

Appendix A – Consultation Packet

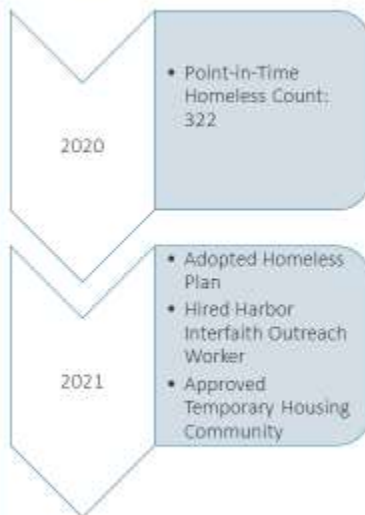
Community



HOME-ARP Allocation Plan

Consultation Presentation

Torrance Activities & Homeless Plan



February 2021

Outreach Worker/Housing Navigator hired.
Outreach statistics February 2021 – December 2021:
85 interactions with 39 new clients

May 2021

The Torrance Public Housing Authority (PHA) receives 33 Emergency Housing Vouchers (EHV) vouchers to serve: (1) Homeless; (2) At risk of homelessness; (3) Fleeing, or attempting to flee, domestic violence, sexual assault, stalking or human trafficking; (4) Recently homeless and for whom providing rental assistance will prevent the individual/family's homelessness/housing instability.

In addition to the 33 EHVs, the PHA also has 25 Veterans Affairs Supportive Housing Vouchers (VASH) and 690 Housing Choice Vouchers (HCV).

June 22, 2021:

Torrance City Council approves the activation of Civic Center grounds as the site for temporary housing community. (40 units)

January 2022– present funding for temporary housing community:

- PLHA
- SBCCOG
- LA County



Overview of HOME-ARP

- March 2021 – American Rescue Plan (ARP) signed into law, approving \$5 billion in federal HOME funding.
- \$1,710,939 allocated to City of Torrance
- Torrance to submit an Allocation plan to receive funds

2

Potential Use of Funds



Development and support of affordable housing, as currently permitted under the HOME program

Tenant-based rental assistance



Supportive services, including activities such as transitional housing, housing counseling, and homeless prevention services

Acquisition and development of non-congregate shelter, or remain as non-congregate shelter units



3

Eligible Qualifying Populations

- Experiencing homelessness
- At risk of homelessness
- Fleeing domestic violence, dating violence, sexual assault, stalking, or human trafficking



- Other populations with high risk of housing instability (including households that are low-income and highly cost burdened; that have moved two or more times in the last 60 days; and that are living in a hotel/motel)

4

HUD Guidance



CPD-21-10 Notice identifies the following as required components of a participating jurisdictions HOME-ARP Allocation plan

- A summary of the consultation process and results of upfront consultation
- Summary of comments received through public participation process and a summary of any comments/recommendations not accepted and why
- Description of HOME-ARP qualifying populations within jurisdiction
- Assessment of unmet needs of each qualifying populations
- Assessment of gaps in housing/shelter inventory, homeless assistance and services, and homelessness prevention service delivery system
- Planned use of HOME-ARP funds for eligible activities
- Estimate of number of housing units for qualifying populations that Torrance will be producing/preserving with allocation
- Description of preferences

5



HOME-ARP Survey

Consultation organizations are asked to fill out the attached survey to provide information addressing the biggest priorities and gaps in the City of Torrance's housing and service landscapes. The information gathered from the survey will be included in the Allocation Plan. Staff will be conducting a Public Hearing to City Council tentatively scheduled for April 12, 2022. If you have any questions regarding the survey, contact Chelsea Shafer at CShafer@TorranceCA.Gov

[City of Torrance](#)
[HOME ARP Survey](#)

Community



Thank you!



City of Torrance HOME-ARP Survey



The American Rescue Plan Act of 2021 (ARP) appropriated \$5 billion to communities across the U.S. to provide housing, services, and shelter to individuals experiencing homelessness and other vulnerable populations. These funds were allocated by formula to jurisdictions that qualified for funding through HOME Investment Partnership Program (HOME Program) from the U.S. Department of Housing and Urban Development (HUD). This special round of funding is called the "HOME-ARP" program.

In September 2021, HUD awarded the City of Torrance \$1,710,939 in HOME-ARP funds.

Eligible activities that may be funded with HOME-ARP include:

- (1) development and support of affordable housing;
- (2) tenant-based rental assistance;
- (3) provision of supportive services (such as housing counseling, homelessness prevention, child care, job training, legal services, case management, moving costs, rental applications, and rent assistance); and
- (4) acquisition and development of non-congregate shelter units.

Funds must primarily benefit individuals and households in the following qualifying populations:

- Experiencing homelessness
- At risk of homelessness
- Fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking
- Other populations with high risk of housing instability (including households that are low-income and highly cost-burdened; that have moved two or more times in the last 60 days; and that are living in a hotel/motel)

The purpose of this survey is to garner feedback from stakeholders on how the City of Torrance should use its allocation of HOME-ARP funds. The Torrance Housing Authority will use the feedback to help determine a process for allocating the City's HOME-ARP funds.

Acknowledgement Terms of Service



The purpose of this survey is to collect feedback from community organizations in the City of Torrance and surrounding jurisdictions to help City Officials define needs and priority investment areas to address City needs related to HOME-ARP.

