
Emergency Shelter	17,034	5,182	21,038	21,038	906								
Transitional Housing	6,535	2,162	8,213	8,213	1,939								
Permanent Supportive Housing	20,342	6,517	45,515	45,515	21,385								
Other Permanent Housing	2,684	849	6,011	6,011	464								
Sheltered Homeless						19,642	28,051	3,405	2,779				
Unsheltered Homeless						6,135	106,930	7,996	8,134				
<b>Current Gap</b>										2,208	686	105,730	105,730
<b>Current inventory as a % of need</b>										91%	91%	22%	22%

Source: 2020 Point-in-Time Count, 2020 Housing Inventory Count. <https://www.hudexchange.info/programs/hdx/pit-hic/>

Based on the data in Table 10, there is an unmet need statewide of over 100,000 shelter and short-term housing beds for adult individuals and approximately 2,200 beds and 700 units for children and adults in family households. The current inventory of shelter and short-term housing beds meets 90 percent of the need among family households but only 22 percent of the need among adults.

**Table 11: Homelessness Needs Inventory and Gap Analysis Table - Non-Entitlement Areas**

	Current Inventory					Population Experiencing Homelessness				Gap Analysis			
	Family		Adults Only		Vets	Family HH (at least 1 child)	Adult HH (w/o children)	Veterans	Victims of DV	Family		Adults Only	
	# of Beds	# of Units	# of Beds	# of Units	# of Beds					# of Beds	# of Units	# of Beds	# of Units
Emergency Shelter	3,071	768	3,392	3,392	92								
Transitional Housing	1,555	444	1,468	1,468	240								
Permanent Supportive Housing	2,806	904	5,028	5,028	2,778								
Other Permanent Housing	219	62	224	224	24								
Sheltered Homeless						3,207	4,920	522	*				
Unsheltered Homeless						1,405	19,472	1,517	*				



	Current Inventory					Population Experiencing Homelessness				Gap Analysis			
	Family		Adults Only		Vets	Family HH (at least 1 child)	Adult HH (w/o children)	Veterans	Victims of DV	Family		Adults Only	
	# of Beds	# of Units	# of Beds	# of Units	# of Beds					# of Beds	# of Units	# of Beds	# of Units
<b>Current Gap</b>										<0	190	19,532	19,532

<b>Current inventory as a % of need</b>										100%	86%	41%	41%
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Source: 2020 Point-in-Time Count, 2020 Housing Inventory Count. <https://www.hudexchange.info/programs/hdx/pit-hic/>.

Non-entitlement population share: American Community Survey 5-Year Estimates, 2015-2019. <https://data.census.gov/cedsci/>.

\*Estimates for the sheltered and unsheltered populations of Victims of DV unavailable for non-entitlement areas.

In HOME non-entitlement areas, there is an unmet need of approximately 19,500 shelter and short-term housing beds for adult individuals and approximately 200 units for persons in family households. The current inventory of shelter and short-term housing beds meets 41 percent of the need among adults, and 86 percent of the need for family units. Although there is a shortage of units for families experiencing homelessness in non-entitlement areas, within those units the number of bedrooms meets the need for beds among family households experiencing homelessness. Declining trends in family size and number of children per family may be creating less need for bedrooms and more need for units, particularly in non-entitlement areas. As described in the consultation section, many individuals experiencing homelessness in shelters and transitional housing need behavioral health services (such as mental health and substance use disorder treatment); other health services to treat physical, intellectual and developmental disabilities; transportation services to facilitate the coordination of care; and services to assist with routine activities of daily living. Individuals with complex service needs would benefit from services provided on-site because it is challenging for them to coordinate meetings and appointments in many different locations.

**At Risk of Homelessness as defined in 24 CFR 91.5**

As previously described, the State of California does not produce a numerical estimate of the population at risk of homelessness as defined in 24 CFR 91.5. However, there is data available on the number of renter households earning below 30 percent of AMI, and those earning between 30 and 50 percent of AMI, who also have one or more severe housing problems. Most of these households are severely cost burdened, meaning they pay more than half of their income on housing costs. Although these households are housed, the financial precarity caused by their extremely high housing costs means that they are likely at a high risk of entering homelessness if they have a job loss or other financial emergency. At a minimum, these households need housing that is affordable, meaning that rent and utility costs represent no more than 30 percent of their income.

**Table 12: Housing Needs Inventory and Gap Analysis Table - Statewide**

	<b>Current Inventory</b>	<b>Level of Need</b>	<b>Gap Analysis</b>
Total Rental Units	6,097,585		
Rental Units Affordable to HH at 30% AMI (At-Risk of Homelessness)	486,938		
Rental Units Affordable to HH at 50% AMI (Other Populations)	1,071,621		
0%-30% AMI Renter HH w/1 or more severe housing problems (At-Risk of Homelessness)		976,940	
30%-50% AMI Renter HH w/1 or more severe housing problems (Other Populations)		592,234	
<b>Current Gap, Households &lt;=30% AMI:</b>			490,001
<b>Current Gap, Households &lt;=50% AMI:</b>			497,552
<b>Current inventory as a % of need, Households &lt;=30% AMI:</b>			50%
<b>Current inventory as a % of need, Households &lt;=50% AMI:</b>			68%

Source: HUD Consolidated Planning/CHAS Data, 2014-2018.

Table 12 reports the number of households included in this at-risk population, and the number of rental units affordable to these households.<sup>1</sup> Statewide, there are approximately 975,000 (976,939) renter households whose household income is less than or equal to 30 percent of the household area median family income and who have one or more severe housing problems. For these households, there are only around 500,000 (486,938) affordable rental units, and this inventory is only 50 percent of the need.<sup>2</sup>

Among renter households earning at or below 50 percent of the area median (which includes households earning under 30 percent of AMI and between 30 and 50 percent of AMI) over 1.5 million households have one or more severe housing problems. There are only around one million (1,071,621) rental units affordable to these households, which creates a gap of approximately 500,000 rental units. The existing supply of units affordable to these households is only 68 percent of the actual need.

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<sup>1</sup> The rental units affordable to households earning at or below 50 percent of AMI include the units affordable at 30 percent of AMI. This table's template and layout was suggested by HUD in its Allocation Plan guidance. Based on this template, the number of units affordable to households earning between 30 percent and 50 percent of AMI is 584,683 units.

<sup>2</sup> Another way of estimating this gap would be to compare the total number of rental units affordable to households earning no more than 30 percent of AMI, to the total number of renter households earning no more than 30 percent of AMI. The difference between these numbers is the number of additional units needed to provide affordable housing to all renter households earning at or below 30 percent of AMI. Looking instead at the number of renter households earning at or below 30 percent of AMI and with severe housing problems provides a lower bound estimate of the housing gap for these households.

**Table 13: Housing Needs Inventory and Gap Analysis Table - Non-Entitlement Areas**

	<b>Current Inventory</b>	<b>Level of Need</b>	<b>Gap Analysis</b>
Total Rental Units	964,825		
Rental Units Affordable to HH at 30% AMI (At-Risk of Homelessness)	94,349		
Rental Units Affordable to HH at 50% AMI (Other Populations)	189,570		
0%-30% AMI Renter HH w/1 or more severe housing problems (At-Risk of Homelessness)		125,241	
30%-50% AMI Renter HH w/1 or more severe housing problems (Other Populations)		90,916	
<b>Current Gap, Households &lt;=30% AMI:</b>			30,892
<b>Current Gap, Households &lt;=50% AMI:</b>			26,587

<b>Current inventory as a % of need, Households &lt;=30% AMI:</b>		75%
<b>Current inventory as a % of need, Households &lt;=50% AMI:</b>		88%

**Source: HUD Consolidated Planning/CHAS Data, 2014-2018.**

In non-entitlement areas, lower housing costs mean that this gap is smaller. There are around 95,000 rental units affordable to households earning no more than 30 percent of AMI, and 125,000 renter households at or below 30 percent of AMI with severe housing problems, creating a gap of approximately 30,000 units. Among households earning at or below 50 percent of AMI, there are approximately 190,000 affordable units and over 215,000 households in need of affordable units, representing a gap of over 25,000 units. In non-entitlement areas, the affordable inventory is 75 percent of the need among households earning at or below 30 percent AMI and just under 90 percent of the need among households earning at or below 50 percent AMI. Many households earning higher incomes occupy units affordable to households with lower incomes, creating a larger gap for the lowest income households. While data does not exist on the extent to which this occurs, it suggests that the actual affordable housing gap is larger than estimated here.

Consultation and focus group participants reported that the primary service needs among individuals and families who are housed and at risk of homelessness include employment, job training, and childcare services to allow these households to increase their incomes; and housing navigation services to help households at immediate risk of eviction find alternate housing. Many organizations that were consulted identified housing navigation and employment services for persons exiting correctional facilities available to these persons before they exit the facilities as a priority need and service gap in the state. Often, these individuals do not qualify for housing and employment services that require participants to be “literally homeless” under the McKinney-Vento definition because they were not experiencing homelessness prior to incarceration.

***Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking, as defined by HUD in the Notice***

In conjunction with the National Network to End Domestic Violence, the California Partnership to End Domestic Violence conducts annually a one-day survey of domestic violence service providers in California, similar to the Point-in-Time Count of homelessness. The 2020 survey identified 4,533 domestic violence survivors who were served on the day of the survey, and 1,071 requests for services that programs could not provide because they lacked the resources. Approximately 42 percent of the unmet requests for services were for emergency shelter and short-term housing. The other requests included transportation, childcare, legal advocacy, and other support needs such as landlord-tenant mediation and public benefits navigation.

***Other populations requiring services or housing assistance to prevent homelessness and other populations at greatest risk of housing instability as defined by HUD in the Notice***

As described in Table 12, there are approximately 600,000 households statewide earning between 30 percent and 50 percent of the area median income with one or more severe housing problems, which places them at greatest risk of housing instability (as defined by HUD in the HOME-ARP Notice). The total gap in housing inventory for these households, calculated as the difference between the number of renter households earning no more than 50 percent of AMI who need affordable housing and the number of units affordable to these households, is approximately 500,000 rental units. The total inventory of rental units affordable to households earning at or below 50 percent of AMI is around two-thirds (68 percent) of the number of these households with severe housing problems.

In non-entitlement areas, there is a smaller gap in housing inventory for these households. There are approximately 90,000 renter households earning between 30 percent and 50 percent of AMI with one or more severe housing problems. The total gap in housing inventory for renter households earning at or below 50 percent of AMI who need affordable housing in non-entitlement areas is approximately 25,000 units, and the current inventory of units affordable to these households is around 90 percent of the need.

Consultation and focus group participants identified a broad range of service needs for individuals in this broad QP category. These needs include housing navigation and tenant-landlord mediation services, physical and behavioral health care, supportive services for individuals with intellectual and developmental disabilities, elder care (including physical health and memory care), housing navigation services and in-home assistance with activities of daily living for individuals with disabilities, food assistance, employment assistance and job training, housing navigation and supportive services specifically targeted for veterans, and services that engage age-specific (e.g. youth, seniors) and culturally specific communities, especially tribal communities in the state.

