DATE: March 21, 2023

TO: Mayor and Council Members

FROM: Section 8, Housing and CDBG Department

SUBJECT: Public Hearing - Substantial Amendment to the Fiscal Year 2021-2022 Annual Action Plan for the Allocation of HOME Investment Partnerships Program-American Rescue Plan (HOME-ARP) Funds

RECOMMENDATION:
It is recommended that the Mayor and Council Members take the following actions:

1. Conduct a public hearing to receive public comments regarding a Substantial Amendment to the Fiscal Year 2021-2022 Annual Action Plan for the Allocation of HOME Investment Partnerships Program-American Rescue Plan (HOME-ARP) funds from the U.S. Department of Housing and Urban Development (HUD); and
2. Adopt a resolution adopting a Substantial Amendment to the Fiscal Year 2021-2022 Annual Action Plan.

BACKGROUND:
In accordance with 24 CFR Part 91.105 - Citizen participation plan; local governments, HUD’s Office of Community Planning and Development (CPD), requires participating jurisdictions to adopt a plan that sets forth the jurisdiction’s policies and procedures for citizen participation. The Citizen Participation Plan must provide for and encourage citizens to participate in the development of the Consolidated Plan, the Annual Action Plan, any substantial amendment to the Consolidated Plan, and the Consolidated Annual Performance Evaluation Report (CAPER).

The Consolidated Plan allows local governments to assess their affordable housing and community development needs and market conditions over three to five fiscal years and concurrent program years (fiscal/program year), and to make data-driven investment decisions based on those specific needs. The consolidated planning process serves as the framework for community-wide dialogue to identify housing and community development priorities and establish goals that align and focus funding from the CPD formula block grant programs. The City approved its 2021-2022 Annual Action Plan on July 20, 2021.

Per the City’s Citizen Participation Plan, a substantial amendment to the Annual Action Plan is required when a substantial change is proposed as it relates to funding priorities, proposed activities, goals, and objectives. Normally, a substantial amendment to an Annual Action Plan requires a thirty (30)-day public comment period; however, HUD has waived this requirement on the condition that no less than fifteen (15) days are provided for public comments on each substantial amendment.
DISCUSSION:
The City of Inglewood is a participating jurisdiction for HOME Investment Partnerships (HOME) funds through HUD. As such, the City has been awarded $3,108,579 of HOME-ARP funding.

As a prerequisite for receiving the HOME-ARP allocation, the City is required to submit a HOME-ARP Allocation Plan that includes 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; and 6) a summary of planned use of HOME-ARP funds for eligible activities based on the unmet needs of the qualifying populations.

Throughout the City, a case can be made for funding any of the eligible activities allowed using the HOME-ARP allocation of funds. But given limited funds, and after a careful consideration of the consultation results and review of the needs assessment and gap analysis, the City has determined that this allocation of HOME-ARP funds will be used for the acquisition, construction, or rehabilitation of affordable rental housing, Tenant-Based Rental Assistance, nonprofit operating assistance, nonprofit capacity building, and administration and planning. As outlined in the Allocation Plan, the City anticipates using the funding in following manner:

<table>
<thead>
<tr>
<th>Activity</th>
<th>Funding Amount</th>
<th>Percent of Allocation</th>
<th>Statutory Limit</th>
</tr>
</thead>
<tbody>
<tr>
<td>Non-congregate Shelter</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Affordable Rental Housing $2,020,576</td>
<td>$ 2,020,576.00</td>
<td>65%</td>
<td></td>
</tr>
<tr>
<td>Tenant-Based Rental Assistance</td>
<td>$ 155,429.00</td>
<td>5%</td>
<td></td>
</tr>
<tr>
<td>Supportive Services</td>
<td>$ 155,429.00</td>
<td>5%</td>
<td></td>
</tr>
<tr>
<td>Nonprofit Operating Assistance</td>
<td>$ 155,429.00</td>
<td>5%</td>
<td>5%</td>
</tr>
<tr>
<td>Nonprofit Capacity Building 5% 5%</td>
<td>$ 155,429.00</td>
<td>5%</td>
<td>5%</td>
</tr>
<tr>
<td>Administration and Planning</td>
<td>$ 466,287.00</td>
<td>15%</td>
<td>15%</td>
</tr>
<tr>
<td>Total HOME-ARP Allocation</td>
<td>$ 3,108,579.00</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

The American Rescue Plan Act (ARP) defines qualifying individuals or families, including Veterans, that are the following: 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 prevent a family’s homelessness or serve those with the greatest risk of housing instability.
HOME-ARP funds may be used to benefit qualifying populations through the following programs:

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.

To ensure broad input into the HOME-ARP Allocation Plan from stakeholders and service providers, on February 15, 2023, the City engaged in a consultation session, a survey of stakeholders, and 15-day public comment period that started on March 8, 2023 through March 21, 2023. Additional input may be received in the public hearing on March 21, 2023.

FINANCIAL/FUNDING ISSUES AND SOURCES
There is no fiscal impact to the General Fund to conduct this Public Hearing and to approve the Substantial Amendment to the Annual Action Plan.

