

Revision

- Updated Substantial Amendment to the FY 2021-2022 Annual Action Plan, including proposed allocations for Home Investment Partnership - American Rescue Plan Act funds

MEMORANDUM

DATE: SEPTEMBER 15, 2022

TO: COMMUNITY PLANNING AND DEVELOPMENT (CPD)
GRANTS SUBCOMMITTEE

FROM: SCOTT WEBB 
CITY PLANNER



SUBJECT: UPDATED SUBSTANTIAL AMENDMENT TO THE FY 2021-2022 ANNUAL ACTION PLAN, INCLUDING PROPOSED ALLOCATIONS FOR HOME INVESTMENT PARTNERSHIP – AMERICAN RESCUE PLAN ACT FUNDS

AGENDA ITEM NO. 1

After the preparation of the Staff Report for the subject item, City staff received a revised Substantial Amendment to the FY 2021-2022 Annual Action Plan (“Annual Action Plan Amendment”) from the Apple Valley/Victorville Consortium’s consultant, which includes grammatical corrections as well as the proposed allocation of Federal Home Investment Partnership – American Rescue Plan Act (HOME-ARP) funds that reflect the discussion included in the original Staff Report.

As discussed in the original Staff Report, the HOME-ARP funding is proposed by staff to be provided to the “Supportive Services” category, which includes a range of applications such as mental and physical health, substance abuse, life skills training, job training, and education that can be used to provide the types of wrap-around services planned for the Wellness Center as well as throughout the City. Additionally, the Annual Action Plan Amendment reserves 15% of the total HOME-ARP allocation to Administration and Planning, that can be used to fund administrative functions such as City staff, legal reviews, etc.

Recommendation:

That the CPD Grants Subcommittee proceed with the recommendation outlined in the original Staff Report.

Attachment

Submitted by: Alex Jauregui, Senior Planner



Town of
Apple Valley



**Substantial Amendment
2021 Action Plan HOME-ARP
HOME INVESTMENT PARTNERSHIPS PROGRAM
AMERICAN RESCUE PLAN**

September 2022



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DRAFT Substantial Amendment to 2021 Annual Action Plan HOME-ARP ALLOCATION PLAN

HOME Investment Partnerships Program
American Rescue Plan



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VERSION HISTORY

No.	Summary of Changes			
1	Town of Apple Valley Published Draft for Public Comment:	9/23/22	Sent to HUD for Approval:	TBD
	City of Victorville Published Draft for Public Comment:	9/16/2022		
	Town of Apple Valley Conducted Public Hearing:	11/8/22	Approved by HUD:	TBD
	City of Victorville Conducted Public Hearing:	10/18/2022		
	Original HOME-ARP Allocation Plan.			

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Executive Summary

The Apple Valley-Victorville Consortium has been allocated \$2,913,966 of HOME Investments Partnerships Program-American Rescue Plan Act (HOME-ARP) funding from the US Department of Housing and Urban Development (HUD). In order to receive the HOME-ARP allocation, the Consortium must develop a HOME-ARP Allocation Plan that will become part of the Consortium's PY2021 HUD Annual Action Plan by Substantial Amendment.

To ensure broad input into the HOME-ARP Allocation Plan from stakeholders and the public, the Consortium engaged in consultation with stakeholders and the public, including a virtual consultation session, a survey of stakeholders, a 30-day public comment period, and a public hearing.

The needs assessment and gap analysis identified the following needs and gaps within the Consortium:

- In February 2020, the annual Point in Time (PIT) count revealed that 232 people were residing in emergency housing, either in shelter or transitional housing. Another 250 people were unsheltered on the streets, in tents or makeshift shelters, or in cars, vans, RVs or campers.
- 2014-2018 CHAS Data from HUD reported 9,810 households with incomes at or below 30% AMI are at greatest risk of housing instability in the Consortium.
- The greatest need for supportive services is in the areas of financial assistance, food assistance, housing search and housing counseling services, and job training and employment assistance.

The Consortium considered all of the eligible activities for this funding and the qualifying populations to be served, assessed the available resources and the gaps present, in making its decision about how the limited funds would most benefit the community. It also considered the Wellness Center, opening soon in Victorville. The project will offer a low-barrier emergency shelter with a recuperative care facility, medical clinic, interim housing and supportive services.

To address the needs within the community, the Consortium will allocate its HOME-ARP funds to Supportive Services designed to assist the homeless and those at risk of becoming homeless. It is the intent to have many of the services either offered or based at the Wellness Center, serving homeless and those at risk of homelessness.