***Identify any gaps within the current shelter and housing inventory as well as the service delivery system:***

The data presented earlier in this section indicates that there are significant unmet needs for shelter and short-term housing beds available to people experiencing homelessness, particularly among adult-only households. There also is a severe and persistent shortage of housing units that are affordable to households earning below 30 percent of AMI. The National Low-Income Housing Coalition's (NLIHC) "The Gap" report uses an alternate measure of the housing gap which compares the number of households earning below 30 percent of AMI who lack affordable housing to the number of units currently available for them (i.e., not occupied by other households).<sup>ix</sup> Using this approach, NLIHC estimates a shortage of units affordable and available to households earning no more than 30 percent of AMI of over one million units (1,003,595 units) in the State of California.

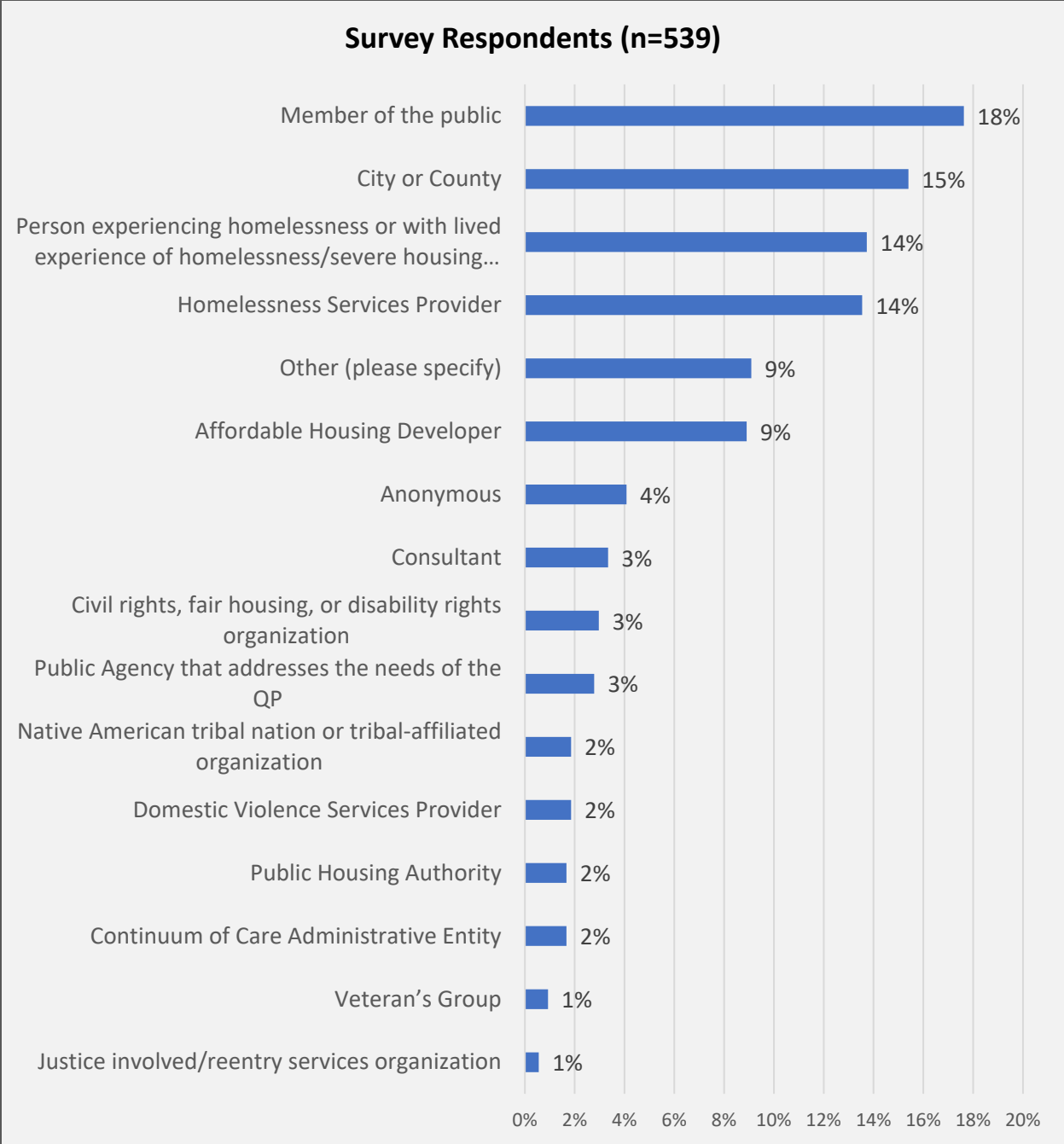
As described in the "Consultation" section of this Plan, we asked participants in one-on-one consultations and focus groups to identify and discuss the biggest gaps in their communities' current shelter and housing inventory, and in their service delivery systems. We also asked them what people who are experiencing homelessness or at risk of homelessness say they need most, based on their direct relationships with these individuals through their work.

Participants in one-on-one consultations and focus groups confirmed that a lack of affordable rental housing is a key gap in addressing the needs of individuals in the qualifying populations. There are very few units currently available at the rent that extremely low-income households can afford to pay, and new affordable housing development restricted to households at this income level is financially infeasible without additional rent subsidies to cover the operating and debt service costs of the project. Participants reported that the lack of affordable housing is especially acute in rural areas and in tribal communities, where there are fewer affordable housing developers.

Participants in one-on-one consultations and focus groups identified housing and service gaps of particular concern for two groups among the qualifying populations: individuals exiting from correctional facilities (the "re-entry population") and tribal communities. Individuals in the re-entry population often experience homelessness and housing instability when they are released. Additionally, the re-entry population does not

qualify under the federal definition of “homeless” for housing and supportive services programs because most are designated for individuals experiencing homelessness. Many people in Native and Indigenous communities also have difficulty obtaining housing and supportive services through federal and state programs due to a lack of culturally and linguistically competent housing developers and supportive services providers.

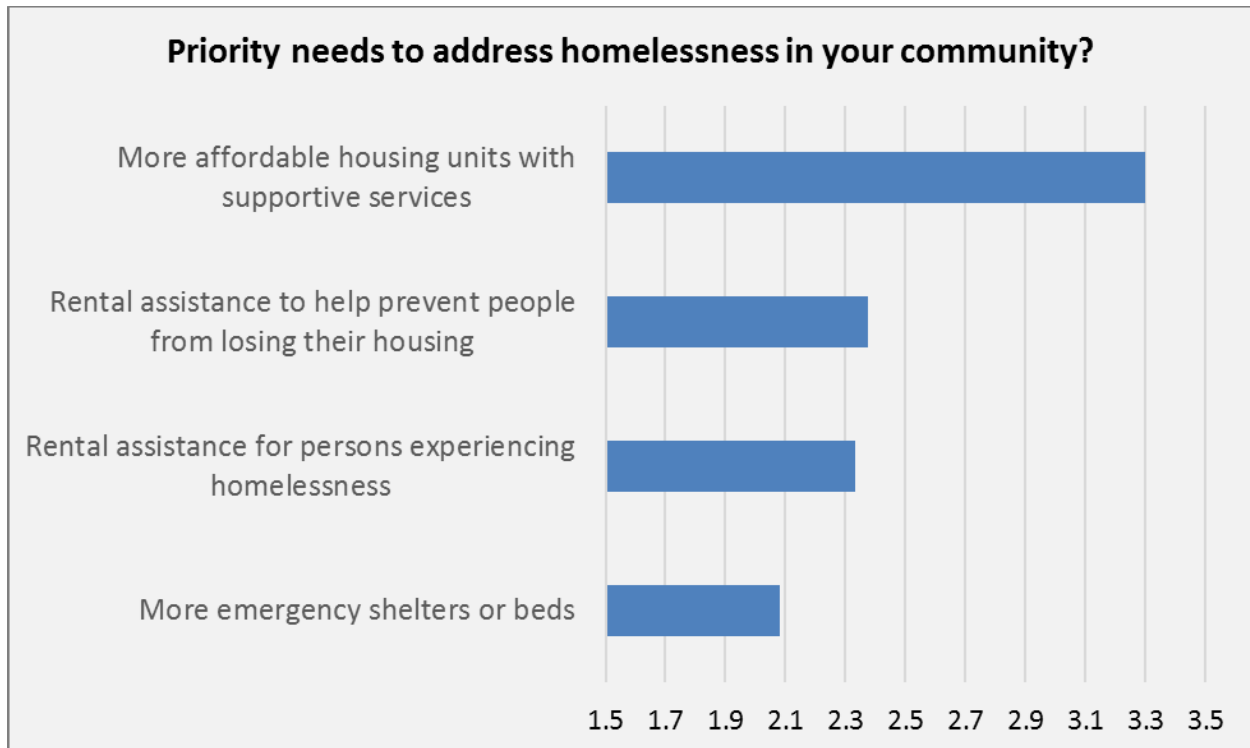
HCD also distributed a survey to interested HOME-ARP stakeholders via HCD’s listservs. The survey was designed to gather information from a broad statewide sample of stakeholders in the required consultation groups, as well as from local jurisdictions and affordable housing developers, on unmet needs and gaps in their community’s homelessness response (including shelter, housing and service delivery systems), current and anticipated local funding sources for HOME-ARP qualifying populations and eligible activities, and recommendations on how HCD should allocate funding to activity categories. A plurality of survey respondents identified as members of the public, and a significant share of survey respondents (14 percent) identified as people experiencing homelessness or with lived experience of homelessness or severe housing insecurity.



**Figure 1: HOME-ARP Survey Respondents, by type**



HCD asked survey respondents to rank what their communities need most for QPs among the categories of activities eligible for HOME-ARP funds. Affordable housing with supportive services ranked highest, followed by rental assistance for the QP. HCD also asked survey respondents to identify the largest gaps in their communities' homelessness response system, by choosing the top five among 16 different types of assistance. The most highly prioritized gap was for permanent supportive housing services, followed by behavioral health services, alternative emergency shelters (e.g., village-style shelters, safe parking, and safe camping sites), long term rental assistance, and shelters with on-site housing navigation services.<sup>3</sup>



**Figure 2: HOME-ARP Survey Respondents' priority needs to address homelessness**

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<sup>3</sup> Survey respondents ranked four categories of HOME-ARP categories on a scale of one to four and ranked their top five largest gaps in their communities' homelessness response system among 16 options. The figures report the average scores for each option.