Your participation in this survey is voluntary. You may choose not to participate. The procedures involve completing an online survey that will take approximately 10 minutes. The results will be consolidated and presented to the City Council as part of the HOME-ARP Allocation plan. Specific required contact information will be provided to City leaders to facilitate understanding the need further and funding requests. The survey questions will be about community needs that have developed.

If you have any questions about the survey, please contact Chelsea Shafer at CShafer@TorranceCA.Gov

Definitions



The world of federal funding comes with a lot of specific language. Below are definitions for terms that are used frequently in relation to HOME-ARP funds.

NON-CONGREGATE SHELTER: As opposed to congregate settings, such as traditional homeless shelters, non-congregate shelter provides more private accommodations (individual rooms). During the COVID-19 pandemic, people living in congregate facilities have been at higher risk of contracting or having complications from the virus because physical distancing is difficult.

QUALIFYING POPULATIONS: For HOME-ARP funds, this means people experiencing homelessness, at risk of homelessness, fleeing or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking, or otherwise at high risk of housing instability.

SUPPORTIVE SERVICES: Services that help households maintain housing stability and quality of life. These may include: support with finding and applying for housing, financial assistance for moving costs, child care, legal services, mental health and substance use services, and more.

TENANT-BASED RENTAL ASSISTANCE: A rent subsidy to help households afford housing costs, such as rent and security deposits. "Tenant-based" means the subsidy is attached to the household, and they can use it to rent any rental unit that meets program guidelines and whose landlord is willing to accept the subsidy payment.

About you



Through this stakeholder consultation process, the City is seeking input from groups or organizations that work with people experiencing (1) homelessness, (2) at risk of homelessness, (3) fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking, or (4) other families requiring services or housing assistance to prevent homelessness or at greatest risk of housing instability.

What is your name? *

Short answer text

What group or organization are you affiliated with? *

Short answer text

Which type of organization(s) below best describes the group with which you are affiliated? *
(select as many choices as needed)

- Homeless Service Provider
- Victims Service Provider
- Veterans' Group
- Civil Rights Organization
- Fair Housing Organization
- Organization Serving People with Disabilities
- Other Organization Addressing the Needs of People Experiencing or At Risk of Homelessness; People Flee...
- Other...

Housing/Service Needs and Priorities



Please share your thoughts below to help identify the priorities and gaps in the City of Torrance's housing and service landscape. This will help inform the process by which HOME-ARP funds are allocated to address those needs and priorities.

What unmet housing and service needs do you see among "Qualifying Populations" in Torrance? *

Long answer text

What gaps do you see within the current shelter inventory located in Torrance? *

Long answer text

What gaps do you see within the current housing inventory located in Torrance?

Long answer text

What gaps do you see within the current service delivery system located in Torrance?

Long answer text

Does your agency provide services for the "Qualifying Populations" located in Torrance? *

(A) Supportive Services (such as case management, housing counseling and homelessness prevention) (B) Affordable housing units (C) Tenant-based rental assistance (D) Non-congregate shelter units

	Yes	No
Supportive Services	<input type="checkbox"/>	<input type="checkbox"/>
Affordable housing units	<input type="checkbox"/>	<input type="checkbox"/>
Tenant-based rental assistance	<input type="checkbox"/>	<input type="checkbox"/>
Non-congregate shelter units	<input type="checkbox"/>	<input type="checkbox"/>

Does your agency provide emergency shelter, transitional housing, or other permanent supportive housing located in Torrance? *

- Yes
- No

If yes, please indicate the number of beds, units and the type of households assisted (families, adults, or veterans)

Long answer text

Do you believe that the City of Torrance should consider using HOME ARP for the provision of supportive services? *

- Yes
- No

If yes, what specific needs do you see are needed in the community?

Long answer text



Do you believe that the City of Torrance should consider using HOME ARP for the provision of affordable housing? *

Yes

No

If yes, what specific needs do you see are needed in the community?

Long answer text

Do you believe that the City of Torrance should consider using HOME ARP for the provision of rental assistance? *

Yes

No

If yes, what specific needs do you see are needed in the community?

Long answer text

Do you believe that the City of Torrance should consider using HOME ARP for the provision of acquisition/development of non-congregate shelter units (i.e., emergency shelter provided in individual rooms)? *

Yes

No

If yes, what specific needs do you see are needed in the community?

Long answer text

Is there anything else you would like to add?

Long answer text

Section 6 of 6

Thanks for Your Input!



We also invite you to join the public hearing on the City's HOME-ARP funding on April 12, 2022 at 6:30 PM as part of the City Council meeting.

Those interested in watching the meeting can find a link at <https://www.torranceca.gov/government/council-agendas-minutes>. Those interested in speaking at the meeting should contact Chelsea Shafer at CShafer@TorranceCA.Gov or 310-618-5840. Anyone requiring auxiliary aids and services under the Americans with Disabilities Act (ADA) or a language translator should contact the City Manager's Office on or before April 7, 2022 at (310) 618-5880

Appendix B – Consultation Feedback

What group or organization are you affiliated with?
Center for the Pacific Asian Family-CPAF
City of Torrance Housing Authority
Department of Veteran Affairs
Family Promise of the South Bay
Harbor Interfaith Services
National Alliance on Mental Illness – (NAMI) South Bay
Providence Little Company of Mary
Rainbow Services
South Bay Coalition to End Homelessness
Torrance Memorial Medical Center
Torrance Unified School District