Introduction

The Apple Valley-Victorville Consortium has been allocated \$2,913,966 of HOME Investment Partnerships Program-American Rescue Plan Act (HOME-ARP) funding from the US Department of Housing and Urban Development (HUD). To receive the HOME-ARP allocation the Apple Valley-Victorville Consortium must develop a HOME-ARP Allocation Plan that will become a part of the Consortium's PY2021 HUD Annual Action Plan by substantial amendment. The HOME-ARP Allocation Plan must include the following:

1. A summary of the consultation process and the results of consultation;
2. A summary of comments received through the public participation process and a summary of any comments or recommendations not accepted and the reason why;
3. A description of HOME-ARP qualifying populations within the jurisdiction;
4. An assessment of unmet needs of each qualifying population;
5. An assessment of gaps in housing and shelter inventory, homeless assistance and services, and homelessness prevention service delivery system;
6. A summary of planned use of HOME-ARP funds for eligible activities based on the unmet needs of the qualifying populations;
7. An estimate of the number of housing units for qualifying populations the Consortium will produce or preserve with its HOME-ARP allocation;
8. A description of any preferences for individuals and families in a particular qualifying population or a segment of a qualifying population;
9. HOME-ARP Refinancing Guidelines; and
10. Certifications and SF-424, SF-424B, and SF-424D Forms.

The following entities are responsible for preparing the Allocation Plan and administration of the HOME-ARP grant.

Responsible Agencies		
Agency Role	Name	Department/Agency
Lead Agency	Town of Apple Valley	Housing and Community Development Department
Consortium Member	City of Victorville	Development Department

HOME-ARP Eligible Qualifying Populations and Activities

HUD's CPD Notice 21-10 Requirements for the Use of Funds in the HOME-American Rescue Plan Program establishes the requirements for funds appropriated under section 3205 of the

American Rescue Plan Act of 2021 for the HOME Investment Partnerships Program (HOME) to provide homelessness assistance and supportive services.

The American Rescue Plan Act (ARP) defines qualifying individuals or families, including Veterans, that are:

1. Homeless, as defined in section 103(a) of the McKinney-Vento Homeless Assistance Act;
2. At risk of homelessness, as defined in section 401 of the McKinney-Vento Homeless Assistance Act;
3. Fleeing or attempting to flee domestic violence, dating violence, sexual assault, or stalking (as defined by HUD in 24 CFR 5.2003) or human trafficking (as outlined in the Trafficking Victims Protection Act of 2000 as amended [22 USC 7102]); and
4. Part of other populations, where providing supportive services or assistance under section 212(a) of the National Affordable Housing Act 42 USC 12472(a) would:
 - a. Prevent a family's homelessness;
 - b. Serve those with the greatest risk of housing instability.

HOME-ARP funds may be used benefit qualifying populations through:

1. Tenant-based Rental Assistance (TBRA);
2. Development and support of affordable housing;
3. Provision of supportive services;
4. Acquisition and development of non-congregate shelter;
5. Nonprofit capacity building and operating assistance; and
6. Program planning and administration.

Stakeholder Consultation and Public Participation

HUD requires each HOME-ARP Participating Jurisdiction to consult with agencies and service providers whose clientele include the HOME-ARP qualifying populations. Agencies that must, at a minimum, be consulted include the Continuum of Care serving the jurisdiction's geographic area, homeless and domestic violence service providers, veterans' groups, public housing agencies (PHAs), public agencies that address fair housing, civil rights, and the needs of persons with disabilities.

HUD also requires that each Participating Jurisdiction provide opportunities for the public to comment on the proposed Allocation Plan, including the amount of HOME-ARP funds that will be received and the range of activities that the Consortium may undertake.

To ensure broad input into the HOME-ARP Allocation Plan from stakeholders and the public, the Consortium engaged in consultation with stakeholders and the public, including a virtual consultation session, a survey of stakeholders, a 30-day public comment period, and a public hearing.

Stakeholder Consultation

The Apple Valley-Victorville Consortium consulted with representatives from multiple agencies, groups, and organizations involved in the development of affordable housing, addressing homelessness, and the provision of services to qualifying populations in preparing this HOME-ARP Allocation Plan.

Two virtual sessions were held June 30, 2022. Representatives from multiple agencies, groups, and organizations were invited via email to attend. Those unable to attend were invited to submit written comments via emails or schedule a phone call to share their thoughts.

The virtual consultation session included an overview of the HOME-ARP notice to inform attendees of the qualifying populations and eligible activities, an opportunity to ask clarifying questions, a request for input into needs and gaps, and priority populations and activities, and an overview of the Allocation Plan timeline and process.

A survey instrument was designed and available online and invited representatives from multiple agencies, groups, and organizations to rank the qualifying populations and eligible

activities and services in order of perceived need, and the best approach for carrying out those activities for the community.

The Consortium’s virtual sessions were attended by 19 representatives of 17 agencies. The survey was completed by five representatives of five agencies and two members of the public. All HUD-required agency types were represented in either the virtual session or the online survey.

Organizations Consulted by Type and Method

Organization Consulted	Type of Organization	Method of Consultation
A Core Solution	Nonprofit, addresses needs of qualifying populations including homeless	Virtual Session
Antelope Valley Domestic Violence Center dba Valley Oasis	Nonprofit, addresses needs of qualifying populations including domestic violence victims	Survey
Apple Valley Adult School	Nonprofit, addresses needs of qualifying populations	Survey
Christ of Solid Rock	Nonprofit, addresses needs of qualifying populations including homeless	Virtual Session
City of Victorville	Public, addresses needs of qualifying populations, serves as public housing authority	Virtual Session
Community Health Action Network	Nonprofit, addresses needs of qualifying populations including homeless	Virtual Session
Family Assistance Program	Nonprofit, addresses needs of qualifying populations including homeless	Virtual Session Survey
Goodwill Southern California	Nonprofit, addresses needs of qualifying populations	Virtual Session
High Desert Mutual Aid	Nonprofit, addresses needs of qualifying populations including homeless	Virtual Session
Inland Regional Center	Nonprofit, addresses needs of qualifying populations including disabled	Survey
Office of District 1 County Supervisor	Public, addresses needs of qualifying populations	Virtual Session
Project 180	Public, addresses needs of qualifying populations	Survey
Providence St. Mary's Hospital	Nonprofit, addresses needs of qualifying populations	Virtual Session
Retired Military Personnel	Individual, volunteer Veterans' advocate	Virtual Session

Ruth & Naomi Project	Nonprofit, addresses needs of qualifying populations	Virtual Session
Symba Center	Nonprofit, addresses needs of qualifying populations including homeless	Virtual Session
The Lords Table	Nonprofit, addresses needs of qualifying populations including homeless	Virtual Session
Town of Apple Valley	Public, addresses needs of qualifying populations, serves as public housing authority	Virtual Session
Victor Valley Domestic Violence	Nonprofit, addresses needs of qualifying populations including victims of domestic violence	Virtual Session
Victor Valley Family Resource Center	Nonprofit, addresses needs of qualifying populations including homeless	Virtual Session
Women of Nobel Character	Nonprofit, addresses needs of qualifying populations including homeless	Virtual Session

Summary of Feedback Received from Consulted Organizations

Consultation revealed strong support for the following:

Tenant-based rental assistance (TBRA). There currently is no TBRA assistance available in the Consortium. Of respondents to the survey, 83% believed there was a high need for this activity.

Development and support of affordable housing. Participants in the virtual sessions discussed the need for additional affordable housing. Many expressed concerns about the challenge of identifying housing and getting into the units without vouchers or other programs of support. Currently there is one affordable housing program with project-based vouchers that is meeting their period of affordability and there is concern about the future of that project. Several participants pointed out the needs for affordable housing specifically for families, seniors, and domestic violence victims. Of respondents to the survey, 50% believed there was a high need for this activity.

Acquisition and development of non-congregate shelter. Many participants mentioned the need for shelter in general and for specific populations including families, those fleeing domestic violence and other situations, people with service animals, the elderly and single people. A new project in Victorville, the Wellness Center, is scheduled to open in early 2023 will provide additional shelter beds, both congregate and non-congregate. Of respondents to the survey, 29% believed there was a high need for this activity.

Provision of supportive services. Many examples of supportive services were mentioned in the virtual session including general services to families, foster children including those aging out of the system, credit repair services, employment and job preparation services, and eviction relief. Survey respondents were asked to rate what they believed is the current need for various services eligible under HOME-ARP. Of respondents to the survey, 17% believed there was a high need for this activity. The activities with the most ratings for “high need” were financial assistance costs, food assistance, housing search and counseling services, job training and employment services, mental health services, outreach services, substance abuse treatment, and transportation assistance (67% each).

Rating of Current Need for Supportive Services				
Supportive Services	High Need	Moderate Need	Low Need	No Need
Financial assistance costs	67%	17%	17%	0%
Food assistance	67%	17%	17%	0%
Housing search and counseling services	67%	33%	0%	0%
Job training and employment services	67%	33%	0%	0%
Mental health services	67%	33%	0%	0%
Outreach services	67%	33%	0%	0%
Substance abuse treatment	67%	17%	17%	0%
Transportation assistance	67%	33%	0%	0%
Education services	60%	40%	0%	0%
Case management services	50%	33%	17%	0%
Landlord/tenant liaison services	50%	33%	17%	0%
Legal services	50%	33%	17%	0%
Outpatient health services	50%	50%	0%	0%
Services for special populations	50%	33%	17%	0%
Credit repair services	33%	50%	17%	0%
Mediation services	33%	50%	17%	0%
Childcare assistance	29%	57%	14%	0%

Nonprofit capacity building and operating assistance. In the survey, respondents were asked if they believed there was a need for nonprofit capacity building and operating assistance. Of respondents to the survey, 86% responded affirmatively that there was a need in the nonprofit sector for this assistance.