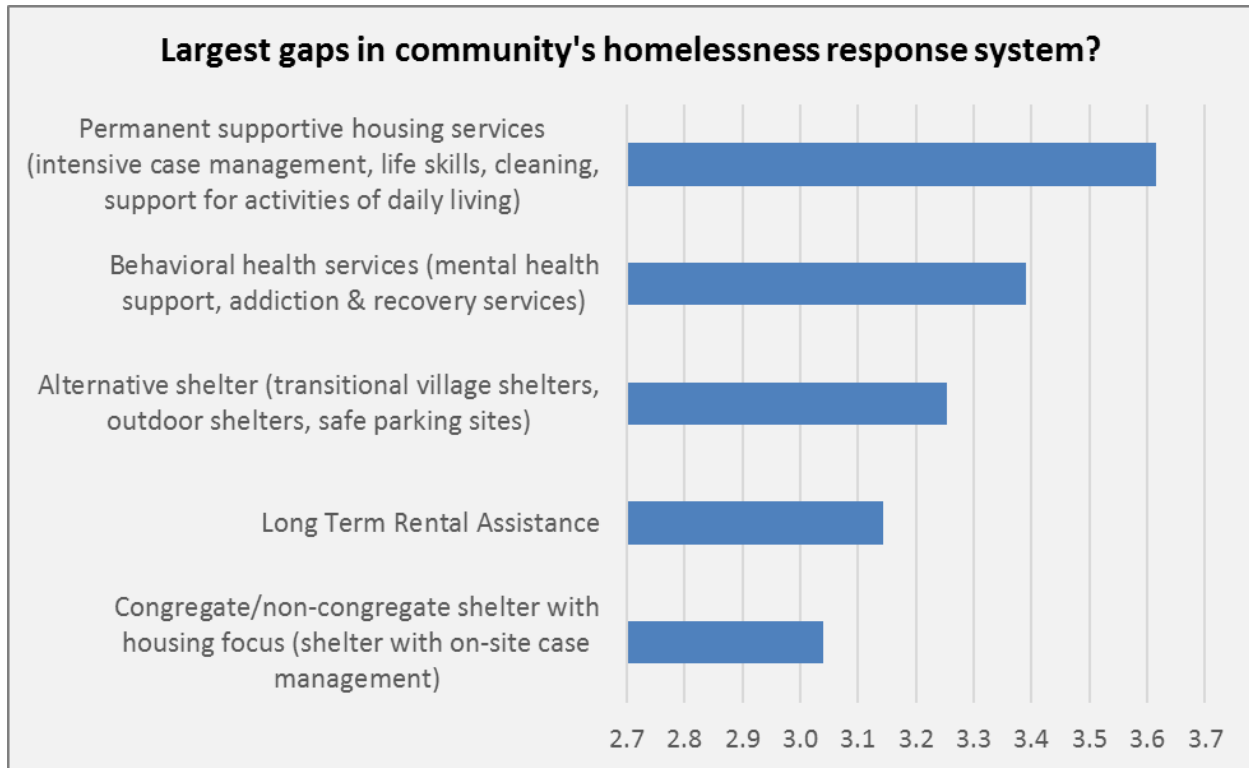


Figure 3: HOME-ARP Survey Respondents' largest gaps in community's homelessness response system

***Under Section IV.4.2.ii.G of the HOME-ARP Notice, a PJ may provide additional characteristics associated with instability and increased risk of homelessness in their HOME-ARP allocation plan.***

***These characteristics will further refine the definition of "other populations" that are "At Greatest Risk of Housing Instability," as established in the HOME-ARP Notice. If including these characteristics, identify them here:***

Section IV.A.4.2.ii.G of the HOME-ARP Notice states that households "at greatest risk of housing instability" includes households that have annual income less than or equal to 50 percent of the area median and live in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in the PJ's Consolidated Plan. California's 2020-24 Consolidated Plan identifies the following housing characteristics as associated with instability and an increased risk of homelessness<sup>x</sup>:

- Rental housing cost burden, where housing costs exceed 30 percent of a household's total income, and severe housing cost burden, where costs exceed 50 percent of income.
- Housing located in neighborhoods undergoing gentrification or in areas affected by natural disasters.
- Physically substandard or unsafe housing.

### ***Identify priority needs for qualifying populations:***

This needs assessment and gaps analysis has identified affordable rental housing and supportive services as a priority need among all four of the qualifying populations. Persons experiencing homelessness (QP 1) need access to low-barrier, deeply affordable housing and case management that is available to them where they are located (on-site at shelter or housing) and that is consistent as their housing status changes. Persons at risk of homelessness (QP 2) need housing navigation and supportive services to find and/or maintain affordable and stable housing and employment. Persons fleeing domestic violence (QP 3) need crisis intervention and housing navigation services that are designed to meet the confidentiality and other needs of these survivors. Many persons who require continuing supportive services to avoid homelessness, or who are at the highest risk of housing instability (QP 4), need permanently affordable housing with on-site services targeted to addressing the specific issues contributing to their housing instability. Based on our consultation activities, there is no one-size-fits-all approach to providing supportive services for different populations, but stakeholders agreed that it is important to provide services nearby or on-site with housing.

### **Affordable Rental Housing and Supportive Services in Non-Entitlement**

**Jurisdictions:** Multiple consultation and focus group participants reported that the lack of affordable housing for individuals in the qualifying populations is more acute in non-entitlement areas of the state. Although land costs are lower in non-entitlement areas, construction costs are just as high as in entitlement areas due to a lack of construction labor and the high cost of building materials statewide. Non-entitlement jurisdictions lack local sources of funding to provide project-based rental assistance and supportive services for affordable housing for people in the qualifying populations. There are fewer homeless and domestic violence service providers in these areas, and these service providers find it more difficult to attract and retain qualified staff. Many consultation and focus group participants identified housing needs among agricultural workers, undocumented immigrants and “mixed status” families (where some individuals have eligible immigration status and some do not), and people who speak languages indigenous to Central and South America, as priority needs within qualifying populations in non-entitlement areas.

### **Affordable Rental Housing and Supportive Services in Tribal Communities/Tribal**

**Nations:** According to a national expert panel on homelessness among American Indians, Alaska Natives and Native Hawaiians (AIAN and NH) facilitated by HUD, members of these populations are at higher risk than the general population for many of the conditions that contribute to falling into one of the qualifying populations, including disproportionately high rates of poverty, domestic and other violence, and behavioral and substance use disorders. Historic geographic displacement and dispossession, genocide, forced assimilation, language and cultural suppression, and discrimination contributed to a lack of investment and opportunity in tribal lands.<sup>xi</sup>

Focus group and consultation participants from tribal communities described the unique challenges in serving community members in the qualifying populations, including a lack of affordable housing on tribal lands and in the urban areas where some California tribes are located; difficulties in finding and retaining staff who can provide culturally competent services to AIAN and NH people; and limited services available in rural tribal communities. Community-based organizations serving AIAN and NH communities also need assistance to expand their capacity to provide services, especially to hire and train additional staff, to develop site-based service delivery options, and to compete for larger funding opportunities.

**Affordable Rental Housing and Supportive Services for the Re-Entry Population:**

Housing for persons released from prisons and jails was identified as a priority need by participants in consultations and focus groups. Approximately 36,000 prisoners are released from state and federal prisons each year in California and, although data is limited, it is estimated that as many as 70,000 individuals are also released from local jails each year. The California Department of Corrections and Rehabilitation (CDCR) estimates 15 percent of the prisoners released from state and federal prison are released into California's non-entitlement counties. The overall rate of homelessness among those released from prison is 15.5 percent, meaning statewide as many as 5,400 individuals (810 individuals in California's non-entitlement counties) released from state or federal prison are homeless upon release every year.<sup>xii</sup>

In consultations and focus groups, public and private agencies serving the needs of individuals in the re-entry population and at risk of housing instability identified many factors contributing to a high risk of homelessness among their clients, including: a history of incarceration leading to rental housing and employment denials; the federal definition of "literally homeless" which excludes many who were formerly incarcerated; a high incidence of behavioral and mental health needs; and limited access to affordable housing and supportive services. According to this feedback, for individuals exiting incarceration, stable housing provides the foundation for all other services to be effective in preventing recidivism.

Our survey asked whether the respondent's local CoC's Coordinated Entry assessment prioritizes individuals leaving an institutional setting (e.g., a correctional facility, hospital, or foster care). Only 18.4 percent of respondents answered that it did, while 26.6 percent of respondents answered that it did not, and 55 percent of respondents were unsure. Coordinated Entry assessments and ranked waitlists are often used by CoCs to prioritize households for supportive housing. The omission of this risk factor for homelessness from a CoC's Coordinated Entry assessment may limit access to supportive housing for people in the re-entry population.

***Explain how the PJ determined the level of need and gaps in the PJ’s shelter and housing inventory and service delivery systems based on the data presented in the plan:***

This assessment determined the level of need and gaps in the State of California’s shelter and housing inventory and service delivery systems using both quantitative and qualitative approaches. The quantitative methodology compared recent measures of shelter and affordable housing inventory to estimates of the size of the qualifying populations in need of shelter and housing to estimate the gap in needed housing units. This approach included estimates for the entire state and for non-entitlement jurisdictions. The qualitative methodology included one-on-one consultations, focus groups, and a survey. Individuals from government and nonprofit agencies, local government jurisdictions, service providers, affordable housing developers, advocacy organizations and the general public were invited to provide their input on the biggest gaps in their communities’ current shelter and housing inventory, and in their service delivery systems. We analyzed their responses and, in conjunction with the quantitative analysis, identified affordable rental housing and supportive services as the areas of highest need.

## **HOME-ARP Activities**

***Describe the method(s) that will be used for soliciting applications for funding and/or selecting developers, service providers, subrecipients and/or contractors:***

HCD will establish the HOME-ARP Program in the State of California in compliance with HUD Notice CPD-21-10 (“Requirements for the Use of Funds in the HOME-American Rescue Plan Program”) and issue multiple Notices of Funding Availability (NOFAs) to select projects that address the priority needs for the QP. At minimum, HCD will issue two NOFAs: a HOME-ARP Rental Housing NOFA and a Supportive Services NOFA. All NOFAs issued by HCD will specify eligible applicants, eligible activities, minimum and maximum funding amounts, application thresholds and evaluation criteria, and will provide instructions on how to submit an application. Application review will consist of a threshold, rating and ranking, and feasibility review to ensure proposed projects are feasible. Applicants will be evaluated to determine if they have the financial capacity and experience to carry out the HOME-ARP activity.

The NOFAs for the rental housing and supportive services activities will include a 10 percent target for California’s Tribal Entities. Additionally, the rental housing NOFA will have a 20 percent target for rural communities. The NOFAs may also include additional targets that meet HCD policy objectives. Targets within the NOFA will not establish preferences. Additionally, HCD may identify and provide HOME-ARP funding to projects that meet HOME-ARP criteria, address the priority needs of the QP and best leverage the availability of state, county, and local funding. At a minimum, the NOFA will specify eligible applicants, eligible activities, minimum and maximum funding amounts, application thresholds and evaluation criteria, and will provide instructions on how to submit an application. In all cases where California’s state statute, regulations and/or guidelines conflict with the HUD Notice CPD 21-10 and HUD’s HOME-ARP guidance, the project must defer to HUD’s guidance.

**Describe whether the PJ will administer eligible activities directly:**

HCD will directly administer the HOME-ARP rental housing activities by providing loans and grants to eligible project developers. HCD will provide grants to subrecipients to carry out the HOME-ARP supportive services activities.

**Administrative Subrecipient**

**If any portion of the PJ's HOME-ARP administrative funds are provided to a subrecipient or contractor prior to HUD's acceptance of the HOME-ARP allocation plan because the subrecipient or contractor is responsible for the administration of the PJ's entire HOME-ARP grant, identify the subrecipient or contractor and describe its role and responsibilities in administering all of the PJ's HOME-ARP Program:**

No portion of HCD's administrative funds will be provided to a subrecipient or contractor prior to HUD's acceptance of the HOME-ARP allocation plan.