DESCRIPTION ON ANY ATTACHMENTS:
Attachment No. 1 – Resolution
Attachment No. 2 – HUD Funding Award Letter, dated September 20, 2021

PREPARED BY:
Roberto Chavez, HUD Programs Manager
Tracey Duncan, Sr. Program Specialist

COUNCIL PRESENTER:
Tracey Duncan, Sr. Program Specialist
APPROVAL VERIFICATION SHEET

DEPARTMENT HEAD APPROVAL/
DEPUTY CITY MANAGER APPROVAL: ____________________________
Harjinder Singh, Deputy City Manager

CITY MANAGER APPROVAL: ________________________________
Artie Fields, City Manager
ATTACHMENT NO. 1
RESOLUTION NO. ___

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF INGLEWOOD, CALIFORNIA, ADOPTING A SUBSTANTIAL AMENDMENT TO THE FISCAL YEAR 2021-2022 ANNUAL ACTION PLAN TO INCLUDE THE HOME INVESTMENT PARTNERSHIPS – AMERICAN RESCUE PLAN PROGRAM ALLOCATION PLAN

WHEREAS, the City of Inglewood is a participating jurisdiction for HOME Investment Partnerships funds through the U.S. Department of Housing and Urban Development (HUD);

WHEREAS, the City has been awarded $3,108,579 in HOME Investment Partnerships - American Rescue Plan (HOME-ARP) Program funds; and

WHEREAS, in order to receive these HOME-ARP Program funds, the City must submit a HOME-ARP Allocation Plan that is approved by HUD; and

WHEREAS, the City’s Citizen Participation Plan and HUD regulations require a substantial amendment to the Fiscal Year (FY) 2021-2022 Annual Action Plan to include the HOME-ARP Allocation Plan;

WHEREAS, on March 21, 2023, the City Council conducted a public hearing to consider a substantial amendment to the FY 2021-2022 Annual Action Plan to include the HOME-ARP Allocation Plan; and

WHEREAS, the City Council now desires to adopt the substantial amendment;

NOW, THEREFORE, THE CITY COUNCIL OF THE CITY OF INGLEWOOD DOES RESOLVE AS FOLLOWS:

Section 1. The above recitals are incorporated herein by reference.

Section 2. The substantial amendment to the FY 2021-2022 Annual Action Plan to include the HOME-ARP Allocation Plan, attached hereto as Exhibit “A” is hereby adopted.

///
Section 3. The City Clerk shall certify to the adoption of this resolution and the same shall be in full force and effect immediately upon adoption.

PASSED, APPROVED, AND ADOPTED this _____ day of ________ 2023.

________________________________________
James T. Butts, Jr., Mayor

ATTEST:

________________________________________
Aisha L. Thompson, City Clerk
City of Inglewood Substantial Amendments to the 2021-2022 Annual Action Plan

The following is a summary and draft language that amends the 2021-2022 Annual Action Plan.

Background

The City of Inglewood’s federal Consolidated Plan details the funding strategy for the Community Development Block Grant (CDBG) in fiscal year 2021-2022. The Annual Action Plan details each year within the 5-year Consolidated Plan and outlines the implementation of annual funding, which is developed through public input, analyses, and planning.

The City’s Citizen Participation Plan (CPP) describes the efforts that the City will take to encourage its residents to participate in developing these plans. It also provides requirements for public process when a “substantial amendment” to the Annual Action Plan is proposed. The following changes constitute a substantial amendment and require public notice as described in the CPP:

- Increases or decreases by 25% change in the amount allocated to a category of funding
- A significant change to an activity’s proposed beneficiaries or persons served
- Funding of a new activity not previously described in the Action Plan.

Per the City’s Citizen Participation Plan, a substantial amendment to the Annual Action Plan is required when a substantial change is proposed as it relates to funding priorities, proposed activities, goals and objectives. Normally, a substantial amendment to an Annual Action Plan requires a thirty (30) - day public comment period; however, HUD has waived this requirement on the condition that no less than fifteen (15) days are provided for public comments on each substantial amendment and that reasonable notice and the opportunity for public comment is provided. A public hearing will be set for March 21, 2023 for public comment.

Additionally, HUD has awarded funding through the HOME-American Rescue Plan Act (HOME-ARP) which requires the submission of a HOME-ARP Allocation Plan in the 2021-2022 Annual Action Plan.

Proposed Substantial Amendments

The City is proposing the following amendment to the 2021-2022 Annual Action Plan in order to add an eligible activity that was not previously identified:

The City is proposing the following amendment to the 2021-2022 Annual Action to receive HOME-ARP funds which may be used primarily to benefit the qualifying populations through the following programs:

1. Tenant-Based Rental Assistance (TBRA) Program;
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
Exhibit A

Analysis

This proposal qualifies as a substantial amendment because it meets all three criteria:

• Increases or decreases by the greater of $100,000 or a 25% change in the amount allocated to a category of funding

• A significant change to an activity’s proposed beneficiaries or persons served

• Funding of a new activity not previously described in the Action Plan.

Changes to the 2021-2022 Annual Action Plan are primarily a result of a Public Process

The City of Inglewood is providing notice of at least a fifteen (15) - day public comment period as part of the HUD public participation exemption process. Additionally, one public hearing will be held to provide opportunities for public comment on March 21, 2023 at 2:00 p.m., for City Council consideration of Substantial Amendments adoption in City Council Chambers or via Facebook Live with audio and limited video, which can be found at: https://facebook.com/cityofinglewood/.

Documents can also be viewed on our website at www.cityofinglewood.org.

Comments may also be provided to Tracey Duncan by email (tduncan@cityofinglewood.org), phone (310-412-8844), or in writing addressed to:

City of Inglewood
RE: HOME-ARP Allocation Plan Funds
City of Inglewood
Community Development Block Grant (CDBG) Division
Attn.: Tracey Duncan
1 W. Manchester Blvd., Suite 750
Inglewood, CA 90301

Approved 2021-2022 Annual Action Plan, amend the estimated HOME Activities in sections AP-55 (pg. 31) Affordable Housing; and, AP-85 (pg. 37) Other Actions, as follows (additions):

AP-55 Affordable Housing

The City of Inglewood anticipates using HOME ARP Program funds and State affordable housing bonds to provide more affordable housing opportunities.