*Group or organization entry numbers have been randomized to protect anonymity

Which type of organization(s) below best describes the group with which you are affiliated? (select as many choices as needed)	
Entry 1	Healthcare
Entry 2	Homeless Service Provider
Entry 3	Homeless Service Provider, Victims Service Provider, Veterans' Group, Organization Serving People with Disabilities, Other Organization Addressing the Needs of People Experiencing or At Risk of Homelessness; People Fleeing Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking; or People with High Risk of Housing Instability, Local South Bay Cities
Entry 4	Homeless Service Provider
Entry 5	Organization Serving People with Disabilities, Organization Serving People with Disabilities and Their Families
Entry 6	Other organization addressing the needs of people experiencing or at risk of homelessness; people fleeing domestic violence, dating violence, sexual assault, stalking, or human trafficking; or people with high risk of housing instability
Entry 7	Other: Public Housing Authority
Entry 8	Other organization addressing the needs of people experiencing or at risk of homelessness; people fleeing domestic violence, dating violence, sexual assault, stalking, or human trafficking; or people with high risk of housing instability
Entry 9	Victims Service Provider
Entry 10	Homeless Service Provider, Victims Service Provider, Other Organization Addressing the Need of People Experiencing or At Risk of Homelessness; People Fleeing Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking; or People with High Risk of Housing Instability
Entry 11	Homeless Service Provider

What unmet housing and service needs do you see among “Qualifying Populations” in Torrance?	
Entry 1	Insufficient number of available units to house those who need it. People moving into homelessness at a higher rate than people finding permanent housing. Community resistance to housing low-income residents. (NIMBY) Landlords have no incentives to work with homeless services providers. Inadequate supply of mental health service providers.
Entry 2	Affordable Housing
Entry 3	With Torrance moving ahead with the 40 unit temporary shelter for individual adults, I feel the most pressing needs are (1) to provide case management services because the current Coordinated Entry System is not adequately funded to do this for the entire region, let alone to focus more effort in Torrance; (2) look at ways to increase the affordable housing stock.
Entry 4	Mental health support for children and families as well as affordable housing options.
Entry 5	Supportive housing There are very few board and care and low income housing units for persons with a mental illness who because of their illness have low or no incomes.
Entry 6	Overall there is a need for both interim housing options as well as permanent housing
Entry 7	There is a need for more supportive services for the qualifying populations in Torrance. This includes case management for people experiencing homelessness, elderly people, and individuals with disabilities. Additionally, there are no homeless shelters in Torrance to refer households experiencing homelessness to.
Entry 8	Supportive services such as case management for families living in cars or doubled up temporarily who need support accessing available resources to get them to permanent housing
Entry 9	Availability of safe, permanent, affordable housing.
Entry 10	Low income housing and housing vouchers for the City of Torrance
Entry 11	Deposit monies for security and utilities. As well as furniture/household goods

What gaps do you see within the current shelter inventory located in Torrance?	
Entry 1	Does Torrance have a homeless shelter?
Entry 2	No interim housing resources at this time.
Entry 3	With the new 40-unit shelter having more options for families (especially found within TUSD) is one area to explore.
Entry 4	Family short-term shelter and transitional housing.
Entry 5	There are any shelters for homelessness in Torrance for persons with a mental illness and who are homeless or at risk of homelessness. Persons have to go to Long Beach or other areas. The shelters in Los Angeles are for their residents. There is no regional plan.
Entry 6	Interim housing: whether congregate, motel conversions, or pallet shelters. There is also a big lack of local recuperative care options for discharging homeless patients who have needs that do not make it safe to discharge them from the hospital but are stable enough that they do not need to stay in hospital care
Entry 7	There are no homeless shelters in the City of Torrance that we can refer people experiencing homelessness to.
Entry 8	Family shelter, assistance very locally so parents don't have to travel too far for support
Entry 9	No availability of shelter or interim housing beds for survivors – not sure any exist
Entry 10	There is not enough funding for transitional shelter programs that can provide wrap around, comprehensive services for PEH populations
Entry 11	Limited; particularly for couples

What gaps do you see within the current housing inventory located in Torrance?	
Entry 1	Housing demand is much greater than housing supply. The need is for permanent supportive housing.
Entry 2	Lack of affordable housing and owners/landlords that accept Section 8
Entry 3	The City needs much more affordable housing, as I've already noted.
Entry 4	Affordable housing and rental units.
Entry 5	There is no continuum of housing. Some persons with a mental illness can do well and live in low income housing units, some persons with a mental illness can do well in a board and care, some low income persons who are homeless need a shelter with services. There is a need for some type of crisis residential where upon discharge from hospital or some institutional type setting a person with a mental illness can have some time to stabilize. Coming out of hospital after a few days or some type of locked setting the person often get lost in non-existing system and become destabilized again and again.
Entry 6	
Entry 7	There is a need for more multifamily housing that accepted rental subsidies like Section 8. Additionally, there is a need for more housing for persons with disabilities. Torrance has several buildings for seniors (62+), but no buildings for disabled individuals/families
Entry 8	Rents are extremely high, not too many options for families with credit issues or previous housing issues (eviction, etc.), no low income housing available
Entry 9	No specific housing projects for survivors of domestic violence
Entry 10	Low income housing is scarce and there should be more emphasis on housing providers partnering up with social service agencies to co-locate in these buildings and provide services on-site to the residents.
Entry 11	Limited stock in the area of choice