**Use of HOME-ARP Funding**

*In accordance with Section V.C.2. of the Notice (page 4), PJs must indicate the amount of HOME-ARP funding that is planned for each eligible HOME-ARP activity type and demonstrate that any planned funding for nonprofit organization operating assistance, nonprofit capacity building, and administrative costs is within HOME-ARP limits.*

**Table 14: Use of HOME-ARP Funding**

	Funding Amount	Percent of Grant	Statutory Limit
<b>Development of Affordable Rental Housing</b>	<b>\$110,352,595</b>	<b>71.2%</b>	
Affordable Housing NOFA	\$89,000,000	57.4%	
Northern California Target	\$31,150,000	20.1%	
Southern California Target	\$31,150,000	20.1%	
10% Target for Tribal Entities	\$8,900,000	5.7%	
20% Target for Rural Areas	\$17,800,000	11.5%	
Rental Housing Reserve	\$5,352,595	3.5%	
Re-entry Housing Pilot Project(s)	\$16,000,000	10.3%	
<b>Supportive Services</b>	<b>\$27,000,000</b>	<b>17.4%</b>	
Open Funding	\$24,300,000	15.7%	
10% Target for Tribal Entities	\$2,700,000	1.7%	
<b>Administration and Planning</b>	<b>\$17,650,459</b>	<b>11.4%</b>	<b>15%</b>
HCD Admin & Planning	\$14,950,459	9.6%	
Subrecipient Admin & Planning	\$2,700,000	1.7%	
<b>Total HOME ARP Allocation</b>	<b>\$155,003,054</b>		

***Additional narrative, if applicable:***

The rationale for HCD's HOME-ARP Allocation is based on data, consultation meetings, and survey results. Affordable rental housing is the number one need in California, therefore HCD allocated 71 percent of its HOME-ARP allocation to HOME-ARP's rental housing activity. Seventeen percent of the allocation will be used for Supportive Services, which is critical to keeping Californians from entering homelessness and increasing overall housing stability in California. Additionally, 11 percent of the award will go toward Administration and Planning costs both for HCD and subrecipients awarded Supportive Services funding. This allocation breakdown is intended to ensure HCD's one-time HOME-ARP allocation assists the greatest number of the QP, providing different levels of service and housing needs.

***Describe how the PJ will distribute HOME-ARP funds in accordance with its priority needs identified in its needs assessment and gap analysis:***

The public input HCD received during its consultation process and the results of the needs assessment and gaps analysis indicated the priority needs for California communities are the development of affordable housing and implementation of supportive services for the QPs. HCD will fund three HOME-ARP eligible activities: Development of Affordable Rental Housing, Supportive Services, and Administration and Planning costs.

***Development of Affordable Rental Housing***

Through a competitive \$89,000,000 NOFA, HOME-ARP affordable housing funding will be made available to development entities for the construction, rehabilitation, and acquisition of rental housing in California's non-entitlement jurisdictions. The competitive NOFA will have a 10 percent target for California's Tribal Entities and 20 percent will be a target for rural non-entitlement jurisdictions. Of the remaining funds, HCD will target distributing them evenly between Northern and Southern California, which balances to a 35 percent target for each region. A list of which counties fall under each region will be included in the NOFA. The NOFA may also include additional targets that meet HCD policy objectives. These targets will not establish a preference. In the event targets are not fully utilized, the remainder of the funds will revert back to applicants not included in the targets.

HCD will make an additional \$16 million available to projects that meet HOME-ARP criteria, and address the priority needs of the at risk of homelessness population, specifically individuals and families that are exiting a publicly funded institution, or system of care. HCD is partnering with the California Department of Corrections and Rehabilitation (CDCR) to identify these projects. These projects will not be selected as part of the competitive NOFA HOME-ARP affordable housing process but based on criteria agreed upon between HCD and CDCR. The project criteria are currently in development.



In addition, \$5,352,595 will be held in reserves to account for cost overruns. These funds may be allocated to any affordable rental housing project described above, including the re-entry housing pilot project or projects awarded through the affordable housing NOFA.

### *Supportive Services*

HCD will establish the Housing Plus Support Program (HPSP) to implement the HOME-ARP Supportive Services activities. Funding will be made available to services providers who specialize in using evidence-based practices to immediately house the QP while delivering individualized support to keep them housed. Funding will be made available to providers serving the QPs in California’s non-entitlement jurisdictions. The over-the-counter Supportive Services NOFA will have a 10 percent target for California’s Tribal Entities. The NOFA may also include additional targets that meet HCD policy objectives. All targets will require the supportive services provider to provide services to all of the HOME-ARP QP and not establish a preference. In the event targets are not fully utilized, the remainder of the funds will revert back to applicants not included in the targets. This will ensure funds are expended prior to the HOME-ARP Budget Period.

Funds will be awarded to five regions in California according to need. Need is determined by the estimated number of people who meet the conditions of the qualifying population who live in the non-entitlement jurisdictions of those regions. The regions and allocation amounts are summarized below:

Regions*	Allocated Fund
Region-1 (Northern CA)	\$8,910,000
Region-2 (Bay Area)	\$2,970,000
Region-3 (Central CA)	\$6,210,000
Region-4 (Greater Los Angeles)	\$3,240,000
Region-5 (Southern CA)	\$2,970,000
Tribal Target (10%)	\$2,700,000
<b>Total</b>	<b>\$27,000,000</b>

\*See Attachment A for Map of the Regions

HOME-ARP supportive services allocations are intended by HUD to support individuals and families to secure stable housing and prevent homelessness. By supporting households experiencing homelessness and those at risk of homelessness to maintain stable housing, the HPSP will provide significant subsidies to the existing and developing affordable housing infrastructure in California, including to existing HCD-assisted affordable housing projects. The population to be served by this program will likely occupy subsidized rental units, and through financial assistance, case management, and housing support assistance, the HPSP will further support the viability of existing affordable housing developments around the state.



At least 65 percent of HPSP funds, or over \$18 million, will support short- and medium-term financial assistance for members of the QP. These funds can provide rent support, first and last-month's rent, security deposits, arrearages, application fees, moving costs, and utility deposits and payments. In this way, in addition to assisting the households, the HPSP will provide an additional subsidy to the owners and operators of affordable housing. Up to 25 percent of HPSP funds, or over \$7 million, will support case management services and housing support services. These services will assist members of the QP access, enter, and maintain secure housing in affordable housing units. This will assist affordable housing owners and operators by providing resources that keep tenants sustainably housed, as well as by bolstering their network to lease-up new tenants.

***Describe how the characteristics of the shelter and housing inventory, service delivery system, and the needs identified in the gap analysis provided a rationale for the plan to fund eligible activities:***

The HOME-ARP strategy for California separates the program into four categories, each with a method of soliciting applications or selecting sub-recipients. These four categories are:

- The Development of Affordable Rental Housing in Non-Entitlement Jurisdictions
- The Development of Affordable Rental Housing for the Re-Entry Population
- The Development of Affordable Rental Housing by Tribal Entities
- Supportive Services
- Supportive Services to be provided by Tribal Entities

HCD will not fund the HOME-ARP TBRA or the HOME-ARP Non-Congregate Shelter activities. During HCD's consultation process many entities expressed difficulties employing Housing Choice Vouchers and VASH Vouchers due to the short supply of units. In response, HCD will not fund the TBRA programs as they have the potential to face the same problem – a lack of available units. The Non-Congregate Shelter activity consistently ranked last among eligible HOME-ARP Activities during HCD's consultation process. This feedback coupled with the fact that Non-Congregate Shelter projects receive substantial funding from other federal and state funding sources, including the federally funded Emergency Solutions Grants (CARES Act) Program (\$315 million) and California's Homekey Program (\$2.05 billion) informed this decision.

***The Development of Affordable Rental Housing in Non-Entitlement Jurisdictions***

HCD will allocate funding to acquire, develop, or rehabilitate housing for the QPs in non-entitlement jurisdictions to increase the availability of affordable rental housing available to the QP. Additionally, the Homeless Needs Inventory and Gap Analysis shows a significant need for affordable rental housing for the QP.

The scarcity of affordable rental units in the State of California is one of the primary factors leading to homelessness. As stated in the Gap Analysis above, the need for affordable housing across California exceeds the supply by approximately 500,000 units. Twenty-five thousand of these missing units are in non-entitlement jurisdictions.

Additionally, non-entitlement jurisdictions traditionally receive less federal support for affordable housing projects and carry higher capital needs to develop. Through our stakeholder consultations, rental housing was cited as the most-desired project for this funding, as well as the project type that had the highest capital need.

Therefore, affordable rental acquisition, new construction, and rehabilitation have the highest potential for success in reducing homelessness and increasing housing stability in California.

### *The Development of Affordable Rental Housing for the Re-Entry Population*

HCD will select project(s) that produce affordable rental units for the re-entry population. HCD is partnering with the California Department of Corrections and Rehabilitation (CDCR) to identify these projects. HCD will select one or more projects from qualified developers that will meet all HOME-ARP requirements. Developers will have experience and a solid track record in building affordable housing for the re-entry population. HCD will leverage partnerships with other state and local agencies to assist in project design as well as service providers offering customized services to tenants. These projects will be restricted to non-entitlement jurisdictions.

The HOME-ARP Program is uniquely positioned to meet the needs of the re-entry population where other federal and state housing programs often have barriers. Many programs that serve homeless populations require that a person exiting a correctional institution qualify under the federal definition of “homeless” to be eligible for housing and services. Specifically, a person in this situation would need to have been homeless within the 90 days prior to entering the institution. This prevents a significant portion of the re-entry population from accessing critical affordable housing and supportive services needed for successful reintegration to society. Additionally, many landlords do not accept tenants with a history of incarceration, creating further barriers. However, since the HOME-ARP Program also serves populations who are at-risk of homelessness or at the greatest risk of housing instability, the re-entry population qualify as long as they meet the stated income requirements.<sup>xiii</sup>

The purpose of establishing a limitation for the re-entry population is to ensure that this portion of the QP is served by the HOME-ARP program. As previously mentioned, due to HUD’s definition of homelessness, many members of this population are excluded from housing assistance. They do not meet the definition, and thereby do not qualify for programs intended to support homeless populations. In the HOME-ARP program, members of the re-entry community do qualify under two of the QPs as described below. However, this community has housing and service needs that are different from other QPs. They also generally are not included in Continuum of Care networks since they are not defined as homeless. For these reasons, historically members of the re-entry community have not been able to gain access to affordable housing units that are open to all QPs.

Members of the re-entry community are eligible for the HOME-ARP program. As long as they meet income requirements, the re-entry population is included in the definitions of a person “at risk of homelessness” and “at the greatest risk of housing instability” from sections IV.A.2.1.iii.F and IV.A.4.2.ii.F of the CPD-21-10 respectively:

IV.A.2.1.iii.F

2. At risk of Homelessness, as defined in 24 CFR 91.5 At risk of homelessness:

(1) An individual or family who:

(i) Has an annual income below 30 percent of median family income for the area, as determined by HUD;

(ii) Does not have sufficient resources or support networks, e.g., family, friends, faith based or other social networks, immediately available to prevent them from moving to an emergency shelter or another place described in paragraph (1) of the “Homeless” definition in this section; and

(iii) Meets one of the following conditions:

...