New Project Funding Name: HOME-American Rescue Plan (ARP) Allocation Plan

Target Area: City of Inglewood

Needs Addressed: Various

Funding: HOME-American Rescue Plan (ARP)

Type of Program(s): Affordable housing; development and acquisition; supportive services; program planning and development. Providing the use of HOME Program funds to provide more affordable housing opportunities.
Exhibit A

**HOME:** $3,108,579

**Number:** Citywide

**Description:** The goal of the HOME-ARP Allocation Plan is to address the need for homelessness assistance and supportive services which primarily benefit individuals and families specified as qualifying populations by providing affordable housing and stability.

- END OF ANNUAL ACTION PLAN AMENDMENT -
Substantial Amendment to
2021 Annual Action Plan
HOME-ARP ALLOCATION PLAN

February 2023
DRAFT

Substantial Amendment to 2021 Annual Action Plan

HOME-ARP ALLOCATION PLAN

HOME Investment Partnerships Program
American Rescue Plan
DRAFT

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CITY COUNCIL

James T. Butts, Jr.
Mayor/Chairman

George Dotson
District 1 Councilmember

Alex Padilla
District 2 Councilmember

Eloy Morales, Jr.
District 3 Councilmember

Dionne Faulk
District 4 Councilmember
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VERSION HISTORY

<table>
<thead>
<tr>
<th>No.</th>
<th>Summary of Changes</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Published Draft for Public Comment: 3/6/23</td>
</tr>
<tr>
<td></td>
<td>Sent to HUD for Approval:</td>
</tr>
<tr>
<td></td>
<td>Conducted Public Hearing: 3/21/23</td>
</tr>
<tr>
<td></td>
<td>Approved by HUD:</td>
</tr>
<tr>
<td></td>
<td>Original HOME-ARP Allocation Plan.</td>
</tr>
</tbody>
</table>

Public Contact Information

City of Inglewood
Community Development Block Grant Division
1 Manchester Boulevard, Suite 750
Inglewood, CA 90301

www.cityofinglewood.org/163/Community-Development-Block-Grant-CDBG
Executive Summary

The City of Inglewood has been allocated $3,108,579 of HOME-American Rescue Plan Act (HOME-ARP) funding from the U.S. Department of Housing and Urban Development (HUD). In order to receive the HOME-ARP allocation, the City must develop a HOME-ARP Allocation Plan that will become part of the City’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 City 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 City:

- In February 2022, the annual Point in Time (PIT) count revealed that 519\(^1\) people were unsheltered on the streets, in tents or makeshift shelters, or in cars, vans, RVs or campers.

- 2015-2019 Comprehensive Housing Affordability Strategy (CHAS) Data from HUD reported 5,115 households with incomes at or below 30% AMI are at risk of homelessness in the City.

- The CHAS data reports that there are 1,335 households with incomes more than 30 and but equal to or less than 50% AMI that are at risk of homelessness in the City because of at least one of the housing problems as defined by HUD.

- According to service providers, rental vacancies are two percent or less. The current level of housing supply and demand makes it very difficult to find units for qualifying populations.

- The greatest need for supportive services is in the areas of mental health services, homeless case management, and homeless wrap-around services. Service providers

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\(^1\) At the time of this writing, this number is being verified as some of the persons included in the City’s count were located in neighboring Lennox.
also noted the need for providing services for a longer period of time that were catered to the specific needs of the household.

To address these needs within the community, the City will be using the funds …..
Introduction

The City of Inglewood has been allocated $3,108,579 of HOME-American Rescue Plan Act (HOME-ARP) funding from the US Department of Housing and Urban Development (HUD). To receive the HOME-ARP allocation, the City of Inglewood is required to develop a HOME-ARP Allocation Plan that will become a part of the City'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 City 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

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

<table>
<thead>
<tr>
<th>Agency Role</th>
<th>Name</th>
<th>Department/Agency</th>
</tr>
</thead>
<tbody>
<tr>
<td>HOME-ARP Administrator</td>
<td>City of Inglewood</td>
<td>Community Development Block Grant (CDBG) Division</td>
</tr>
</tbody>
</table>

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 or 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 City may undertake.

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

Stakeholder Consultation

The City of Inglewood 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.

A virtual consultation session was held February 15, 2023. 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 Los Angeles Homeless Services Authority (LAHSA), the lead agency for the Los Angeles Continuum of Care (CoC), held a virtual session to provide their recommendations to jurisdictions being allocated funds. That session was held February 6, 2022, and attended by staff and representatives of the City. LAHSA also provided a written memorandum outlining their HOME-ARP funding recommendations.

The City’s virtual session was attended by 19 representatives of 13 agencies. The survey was completed by 13 representatives of 12 agencies. All HUD-required agency types and qualifying populations were represented in either the virtual session or the online survey.

**Organizations Consulted by Type and Method**

<table>
<thead>
<tr>
<th>Organization Consulted</th>
<th>Type of Organization</th>
<th>Method of Consultation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Catholic Charities of Los Angeles</td>
<td>Nonprofit, addresses needs of qualifying populations including homeless and those at risk of homelessness</td>
<td>Survey</td>
</tr>
<tr>
<td>City of Inglewood</td>
<td>Public, addresses needs of all qualifying populations</td>
<td>Virtual Session Survey</td>
</tr>
<tr>
<td>City of Inglewood Housing Authority</td>
<td>Public, addresses needs of qualifying populations, serves as public housing authority</td>
<td>Virtual Session</td>
</tr>
<tr>
<td>County of Los Angeles Public Health Center</td>
<td>Public, addresses needs of all qualifying populations, providing health services</td>
<td>Virtual Session</td>
</tr>
<tr>
<td>Didi Hirsch Mental Health Services</td>
<td>Nonprofit, addresses needs of all qualifying populations including those with disabilities, providing mental health services</td>
<td>Virtual Session Survey</td>
</tr>
<tr>
<td>Families for Children</td>
<td>Nonprofit, addresses needs of qualifying populations including homeless and those at risk of homelessness, providing housing and behavioral health services</td>
<td>Survey</td>
</tr>
<tr>
<td>Harbor Interfaith Services</td>
<td>Nonprofit, addresses needs of qualifying populations including homeless</td>
<td>Virtual Session Survey</td>
</tr>
<tr>
<td>Housing Rights Center</td>
<td>Public, addresses needs of all qualifying populations, providing fair housing and civil rights services</td>
<td>Virtual Session</td>
</tr>
<tr>
<td>Inglewood Police Department</td>
<td>Public, addresses needs of all qualifying populations</td>
<td>Virtual Session</td>
</tr>
<tr>
<td>Inglewood Unified School District</td>
<td>Public, addresses needs of all qualifying populations</td>
<td>Virtual Session Survey</td>
</tr>
</tbody>
</table>
Organizations Consulted by Type and Methods