What gaps do you see within the current service delivery system located in Torrance?	
Entry 1	Torrance has partnered with Harbor interfaith Services, and that is a fantastic start for homeless services.
Entry 2	Mental Health Services.
Entry 3	So the County-funded homelessness system is not able to provide an immediate response (same day) to meet the needs of the unhoused. Torrance currently has one street outreach/case manager and she's made tremendous progress in working with and housing people/ But for the size of City's homelessness population based on the Homeless Count, there needs to be more city-dedicated staff to "move the needle" as more and more people become homelessness due to economic situations. These were large needs 2+ years ago and the pandemic has only increased them.
Entry 4	There are no services focused specifically on the residents and community of Torrance. Most of the work is outsourced to HarborInterfaith or PATH with no local presence. Connections within the school system are available and law enforcement are much more prepared than most others in the SPA.
Entry 5	There is a lack of treatment services and housing. Most psychiatrists don't take insurance or Medi-Cal, it is hard to find psycho-social therapists and there usually no supportive services for person with a mental illness in board and cares. COVID has only made it much worse.
Entry 6	Collaboration with healthcare providers; interim shelters; street medicine
Entry 7	There are not enough case management services in the City of Torrance. There is only one outreach worker and no homeless service providers located directly within the jurisdiction.
Entry 8	No support for homeless families outside of the school district. FSS support is scarce, extremely limited, far away and often our families don't qualify because their needs are not as severe as other chronically homeless or homeless with co-occurring disorders, etc.
Entry 9	Not really familiar
Entry 10	There are a few robust homeless/housing coalitions that try their best to get information out and mobilize the community around resources and services, but it would be ideal to have the city of Torrance create more portals of information regarding homeless and housing resources to its residents.
Entry 11	Transitional housing

Does your agency provide services for the “Qualifying Populations” located in Torrance? (A) Supportive Services (such as case management, housing counseling and homelessness prevention) (B) Affordable housing units (C) Tenant-based rental assistance (D) Non-congregate shelter units.

Consultant	Supportive Services	Affordable Housing Units	Tenant-based rental assistance	Non-congregate shelter units
Entry 1	No	No	No	No
Entry 2	Yes	No	Yes	No
Entry 3	No	No	No	No
Entry 4	Yes	No	Yes	Yes
Entry 5	Yes	No	No	No
Entry 6	No	No	No	No
Entry 7	No	No	Yes	No
Entry 8	No	No	No	No
Entry 9	No	No	No	No
Entry 10	Yes	No	Yes	Yes
Entry 11	Yes	No	No	No

Does your agency provide emergency shelter, transitional housing, or other permanent supportive housing located in Torrance?	
Entry 1	No
Entry 2	No
Entry 3	No
Entry 4	Yes
Entry 5	No
Entry 6	No
Entry 7	Yes
Entry 8	No
Entry 9	No
Entry 10	No
Entry 11	Yes

If yes, please indicate the number of beds, units and the type of households assisted (families, adults, or veterans)	
Entry 1	
Entry 2	
Entry 3	
Entry 4	We have space for 4 families and we serve families.
Entry 5	
Entry 6	
Entry 7	The Housing Authority provides permanent housing to voucher holders. The only permanent supportive housing is through the EHV program, the City has EHV vouchers.
Entry 8	
Entry 9	
Entry 10	
Entry 11	200+ across the county

Do you believe that the City of Torrance should consider using HOME ARP for provision of supportive services?	
Entry 1	Yes
Entry 2	No
Entry 3	Yes
Entry 4	Yes
Entry 5	Yes
Entry 6	Yes
Entry 7	Yes
Entry 8	Yes
Entry 9	Yes
Entry 10	Yes
Entry 11	Yes

If yes, what specific needs do you see are needed in the community?	
Entry 1	Case management, housing navigation. ALSO...there should be special services dedicated to those living in their cars. Safe parking spaces. Hygiene/dignity/supportive services like restrooms and laundry facilities. Case management. Social services. People living in their cars often have full-time jobs and sometimes, families.
Entry 2	
Entry 3	Additional case management staff, and to fill any gaps that CES does not cover in terms of client aid/direct support.
Entry 4	Mental health, academic support, housing navigation, and access to family resources
Entry 5	Mental health and substance abuse supportive services with county departments of DMH and DPH
Entry 6	Supportive services for those living in non-congregate shelters that expedite placement into permanent housing
Entry 7	Case management, utility deposits, security deposits, credit check fees, credit cleaning services, moving expenses.
Entry 8	
Entry 9	Addressing the needs of families and individuals who have experienced domestic violence
Entry 10	Advocacy, case management, increasing language access for Asian communities, as far as housing/homeless social service information and referrals go.
Entry 11	Deposit and furniture

Do you believe that the City of Torrance should consider using HOME ARP for provision of affordable housing?	
Entry 1	Yes
Entry 2	Yes
Entry 3	No
Entry 4	No
Entry 5	Yes
Entry 6	Yes
Entry 7	No
Entry 8	Yes
Entry 9	Yes
Entry 10	Yes
Entry 11	Yes