(F) Is exiting a publicly funded institution, or system of care (such as a health-care facility, a mental health facility, foster care or other youth facility, or correction program or institution); or

IV.A.4.2.ii.F

(ii) has annual income that is less than or equal to 50% of the area median income, as determined by HUD, AND meets one of the following conditions from paragraph (iii) of the “At risk of homelessness” definition established at 24 CFR 91.5:

...

(F) Is exiting a publicly funded institution, or system of care (such as a health-care facility, a mental health facility, foster care or other youth facility, or correction program or institution); or

Of these two definitions, the second under Section IV.A.4 is the least restrictive. Members of the re-entry population who qualify for assistance from the HOME-ARP Program are those who are exiting a publicly funded correctional facility or mandated correctional program, have an annual income less than or equal to 50 percent of the area median income (AMI), and do not otherwise qualify under the definition in Section IV.A.2.

However, many will qualify under the definition in Section IV.A.2. Much of the re-entry population earns no income or an income below 30 percent of AMI and lack the resources to prevent them from moving into an emergency shelter. Therefore, both definitions will be used to qualify applicants.

The re-entry population experiences a great risk of homelessness. According to the California Department of Corrections and Rehabilitation, approximately 15.5 percent of individuals exiting state and federal prisons become homeless. This equates to roughly 5,400 people each year.<sup>xiv</sup> Homelessness also puts formerly incarcerated individuals at a much higher risk of recidivism or returning to corrective institutions. For example, a study in San Francisco showed that people exiting correctional institutions who experience homelessness during their probation see a 44 percent increase in recidivism risk compared to the whole population.<sup>xv</sup> Additionally, the Vera Institute for Justice found that people who are experiencing homeless are 11 times more likely to be arrested than those stably housed.<sup>xvi</sup>

By providing affordable rental units for low-income individuals exiting correctional institutions, HCD will meet a critical need for a vulnerable population. HCD will work with developers and nonprofit organizations experienced in housing and rehabilitating the re-entry population to develop these units, further reducing barriers by adding to the available affordable rental housing stock maintained by owners and landlords who do not exclude tenants based on criminal record. These units will prevent re-entry individuals from becoming homeless, and significantly reduce the risk of recidivism. As a result, they will stand a much greater chance of reintegrating effectively into society.

#### ***The Development of Affordable Rental Housing by Tribal Entities***

Within HCD's affordable rental housing NOFA will be a 10 percent target for Tribal Entities to develop affordable rental units. HCD will select project(s) from applications submitted by Tribal Entities that meet all HOME-ARP requirements. To be eligible for funding, applicants must have development experience and the development and financial capacity necessary to carry out the project. This target does not establish a project preference; projects awarded will be required to serve all QPs. At a minimum, the NOFA will specify eligible applicants, eligible activities, minimum and maximum funding amounts, application thresholds and evaluation criteria, and will provide instructions on how to submit an application.

#### ***Supportive Services***

HCD will establish the Housing Plus Support Program (HPSP) to implement the HOME-ARP Supportive services activities. Funding will be made available to services providers who specialize in using evidenced-based practices to immediately house the QP while delivering individualized support to keep them housed. Funding in the amount of \$27,000,000 will be available through an over-the-counter NOFA. Funding will serve the QPs in California's non-entitlement jurisdictions. To ensure an equitable distribution of funds throughout California's vast geography, funds will be allocated to five regions based on the estimated number of people who meet the conditions of the qualifying population who live in the non-entitlement jurisdictions of those regions. These funds are intended to provide critical services that prevent individuals and families from entering or re-entering homelessness, and/or assist those experiencing homelessness transition into stable housing. At a minimum, the NOFA will specify eligible applicants, eligible activities, minimum and maximum funding amounts, application threshold and evaluation criteria, and will provide instructions on how to apply. There will be

\$2,700,000 made available to subrecipients awarded funding for supportive services to assist with capacity building and operating costs through program development.

### *Supportive Services provided by Tribal Entities*

Within the Supportive Services NOFA will be a 10 percent target for organizations operated by Tribal Entities. These awards will fund supportive services for all QPs and, therefore, will not establish a preference. At a minimum, the NOFA will specify eligible applicants, eligible activities, minimum and maximum funding amounts, application thresholds and underwriting criteria, and will provide instructions on how to apply.

During our consultations, various stakeholders expressed the need to provide culturally competent care for Indigenous populations. There are two main reasons for this.

First, Indigenous peoples exhibit a higher need for supportive services. According to the 2021 American Community Survey, 14.6 percent American Indian or Alaska Natives in California fall below the poverty line, compared to 12.3 percent of the general population. Also, while American Indian or Alaska Native people only comprise 1.7 percent of the general population in California, they account for 4 percent of the total homeless population. Nationally, Indigenous peoples have historically experienced higher levels of substance abuse issues, mental health problems, behavioral health problems, and encounters with domestic violence. For example, a study by the Indian Health Service in 2011 found that 17 percent of American Indians and Alaska Natives had mental health needs and the suicide rate was 1.7 times that of the general population. Additionally, the alcohol-related death rate was five times higher than that of the general population.<sup>xvii</sup>

Second, many organizations who provide services for the QP lack culturally and linguistically competent staff to serve indigenous communities. These institutions can create barriers for indigenous people. In 2012, HUD met with a panel of experts on homelessness among American Indians, Alaska Natives, and Native Hawaiians. In the report, experts, who included direct service providers, tribal members, and nonprofit executives, pointed to several barriers that often lead homeless indigenous peoples, or those who are at a great risk of becoming homeless, to exit or avoid critical services. These barriers range from service providers misinterpreting non-verbal communication to program policies penalizing behaviors that are norms for many indigenous cultures.

For example, one expert from HUD's panel indicated that distrust sometimes happens when an indigenous person seeking services pauses to answer a question, which in some cultures is customary and respectful. However, the program representative interprets that as the person "creating a story" or lying to secure services. Additionally, people have been removed from programs for traveling suddenly to attend funerals or similar events. While this behavior is understood among many indigenous cultures, programs operated by members of the dominant culture often have not accounted for these events in their policies. As a result, upon the individual or family's return, they may not be admitted back into the program or are put at the back of the waitlist. Beyond these program barriers, staff who are not culturally competent typically lack the skills

and insight to effectively conduct outreach for Native people. This makes it even less likely that they will access critical services.

This target does not establish a preference for a sub-population, and recipients will be required to make their services available to the entire QP. However, accounting for the potential barriers created by organizations who lack culturally and linguistically competent staff, HCD has determined that a target for Tribal Entities is imperative to ensuring that indigenous people within the QP can meaningfully access HOME-ARP Program services.

## **HOME-ARP Production Housing Goals**

### ***Estimate the number of affordable rental housing units for qualifying populations that the PJ will produce or support with its HOME-ARP allocation:***

Based on an anticipated average investment of \$500,000 per HOME-ARP unit (including operating assistance), it is anticipated that the HOME-ARP allocation being used for rental housing development will support the creation of 178 affordable housing units for the qualifying populations., as well as at least 32 affordable housing units for the re-entry pilot project, totaling 210 HOME-ARP supported rental housing units. HCD anticipates, on average, The 178 non-reentry HOME-ARP units will comprise 20 percent of the total units for the projects in its HOME-ARP portfolio, therefore, HCD anticipates HOME-ARP funding will also leverage the creation of at least 875890 affordable units serving low-income households. In totality, HCD anticipates the HOME-ARP Rental Housing Program will assist in the creation of at least 922 affordable housing units.

### ***Describe the specific affordable rental housing production goal that the PJ hopes to achieve and describe how the production goal will address the PJ's priority needs:***

HCD's HOME-ARP affordable rental housing allocation will provide deeply affordable housing units for California's most vulnerable families and individuals. HOME-ARP funding will work to address decades of undersupply and move California closer to closing the gap of over one million housing units that are currently unavailable to extremely low-income households. To act with urgency to address homelessness and housing instability, HOME-ARP funding will eliminate financial barriers that cause delays in affordable housing construction by making substantial capital investment in projects to reduce debt service on HOME-ARP units. HCD may utilize HOME-ARP funds to pay the entire cost to acquire, rehabilitate, and/or construct HOME-ARP units. The estimate of 178 HOME-ARP assisted units is based on current development cost data for California, as well as operating funds necessary for the feasibility of a HOME-ARP project. By providing sufficient subsidy to ensure the viability of each project for 15 years, these developments will provide long-term support, preventing homelessness and increasing housing stability in California.



## Preferences

*Identify whether the PJ intends to give preference to one or more qualifying populations or a subpopulation within one or more qualifying populations for any eligible activity or project:*

n/a

## Limitations in a HOME-ARP rental housing or NCS project

*Limiting eligibility for a HOME-ARP rental housing or NCS project is only permitted under certain circumstances.*

- *PJs must follow all applicable fair housing, civil rights, and nondiscrimination requirements, including but not limited to those requirements listed in 24 CFR 5.105(a). This includes, but is not limited to, the Fair Housing Act, Title VI of the Civil Rights Act, section 504 of Rehabilitation Act, HUD's Equal Access Rule, and the Americans with Disabilities Act, as applicable.*
- *A PJ may not exclude otherwise eligible qualifying populations from its overall HOME-ARP program.*
- *Within the qualifying populations, participation in a project or activity may be limited to persons with a specific disability only, if necessary, to provide effective housing, aid, benefit, or services that would be as effective as those provided to others in accordance with 24 CFR 8.4(b)(1)(iv). A PJ must describe why such a limitation for a project or activity is necessary in its HOME-ARP allocation plan (based on the needs and gap identified by the PJ in its plan) to meet some greater need and to provide a specific benefit that cannot be provided through the provision of a preference.*
- *For HOME-ARP rental housing, section VI.B.20.a.iii of the Notice (page 36) states that owners may only limit eligibility to a particular qualifying population or segment of the qualifying population if the limitation is described in the PJ's HOME-ARP allocation plan.*
- *PJs may limit admission to HOME-ARP rental housing or NCS to households who need the specialized supportive services that are provided in such housing or NCS. However, no otherwise eligible individuals with disabilities or families including an individual with a disability who may benefit from the services provided may be excluded on the grounds that they do not have a particular disability.*

*Describe whether the PJ intends to limit eligibility for a HOME-ARP rental housing or NCS project to a particular qualifying population or specific subpopulation of a qualifying population identified in section IV.A of the Notice:*

HCD will adopt a limitation for the projects selected to serve the re-entry population. A total of \$16 million will be allocated to these projects. The re-entry population is included in the definitions of a person "at risk of homelessness" and "at the greatest risk of housing instability" from sections IV.A.2.1.iii.F and IV.A.4.2.ii.F of the CPD-21-10

respectively. Based on California's priority needs, this limitation is necessary to address a greater gap in effective housing, aid, benefit, and services within the re-entry population.