<table>
<thead>
<tr>
<th>Organization Consulted</th>
<th>Type of Organization</th>
<th>Method of Consultation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Los Angeles Homeless Services Authority (LAHSA)</td>
<td>Nonprofit, addresses needs of qualifying populations including homeless, CoC for</td>
<td>Virtual Session</td>
</tr>
<tr>
<td></td>
<td>the County</td>
<td>Survey, Agency Session</td>
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<tr>
<td>Lennox-Inglewood Tenants’ Union</td>
<td>Nonprofit, addresses needs of all qualifying populations including those with housing instability</td>
<td>Survey</td>
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<tr>
<td>Los Angeles County Dept of Public Health</td>
<td>Public, addresses needs of all qualifying populations</td>
<td>Survey</td>
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<tr>
<td>Midnight Mission Homelight Family Living Program</td>
<td>Nonprofit, addresses needs of qualifying populations including homeless</td>
<td>Virtual Session</td>
</tr>
<tr>
<td>St. Margaret’s Center</td>
<td>Nonprofit, addresses needs of qualifying populations including homeless and at risk of homelessness</td>
<td>Virtual Session</td>
</tr>
<tr>
<td>U.S. Vets Inglewood</td>
<td>Nonprofit, addresses needs of qualifying populations including veterans</td>
<td>Virtual Session</td>
</tr>
</tbody>
</table>

Summary of Feedback Received from Consulted Organizations

Consultation revealed strong support for the following:

Development and support of affordable rental housing. Participants in the virtual session discussed the need for additional affordable rental housing. Specific issues mentioned included the shortage of affordable rental housing inventory with a local vacancy rate of two percent; shortage of affordable rental housing available to voucher holders; and rising rents. A participant also noted that new rent control laws allow landlords to raise rents every 12 months. A representative of the Housing Authority reported that when the Section 8 housing voucher waiting list was opened earlier this year, they received 30,000 applications in one week. Of respondents to the survey, 83% 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 substance abuse and mental health services, vocational training, childcare services, and housing services for families with children. 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, 75% believed there was a high need for this activity. The activities with the most ratings for “high need” were mental health services (92%), housing search assistance, substance abuse treatment, case management services (85%), and childcare assistance (77%).
<table>
<thead>
<tr>
<th>Supportive Services</th>
<th>High Need</th>
<th>Moderate Need</th>
<th>Low Need</th>
<th>No Need</th>
</tr>
</thead>
<tbody>
<tr>
<td>Mental health services</td>
<td>92%</td>
<td>8%</td>
<td>0%</td>
<td>0%</td>
</tr>
<tr>
<td>Housing search and counseling services</td>
<td>85%</td>
<td>15%</td>
<td>0%</td>
<td>0%</td>
</tr>
<tr>
<td>Substance abuse treatment</td>
<td>85%</td>
<td>15%</td>
<td>0%</td>
<td>0%</td>
</tr>
<tr>
<td>Case management services</td>
<td>85%</td>
<td>15%</td>
<td>0%</td>
<td>0%</td>
</tr>
<tr>
<td>Childcare assistance</td>
<td>77%</td>
<td>15%</td>
<td>8%</td>
<td>0%</td>
</tr>
<tr>
<td>Job training and employment services</td>
<td>62%</td>
<td>38%</td>
<td>0%</td>
<td>0%</td>
</tr>
<tr>
<td>Food assistance</td>
<td>62%</td>
<td>38%</td>
<td>0%</td>
<td>0%</td>
</tr>
<tr>
<td>Financial assistance costs</td>
<td>62%</td>
<td>38%</td>
<td>0%</td>
<td>0%</td>
</tr>
<tr>
<td>Outreach services</td>
<td>54%</td>
<td>38%</td>
<td>8%</td>
<td>0%</td>
</tr>
<tr>
<td>Landlord/tenant liaison services</td>
<td>54%</td>
<td>23%</td>
<td>8%</td>
<td>15%</td>
</tr>
<tr>
<td>Services for special populations</td>
<td>54%</td>
<td>46%</td>
<td>0%</td>
<td>0%</td>
</tr>
<tr>
<td>Education Services</td>
<td>46%</td>
<td>54%</td>
<td>0%</td>
<td>0%</td>
</tr>
<tr>
<td>Transportation assistance</td>
<td>46%</td>
<td>16%</td>
<td>8%</td>
<td>0%</td>
</tr>
<tr>
<td>Credit repair services</td>
<td>46%</td>
<td>23%</td>
<td>23%</td>
<td>8%</td>
</tr>
<tr>
<td>Legal services</td>
<td>58%</td>
<td>54%</td>
<td>0%</td>
<td>8%</td>
</tr>
<tr>
<td>Outpatient health services</td>
<td>38%</td>
<td>62%</td>
<td>0%</td>
<td>0%</td>
</tr>
<tr>
<td>Mediation services</td>
<td>38%</td>
<td>38%</td>
<td>23%</td>
<td>0%</td>
</tr>
<tr>
<td>Mental health services</td>
<td>92%</td>
<td>8%</td>
<td>0%</td>
<td>0%</td>
</tr>
<tr>
<td>Housing search and counseling services</td>
<td>85%</td>
<td>15%</td>
<td>0%</td>
<td>0%</td>
</tr>
<tr>
<td>Substance abuse treatment</td>
<td>85%</td>
<td>15%</td>
<td>0%</td>
<td>0%</td>
</tr>
<tr>
<td>Case management services</td>
<td>85%</td>
<td>15%</td>
<td>0%</td>
<td>0%</td>
</tr>
</tbody>
</table>