If yes, what specific needs do you see are needed in the community?	
Entry 1	Housing is not affordable, which is why people/families are entering homelessness at a faster rate than ever before.
Entry 2	Master Leasing Units/ Small complexes for permanent housing
Entry 3	I'm a bit ambivalent about this. While affordable housing is definitely needed, the grant amount will do little (if anything) to address the shortage, even if 100% of it is used for it. I'd like to suggest the City find other ways to finance incentives, zoning change initiatives, etc. to affect this rather than using the ARP funds.
Entry 4	While it would be amazing to have more affordable housing options, the truth is that land and living space is such an expensive commodity that I don't believe it to be an efficient used of funds. If this provision can relate to recruiting and supporting current homeowners and landlords to encourage them to accept Section 8 and build more affordable housing options, then I would say it would be beneficial.
Entry 5	More housing units and support for board and cares
Entry 6	
Entry 7	
Entry 8	
Entry 9	Housing projects specific for survivors of DV
Entry 10	If you build low income housing, there will be more opportunity to eradicate the possibility for homelessness for so many vulnerable people
Entry 11	Incentives for landlords

Do you believe that the City of Torrance should consider using HOME ARP for provision of rental assistance?	
Entry 1	Yes
Entry 2	No
Entry 3	No
Entry 4	Yes
Entry 5	Yes
Entry 6	No
Entry 7	No
Entry 8	No
Entry 9	Yes
Entry 10	Yes
Entry 11	Yes

If yes, what specific needs do you see are needed in the community?	
Entry 1	Many as already listed
Entry 2	Not applicable
Entry 3	I feel this is a band aid option that won't provide long-term positive results. There are/were other resources available for rental assistance.
Entry 4	We have seen success in providing move in assistance, and short-term, and medium-term support to provide that jump start to provide long term success for families!
Entry 5	The cost of living and the current average wage of people is an ever widening gap that is why people do need rental assistance
Entry 6	
Entry 7	
Entry 8	
Entry 9	Prevention of homelessness through using the DV housing first model
Entry 10	The cost of living and the current average wage of people is an ever widening gap that is why people do need rental assistance
Entry 11	Security and utility deposits

Do you believe that the City of Torrance should consider using HOME ARP for the provision of acquisition/development of non-congregate shelter units (i.e., emergency shelter provided in individual rooms)?

Entry 1	Yes
Entry 2	Yes
Entry 3	Yes
Entry 4	Yes
Entry 5	Yes
Entry 6	Yes
Entry 7	No
Entry 8	Yes
Entry 9	Yes
Entry 10	Yes
Entry 11	Yes

If yes, what specific needs do you see are needed in the community?

Entry 1	Emergency housing is needed, but the goal has to be permanent housing.
Entry 2	Pallet Shelter
Entry 3	
Entry 4	If I was providing a level of prioritization of the aforementioned items, this would be categorized as the least effective but most urgent. Any development of shelter beds should necessarily be accompanied with the appropriate resources to identify and obtain long-term housing solutions.
Entry 5	
Entry 6	Pallet shelter/tiny homes; recuperative care
Entry 7	
Entry 8	Family shelter and/or supportive services
Entry 9	The full continuum is really needed, from getting people off the streets now and into interim housing, to establishing PSH our neighbors who need more than just rental support, affordable housing for low income individuals and families.
Entry 10	

Entry 11	Couples and families
-----------------	----------------------

Is there anything else you would like to add?	
Entry 1	Thank you for your efforts, and the opportunity to provide input
Entry 2	
Entry 3	
Entry 4	There are many creative solutions that a City like Torrance could incorporate to really make an impact in their city. With the right partnerships and connections, utilizing these resources can really change the landscape of homelessness in the City.
Entry 5	
Entry 6	
Entry 7	
Entry 8	Families living in cars are becoming more of an issue.
Entry 9	Please let us know how we can partner with the City to expand housing options for survivors and their children.
Entry 10	
Entry 11	

Appendix C – LAHSA Consultation Memo and Webinar



Date: December 21, 2021

To: HOME-ARP Recipients within the LA CoC

From: Molly Rysman, Chief Programs Officer

cc: Gateway Cities Council of Governments
Las Virgenes/Malibu Council of Governments
North Los Angeles County Council of Governments
San Gabriel Valley Council of Governments
South Bay Cities Council of Governments
Westside Cities Council of Governments

RE: 2021 HOME-ARP Funding Recommendations from the LA CoC

This memorandum provides a summary of the HOME Investment Partnerships – American Rescue Plan (HOME-ARP) program requirements as it relates to collaboration with a local Continuum of Care (CoC) and use of coordinated entry (CE). This memorandum also provides recommendations from LAHSA, lead agency for the Los Angeles CoC, to jurisdictions being allocated funds from the HOME-ARP. Below is what is included in this memo:

- Overview of HOME-ARP Grant Funding
- HOME-ARP Project Referral Methods – Use of Coordinated Entry (CE)
- Application Requirements – HOME-ARP Allocation Plan
- Overview of Eligible Uses
- LAHSA Recommendations for Use of HOME-ARP Funding
- Appendix A. HOME-ARP Allocations by Jurisdiction

The following information is in accordance with [the U.S. Department of Housing and Urban Development \(HUD\) Notice](#) regarding Requirements for the Use of Funds in the HOME Investment Partnerships – American Rescue Plan (HOME-ARP) program, released in September 2021. A total of \$197 million is being allocated to 30 jurisdictions in Los Angeles County, 27 of which are located in the LA CoC.