***If a PJ intends to implement a limitation, explain why the use of a limitation is necessary to address the unmet need or gap in benefits and services received by individuals and families in the qualifying population or subpopulation of qualifying population, consistent with the PJ's needs assessment and gap analysis:***

During our consultation process, stakeholders indicated that individuals exiting correctional institutions experience some of the highest levels of difficulty accessing critical resources, especially housing resources. Many landlords will not rent to individuals with a criminal history, making it difficult for members of this population to secure stable housing. Additionally, for those who earn under 50 percent of the area median income, or those who are at a high risk of homelessness, many programs designed to provide housing services exclude members of the re-entry population from their definition of homelessness, rendering them ineligible for services. Specifically, many of these programs will only serve those exiting an institution if they were homeless within the 90 days preceding their incarceration. Additionally, stakeholders indicated that those exiting institutions need specialized supportive services.

Those released from state and federal prisons in California are at an extremely high risk of homelessness and housing insecurity, with an estimated 15.5 percent of individuals exiting institutions becoming homeless. That is as many as 5,400 members of this population each year. These individuals face a higher risk of returning to correctional facilities than those who can secure housing. By setting aside a portion of HOME-ARP funding to serve this specific population, HCD will provide critical resources to a group who are traditionally excluded from other programs, prevent post-exit homelessness, and reduce the risk of recidivism.

***If a limitation was identified, describe how the PJ will address the unmet needs or gaps in benefits and services of the other qualifying populations that are not included in the limitation through the use of HOME-ARP funds (i.e., through another of the PJ's HOME-ARP projects or activities):***

HCD will address the unmet needs or gaps in benefits and services of the other populations not included in the re-entry limitation by requiring that 90 percent (or \$139 million) of its HOME-ARP funding be used to meet the priority needs of all of the QP.

### **Refinancing Guidelines**

N/A - HOME-ARP funds will not be used to refinance existing debt secured by multifamily rental housing rehabilitated with HOME-ARP funds.



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- <sup>i</sup> U.S. Interagency Council on Homelessness. “Findings – and Limitations – of the 2021 Point-in-Time Count”. February 8, 2022. Available at <https://www.usich.gov/news/findingsand-limitationsof-the-2021-point-in-time-count/>.
- <sup>ii</sup> California Interagency Council on Homelessness. Statewide Homelessness Assessment, FY 18-FY 20. [https://www.bcsh.ca.gov/calich/documents/homelessness\\_assessment.pdf](https://www.bcsh.ca.gov/calich/documents/homelessness_assessment.pdf) . Pages 40-52.
- <sup>iii</sup> State of California 2020-2024 Consolidated Plan, Needs Assessment – Section NA-10, Housing Needs Assessment. [https://www.hcd.ca.gov/policy-research/plans-reports/docs/2020-2024\\_CP.pdf](https://www.hcd.ca.gov/policy-research/plans-reports/docs/2020-2024_CP.pdf).
- <sup>iv</sup> State of California Department of Justice, OpenJustice Data Portal. <https://openjustice.doj.ca.gov/exploration/crime-statistics/domestic-violence-related-calls-assistance>.
- <sup>v</sup> U.S. Department of Justice, Bureau of Justice Statistics. *Criminal Victimization, 2020*. Rachel E. Morgan, Ph.D., and Alexandra Thompson. <https://bjs.ojp.gov/library/publications/criminal-victimization-2020>.
- <sup>vi</sup> Smith, S.G., Chen, J., Basile, K.C., Gilbert, L.K., Merrick, M.T., Patel, N., Walling, M., & Jain, A. (2017). The National Intimate Partner and Sexual Violence Survey (NISVS): 2010-2012 State Report. Atlanta, GA: National Center for Injury Prevention and Control, Centers for Disease Control and Prevention. Available at <https://www.cdc.gov/violenceprevention/pdf/NISVS-StateReportBook.pdf>.
- <sup>vii</sup> Perry-Undem and Blue Shield of California Foundation. “Californians’ Views on Gender, Sexism and Domestic Violence. October 2017. Available at [https://blueshieldcafoundation.org/sites/default/files/covers/DV%20Report%209.26\\_FINAL.pdf](https://blueshieldcafoundation.org/sites/default/files/covers/DV%20Report%209.26_FINAL.pdf).
- <sup>viii</sup> State of California Consolidated Annual Performance Evaluation Report, Fiscal Year 2020-21. <https://www.hcd.ca.gov/policy-research/plans-reports/docs/2.%20Draft%20CAPER%2020-21%208.26.2021.pdf>
- <sup>ix</sup> National Low-Income Housing Coalition. “The Gap: The Affordable Housing Gap Analysis 2022”. April 2022. Available at [https://nlihc.org/sites/default/files/gap/Gap-Report\\_2022.pdf](https://nlihc.org/sites/default/files/gap/Gap-Report_2022.pdf).
- <sup>x</sup> State of California 2020-2024 Consolidated Plan, Needs Assessment – Section NA-10, Housing Needs Assessment. *Ibid*.
- <sup>xi</sup> U.S. Interagency Council on Homelessness. “Expert Panel on Homelessness among American Indians, Alaska Natives, and Native Hawaiians.” Retrieved from [https://www.usich.gov/resources/uploads/asset\\_library/Expert\\_Panel\\_on\\_Homelessness\\_among\\_American\\_Indians%2C\\_Alaska\\_Natives%2C\\_and\\_Native\\_Hawaiians.pdf](https://www.usich.gov/resources/uploads/asset_library/Expert_Panel_on_Homelessness_among_American_Indians%2C_Alaska_Natives%2C_and_Native_Hawaiians.pdf)
- <sup>xii</sup> California Department of Corrections and Rehabilitation, Division of Correctional Policy Research and Internal Oversight, Office of Research. “Recidivism Report For Offenders Released From The California Department Of Corrections And Rehabilitation In Fiscal Year 2015-16.” Retrieved from <https://www.cdcr.ca.gov/research/wp-content/uploads/sites/174/2021/09/Recidivism-Report-for-Offenders-Released-in-Fiscal-Year-2015-16.pdf>
- <sup>xiii</sup> Chan Zuckerberg Initiative. “Returning Home Well.” Retrieved from <https://chanzuckerberg.com/newsroom/partnership-launched-support-returning-citizens-california-urgently-reduces-prison-populations-covid-19/>
- <sup>xiv</sup> California Department of Corrections and Rehabilitation, *ibid*.
- <sup>xv</sup> Jacobs LA, Gottlieb A. The effect of housing circumstances on recidivism: Evidence from a Sample of People on Probation in San Francisco. *Criminal Justice Behavior* 2020 Sep;47(9):1097-1115. Retrieved from <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC8496894/>
- <sup>xvi</sup> Vera Institute of Justice. “Opening Doors to Housing Initiative.” Retrieved from <https://www.vera.org/investing-in-communities/opening-doors-to-housing-initiative>
- <sup>xvii</sup> U.S. Interagency Council on Homelessness, *ibid*.

**Attachment A**



**HOME-ARP REGIONS**

**Region 1 - Northern California**  
 Del Norte, Siskiyou, Modoc, Humboldt, Trinity, Shasta, Lassen, Tehama, Mendocino, Plumas, Glenn, Butte, Sierra, Nevada, Lake, Colusa, Yuba, Placer, Sutter, Yolo, El Dorado, Sacramento

**Region 2 - Bay Area**  
 Sonoma, Napa, Solano, Marin, Contra Costa, Alameda, San Francisco, San Mateo, Santa Clara, Santa Cruz

**Region 3 - Central California**  
 Amador, Alpine, San Joaquin, Calaveras, Stanislaus, Tuolumne, Merced, Mariposa, Mono, Madera, San Benito, Fresno, Monterey, Kings, Tulare, Inyo, San Luis Obispo, Kern, Santa Barbara, San Bernardino

**Region 4 - Greater Los Angeles Area**  
 Ventura, Los Angeles, Orange

**Region 5 - Southern California**  
 Riverside, San Diego, Imperial

## Appendix: Public Comments

**From:** Brenda Grealish, Executive Officer, CA Council on Criminal Justice and Behavioral Health  
**To:** Department of Housing & Community Development  
Attn: Federal Branch, HOME-ARP  
**Re:** CCJBH Letter of Support for the California Department of Housing and Community Development HOME-American Rescue Plan Program Draft Allocation Plan  
**See letter attached.**

**HCD Response:** Thank you for your letter of support, which provides further empirical evidence documenting the needs of individuals in the re-entry population. We also look forward to working together to connect persons in the criminal justice system to stable and rehabilitative housing.

**From:** Lucia Choi, Esq., Senior Attorney - Civil Rights Practice Group, Disability Rights California  
**To:** Department of Housing & Community Development  
Attn: Federal Branch, HOME-ARP  
**Re:** HOME-American Rescue Plan Program Draft Allocation Plan Comments  
**See letter attached.**

**HCD Response:** Thank you for your feedback regarding the State of California HOME-ARP program. HCD is committed to funding a broad range of affordable rental housing development and supportive services projects, to serve the needs of members of all four of the qualifying populations as required by HUD. Based on the U.S. Department of Housing and Urban Development (HUD)'s rules governing the HOME-ARP program (described in the HOME-ARP Notice, available at <https://www.hud.gov/sites/dfiles/OCHCO/documents/2021-10cpdn.pdf> (accessed 2/21/2023)) and the consultations, needs assessment and gaps analysis included in the Plan, HCD does not determine that the more specific prescriptions and requirements requested in your comment are indicated at this time. We encourage you to follow the State of California HOME-ARP program to learn more about the specific projects that will be funded by HCD.

**From:** Jessica Hoff-Berzac, President, UPholdings California, LLC  
**To:** Department of Housing & Community Development  
Attn: Federal Branch, HOME-ARP  
**Re:** Public Comment on Proposed HOME – American Rescue Allocation Plan (ARP)

On behalf of UPholdings, we would like to express our gratitude for the opportunity to share our comments on this year's allocation plan. We believe that the HOME-ARP funding will create numerous opportunities for the highly vulnerable populations in Fresno and the entire Central Valley.

According to the allocation plan, HOME-ARP conducted an extensive consultation process to identify critical gaps in housing and services. We recognize that individuals in qualifying populations (QPs) are best able to thrive in communities with stable housing and supportive services. Furthermore, the survey

conducted by HOME-ARP (Fig. II & III) revealed that permanent supportive housing and behavioral health services were the most significant gaps presented in the homelessness response system. The regional allocation for supportive services can certainly shorten the delivery timeline of critical services to QPs.

To address the gaps in the response system, UPholdings suggests including regional set-asides for the development of affordable housing. This approach will enable project developers, particularly in smaller communities, to deliver affordable housing on a more reliable timeline. We believe that the regional set-aside for both housing and supportive services would significantly enhance the homelessness response system. Thank you once again for the opportunity to provide our feedback on this important matter.

**HCD Response:** Thank you for your feedback regarding the State of California HOME-ARP program. At this point, HCD is considering including regional targets for the affordable housing development program, but does not plan to include regional set-asides. Regional targets aim to accomplish the goals outlined in your comment without imposing undue restrictions on the awarding of funds. Please refer to the “HOME-ARP Activities” section of the final Allocation Plan for details on the geography and funding for the regional targets. We encourage you to follow the State of California HOME-ARP program to learn more about the specific details of the affordable housing development Notice of Funding Availability as they become available.