**Acquisition and development of non-congregate shelter.** The need for additional shelter beds within the City was a frequent subject of comments from those attending the virtual session. Many participants mentioned the need for shelter beds to be available to homeless other than Veterans. There is a shelter opening soon that will offer 240 new beds nearby, but participants believed that the opening would not meet the current need for shelter. Of respondents to the survey, 58% believed there was a high need and 33% believed there was a moderate need for this activity.

**Tenant-based rental assistance (TBRA).** In conjunction with affordable housing, many attendees mentioned the need to increase availability of the TBRA program. Currently the Housing Authority manages a project-based voucher program but no longer offers a TBRA voucher program. The decision to end it was based on the staffing needed to manage the
program. Of respondents to the survey, 50% believed there was a high need for this activity and 42% believed there was a moderate need for this activity.

Nonprofit operating assistance. In the survey, respondents were asked if they believed there was a need for nonprofit operating assistance. Of respondents to the survey, 92% responded affirmatively that there was a need in the nonprofit sector for this assistance.

Public Participation

To provide opportunities for public participation, the City of Inglewood sent an email to all agencies and individuals on its email list notifying them of the opportunity to participate in the virtual consultation session held on February 15, 2023. 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 City staff.

A combined notice of public comment period and public hearing was published in the Inglewood Today on February XX, 2023. The public notice was published in English and Spanish. Inglewood Today qualifies as a newspaper of general circulation.

Efforts to Broaden Public Participation

To broaden public participation, local organizations assisting the community were also invited via email to attend the virtual consultation session held during the development of the Allocation Plan. Accommodations were made available if needed.

Public Comments and Recommendations Received

To be completed after the public comment period has closed and the public hearing has been held.

Public Comments and Recommendations Not Accepted and Reasons Why

To be completed after the public comment period has closed and the public hearing has been held.
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 2022 in the City 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.

<table>
<thead>
<tr>
<th>Emergency Housing Beds Available January 2022</th>
</tr>
</thead>
<tbody>
<tr>
<td>Family Units</td>
</tr>
<tr>
<td>----------------</td>
</tr>
<tr>
<td>Emergency Shelter²</td>
</tr>
<tr>
<td>Transitional Housing</td>
</tr>
<tr>
<td>Total Emergency Housing Beds</td>
</tr>
</tbody>
</table>

² Include Safe Haven housing as defined by the Housing Inventory Count.
The HMIS Provider for Los Angeles County, LAHSA, gathers and reports data in the county for rapid rehousing and supportive housing available in the County. While LAHSA operates on a regional basis, the information below is provided for the City.

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.

<table>
<thead>
<tr>
<th>Rapid Rehousing and Permanent Supportive Housing Available January 2022</th>
<th>Family Units</th>
<th>Family Beds</th>
<th>Adult-Only Beds</th>
<th>Child-Only Beds</th>
<th>Total Year-Round Beds</th>
</tr>
</thead>
<tbody>
<tr>
<td>Rapid Rehousing³</td>
<td>1</td>
<td>3</td>
<td>67</td>
<td>0</td>
<td>70</td>
</tr>
<tr>
<td>Permanent Supportive Housing</td>
<td>0</td>
<td>0</td>
<td>58</td>
<td>0</td>
<td>58</td>
</tr>
<tr>
<td>Total Year-Round Beds</td>
<td>1</td>
<td>3</td>
<td>125</td>
<td>0</td>
<td>128</td>
</tr>
</tbody>
</table>

Size and Demographic Composition of Qualifying Populations

The 2022 Point-in-Time (PIT) Count of both sheltered and unsheltered homelessness is used for this analysis. The count was conducted by the Los Angeles Continuum of Care.

Sheltered Homeless Populations

The 2022 Sheltered PIT Count identified 231 people experiencing sheltered homelessness in the City. This included 27 persons in emergency shelter, 49 persons in safe havens, and 155 persons in transitional housing. 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.

³ Include Emergency Housing Vouchers administered by the Inglewood Housing Authority
Unsheltered Homeless Populations

The 2022 Unsheltered PIT Count identified 519 people experiencing unsheltered homelessness. This included 199 persons on the street, 147 persons in tents or makeshift shelters, and 173 persons in vehicles. The unsheltered count in 2022 was significantly higher than the previous five years when the count ranged from 221 to 296. During the consultation process, it was noted that a change in the tabulation of the regional count contributed to a large increase in the homeless count within the City. Specifically, portions of Lennox that have a high concentration of homeless were included in the 2022 count.

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 2015-2019 Data indicates that there are approximately 7,260 renter households with incomes at or below 30% AMI. This income range accounts for 31% of all renter households and 20% of all households in the City. Of these households, 6,110 are cost burdened, meaning the household pays more than 30% of their income toward housing costs. HUD considers any household paying more than 50% of their income for housing as severely cost burdened. Any disruption to household income or significant unplanned expense, such as car repair or medical care, may result in eviction and possibly homelessness. Seven out of every ten extremely low-income renters within the City, approximately 5,115 households, are considered to have a severe cost burden.

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

The State of California Department of Justice maintains statistics on domestic violence statewide by jurisdiction. In 2021, the Inglewood Police Department responded to a total of 273 calls related to domestic violence in the City. Of these calls:
- 235 of these domestic incidents did not involve a weapon
- 38 calls involved a weapon
  - 1 domestic incident involved a firearm
  - 3 domestic incidents involved a knife or cutting instruments
  - 13 domestic incidents involved other dangerous weapons
  - 21 domestic incidents involved personal weapons (i.e., feet or hands, etc.)