Overview of HOME-ARP Grant Funding

The \$1.5 trillion American Rescue Plan, approved by Congress and signed by President Biden on March 11, 2021, contains \$5 billion for affordable rental housing and homelessness assistance through HOME-ARP. These formula block grants provide states and local jurisdictions (“participating jurisdictions”) with flexible funding to reach populations experiencing homelessness or currently at risk of homelessness and address local affordable housing, non-congregate shelter, and supportive service needs within their respective communities. These funds are not intended to be thought of as [traditional HOME program](#)

[funds](#) but are intended to address homelessness. HOME-ARP funds are reserved for the following key uses:

- Development and support of affordable rental housing
- Tenant-based rental assistance (TBRA)
- Supportive services for qualifying populations
- Acquisition and development of non-congregate shelter (NCS)
 - HOME-ARP grants may not be used for operating costs for non-congregate shelter or costs associated with converting non-congregate shelter to permanent housing
- Non-profit operating expenses and capacity building
 - Funding for this use is limited to five percent (5%) for supporting operating expenses for non-profit entities carrying out HOME-ARP projects and services, with the option to increase funding by an additional five percent (5%) for costs related to capacity building

Qualifying Populations: HOME-ARP funded projects and supportive services must serve individuals or families from the following qualifying populations:

- Homeless, [as defined by federal law](#):
 - 1) An individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:
 - i. An individual or family with a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, including a car, park, abandoned building, bus or train station, airport, or camping ground;
 - ii. An individual or family living in a supervised publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state, or local government programs for low-income individuals); or
 - iii. An individual who is exiting an institution where he or she resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution;
 - 2) An individual or family who will imminently lose their primary nighttime residence, provided that:
 - i. The primary nighttime residence will be lost within 14 days of the date of application for homeless assistance;
 - ii. No subsequent residence has been identified; and
 - iii. The individual or family lacks the resources or support networks, e.g., family, friends, faith-based or other social networks needed to obtain other permanent housing;
 - 3) Unaccompanied youth under 25 years of age, or families with children and youth, who do not otherwise qualify as homeless under this definition, but who:
 - i. Are defined as homeless under section 387 of the Runaway and Homeless Youth Act ([42 U.S.C. 5732a](#)), section 637 of the Head Start Act ([42 U.S.C. 9832](#)), section 41403 of the Violence Against Women Act of 1994 ([42 U.S.C. 14043e-2](#)), section

330(h) of the Public Health Service Act ([42 U.S.C. 254b\(h\)](#)), section 3 of the Food and Nutrition Act of 2008 ([7 U.S.C. 2012](#)), section 17(b) of the Child Nutrition Act of 1966 ([42 U.S.C. 1786\(b\)](#)), or section 725 of the McKinney-Vento Homeless Assistance Act ([42 U.S.C. 11434a](#));

- ii. Have not had a lease, ownership interest, or occupancy agreement in permanent housing at any time during the 60 days immediately preceding the date of application for homeless assistance;
 - iii. Have experienced persistent instability as measured by two moves or more during the 60-day period immediately preceding the date of applying for homeless assistance; and
 - iv. Can be expected to continue in such status for an extended period of time because of chronic disabilities, chronic physical health or mental health conditions, substance addiction, histories of domestic violence or childhood abuse (including neglect), the presence of a child or youth with a disability, or two or more barriers to employment, which include the lack of a high school degree or General Education Development (GED), illiteracy, low English proficiency, a history of incarceration or detention for criminal activity, and a history of unstable employment; or
- 4) Any individual or family who:
- i. Is fleeing, or is attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions that relate to violence against the individual or a family member, including a child, that has either taken place within the individual's or family's primary nighttime residence or has made the individual or family afraid to return to their primary nighttime residence;
 - ii. Has no other residence; and
 - iii. Lacks the resources or support networks, e.g., family, friends, faith-based or other social networks, to obtain other permanent housing.
- At-Risk of Homelessness, [as defined by federal law](#):
 - 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:
 - A. Has moved because of economic reasons two or more times during the 60 days immediately preceding the application for homelessness prevention assistance;
 - B. Is living in the home of another because of economic hardship;
 - C. Has been notified in writing that their right to occupy their current housing or living situation will be terminated within 21 days after the date of application for assistance;

- D. Lives in a hotel or motel and the cost of the hotel or motel stay is not paid by charitable organizations or by federal, State, or local government programs for low-income individuals;
 - E. Lives in a single-room occupancy or efficiency apartment unit in which there reside more than two persons or lives in a larger housing unit in which there reside more than 1.5 people per room, as defined by the U.S. Census Bureau;
 - 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
 - G. Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in the recipient's approved consolidated plan;
- 2) A child or youth who does not qualify as "homeless" under this section, but qualifies as "homeless" under section 387(3) of the Runaway and Homeless Youth Act ([42 U.S.C. 5732a\(3\)](#)), section 637(11) of the Head Start Act ([42 U.S.C. 9832\(11\)](#)), section 41403(6) of the Violence Against Women Act of 1994 ([42 U.S.C. 14043e-2\(6\)](#)), section 330(h)(5)(A) of the Public Health Service Act ([42 U.S.C. 254b\(h\)\(5\)\(A\)](#)), section 3(m) of the Food and Nutrition Act of 2008 ([7 U.S.C. 2012\(m\)](#)), or section 17(b)(15) of the Child Nutrition Act of 1966 ([42 U.S.C. 1786\(b\)\(15\)](#)); or
- 3) A child or youth who does not qualify as "homeless" under this section, but qualifies as "homeless" under section 725(2) of the McKinney-Vento Homeless Assistance Act ([42 U.S.C. 11434a\(2\)](#)), and the parent(s) or guardian(s) of that child or youth if living with her or him.
- Fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, and human trafficking
 - Part of populations where providing supportive services would prevent homelessness, including formerly homeless households using temporary assistance and/or households identified as being at greatest risk of homelessness
 - Veterans and families that include veteran family members that meet above criteria

For HOME-ARP Rental Housing projects, at least 70% of units must be reserved for households from qualifying populations with the remaining units to be reserved for low-income populations. All funds used for the remaining uses, including TBRA, supportive services, and NCS, must assist qualifying individuals and families.