**From:** Patty Hanzo

**To:** HOME-ARP@HCD

**Subject:** Feedback for ARPA funds expenditures

Good afternoon,

I was reading about ARPA funds on your page and have some feedback as a community member: <https://www.hcd.ca.gov/grants-and-funding/programs-active/home-american-rescue-plan-program>

Below are some programs and tactics that may help reduce homelessness, promote housing for various types of populations and prioritize needs that in my view must be planned for California:

First, I would like to suggest that the following definitions be modified and applied in areas of California with the following types of populations and numbers.

1. at-risk of homelessness individuals and families should include a household/family paying 50% or over 50% of income for rent and/or for childcare costs. Include struggling college students and senior citizens to at-risk
2. other types of population groups requiring services should also include college students, senior citizens, veterans, and migrant households, especially in cities with state colleges and a number of higher migrant workers

As a general goal, offering public servants like educators, social workers, nurses, and city/county/state

employees (including librarians, fire, and cops) affordable housing within the city/county/state that they work in would attract long-term residents. This article from January 2023 shows how an affordable housing project can be sponsored by the city, county, school district, and corporation. Such efforts can resolve our local school district's employee retention problem and reduce what the City of Fullerton has been experiencing, losing newly trained cops to other cities after 1-2 years on the force; leaving due to non-competitive wages (low wages compared to other Orange County cities).

Link: <https://sfyimby.com/2023/01/housing-for-teachers-and-staff-members-planned-at-231-grant-avenue-in-palo-alto-santa-clara-county.html> [sfyimby.com]

Services or financial aid must be considered and added to your proposals for college **students** and the **elderly** that are at-risk of homelessness due to the inability to pay an unexpected expense, tuition payment, surprise medical bills, and/ or increased rent. Fullerton has had problems with landlords of senior mobile homes that raised rent during the pandemic (2020 and 2021) when there was a rent moratorium. Our city has several colleges and students that may be experiencing struggles, so reaching out to college housing departments and counselors helps identify potential clients to assist in an effort to prevent them from becoming unhoused and poor. Local medical centers and senior centers can also refer clients.

A household/family paying 50% or over 50% of income for rent must be prioritized at the state level. Households with **childcare expenses** must be considered for financial aid and respite. A family or single parent/caregiver paying 50% or more than 50% of income for childcare would benefit from financial relief, and the same goes for struggling college students and senior citizens. When we help individuals, households, and families save money so that they find more affordable housing, reduce their debt, pay off unexpected medical bills, pay tuition, legal aid services, and other costs it may prevent evictions, poverty, and homelessness.

Please consider the following methods, financial aid options to clients, and services:

Provide a **one-time payment** directly to the provider/debtor for medical bills because it is depleting funds and therefore, the client is heading towards medical bankruptcy. Provide payment to the housing lawyer fee, childcare bill for 3 months, mobile home repairs, and the pet deposit in addition to the typical assistance of TBRA, moving costs, and security deposit payment.

Provide payment for a money management educational workshop/course, vocational training registration fees, one semester of tuition, job license renewal fees, job-related certificate, and job interview skills course. Give non-profits organizations that delivery services funds to distribute to clients for gasoline, bus passes, hotel vouchers, train tickets, and other identified needs.

Solicit assistance from medical providers to refer clients to telemedicine consultations and referrals for mental health services if clients cannot or will not attend in-person counseling or therapy sessions. Help families and individuals get Food Stamps, General Relief (for adults), medical insurance like MediCal, Welfare-to-Work (WTW), and Social Security Disability.

Another idea is to identify city/county/state land that might be used to place affordable tiny houses, factory-built houses, and/or mobile homes for couples and individuals.

Fund a specialized third party to conduct quarterly training meetings in order to provide HOME-ARPA recipients with technical assistance services (evaluation plans, mainstream referral process, data maintenance, and/or other identified capacity building needs) with the intent to improve service delivery systems throughout the City of Fullerton and with the county. One example comes from CSUF's Social Science Research Center <https://hss.fullerton.edu/ssrc/clients/index.aspx> [[hss.fullerton.edu](https://hss.fullerton.edu)]

Converting a building into a shelter would require a couple of million dollars which must come from various funding sources. It might be helpful to encourage the private sector to contribute/donate/sponsor a portion of this type of project or all of that effort as a tax write-off or good deed. Habitat for Humanity can be an ally in this effort, Google, and others.

Thank you for considering these suggestions.

--

Sincerely,  
Patricia Hanzo, MSW  
Fullerton, CA

**HCD Response:** Thank you for your feedback regarding the State of California HOME-ARP program. In general, the rules governing the HOME-ARP program (including eligible grant recipients, qualifying populations who can receive benefits, and allowable uses of funds) are described in the U.S. Department of Housing and Urban Development (HUD) HOME-ARP Notice, available at <https://www.hud.gov/sites/dfiles/OCHCO/documents/2021-10cpdn.pdf> (accessed 2/21/2023). As a condition of receiving HOME-ARP funds, HCD must comply with HUD's program requirements.

HUD provides detailed descriptions of the four qualifying populations and allowable uses of funds in the Notice. Members of the communities you describe may qualify for HOME-ARP benefits depending on their specific situations. The activities that will be funded by HCD's HOME-ARP program were determined primarily by the statewide needs assessment and gaps analysis, feedback from our consultation process, and coordination with local jurisdictions also receiving HOME-ARP funding directly from HUD. Some of the activities you identify will be eligible for HCD HOME-ARP funding, some will be funded by local HOME-ARP programs, and some are not eligible based on HUD rules. We encourage you to follow the State of California HOME-ARP program to learn more about the specific projects that will be funded by HCD.

**From:** Michael Pisano  
**To:** HOME-ARP@HCD  
**Subject:** HOMEARP - Public Comment  
Hi HOME-ARP,  
HOME-American Rescue Plan Program...

1. Can this funding be eligible to Universities & Community Colleges – as some campuses have some students allegedly living out of their cars?
2. Can this funding be used to supplement Mobile Home Space Rent – I pay 70% of my income on my Mortgage & Space Rent?
3. Can this funding be used to have Mobile Home Mortgages at the same rate as Residential Mortgages – I have a 7.1% interests rate – prior to the Feds raising rates due to inflation.
4. Can Park Owners apply to use this funding to help adjust space rent for those that pay 70% of their income on mortgage & space rent?

Thank you for your time & consideration

Michael Pisano – Santa Cruz County

**HCD Response:** Thank you for your questions regarding the State of California HOME-ARP program. In general, the rules governing the HOME-ARP program (including eligible grant recipients, qualifying populations who can receive benefits, and allowable uses of funds) are described in the U.S. Department of Housing and Urban Development (HUD) HOME-ARP Notice, available at <https://www.hud.gov/sites/dfiles/OCHCO/documents/2021-10cpdn.pdf> (accessed 2/21/2023). As a condition of receiving HOME-ARP funds, HCD must comply with HUD's program requirements. In particular, HOME-ARP housing activities are restricted to rental housing development and assistance. To answer your specific questions,

1. Students residing in a location not meant for human habitation (e.g. a vehicle) would be eligible for HOME-ARP assistance, as they are experiencing literal homelessness as defined in the McKinney-Vento Homeless Assistance Act.
2. According to the HOME-ARP Notice, eligible HOME-ARP rental housing includes "housing" as defined at 24 CFR 92.2, which includes manufactured housing lots ([https://www.ecfr.gov/current/title-24/subtitle-A/part-92/subpart-A/section-92.2#p-92.2\(Housing\)](https://www.ecfr.gov/current/title-24/subtitle-A/part-92/subpart-A/section-92.2#p-92.2(Housing))). HCD does not plan to provide tenant-based rental assistance with HOME-ARP funds. The final determination as to whether a HOME-ARP affordable housing development project includes manufactured housing lots will be determined by the project applicants/awardees.
3. Mortgage subsidy for individual borrowers is not an allowable use of HOME-ARP funds.
4. See answer to 2. above. In addition, recipients of HOME-ARP benefits must belong to one of the four Qualifying Populations as described in HCD's Allocation Plan.

We encourage you to follow the State of California HOME-ARP program to learn more about the specific projects that will be funded by HCD.

**From:** Robert H. McConnell

**To:** HOME-ARP@HCD

**Subject:** Homeless ARPA funds

The shortcoming of this is that it leaves local jurisdictions with no power to use a parcel, even for a short time. There is nothing about cleaning and/or clearing public streets. There is no program for people in motor homes, let alone cars. With "affordable" housing costing \$400,000.00 and up PER unit, this is not affordable. There is nothing to provide small homes, with sanitation, utility, and staff supervision on site



for what may well be a temporary blimp in the population cycle. There is no ability to link requiring individuals to participate in assisting programs, such as mental health, addiction, lack of job skills.

**HCD Response:** Thank you for your feedback regarding the State of California HOME-ARP program. The allowable activities for HOME-ARP funding and rules governing HOME-ARP program participation are described in the U.S. Department of Housing and Urban Development (HUD) HOME-ARP Notice, available at <https://www.hud.gov/sites/dfiles/OCHCO/documents/2021-10cpdn.pdf> (accessed 2/21/2023). As a condition of receiving HOME-ARP funds, HCD must comply with HUD's program requirements. All housing and services provided through the HOME-ARP program must be affordable to low-income households as defined by HUD. We encourage you to follow the State of California HOME-ARP program to learn more about the specific projects that will be funded by HCD.

**From:** Kimberly Harvey

**To:** HOME-ARP@HCD

**Subject:** Prevention measures for at-risk prospects

Good gracious morning my name is Kimberly Harvey and while navigating the outline HomeARP initiative, my thoughts were reflecting prevention needed for seniors, who worked all of their lives and some still working but never asked for government assistance until they become displaced,( physical disabilities) evictions, temporary workers compensation, unemployment's status,loss of business , facing economic instabilities and increased mental health. The list is long but they are not quite sleeping on the concretes, or in their vehicles, or talking to themselves. For example, a 60 year old, injured on the job, have to move due to owners selling house, fighting for worker's compensation with unethical practices from employers, attorneys, Corvid setbacks, lost wages, buried three siblings, lost business, credit debt, repo status of car, and top it off service provider's penalizing " not suffering enough to be placed in the CES system and considered not priority. Homelessness is a crime so they say but a system that don't support productive work ethics is inhumane. Thanks for allowing my comment to be heard and I sincerely hope my concern will be taken into consideration for your perusal.

**HCD Response:** Thank you for your feedback regarding the State of California HOME-ARP program. As required by the U.S. Department of Housing and Urban Development, HOME-ARP housing and services will be made available to all Californians who belong to one of the four Qualified Populations as defined by HUD:

- 1) homeless, as defined in section 103 of the McKinney-Vento Homeless Assistance Act;
- 2) at risk of homelessness, as defined in section 401 of McKinney-Vento;
- 3) fleeing, or attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking; or
- 4) in other populations where providing supportive services or assistance would prevent a family's homelessness or would serve those with the greatest risk of housing instability.

Seniors who belong to any of the above four Qualified Populations will be eligible for HOME-ARP benefits.