Public Participation

To provide opportunities for public participation, the Apple Valley-Victorville Consortium sent an email to all agencies and individuals on its email list notifying them of the opportunity to participate in the virtual consultation sessions held on June 30, 2022. In addition to attending the virtual consultation session, they were asked to complete an online survey regarding their views of the level of need for the eligible activities and qualifying populations as described by the CPD Notice 21-10. Those unable to attend, or who had further comments after the virtual session were invited to email them directly to Consortium staff.

A Public Notice for the public comment period and public hearing was published in the *Valleywide Newspaper* on September 16, 2022, and the *Victorville Daily Press* on September 23, 2022. The public notice was published in both English and Spanish. The *Valleywide Newspaper* and *Victorville Daily Press* the qualify as newspapers of general circulation.

Efforts to Broaden Public Participation

To broaden public participation, members of the public who are on the Consortium's email list were also invited via email to attend the virtual consultation session held in the formulation of the Allocation Plan.

Public Comments and Recommendations Received

To be completed after the Public Comment period and the Public Hearing.

Public Comments and Recommendations Not Accepted and Reasons Why

To be completed after the Public Comment period and the Public Hearing.

Needs Assessment and Gap Analysis

The needs assessment and gap analysis must evaluate the size and demographic composition of HOME-ARP qualifying populations, and unmet needs of HOME-ARP qualifying populations. In addition, the needs assessment and gap analysis must identify any gaps within its current shelter and housing inventory, and service delivery system. This needs assessment and gap analysis focuses on the following:

1. Sheltered and unsheltered homeless populations;
2. Currently housed populations at risk of homelessness;
3. Other families requiring services or housing to prevent homelessness; and
4. Those at greatest risk of housing instability or unstable housing situations.

Housing Inventory Count

The annual Housing Inventory Count (HIC) provides useful context regarding the number and type of beds and units that are available for individuals and families experiencing on any given night. The following tables summarize beds and units available as of January 2021 in the Consortium by bed type.

Emergency housing beds include emergency shelter and transitional housing; emergency shelter generally allows for short-term or nightly stays, while transitional housing generally allows for a stay up to 24 months. Both types of emergency housing may include supportive services designed to facilitate movement to independent living.

The 2021 HIC did not include details about housing available for subpopulations.

Emergency Housing Beds Available January 2021					
	Family Units	Family Beds	Adult-Only Beds	Child-Only Beds	Total Year-Round Beds
Emergency Shelter	6	18	60	13	97
Transitional Housing	15	54	33	1	103
Total Emergency Housing Beds	21	72	93	14	200

The 2021 Continuum of Care Housing Inventory Count includes one transitional housing project, that had been located in Apple Valley, but has since closed its doors. Although included in the 2021 report published by HUD, we have not included in the count in the plan.

Rapid rehousing provides security and utility deposits and/or monthly rental and utility assistance for rental units that rent for less than the fair market rent. Assistance is generally provided for the shortest period of time necessary for a household to gain stable housing and can range from 3 to 24 months. Permanent supportive housing provides for an unlimited lease term; residents receive services necessary to promote continued housing stability.

Rapid Rehousing and Permanent Supportive Housing Available January 2022					
	Family Units	Family Beds	Adult-Only Beds	Child-Only Beds	Total Year-Round Beds
Rapid Rehousing	0	0	0	0	0
Permanent Supportive Housing	0	0	0	0	0
Total Year-Round Beds	0	0	0	0	0

Size and Demographic Composition of Qualifying Populations

Sheltered Homeless Populations

The 2022 Point-in Time (PIT) count identified 232 people experiencing sheltered homelessness in the Consortium on during the night of February 23 through the early morning of February 24, 2022. People are considered sheltered when they are residing in emergency shelter or transitional housing, but not when they are receiving rapid rehousing assistance or residing in permanent supportive housing. Among individuals experiencing sheltered homelessness:

- 169 (73%) were in emergency housing
 - 1 in Apple Valley
 - 168 in Victorville
- 63 (27%) were in transitional housing for homeless persons
 - All in Victorville

Unsheltered Homeless Populations

The 2022 Point-in Time (PIT) count identified 250 people experiencing unsheltered homelessness on February 24, 2022. A person was considered homeless and counted only

when they fell within the HUD-based definition by residing in a place not meant for human habitation, such as a car, a park, on the sidewalk, or an abandoned building. The count did not report the numbers for each living situation.

- Apple Valley: 26
 - up from the 2020 count of 24
- Victorville: 224
 - down from the 2020 count of 298

At-risk of Homelessness

Households at risk of homelessness are those with incomes at or below 30% AMI that lack sufficient resources or support networks to prevent homelessness, and

- Have moved more than two times due to economic reasons in the past 60 days, or
- Are doubled up with another household due to economic hardship, or
- Will be evicted within 21 days, or
- Live in a hotel or motel without financial assistance from a nonprofit or government entity, or
- Live in an efficiency apartment and are overcrowded, or
- Are exiting a publicly-funded institution or system of care

The CHAS 2014-2018 Data Table 10 indicates that there are approximately 5,255 renter households with incomes at or below 30% AMI that are at risk of homelessness in the Consortium.

- Apple Valley: 1,740
- Victorville: 3,515

Fleeing or Attempting to Flee Domestic Violence, Dating Violence, Sexual Assault, Stalking or Human Trafficking

Nationwide, domestic violence, assault, and stalking are underreported according to the U.S. Department of Justice. *Criminal Victimization, 2020*, reports only 58 percent of all domestic violence events were reported to the police. The State of California Department of Justice maintains statistics on domestic violence calls to local law enforcement statewide by jurisdiction (openjustice.doj.ca.gov). In 2020, police in Apple Valley and Victorville responded to a total of 675 calls related to domestic violence. Of these calls for assistance:

- 390 of these domestic incidents did not involve a weapon
- 282 calls involved a weapon

- 22 domestic incidents involved a firearm
- 13 domestic incidents involved a knife or cutting instruments
- 46 domestic incidents involved other dangerous weapons
- 201 domestic incidents involved personal weapons (i.e., feet or hands)
- 87 cases involved strangulation
- 11 cases involved suffocation

It is difficult to estimate the number and type of families in need of housing assistance based on the data provided by state's Open Justice program. In households where physical violence occurred, it is possible that at least one member, possibly more include children, will need to relocate within the next five years to escape recurring violence.

Victims of domestic violence suffer in many ways including economically which impacts access to safe and affordable permanent housing. Nationally, statewide, and in the Apple Valley-Victorville Consortia there is need for emergency shelter and affordable permanent housing.

Other Populations

Other populations, as defined by HOME-ARP, include those who:

1. Are currently housed and at risk of repeat homelessness;
2. Have incomes at or below 30% AMI and are experiencing severe housing cost burden; and
3. Otherwise meet the definition of at risk of homelessness and have incomes income of more than 30% and at or below 50%

Other Populations: At greatest risk of housing instability – Households with incomes <30% AMI and experiencing housing cost burden

The 2014-2018 HUD CHAS data indicates there are 9,810 renter households with an annual income at or below 30% AMI with a cost burden that are at greatest risk of housing instability.

These renter households include:

- Two-person households, one or both of whom are age 62 or older: 15
- Small families with 2-4 non-elderly people: 50
- Large families with 5 or more people: 55
- People living alone or with non-relatives who are age 62 or older: 30
- People living alone or with non-relatives, none of whom are age 62 or older: 20

Other Populations: At greatest risk of housing instability – Households with incomes 31-50% AMI that meet HUD’s §91.5 definition of at risk of homelessness

Households in this category are those with incomes at more than 30% and at or below 50% AMI that lack sufficient resources or support networks to prevent homelessness, and

- Have moved more than two times due to economic reasons in the past 60 days, or
- Are doubled up with another household due to economic hardship, or
- Will be evicted within 21 days, or
- Live in a hotel or motel without financial assistance from a nonprofit or government entity, or
- Live in an efficiency apartment and are overcrowded, or
- Are exiting a publicly-funded institution or system of care

HUD Comprehensive Housing Affordability Strategy (CHAS) 2014-2018 Data Table 10 provides information on households that include more than one family, household income level and overcrowding. The CHAS data indicates that there are approximately 4,265 households with incomes between 30 and 50% AMI that are at risk of homelessness in the Consortium because of at least one of the housing problems as defined by HUD. In addition, 35 are living in households with more than one family.

Unmet Housing Needs of Qualifying Populations

The greatest unmet housing need of qualifying populations is the availability of affordable rental housing. As the table below shows, only 2% of the more than 8,500 rental units in the Consortium are available to households with incomes at or below 50% AMI.

Housing Needs Inventory and Gap Analysis					
		Available Units	Level of Need	HH with at least 1 Housing Problem	GAP (units-level of need)
Total Rental Units	8,585				
<=30% AMI		145	5,255	4,510	(5,110)
>30% to <=50% AMI		50	4,690	5,255	(4,640)
Total <=50% AMI		195	9,945	9,765	(9,750)

Unmet Service Needs of Qualifying Populations

Based on consultation with service providers in the Consortium, the greatest unmet service needs of qualifying populations included sheltered and unsheltered homeless populations, currently housed populations at risk of homelessness, other families requiring services or

assistance to prevent homelessness, and those at greatest risk of housing instability or in unstable housing situations are:

- Financial assistance costs
- Food assistance
- Housing search and counseling services
- Job training and employment services
- Mental health services
- Outreach services
- Substance abuse treatment
- Transportation assistance

Additional unmet service needs of qualifying populations, including sheltered and unsheltered homeless populations, currently housed populations at risk of homelessness, other families requiring services or assistance to prevent homelessness, and those at greatest risk of housing instability or in unstable housing situations include the following as described in HUD CPD Notice 2021-10, as may be amended:

- Education services
- Case management services
- Landlord/tenant liaison services
- Legal services
- Outpatient health services
- Services for special populations
- Credit repair services
- Mediation services
- Childcare assistance

Current Resources Available to Assist Qualifying Populations

Current available resources include:

- Congregate beds and non-congregate shelter units;
- Supportive services;
- Tenant-based rental assistance; and
- Affordable and permanent supportive housing
- Housing vouchers

Current Resources: Congregate Beds and Non-congregate Shelter Units

In January 2021, there were 200 congregate beds and no beds in non-congregate shelter units. Congregate beds include emergency, safe haven, and transitional housing beds and units. Non-congregate shelter includes permanent supportive housing and rapid re-housing.

Current Resources: Supportive Services

San Bernardino County's homeless Continuum of Care (CoC) is comprised of a network of public, private, faith-based, for-profit, and non-profit service providers who utilize several federal, state, and local resources to provide services for homeless people. The region's municipalities, including the Consortium, also provide resources for services that assist the homeless and those at risk of becoming homeless. The non-profit and faith-based community plays a key role in the current CoC system. Hundreds of agencies throughout the County provide programs ranging from feeding the homeless on the street to creating permanent supportive housing opportunities. These services are available to homeless families with children, and single men and women. The non-profit and faith-based community also serves special needs populations, such as victims of domestic violence, veterans, the disabled and youth.

Current Resources: Tenant-based Rental Assistance

There are no Tenant-based Rental Assistance programs available in the Consortium.

Current Resources: Affordable and Permanent Supportive Rental Housing

There are 13 apartment complexes within the Consortium that have been identified as being affordable rental housing units. The apartment complexes are identified by searching the Internet for "affordable housing" in each community. The properties offer at least 1,206 affordable units. Of those properties,

- Four properties are project-based Housing Choice Voucher projects (estimated 361 units)
- Eight properties are Low-Income Housing Tax Credit (LIHTC) projects (estimated 811 units)
- Two are Section 515 Rural Rental Housing and Section 521 USDA Rental Assistance projects (34 units)
- Two rent only to seniors 55 units)

Of the four complexes renting to the general population that responded to the survey, all complexes (with a total of 405 units) had waiting lists that totaled “more than” 752 names (there may be duplicates on the four lists); all currently have waiting lists; and three had closed their lists; one list is open because the funding requires it to remain open; the lists were between two and four years old. Based on the survey and information found online, none of the 13 complexes had units available for rent.

The only complex renting to only seniors that responded to the survey reported a waiting list of 33 names (12 units) and reported that the waiting lists included names dating back three to four years. Based on the survey and information found online, neither of the complexes had units available for rent.

Current Resources: Housing Vouchers

The Housing Authority of the County of San Bernardino currently has 8,714 Housing Choice Vouchers deployed within the County. Of those, there are 922 vouchers deployed in the Consortium.

The Housing Authority also maintains a waiting list for those vouchers. It is currently using a waiting list from 2019. There are 5,840 names still on the list and the list will probably be depleted in the next six to eight months if funding continues. Applications were taken for the 2022 waiting list between June 7 and June 30, 2022. About 26,000 applications were received and are currently being processed.

The Consortium, the Town, and the City do not sponsor any Housing Choice Vouchers.

Shelter, Housing and Service Delivery System Gaps

Shelter Gap

There is an estimated need for 250 additional shelter beds based on the 2022 PIT count. The PIT count found that there were 232 persons in emergency shelter or transitional housing in the Consortium, but 250 unsheltered persons in a variety of situations, including on the street, in tents or makeshift shelters, or in cars, vans or RVs/campers.

The 2022 PIT count does not define, how many were individuals, in family units, or children.

Tenant-based Rental Assistance Gap

There is an estimated gap of 5,970 tenant-based rental assistance vouchers for households with income at or below 50% AMI and paying more than 50% of household income for rent, including utilities.

Tenant-based Rental Assistance Gap	
Renter Households with Income at or below 50% AMI paying more than 50% of income for rent, including utilities	5,970
TBRA vouchers available	0
<i>TBRA gap</i>	<i>5,970</i>

The Tenant-based Rental Assistance voucher gap was calculated using HUD CHAS data Table 7 and is equal to the number of renter households with income at or below 50% AMI and paying more than 50% of household income for rent, including utilities, less the number of households being served with TBRA assistance.

Affordable Supportive Rental Housing Gap

There is an estimated gap of 4,220 rental units affordable to renter households with income at or below 30% AMI and an estimated gap of 1,850 rental units affordable to renter households with income more than 30% and at or below 50% AMI.

Affordable Rental Unit Gap	
Renter Households with Income at or below 30% AMI paying more than 50% of income for rent, including utilities	4,220
Renter Households with Income 30% to 50% AMI paying more than 50% of income for rent, including utilities	1,850
<i>Total Affordable Rental Units Needed</i>	<i>6,070</i>

The number of Affordable Rental Units was calculated using HUD CHAS Data Table 7 and is equal to the number of renter households' income category paying more than 50% of household income for rent, including utilities.

Permanent Supportive Rental Housing Gap

Permanent supportive rental housing is a subset of the affordable rental housing gap, primarily for households with income at or below 30% AMI. In addition to affordable rent, permanent supportive housing provides an array of services necessary to help people with

disabilities and/or experiencing chronic homelessness to retain housing stability. There is an estimated gap of 642 permanent supportive housing units in the Consortium.

Permanent Supportive Housing Gap	
Population of Apple Valley and Victorville Census 2020	201,601
Per capita estimate of permanent supportive housing need	.003183
Estimated need for Permanent Supportive Housing	642
Permanent Supportive Housing Available	0
<i>Total Permanent Supportive Housing Gap</i>	<i>642</i>

The number of Permanent Supportive Rental Housing Units needed was calculated by multiplying the current population of the Consortium, according to the California Census 2020, by the per capita need (.003182) in California as calculated by the Corporation for Supportive Housing, less the number of Permanent Supportive Rental Housing Units currently available.

Housing Voucher Gap

The size of the housing voucher gap is in the City unknown. The Consortium represents 9.3% of the county population (2,181,654 in 2020). The current waiting list is 5,840, and it is conceivable that there could be 540 names on the waiting list currently residing in the Consortium area. In addition, there are 26,000 applications for the new list. Using the same formula, and assuming that the applicants on the 2019 have reapplied for the new list, there could be another 1,875 applicants in the City hoping to get housing assistance with a housing voucher.

Service Delivery System Gap

To identify gaps in the service delivery system, the Consortium relied on its consultation with stakeholders and experience working with the organizations working in the Consortium. The stakeholders believe that the most critical service gaps are in the areas of financial assistance costs, food assistance, housing search and counseling services, job training and employment services, mental health services outreach services, substance abuse treatment, and transportation assistance. The stakeholders also believed there was a need for assistance with general administrative costs and building capacity among the nonprofit service providers serving the Consortium’s qualifying populations.

Characteristics of Housing Associated with Increased Risk of Homelessness for Other Populations

For other populations, severe housing cost burden, or paying more than 50% of household income for rent and utilities is the primary characteristic of housing associated with the risk of homelessness in the Consortium. The HUD CHAS Data Table 7 indicates there are 6,070 households at or below 50% AMI who are spending more than 50% of the household income on rent and utilities.

Priority Needs for Qualifying Populations

Homeless. An article on the website policyadvice.net, *The State of Homelessness in the US-2022*, uses PBS as a source for the following statistics:

- 25% of homeless people have a mental illness
- 38% have an alcohol abuse issue
- 26% have a drug abuse issue

That information, and other research, indicates that there is a need for mental health services and substance abuse services for the homeless in the Consortium. Participants in the consultation process believed that homelessness was best served by the development of additional shelter beds, affordable housing, and TBRA assistance for housing. The priority needs for supportive services included housing search, mental health services, financial assistance, and case management.

At risk of homelessness. One of the indicators of risk of homelessness is housing cost burden. According to the National Alliance to End Homelessness, in their *State of Homelessness: 2021 Edition*, households experiencing a severe housing cost burden and households “doubling up” or sharing housing are both at a greater risk of homelessness than they were in 2007. They used numbers from 2019, before the COVID-19 pandemic and project that reduced work hours and elevated unemployment will have increased those at risk.

Participants in the consultation process believed those at risk of homelessness in the Consortium would benefit from additional affordable housing, TBRA assistance for housing, and supportive services offering housing counseling, fair housing, credit repair services, and eviction defense.

Fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking or human trafficking. The National Resource Center on Domestic Violence reports that

domestic violence is frequently an immediate cause or precursor to homelessness and housing instability and that more than a third of domestic violence survivors report becoming homeless immediately after separating from their partners. The national Institute of Justice reports that one homeless woman in four is homeless mainly because of her experiences with violence. That violence can include categories of domestic violence, dating violence, sexual assault, stalking or human trafficking.

Participants in the consultation process believed those dealing with fleeing unsafe relationships or living situations, would benefit from supportive services offering housing counseling, mental health services, fair housing, case management services affordable housing and TBRA assistance.

Housing instability and homelessness prevention. Housing instability encompasses a number of challenges, such as having trouble paying rent, overcrowding, moving frequently, staying with friends or family, or rent burden. Those populations affected by housing instability can include children and people who have spent time in prison. According to the US Department of Health and Human Services, those affected by housing instability may live in substandard housing subjecting them to health and safety risks, live in overcrowded units, or forced moves that may result in homelessness.

Participants in the consultation process believed that housing instability, often caused by rent burden, and preventing homelessness was best addressed with affordable rental housing, TBRA assistance, non-congregate shelter, and supportive services including job training and employment services, housing search and housing counseling services, childcare, mental health services, outreach services, and case management.

HOME-ARP Activities

The Consortium will solicit applications from developers, service providers, and/or nonprofits to administer eligible activities and/or develop shelter and housing. A Notice of Funds Available (NOFA) will be issued. The NOFA will, at a minimum, specify eligible activities, eligible applicants, minimum and maximum funding amounts, application thresholds, and will provide instructions on how to submit a proposal. The City will not directly administer HOME-ARP activities beyond program administration and planning and no developers, service providers, and/or nonprofits are responsible for program administration and planning on behalf of the City.

The Consortium has an agreement in place for the method in which the HOME funds are to be allocated between the Town of Apple Valley and the City of Victorville. Both the Town and the City have agreed to apply that same allocation formula to the available HOME-ARP funding.

Uses of HOME-ARP Funding

Activity	Funding Allocated by Apple Valley	Funding Allocated by Victorville	Percent of Allocation	Statutory Limit
Non-congregate Shelter				
Affordable Rental Housing				
Tenant-based Rental Assistance				
Supportive Services	\$816,485	\$1,660,386		
Nonprofit Operating Assistance				5%
Nonprofit Capacity Building				5%
Administration and Planning	\$144,086	\$293,009	15%	15%
Subtotals	\$960,571	\$1,953,395		
Total HOME-ARP Allocation	\$2,913,966			

Rationale for Uses of HOME-ARP Funding

The Consortium considered all of the eligible activities for this funding and the qualifying populations to be served, assessed the available resources and the gaps present, in making its decision about how the limited funds would most benefit the community. It also considered the Wellness Center, opening soon in Victorville. The project will offer a low-barrier emergency shelter with a recuperative care facility, medical clinic, interim housing and supportive services.

To address the needs within the community, the Consortium will allocate 85 percent of its HOME-ARP funds to Supportive Services designed to assist the homeless and those at risk of becoming homeless. It is the intent to have many of the services either offered or based at the Wellness Center, serving homeless and those at risk of homelessness. The remaining 15 percent will be used to administer the HOME-ARP program.

HOME-ARP Housing Production Goals

The Apple Valley-Victorville Consortium will not produce any housing units with the HOME-ARP funds.

Preferences

The Apple Valley-Victorville Consortium will not provide preferences to any population or subpopulation.

HOME-ARP Refinancing Guidelines

The Apple Valley-Victorville Consortium does not plan to use HOME-ARP funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds. Therefore, refinancing guidelines pursuant to 24 CFR 92.206(b) are not applicable to this HOME-ARP Allocation Plan.



APPENDIX A

Citizen Participation

Summary of Citizen Participation Comments

Allocation Plan Public Review and Comment Period September 16 to October 16, 2022, for the City of Victorville and September 23 to October 23, 2022.

To be completed after the Public Comment period has ended.

Public Hearing before Victorville City Council on October 18, 2022, and Apple Valley Town Council on November 8, 2022.

To be completed after the Public Hearing is held.



APPENDIX B
SF-424 Grant Application,
SF-424B Assurances,
SF-424D Assurances, and
Allocation Plan Certifications