HOME-ARP Project Referral Methods - Use of Coordinated Entry (CE)

Participating jurisdictions (PJ) may, but are not required to, use the coordinated entry system (CES) for HOME-ARP project and service referrals. If the PJ elects to use a CoC's CES, all HOME-ARP qualifying populations must be included and accepted.

CES and Other Referral Methods: Outside referral methods and project waiting lists may be used in conjunction with CES; however, prioritization criteria must be approved by the PJ.

Application Requirements – HOME-ARP Allocation Plan

To receive the balance of its HOME-ARP funding, each PJ must submit a HOME-ARP allocation plan, developed in consultation with the local Continuum of Care (CoC) and other public stakeholders.

LAHSA will provide a webinar on at 1:00PM on Wednesday, February 9th, for participating jurisdictions to review the content of this memo. LAHSA will also host forums to follow up on the allocation plans created by each PJ, provide consultation on allocation plans, and identify opportunities for collaboration and technical assistance with implementation. Forums will be held for each region and will include lead Coordinated Entry System (CES) providers as well as local Councils of Government (COG). Participation in this webinar following forums will serve as the consultation process for the Los Angeles Continuum of Care. PJs are welcome to consult further with the LA CoC if they choose and want to have a more in-depth consultation with LAHSA staff.

CoC Participation: HOME-ARP allocation plans must be developed in consultation with the local CoC and other service agencies that assist qualifying populations including, but not limited to, local homeless and domestic violence service providers, veterans' groups, and public housing agencies. Note that while participating jurisdictions are required to consult with each CoC operating within their jurisdiction, state participants do not have the same requirement. Submitted plans must describe the consultation process, participating agencies, and include summary of feedback.

In addition to CoC and service provider engagement, PJs are required to provide opportunities for public participation.

Additional Plan Requirements: Additionally, each HOME-ARP allocation plan must include a local Gaps Analysis, a description of HOME-ARP activities and distribution methods, affordable housing production goals, preferences, and refinancing guidelines, when applicable.

Gaps Analysis/Needs Assessment: The mandatory Gaps Analysis/Needs Assessment must describe the scale of unmet housing and service need within the participating jurisdiction, using recent Point in Time Count data and other data available through the local CoC. More specifically, assessments must give insight into the size and demographic composition of the qualifying populations, unmet needs within each qualifying population, and gaps within the local shelter and housing inventory and across the service delivery system.

[Overview of Eligible Uses](#)

The budget period for HOME-ARP grants begins on the Federal Award date and ends on September 30, 2030. The performance of each PJ regarding the use of HOME-ARP funds will be reviewed by HUD and may include, but not be limited to the following forms: remote or on-site monitoring, assessment of documents, and inquiries from sources of relevant information (e.g. audit reports, media reports, citizen complaints).

Rental Housing: HOME-ARP funds can support the acquisition, rehabilitation, and development of affordable rental housing, which includes single room occupancy (SRO) units and permanent supportive housing (PSH). Though funding reserved for this category may not be used for development of temporary housing, such as shelter or non-congregate shelters in hotel and motel settings, HOME-ARP may be used to fund the acquisition of those sites for more permanent housing use.

Tenant-Based Rental Assistance: HOME-ARP can also be used to provide tenant-based rental assistance to qualifying households, which may be used to cover rental costs in a HOME-ARP project or other eligible rental unit. Rental assistance, as well as security and utility deposits are all eligible costs under HOME-ARP TBRA. In contrast with the established HOME program, the maximum term for a rental assistance contract is at the discretion of the PJ or active until the end of the lease, after which assistance can be renewed should funding be available. PJs additionally have the discretion to set maximum amount for HOME-ARP TBRA, which may cover up to 100% of eligible costs.

Supportive Services: Additionally, HOME-ARP can fund a broad range of supportive services including supportive services as defined by McKinney Vento, homeless prevention programs, and housing counseling services. PJs are responsible for ensuring that individuals and families are only receiving HOME-ARP services as needed, and that there is no duplication of services received by the participant. The notice states that this may request use of HMIS and coordination with CoCs and other service providers.

Non-Congregate Shelter (NCS): HOME-ARP grant funds may be used for the acquisition and development of non-congregate shelter (NCS). Operating expenses are not an eligible cost under HOME-ARP. PJs are encouraged to use CE for referrals to HOME-ARP NCS to ensure that all HOME-ARP services can be coordinated effectively. Depending on the type of project and funding amount, there is a minimum period of time that the site must operate as a NCS.

The law authorizes HOME-ARP-funded NCS to be converted into permanent affordable housing or CoC PSH after the minimum use period. During the restricted use period, HOME-ARP funding may not be used to cover the cost of housing conversions.

The restricted use period varies based on the eligible activity that is being funded by HOME-ARP. More details are available in the [HUD notice](#).