Therefore, if each one of these calls represented a household with member(s) who required housing assistance, it can be estimated that there were up to 273 households in 2021 who were in need of some form of housing assistance. The form of housing assistance required may vary depending on the specific circumstances of each case.

During the consultation process, it was noted that DV shelters are almost always full and that there is an assumption that trafficking is undercounted.

**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 CHAS 2015-2019 Data indicates that there are approximately 7,260 renter households with incomes at or below 30% AMI. This income range accounts for 31% of all renter households and 20% of all households in the City. Of these households, 6,110 are cost burdened, meaning the household pays more than 30% of their income toward housing costs. HUD considers any household paying more than 50% of their income for housing as severely cost burdened. Any disruption to household income or significant unplanned expense, such as car repair or medical care, may result in eviction and possibly homelessness. Seven out of every ten extremely low-income renters within the City, approximately 5,115 households, are considered to have a severe cost burden.
Other Populations: At greatest risk of housing instability – Households with incomes 30-50% 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, or
- Otherwise lives in housing that has characteristics associated with instability and increased risk of homelessness.

According to 2015-2019 CHAS Data, there are 5,370 renters in the City with household incomes between 30 and 50% of the area median income. This income range accounts for 23% of all renter households and 15% of all households in the City. Of these households, 4,815 (90%) have a housing problem, as defined by HUD. The most common housing problem is cost burden, which means the household pays more than 30% of their income toward housing costs. 1,335 of these households have a severe cost burden.

During the consultation, some service providers noted a need to serve seniors living on fixed incomes as experiencing a greater risk of housing instability. Others noted a need to serve immigrants.

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 18% of rental units in the City are affordable to households with incomes at or below 50% AMI. Of these, even fewer are available to households with incomes at or below 30% AMI. Based on the number of additional units needed so that low-income rental households do not have a cost burden, there is a need for 6,200 additional rental units according to HUD CHAS data for 2015-2019.
<table>
<thead>
<tr>
<th></th>
<th>Available Units</th>
<th>Cost Burdened</th>
<th>HH with at least 1 Housing Problem</th>
<th>GAP (units-cost burdened)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total Rental Units</td>
<td>23,410</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Less than 30% AMI</td>
<td>905</td>
<td>6,110</td>
<td>7,260</td>
<td>5,205</td>
</tr>
<tr>
<td>30 to 50% AMI</td>
<td>3,335</td>
<td>4,330</td>
<td>5,370</td>
<td>995</td>
</tr>
<tr>
<td>Total less than 50% AMI</td>
<td>4,240</td>
<td>10,440</td>
<td>12,630</td>
<td>6,200</td>
</tr>
</tbody>
</table>

This housing need impacts all four of the qualifying populations and veterans: Homeless lacking the resources to find and/or afford permanent housing; those at risk of homelessness for a variety of reasons, including housing instability due to their income; those fleeing or attempting to flee domestic violence and other forms of violence may flee their situation with adequate resources to find housing or be trying to flee but lack resources; other populations needing assistance or supportive services to prevent homelessness or housing instability.

**Unmet Service Needs of Qualifying Populations**

Based on consultation with service providers in the City, the greatest 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, those fleeing or attempting to flee domestic violence, dating violence, sexual assault, or stalking, or human trafficking, and those at greatest risk of housing instability or in unstable housing situations are:

- Mental health services
- Housing search and counseling services
- Substance abuse treatment
- Case management services
- Childcare assistance
- Job training and employment services
- Food assistance
- Financial assistance costs

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:
- Financial assistance costs
- Outreach services
- Landlord/tenant liaison services
- Services for special populations
- Education services
- Transportation assistance
- Credit repair services
- Transportation assistance
- Legal services
- Outpatient health services
- Mediation services
- Mental health services
- Housing search and counseling services
- Substance abuse treatment
- Case management services

Research on national statistics shows that homeless individuals and families are in need of mental health services and substance abuse treatment to treat what are often the underlying issues causing homelessness. In addition, this qualifying population would benefit from additional case management services and services addressing their basic needs such as food, housing, and health care.

Those fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking or human trafficking need services in housing services, childcare assistance, and legal services. For those facing housing instability, additional housing search and housing counseling services are needed to address the causes of the instability and assistance to stabilize their housing.

Current Resources Available to Assist Qualifying Populations

Current available resources include:

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

Current Resources: Congregate Beds and Non-congregate Shelter Units
In the 2022 Housing Inventory Count, there were 304 emergency shelter, transitional shelter, and safe haven beds in the City. Emergency shelter, locally referred to as interim housing with crisis and bridge components, is a project that offers temporary shelter. Requirements and limitations may vary by program and will be specified by the funder. Transitional housing provides temporary lodging designed to facilitate the movement into permanent housing within 24 months. Safe haven offers supportive housing that serves hard to reach homeless persons with severe mental illness who came from the streets and have been unwilling or unable to participate in supportive services.

**Current Resources: Supportive Services**

The City and its local services providers participate in the Los Angeles Continuum of Care. The LA CoC works to assist the large volume of people experiencing homelessness in Los Angeles County and maintains a network of service providers available to assist those experiencing homelessness and at risk of homelessness. In addition, there are other networks, both formal and informal, of organizations addressing the needs of the qualifying populations being addressed with this funding.

**Current Resources: Tenant-based Rental Assistance**

Tenant-based Rental Assistance is a HOME-funded program that provides assistance to individual households to help them afford the housing costs of market-rate units. The City has used HOME funds in recent years to provide tenant-based rental assistance but is in the process of ending the program and use its resources for the development of new units.