Under HUD's recent policy guidance on preferences, a Coordinated Entry System (CES) prioritization will constitute a preference. Since we do not outline a preference in our allocation plan, a CES may be used



by HCD grantees for referrals; however, their system of prioritization will not be compliant with HOME-ARP. Eligible applicants must be maintained on a waiting list and admitted in chronological order. As required by HUD, prioritization in a local Continuum of Care's CES will not be an eligibility requirement for HOME-ARP projects funded by HCD. Each HOME-ARP project funded by HCD will determine its own target populations in accordance with HUD's requirements and the local needs of each HCD grantee. We encourage you to follow the State of California HOME-ARP program to learn more about the specific projects that will be funded by HCD.

### **Public Comment Question #1**

**From:** Anonymous Attendee

Will HCD be providing more funding to cover those gaps that were identified?

**HCD Response:** HCD will allocate HOME-ARP funding awarded to the State of California to eligible activities, according to the information collected during the Consultation, Needs Assessment and Gaps Analysis research and included in the Allocation Plan. HCD also administers many additional programs with federal and state funding. More information on these programs can be found at <https://www.hcd.ca.gov/grants-and-funding/programs-active>.

### **Public Comment Question #2**

**From:** Kim Coontz, CA Center for Cooperative Development

Do low-income people with severe housing cost burden (also at-risk of homelessness) include people in a mobile home park, whose parks have been purchased by investors qualify? These low-income people, who are at risk of displacement, own their mobile home (mobile homes are not mobile, once you consider the associated costs and logistics).

**HCD Response:** The households described here likely would be eligible for HOME-ARP benefits as members of Qualified Population 2: individuals and families at risk of homelessness, as defined in the HOME-ARP Notice. Eligibility for specific households will be determined on a project-specific basis by the final awardees of HCD's HOME-ARP funds.

HOME-ARP housing activities are restricted to rental housing development and assistance. According to the HOME-ARP Notice, eligible HOME-ARP rental housing includes "housing" as defined at 24 CFR 92.2, which includes manufactured housing lots ([https://www.ecfr.gov/current/title-24/subtitle-A/part-92/subpart-A/section-92.2#p-92.2\(Housing\)](https://www.ecfr.gov/current/title-24/subtitle-A/part-92/subpart-A/section-92.2#p-92.2(Housing))). HCD does not plan to provide tenant-based rental assistance with HOME-ARP funds. The final determination as to whether a HOME-ARP affordable housing development project includes manufactured housing lots will be determined by the project applicants/awardees.

### **Public Comment Question #3**

**From:** Jennifer Savage

While geographic targets would be great, I wonder if it would be better to target a "whole" project? Rather than requiring affordable housing projects to piece meal funding together, is there an opportunity to fund one full or whole project?

**HCD Response:** We support this proposal. HCD’s HOME-ARP Affordable Rental Housing Development program aims to reduce the number of funding sources that are required to make a project feasible, by increasing the per-unit subsidy as compared to other HCD programs. The goal of this approach is to speed up project development and encourage affordable housing developers in areas that have been historically underserved by HCD (e.g. rural areas and Tribal communities) to apply for HOME-ARP funding.

**Public Comment Question #4**

**From:** Jennifer Savage

Any opportunity for technical assistance to help assess whether we will qualify?

**HCD Response:** HCD generally holds public webinars after a Notice of Funding Availability is released, to give potential applicants a chance to ask questions about applying for funding. Questions can also be asked via the [HOMEARP@hcd.ca.gov](mailto:HOMEARP@hcd.ca.gov) contact email.

**Application for Federal Assistance SF-424****\* 1. Type of Submission:**

- Preapplication  
 Application  
 Changed/Corrected Application

**\* 2. Type of Application:**

- New  
 Continuation  
 Revision

**\* If Revision, select appropriate letter(s):****\* Other (Specify):****\* 3. Date Received:****4. Applicant Identifier:****5a. Federal Entity Identifier:****5b. Federal Award Identifier:**

M-23-SP-06-0100

**State Use Only:****6. Date Received by State:****7. State Application Identifier:****8. APPLICANT INFORMATION:****\* a. Legal Name:** State of California**\* b. Employer/Taxpayer Identification Number (EIN/TIN):**

68-0303547

**\* c. UEI:**

L4JQPJ7N5NT4

**d. Address:****\* Street1:** 2020 W. El Camino Avenue**Street2:****\* City:** Sacramento**County/Parish:****\* State:** CA: California**Province:****\* Country:** USA: UNITED STATES**\* Zip / Postal Code:** 95833-1876**e. Organizational Unit:****Department Name:**

Housing and Community Dev HCD

**Division Name:**

Federal Financial Assistance

**f. Name and contact information of person to be contacted on matters involving this application:****Prefix:****\* First Name:**

Jason

**Middle Name:****\* Last Name:** Bradley**Suffix:****Title:** HOME-ARP Section Chief**Organizational Affiliation:**

Staff

**\* Telephone Number:** (916) 247-3136**Fax Number:****\* Email:** Jason.Bradley@hcd.ca.gov

**Application for Federal Assistance SF-424**

**\* 9. Type of Applicant 1: Select Applicant Type:**

A: State Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

\* Other (specify):

**\* 10. Name of Federal Agency:**

Housing and Urban Development (HUD)

**11. Catalog of Federal Domestic Assistance Number:**

14.239

CFDA Title:

HOME Investments Partnership Program

**\* 12. Funding Opportunity Number:**

M-23-SP-06-0100

\* Title:

HOME Investments Partnership Program-American Rescue Plan (HOME-ARP)

**13. Competition Identification Number:**

n/a

Title:

n/a

**14. Areas Affected by Project (Cities, Counties, States, etc.):**

Add Attachment

Delete Attachment

View Attachment

**\* 15. Descriptive Title of Applicant's Project:**

HOME-ARP Allocation Plan - Allocations for Affordable Rental Housing and Supportive Services in the State of California

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

**Application for Federal Assistance SF-424**

**16. Congressional Districts Of:**

\* a. Applicant

\* b. Program/Project

Attach an additional list of Program/Project Congressional Districts if needed.

Add Attachment

Delete Attachment

View Attachment

**17. Proposed Project:**

\* a. Start Date:

\* b. End Date:

**18. Estimated Funding (\$):**

* a. Federal	155,003,054.00
* b. Applicant	
* c. State	
* d. Local	
* e. Other	
* f. Program Income	
* g. TOTAL	155,003,054.00

**\* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

a. This application was made available to the State under the Executive Order 12372 Process for review on

b. Program is subject to E.O. 12372 but has not been selected by the State for review.

c. Program is not covered by E.O. 12372.

**\* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**

Yes  No

If "Yes", provide explanation and attach

Add Attachment

Delete Attachment

View Attachment

**21. \*By signing this application, I certify (1) to the statements contained in the list of certifications\*\* and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances\*\* and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 18, Section 1001)**

\*\* I AGREE

\*\* The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

**Authorized Representative:**

Prefix:  \* First Name:

Middle Name:

\* Last Name:

Suffix:

\* Title:

\* Telephone Number:  Fax Number:

\* Email:



3/20/2023

Signature of Authorized Representative:

\* Date Signed:

**ASSURANCES - NON-CONSTRUCTION PROGRAMS**

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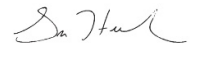
**PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.**

**NOTE:** Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the awarding agency. Further, certain Federal awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:

1. Has the legal authority to apply for Federal assistance and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project cost) to ensure proper planning, management and completion of the project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, through any authorized representative, access to and the right to examine all records, books, papers, or documents related to the award; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
4. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
5. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards for merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
6. Will comply with all Federal statutes relating to nondiscrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681-1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended, relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee- 3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and, (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.
7. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal or federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
8. Will comply, as applicable, with provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.

9. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333), regarding labor standards for federally-assisted construction subagreements.
10. Will comply, if applicable, with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
11. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) Implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
12. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
13. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq.).
14. Will comply with P.L. 93-348 regarding the protection of human subjects involved in research, development, and related activities supported by this award of assistance.
15. Will comply with the Laboratory Animal Welfare Act of 1966 (P.L. 89-544, as amended, 7 U.S.C. §§2131 et seq.) pertaining to the care, handling, and treatment of warm blooded animals held for research, teaching, or other activities supported by this award of assistance.
16. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
17. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
18. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
19. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

<p>SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL</p> 	<p>TITLE</p> <p>Deputy Director</p>
<p>APPLICANT ORGANIZATION</p> <p>California Department of Housing and Community Development</p>	<p>DATE SUBMITTED 3/20/2023</p>

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**PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.**


**NOTE:** Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the Awarding Agency. Further, certain Federal assistance awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:

1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
8. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards of merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
9. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
10. Will comply with all Federal statutes relating to non-discrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681 1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee 3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.



11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
12. Will comply with the provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.
13. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding labor standards for federally-assisted construction subagreements.
14. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
16. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
17. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq).
18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
20. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

<p>SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL</p> 	<p>TITLE</p> <p>Deputy Director</p>
<p>APPLICANT ORGANIZATION</p> <p>California Department of Housing and Community Development</p>	<p>DATE SUBMITTED 3/20/2023</p>

## HOME-ARP CERTIFICATIONS

In accordance with the applicable statutes and the regulations governing the consolidated plan regulations, the participating jurisdiction certifies that:

**Affirmatively Further Fair Housing** --The jurisdiction will affirmatively further fair housing pursuant to 24 CFR 5.151 and 5.152.

**Uniform Relocation Act and Anti-displacement and Relocation Plan** --It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, (42 U.S.C. 4601-4655) and implementing regulations at 49 CFR Part 24. It will comply with the acquisition and relocation requirements contained in the HOME-ARP Notice, including the revised one-for-one replacement requirements. It has in effect and is following a residential anti-displacement and relocation assistance plan required under 24 CFR Part 42, which incorporates the requirements of the HOME-ARP Notice. It will follow its residential anti-displacement and relocation assistance plan in connection with any activity assisted with funding under the HOME-ARP program.

**Anti-Lobbying** --To the best of the jurisdiction's knowledge and belief:

1. No Federal appropriated funds have been paid or will be paid, by or on behalf of it, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement;
2. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, it will complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions; and
3. It will require that the language of paragraph 1 and 2 of this anti-lobbying certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

**Authority of Jurisdiction** --The consolidated plan is authorized under State and local law (as applicable) and the jurisdiction possesses the legal authority to carry out the programs for which it is seeking funding, in accordance with applicable HUD regulations and program requirements.

**Section 3** --It will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u) and implementing regulations at 24 CFR Part 75.

**HOME-ARP Certification** --It will use HOME-ARP funds consistent with Section 3205 of the American Rescue Plan Act of 2021 (P.L. 117-2) and the CPD Notice: *Requirements for the Use of Funds in the HOME-American Rescue Plan Program*, as may be amended by HUD, for eligible activities and costs, including the HOME-ARP Notice requirements that activities are consistent with its accepted HOME-ARP allocation plan and that HOME-ARP funds will not be used for prohibited activities or costs, as described in the HOME-ARP Notice.

*Alicia Sebastian*

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Signature of Authorized Official

March 24, 2023

Date

Assistant Deputy Director - Acting

Title