Recommendations for Use of HOME-ARP Funding

A balance of resources within the homeless services system is critical to ensure effective operations, with people experiencing homelessness able to swiftly access interim housing resources, and once accessed, move quickly from interim housing into permanent housing. As such, an appropriate balance between outreach, services, interim housing, and permanent housing is necessary to ensure that there are not significant 'bottlenecks' in the system that hamper a participants' access to any one of these resources. When inadequate resources are dedicated to permanent housing, for example, participants may linger in shelter for long periods of time, which in turn blocks access to shelter for people experiencing unsheltered homelessness. LAHSA's Homeless Services Systems Analysis recommends a ratio of five (5) permanent housing resources for every one (1) interim housing bed to ensure effective flow of the homeless services system. This need for system 'balance' is what underpins the recommendations put forth below.

Additionally, these recommendations are put forth in the context of an array of other resources from federal, state, and local partners, and ensuring that new resources are working in concert with each other. At the current moment, the federal government has recently allocated a total of 7,411 Emergency Housing Vouchers (EHV) and Housing Choice Vouchers (HCV) across jurisdictions within LA County (as of

November 11, 2021), which represents an unprecedented influx of tenant-based subsidies.¹ The following recommendations emphasize the need for investments in housing resources that will leverage these existing subsidies, increasing the number of units available to utilize these subsidies. LAHSA presents the following recommendations, in descending order, with the first recommendation being the most critical to deliver a balanced homeless service system.

Acquisition

While acquisition of permanent housing resources is limited based on available funds, LAHSA highly recommends this eligible use, particularly if jurisdictions are also able to leverage other funds for purchases of multi-unit buildings, scattered site properties, or even individual units that can then serve people experiencing homelessness. Because of an influx of rental subsidies within the homeless services system, units acquired by cities will be able to be quickly matched to prospective tenants that are paired with a rental subsidy.

Master Leasing

Master leasing represents another option to quickly bring housing units into the homeless system, and a way to bring more housing units to be able to be utilized by prospective tenants that have a rental subsidy matched to them. It also presents a potentially lower cost option than the acquisition of property and may be appropriate for jurisdictions with smaller awards. More information related to this recommendation will be shared at the forthcoming webinar hosted by LAHSA, as details on eligible costs for master leasing are being determined through ongoing discussions between LAHSA and HUD.

Supportive Services

LAHSA recommends funds used for supportive services as outlined in the Overview of Eligible Uses.

Supportive Services to Support Emergency Housing Vouchers: While an array of emergency housing vouchers have been allocated to public housing authorities within Los Angeles County, these vouchers do not cover costs for supportive services, highlighting a gap. To ensure effective utilization and success of EHV, there are a number of supportive service needs. These include housing navigation services to assist with locating and securing a housing unit for people experiencing homelessness, as well as tenant retention services to support the success of tenants and landlords once they are housed using an EHV. In alignment with the information above regarding the availability of subsidies, this recommendation encourages the use of funds to pair supportive services with EHV, namely Navigators.

Problem-Solving: It is estimated that problem-solving, prevention, and diversion could prevent 20% of households from having need of interim housing or accessing the homeless services system.² With consideration of that estimate, LAHSA supports the utilization of problem-solving (also known as diversion), which is a crisis response strategy to identify and access alternative housing resources outside of the homeless services system. This person-centered, short-term housing intervention focuses

¹ Jurisdictions that have received Emergency Housing Vouchers include: Los Angeles County Development Authority (LACDA), Housing Authority of the City of Los Angeles (HACLA), Baldwin Park, Burbank, Compton, Hawthorne, Inglewood, Norwalk, Pomona, Pasadena, Redondo Beach, Santa Monica, South Gate, and Torrance. LACDA is also a recipient of Housing Choice Vouchers.

² Los Angeles Homeless Services Authority. (2019). *Homeless Services System Analysis: Envisioning an Optimal System in Los Angeles*. <https://www.lahsa.org/documents?id=4311-homeless-services-system-analysis-envisioning-an-optimal-system-in-los-angeles>

on maintaining current housing or identifying options within an existing social network.³ This approach could include flexible, one-time financial assistance. LAHSA also encourages the use of Homelessness Prevention, which provides programmatic support to prevent individuals and families from entering the homeless services system.

Appendix A. HOME-ARP Allocations by Jurisdiction

American Rescue Plan Act HOME Allocations			
Alhambra	\$2,063,172	Lynwood	\$1,967,319
Baldwin Park	\$1,128,365	Montebello	\$1,088,774
Bellflower	\$1,301,749	Monterey Park	\$1,175,039
Burbank	\$1,896,632	Norwalk	\$1,231,940
Compton	\$1,988,847	Palmdale	\$2,093,968
Downey	\$1,593,133	Paramount	\$1,087,336
El Monte	\$2,413,008	Pasadena	\$3,042,435
Gardena	\$1,040,280	Pomona	\$3,190,091
Glendale	\$5,109,346	Rosemead	\$1,222,084
Hawthorne	\$2,166,698	Santa Clarita	\$1,913,298
Huntington Park	\$2,180,103	Santa Monica	\$2,220,124
Inglewood	\$3,108,579	South Gate	\$2,584,579
Lancaster	\$2,450,524	Torrance	\$1,710,939
Long Beach	\$10,240,858	Whittier	\$1,265,320
Los Angeles	\$99,891,031	Total	\$196,980,351
Los Angeles County	\$32,614,780		

³ Los Angeles Homeless Services Authority. (2019). *Problem-Solving: A Humanistic Approach to Ending Homelessness*. <https://www.lahsa.org/news?article=586-problem-solving-a-humanistic-approach-to-ending-homelessness>