**Current Resources: Affordable and Permanent Supportive Rental Housing**

There are 4,240 rental units within the City that have been identified as being affordable rental housing units. In addition, there are another 58 units designated as permanent supportive units. The City makes the contact information on these properties available to people and agencies assisting people seeking housing.

**Current Resources: Housing Vouchers**

The Inglewood Housing Authority operates the Housing Choice Voucher program for the City. According to the current Consolidated Plan, there are 1,002 Housing Choice Vouchers being used by households within the City. Those include:

- Veterans: 50 vouchers
- Disabled: 75 vouchers
- Project-Based: 60 vouchers

**Shelter, Housing and Service Delivery System Gaps**

**Shelter Gap**

There is an estimated need for 519 additional shelter beds based on the 2022 PIT count. The PIT count found that there were 519 persons unsheltered persons in a variety of situations, including on the street, in tents or makeshift shelters, or in cars, vans or RVs/campers. It should be noted that a large portion of this population was located in Lennox but attributed to Inglewood in the regional tabulation. A portion of this gap will be met by the new “Safe Landings” interim housing facility in nearby West Athens. The 172 bed facility will provide 24/7 access to men, women, and couples. Thirty-six of the beds will provide detox services for those under the influence.

**Tenant-based Rental Assistance Gap**

The number of tenant-based rental assistance vouchers is calculated using HUD CHAS data 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.

<table>
<thead>
<tr>
<th>Tenant-based Rental Assistance Gap</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Renter Households with Income at or below 50% AMI paying more than 50% of income for rent, including utilities</td>
<td>6,450</td>
</tr>
<tr>
<td>TBRA vouchers available</td>
<td>0</td>
</tr>
<tr>
<td><strong>TBRA gap</strong></td>
<td>6,450</td>
</tr>
</tbody>
</table>

There is an estimated gap of 6,450 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. Another metric for the need of TBRA is demand for Housing Choice Vouchers administered by the Inglewood Housing Authority. The housing authority received more than 30,000 applications the last time it opened its waiting list. The housing authority added 5,000 households to the waiting list.

While tenant-based rental assistance can provide an immediate short-term solution to affordability, this gap can also be addressed by the creation of additional affordable rental housing.
Affordable Supportive Rental Housing Gap

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

<table>
<thead>
<tr>
<th>Affordable Rental Unit Gap</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Renter Households with Income at or below 30% AMI paying more</td>
<td>5,115</td>
</tr>
<tr>
<td>than 50% of income for rent, including utilities</td>
<td></td>
</tr>
<tr>
<td>Renter Households with Income 30% to 50% AMI paying more than</td>
<td>1,335</td>
</tr>
<tr>
<td>than 50% of income for rent, including utilities</td>
<td></td>
</tr>
<tr>
<td><strong>Total Affordable Rental Unit Need</strong></td>
<td><strong>6,450</strong></td>
</tr>
</tbody>
</table>

There is an estimated gap of 5,115 rental units affordable to renter households with income at or below 30% AMI and an estimated gap of 1,335 rental units affordable to renter households with income above 30% and up to 50% AMI.

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 285 permanent supportive housing units in the City.

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

<table>
<thead>
<tr>
<th>Permanent Supportive Housing Gap</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Population of Inglewood Census 2020</td>
<td>107,762</td>
</tr>
<tr>
<td>Per capita estimate of permanent supportive housing need</td>
<td>.003183</td>
</tr>
<tr>
<td>Estimated need for Permanent Supportive Housing</td>
<td>343</td>
</tr>
<tr>
<td>Permanent Supportive Housing Available</td>
<td>58</td>
</tr>
<tr>
<td><strong>Total Permanent Supportive Housing Gap</strong></td>
<td><strong>285</strong></td>
</tr>
</tbody>
</table>
Housing Voucher Gap

There are currently 1,052 Housing Choice Vouchers in use in the City. There are approximately 4,281 applicants currently on the housing authority waiting list. The Housing Authority opened a waiting list for Beach Park Apartments in February 2022 and received 1,792 applications.

Service Delivery System Gap

To identify gaps in the service delivery system, the City relied on its consultation with stakeholders and experience working with the organizations working in the City. The stakeholders believe that the most critical service gaps are in the areas of financial assistance costs, mental health services, homeless case management, and homeless wrap-around services.

The stakeholders also believed there was a need for assistance with general administrative costs among the service providers serving the City’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 City. The HUD CHAS Data indicates there are household 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 City. 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 City 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 City 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, identify the source of funds available, the total funds available, specify eligible activities, eligible applicants, minimum and maximum funding amounts, application thresholds, and will provide instructions on how to submit a proposal.

The NOFA, still to be developed, will define the evaluation criteria in detail, based on the project to be funded. The evaluation of the applications will include consideration of the project to be delivered, the design and timeline of the project, the costs of delivery, and experience in delivering similar projects.

**Uses of HOME-ARP Funding**

<table>
<thead>
<tr>
<th>Activity</th>
<th>Funding Amount</th>
<th>Percent of Allocation</th>
<th>Statutory Limit</th>
</tr>
</thead>
<tbody>
<tr>
<td>Non-congregate Shelter</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Affordable Rental Housing</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Tenant-based Rental Assistance</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Supportive Services</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Nonprofit Operating Assistance</td>
<td></td>
<td>5%</td>
<td></td>
</tr>
<tr>
<td>Nonprofit Capacity Building</td>
<td></td>
<td>5%</td>
<td></td>
</tr>
<tr>
<td>Administration and Planning</td>
<td>$466,286.85</td>
<td>15%</td>
<td>15%</td>
</tr>
<tr>
<td>Total HOME-ARP Allocation</td>
<td>$3,108,579</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Rationale for Uses of HOME-ARP Funding**

Throughout the City, a case can be made for funding any of the eligible activities allowed used the HOME-ARP allocation of funds. But given limited funds, and after a careful consideration of the consultation results and review of the needs assessment and gap analysis, the City has determined that this allocation of HOME-ARP funds will be used for Outreach........
Administration and planning. HOME-ARP administration and planning funds were used to pay City staff working on this allocation plan. HOME-ARP administrative and planning funds were not used to hire consulting services in the preparation of this plan. After the Allocation Plan is approved, administration and planning funds will be used for standard expenses in managing the HOME-ARP program, including the costs of City staff, and hired consultants. Consultants may assist with administrative tasks such as grant administration, monitoring, and reporting.
HOME-ARP Housing Production Goals

The City of Inglewood will produce and support an estimated ___ (___) affordable rental units with HOME-ARP funds. Support may include operating funds and supportive services for all four qualifying populations.

Preferences

The City of Inglewood will not provide preferences to any population or subpopulation. The City intends to make the affordable rental housing units available to all qualifying populations.

HOME-ARP Refinancing Guidelines

The City of Inglewood 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.
Summary of Citizen Participation Comments

Allocation Plan Public Review and Comment Period:
March 6, 2023 to March 21, 2023

To be completed after the public comment period has closed and the public hearing has been held.

Public Hearing before City Council:
March 21, 2023

To be completed after the public comment period has closed and the public hearing has been held.
DRAFT

APPENDIX B

SF-424 Grant Applications,
SF-424B Assurances,
SF-424D Assurances, and
Allocation Plan Certifications
COVID-19 Inglewood Rent Relief Program

Tuesday, September 6, 2022

Jacqueline Bolden
1035 Myrtle Avenue #5
Inglewood, CA 90301

Ms. Bolden,  
COVID-19 Inglewood Rent Relief Program Applicant

Your participation in the application process for the COVID-19 Inglewood Rent Relief Program has been terminated due to the following reason(s):

☐ The Property Owner/Landlord declined to participate in the program.

☒ You failed to submit required and/or requested documentation. No response to an email dated August 16, 2022, with a submittal date of August 30, 2022.

☐ Your household income exceeds the income limits to participate in the program.

☐ You failed to provide proof of loss of income.

☐ You failed to prove that you reside at the address listed on the application.

☐ You received rental assistance from another agency, bringing your rent current.

☐ You do not live within the City of Inglewood city limits.

Thank you for your interest and participation in the COVID-19 Inglewood Rent Relief Program.

If you have questions, contact your caseworker, Mari Guerrero via email at mguerrero@cityofinglewood.org or by calling (310) 412-5575.

Sincerely,

Mari Guerrero
COVID-19 Inglewood Rent Relief Program Caseworker
September 20, 2021

Artie Fields, City Manager
City of Inglewood
One Manchester Boulevard, 9th Floor
Inglewood, CA 90301

Dear Mr. Fields:

The American Rescue Plan Act of 2021 appropriated $5 billion to provide housing, services, and shelter to individuals experiencing homelessness and other vulnerable populations, to be allocated by formula to jurisdictions that qualified for HOME Investment Partnerships Program allocations in Fiscal Year 2021. On September 13, 2021, the Department published a notice, titled: Requirements for the Use of Funds in the HOME-American Rescue Plan Program (the Notice), which you are encouraged to review to assist in developing your program. Enclosed is the Grant Agreement for the HOME Investment Partnerships – America Rescue Plan (HOME-ARP) program:

In accordance with the Notice, and the HOME ARP Grant Agreement, a Participating Jurisdiction (PJ), as of the Federal Award Date, may use up to five percent of its total award for administrative and planning costs. Once your HOME-ARP Allocation Plan is approved by HUD, the remaining award will be made available.

**HOME Investment Partnerships - American Rescue Plan (HOME-ARP)**

Transmittal of this Grant Agreement does not constitute approval of the activities described in your HOME-ARP Allocation Plan. You are reminded that you, as the PJ, are responsible for ensuring that all grant funds are used in accordance with all program requirements. An executed Grant Agreement is a legally binding agreement between the Department of Housing and Urban Development and the City of Inglewood.

To establish a Line of Credit for the HOME-ARP award, it will be necessary for your agency to sign, execute and return one (1) copy of the Grant Agreement. If there is a need to add or remove individuals authorized to access the Integrated Disbursement Information System (IDIS), please submit an IDIS Online Access Request Form (HUD 27055). Also, please ensure the IDIS Online Access Request Form is notarized and returned to this office with your Grant Agreement. Additionally, if there is a need to establish or change the depository account where these funds are to be wired, a Direct Deposit Sign-Up form (SF-1199A) must be completed by your financial institution and returned to this office with a copy of a voided check.

You are reminded that certain activities are subject to the provisions of 24 CFR Part 58 (Environmental Review Procedures). Funds for such activities may not be obligated or expended
until HUD has approved the release of funds in writing. A request for release of funds (RROF) must be accompanied by an environmental certification, and until the RROF is approved and notification is received, no HUD funds should be committed. If the project or activity is exempt per 24 CFR 58.34 or categorically excluded (except in extraordinary circumstances), no RROF is required.

Please execute two (2) copies of the HOME-ARP Grant Agreement with electronic signatures. In response to COVID-19, HUD authorizes you to electronically execute the grant agreement with your electronic signature. Return one (1) of the agreements to this office to the attention of CPD General Correspondence Mailbox, at CPDLA@hud.gov. Maintain a copy of the agreement with your original signature on site in your program files.

HUD congratulates the City of Inglewood on its grant award, and we look forward to assisting you in accomplishing your programs goals. If you have any questions or need further information of assistance, please contact Develyn Rhodes-Johnson, CPD Representative, at (213)534-2587 or develyn.rhodes.johnson@hud.gov.

Sincerely,

[Signature]

Rufus Washington, Director,
Office of Community Planning and Development

Enclosures

cc: