

HOME INVESTMENT PARTNERSHIPS PROGRAM - AMERICAN RESCUE PLAN (HOME-ARP) ALLOCATION PLAN

FISCAL YEAR 2021/2022

DRAFT FOR PUBLIC COMMENT

City of Moreno Valley

Financial & Management Services Department 14177 Frederick St. PO Box 88005 Moreno Valley, CA 92552-0805

City of Moreno Valley HOME-ARP Allocation Plan

TABLE OF CONTENTS

INTRODUCTION	2
HOME-ARP ELIGIBLE QUALIFYING POPULATIONS AND ACTIVITIES	2
CONSULTATION	3
PUBLIC PARTICIPATION	11
NEEDS ASSESSMENT AND GAP ANALYSIS	12
HOMELESS (AS DEFINED IN 24 CFR 91.5 HOMELESS (1), (2), OR (3))	12
AT-RISK-OF-HOMELESSNESS (AS DEFINED IN 24 CFR 91.5)	15
FLEEING OR ATTEMPTING TO FLEE DOMESTIC VIOLENCE, DATING VIOLENCE, SEXUAL ASS. HUMAN TRAFFICKING	
OTHER POPULATIONS —INSTABILITY OF HOUSEHOLDS PAYING 50% IN RENT	18
HOME-ARP ACTIVITIES	20
Uses of HOME-ARP Funding	
HOME-ARP PRODUCTION HOUSING GOALS	23
PREFERENCES & PRIORITIZATION	23
REFERRAL METHODS	24
LIMITATIONS	25

Introduction

The City of Moreno Valley has been allocated \$2.4M of HOME- American Recovery Plan Act (HOME-ARP) funding from the U.S. Department of Housing and Urban Development (HUD). To receive the HOME-ARP allocation, the City must develop a HOME-ARP Allocation Plan (AP) that will become part of the City's FY 2021-2022 HUD Annual Action Plan by substantial amendment.

The HOME-ARP Allocation Plan must include:

- 1. A summary of the consultation process and 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 reasons 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 the 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 State will produce or preserve with its HOME-ARP allocation;
- 8. A description of any preferences for individuals and families in a particular qualifying population or a segment of a qualifying population;
- 9. HOME-ARP Refinancing Guidelines; and
- 10. Certifications and SF-424, SF-424B and SF-424D Forms.

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 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 (aka Qualifying Populations or QPs), including Veterans, that are:

- 1. Homeless, as defined 24 CFR 91.5 *Homeless* (1), (2), or (3):;
- 1. At risk of homelessness, as defined in 24 CFR 91.5 At risk of homelessness;
- 2. 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
- 3. Other Populations who do not qualify under any of the populations above but meet one of the following criteria:
 - a. Other Families Requiring Services or Housing Assistance to Prevent Homelessness

b. Those At Greatest Risk of Housing Instability

 Veterans and Families that include a Veteran Family Member that meet the criteria for one of the qualifying populations described above are eligible to receive HOME-ARP assistance.

Eligible activities include:

- 1. Development and support of affordable housing;
- 2. Tenant-based Rental Assistance (TBRA);
- 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.

Consultation

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

HUD requires each HOME-ARP Participating Jurisdiction (PJ) to consult with agencies and service providers whose clientele include the HOME-ARP qualifying populations. Agencies consulted must at a minimum include the Continuum of Care serving the PJ's geographic area, homeless and domestic violence service providers, veterans' groups, public housing agencies (PHAs), public agencies that address the needs of the qualifying populations, and public or private organizations that address fair housing, civil rights, and the needs of persons with disabilities. States are not required to consult with all Continuums of Care or PHAs in their jurisdiction.

To ensure broad input into the HOME-ARP allocation plan from stakeholders, beginning January 2023 through February 2023, the City engaged in consultation with stakeholders through a series of virtual meetings, phone interviews, and written surveys. Surveys were emailed to 280 public and private agencies and virtual meetings invitations were sent to 24 of these same agencies serving the various QPs.

The goals of the surveys and virtual meetings were to: (1) identify the needs and gaps in services to the various QPs; (2) prioritize the gaps identified, and (3) quantify as much as possible the gaps identified.

List the organizations consulted:

Table 1
City of Moreno Valley
Organizations Consulted

Organizations consulted									
Agency/Organizations Consulted	Type of Agency/Organization	QP Served	Method of Consultation	Date of Consultation	Needs/Gaps Feedback				
Riverside County Continuum of Care (CoC)	Public Agency	Homeless; At- Risk of Homelessness	1/3/23-Email Invitation to Phone consult / Survey	1/18/2023- Phone consult	The RivCo CoC provided several publications and data sets quantifying needs and gaps including the 2022 MoVal Point in Time stats, the MoVal Housing Inventory Count (HIC) and the 2022 RivCo Homeless Action Plan. Gaps included, but were not limited to, insufficient housing affordability, lack of permanent supportive and rapid rehousing units, lack of supportive services, lack of funds for move-in assistance.				
Housing Authority of the County of Riverside (HACR)	Public Agency	Homeless; At- Risk of Homelessness	1/3/23-Email Invitation to Phone consult / Survey	No Response. Feedback from RivCo Allocation Plan incorporated by permission.	The HACR identified lack of affordable housing as a major need, after someone is approved for a voucher finding a unit is extremely difficult.				
Riverside County Office of Aging	Public Agency	Homeless; At- Risk of Homelessness Seniors	1/3/23-Email Invitation to Phone consult / Survey	No Response. Feedback from RivCo Allocation Plan incorporated by permission.	OOA supported the need to direct funds toward the production of affordable permanent housing for the elderly homeless population.				

Table 1 (continued)

		(continued	-/		
Agency/Organizations	Type of	QP Served	Method of	Date of	Needs/Gaps
Consulted	Agency/Organization	α. σσ. τσα	Consultation	Consultation	Feedback
Riverside County Department of Veterans Services	Public Agency	Homeless; At- Risk of Homelessness Vets	1/3/23-Email Invitation to Phone consult / Survey	No Response. Feedback from RivCo Allocation Plan incorporated by permission.	Veterans' Services was consulted about HOME-ARP qualifying populations, and activities. Needs described included: Affordable Housing, Transitional Housing, Wrap Around Services, and Shelters, as well.
Riverside University Health System- Behavioral Health	Public Agency	Homeless; At- Risk of Homelessness Disabled	1/3/23-Email Invitation to Phone consult / Survey		RUHS oversees the County of Riverside's Coordinated Entry System (CES) and they agreed to provide referrals from the CES for HOME ARP funded.
Mary Erickson Community Housing	Private Developer	Homeless Affordable housing	1/3/23-Email Invitation to Phone consult / Survey	1/19/2023- Survey received	More high density affordable housing, especially for students. Provide TBRA and Section 8 vouchers.
Neighborhood Partnership Housing Services	Private Not-for-Profit	Homeless Affordable housing	2/1/23-Email Invitation to Phone consult / Survey	2/7/23-Video consult and survey	Need more affordable housing; more homeowner counseling & foreclosure counseling.
The Salvation Army	Private Not-for-Profit	Homeless; At- Risk of Homelessness	1/3/23-Email Invitation to Phone consult / Survey	1/12/2023- Video consult	Lack of transitional housing; mentoring to get people back on their feet.

Table 1 (continued)

		,			
Agency/Organizations Consulted	Type of Agency/Organization	QP Served	Method of Consultation	Date of Consultation	Needs/Gaps Feedback
Lutheran Social Service of Southern California	Private Not-for-Profit	Homeless; At- Risk of Homelessness	1/3/23-Email Invitation to Phone consult / Survey	1/12/2023- Video consult	Transitional housing units for long term (24 month) counseling addressing mental issues, credit, finances, employment, drug addiction.
Inland So Cal United Way	Private Not-for-Profit	Homeless; At-Risk of Homelessness; Fleeing violence	1/3/23-Email Invitation to Phone consult / Survey	2/1/23-Video consult and survey	More affordable housing especially for singles college grads and women with children fleeing domestic abuse; more rental assistance; transitional services like employment services; sited Wellness Center in Victorville as an example of full scope project. Also, streamlining the process for approval.
Catholic Charities	Private Not-for-Profit	Homeless; At- Risk of Homelessness	1/3/23-Email Invitation to Phone consult / Survey	No Response	No Response.

Table 1 (continued)

			•		
Agency/Organizations	Type of	QP Served	Method of	Date of	Needs/Gaps
Consulted	Agency/Organization	Qi Scived	Consultation	Consultation	Feedback
First Serv Foundation	Private Not-for-Profit	Homeless; At- Risk of Homelessness	1/24/23- Email invitation to Phone consult	1/24/2023- Phone consult	More affordable housing/mental health services/financial management for vets (especially females), seniors, disabled. Incomes not sufficient to cover local housing costs. Need more temporary housing coupled with extensive case management and mandatory education to deal with issues of mental health, unemployment, personal budgeting, and other barriers to sustainability and movement to permanent housing.

Table 1 (continued)

		(continued	- /		
Agency/Organizations	Type of	QP Served	Method of	Date of	Needs/Gaps
Consulted	Agency/Organization	Qi Scived	Consultation	Consultation	Feedback
U.S. Veterans	Private Not-for-Profit	Homeless; At- Risk of Homelessness; Disabled Vets;		2/2/23-Video consult and survey	More affordable housing as 50% of vets (about 500 in 2022) were turned away due to lack of affordable housing; Lack of transitional housing facilities for homeless like the US Vets MoVal facility; Fast tracking mental health assistance; Lack of child and senior care for vets trying to work; Improve access to critical documents like (birth certificates, etc.); Lack of available transportation to jobs, medical; Reducing red tape in screening services and centralizing screen function.
Assistance for Vets	Private Not-for-Profit	Homeless; At- Risk of Homelessness Vets	1/3/23-Email Invitation to Survey	1/17/23-Survey received	Shortage of housing vouchers and affordable village type housing for vets like those built by U.S. Vets. Mental health issues creating barriers to employment are not being addressed.

Table 1 (continued)

Agency/Organizations	Type of	QP Served	Method of	Date of	Needs/Gaps
Consulted	Agency/Organization	Qi Scived	Consultation	Consultation	Feedback
Reset Project	Private Not-for-Profit	Homeless; Domestic Violence	1/3/23-Email Invitation to Video consult / Survey	1/7/2023- Survey received	More TBRA; affordable housing (min 50 units), basic essentials; Must have counseling on basic life skills; treatment of mental health issues all to promote sustainability.
Riverside County Sherriff	Public Agency	Victims of Domestic Violence/Sexual Assault/Stalking/ Human Trafficking	1/3/23-Email Invitation to Video consult / Survey	2/22/23-Crime Stats Provided	City is second only to Riverside in violent crime. More assistance for victims is needed.
SAFE Family Justice Center	Private Not-for-Profit	Victims of Domestic Violence/Sexual Assault/Stalking/ Human Trafficking	1/25/23-Email Invitation to Phone consult / Survey	1/25/2023- Phone consult	Lack of affordable permanent supportive housing for victims of domestic violence.
Riverside Area Rape Crises Center	Private Not-for-Profit	Victims of Domestic Violence/Sexual Assault/Stalking/ Human Trafficking	1/3/23-Email Invitation to Video consult / Survey	2/8/23-Email Invitation to Video consult / Survey	Need shelter for domestic violence victims as there is none in City or County; Lack of sufficient administration budget for necessary case manager/admin staff to follow up with victims in long term.

Table 1 (continued)

Agency/Organizations Consulted	Type of Agency/Organization	QP Served	Method of Consultation	Date of Consultation	Needs/Gaps Feedback
Operation Safe House	Private Not-for-Profit	Victims of Domestic Violence/Sexual Assault/Stalking/ Human Trafficking	1/3/23-Email Invitation to Video consult / Survey	2/1/23-Video consult and Survey	More affordable housing; Major drug rehab services.
Voices for Children	Private Not-for-Profit	Victims of Domestic Violence/Sexual Assault/Stalking/ Human Trafficking	1/3/23-Email Invitation to Video consult / Survey	1/31/23-Video consult and Survey	VFC stated need for more dental health for children terming out of foster care.
Fair Housing Council of Riverside County	Private Not-for-Profit	Civil Rights/ Fair Housing	1/3/23-Email Invitation to Video consult / Survey	No Response	No Response.

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

The public and private agencies consulted were asked to prioritize the four activities eligible with the HOME-ARP funds based on the needs and service gaps to the QP's. The following is the outcome of the prioritization activity for those agencies that provided input.

- 1. Develop and Support more Affordable Rental Housing.
- 2. Provide more wrap around/transitional services, such as counseling and mental health services
- 3. Provide more rental assistance.
- 4. Increase availability of non-congregate shelter units

Lack of affordable rental housing in the City and Riverside County in general was the one constant for the majority of agencies consulted. Populations most impacted were households with Extremely Low Income (ELI) at 30% or less AMI for Riverside County and recently evicted persons, families fleeing domestic violence, and seniors on fixed incomes. One agency recommended a more affordable solution to help increase the affordable housing inventory by purchasing and rehabilitating single-family homes and converting them to shared multi-family housing dwellings, allowing for each room to be rented out. Another agency recommended developing a Wellness Center Campus, like the one in Victorville, that tackles the homeless problem by utilizing the "tiny house" concept to provide more affordable housing. This type of transitional housing for the chronically homeless also provide multiple transitional and health services such as counseling, job training, budgeting, mental health services, etc. This model was considered a major need by the City's homeless prevention subgrantees, The Salvation Army and Lutheran Social Services of Southern California.

Riverside Area Rape Crisis Center and Reset Project stated that there are no available shelters in Riverside County for women and women with children fleeing domestic violence. Through its

ESG-CV grant, the City currently provides 60-day emergency shelter hotel/motel vouchers, but this does not solve the permanent housing problem for this QP. One suggested solution was to provide rapid rehousing rental assistance to this QP, such as first and last month's rent or 3-6 months rental assistance so these persons/families can find and/or retain permanent housing to escape from and/or await resolution of their abusive situation. Another suggestion was for the City to purchase and rehabilitate single-family homes to create more affordable shared housing. Table 6 below reflect crime statistics on victims of domestic violence, sexual assault and sex trafficking, and the lack of available shelters in the City.

Lack of funding for Supporting Services for all QP's was another unmet need identified through the consultations. Services such as comprehensive/long-term case management, mental health services, transportation services, as well as childcare and elderly home care. Subpopulations included persons with disabilities, domestic violence survivors, those with serious mental illness and/or substance abuse disorders and vets.

Public Participation

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

- *Date(s) of public notice:* March 3, 2023
- Public comment period: Beginning March 3, 2023, and ending March 17, 2023
- *Date(s) of public hearing:* March 21, 2023

Describe the public participation process:

HUD requires each Participating Jurisdiction to 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 state may undertake.

Public participation was solicited through a 15-Day public comment period and public hearing. The City provided a 15-day public comment period for the proposed HOME-ARP Allocation Plan beginning March 3, 2023, ending March 17, 2023. A public hearing was conducted at the regularly scheduled council meeting on March 21, 2023. A combined notice of public comment period and public hearing were published in both English and Spanish in local newspapers of general circulation on March 2 and March 3, respectively. Accommodations for the disabled and Spanish language participants were provided at the public hearing.

Describe efforts to broaden public participation:

The HOME-ARP Allocation Plan was posted on the City website, a notice of availability was posted to the City's various social media sites, and an information bulletin notifying stakeholders and the public was distributed via City mailings.

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

There were [pending] comments received during the public comment period and the public hearing. These comments and the City's responses are summarized below:

[Insert Summary or Comments from PCP]

Summarize any comments or recommendations not accepted and state the reasons why: [pending]

Needs Assessment and Gap Analysis

The needs assessment and gap analysis must evaluate the 1) size and demographic composition of HOME-ARP qualifying populations, and 2) 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 populations:

- 1. Homeless sheltered and unsheltered (QP1);
- 2. Households At-Risk of Homelessness (QP2);
- 3. Those Fleeing violence, dating violence, stalking and human trafficking (QP3); and
- 4. Those at greatest risk of housing instability or unstable housing situations (QP4).

The City also utilized the following publications that highlighted the needs and gaps in the City and Riverside County as a whole.

- 1. City of Moreno Valley Housing Element 2021-2029 dated October 2022
- 2. Riverside County 2022 Homeless Action Plan dated January 2022
- 3. Riverside County 2022 Homeless Point-In-Time Count and Survey dated June 2022
- Riverside County Performance Assessment and Gap Analysis dated June 2021

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

Homeless (as defined in 24 CFR 91.5 Homeless (1), (2), or (3))

In partnership with the County of Riverside, the City participated in the 2022 Homeless Point-in-time (PIT) count that was conducted on February 23, 2022. Both, the sheltered and unsheltered homeless data collected is being used for this analysis. The 2022 PIT revealed the City of Moreno Valley experienced 77 unsheltered homeless, a 53% reduction in unsheltered homelessness from the 2020 PIT. Many of the unsheltered persons were living in the streets (35%), in tents or sheds (17%), or encampments (13%) and 43% of the unsheltered persons interviewed were homeless for the first time. Of the 77 unsheltered homeless, 40% were White

(this includes Hispanics), 26% were Black with other races, and the remaining 34% included all other races.

Table 2 below shows the number of unsheltered and sheltered homeless identified in the 2022 PIT.

Table 2
City of Moreno
2022 Homeless Point-in-Time Count

	CITY OF MORENO VALLEY								
Unsheltered	Sheltered	Total							
77	10	87							
Race (all)	Count	%							
American Indian, Alaskan Native, Indigenous	5	6%							
Asian, Asian American	1	1%							
Black, African American, African	20	26%							
Native Hawaiian, Pacific Islander	1	1%							
Multiple Races	8	10%							
White	31	40%							
Unknown Race	11	14%							
Total	77	100%*							

^{*}Percentages do not add up to 100% due to rounding

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 homelessness on any given night. Table 3 below summarize beds and units available in 2022 in the City by bed type as provided in consultation with the Riverside County CoC.

- 1. 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.
- 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 3 below shows the 2022 HIC inventory for the City as provided by the RivCo CoC. There is clear evidence there are **no emergency shelter beds** in the City for the homeless and those fleeing violence of various sorts. There remain **only 2 available transitional housing beds** for the 77 unsheltered homeless (12 beds per the HIC inventory less 10 sheltered per the 2022 PIT count). Although Rapid Rehousing and Permanent Supportive beds totaled 196 for 2022, those beds were not necessarily available to or accepted by the existing and new homeless individuals in the City. It is also important to mention that there are some homeless individuals who do not want housing assistance for various reasons. Table 6 shows homeless persons in the City suffering from mental illness, substance abuse or other undisclosed circumstances that may prevent them from being received in a transitional housing facility. These barriers must be treated to transition these individuals from homelessness and into a state of permanent housing and recovery.

Table 3
City of Moreno Valley
2022 Housing Inventory Count

Emergency Housing Beds Available 2022								
		С	urrent Inventor	-y		Beds f	or Subpopu	lations
	Family Units	Family Beds	Households with Children	Child- Only Beds	Total Year Round Beds	Chronic	Veterans	Youth
Emergency Shelter	0	0	0	0	0	0	0	0
Transitional Housing	0	0	12	0	12	0	12	0
Total Emergency Housing Beds	0	0	12	0	12	0	12	0

	Rapid Re	Rapid Rehousing and Permanent Supportive Housing Available 2022								
		C	urrent Inventor	γ		Beds f	or Subpopu	lations		
	Family Units	Family Beds	Households with Children	Child- Only Beds	Total Year Round Beds	Chronic	Veterans	Youth		
Rapid Rehousing	28	97	29	0	126	0	15	3		
Permanent Supportive Housing	15	52	18	0	70	29	0	0		
Total Year Round Beds	43	149	47	0	196	29	15	3		

Source: Riverside County Continuum of Care

At-Risk-Of-Homelessness (as defined in 24 CFR 91.5)

Table 4 below shows a 2016 comparison of the number of households in the City "At-Risk-Of-Homelessness" due to eviction compared to the State of California and County of Riverside. Households in the City were shown to be at greater risk than households in these larger jurisdictions.

Table 4
City of Moreno Valley
2016 Eviction Notices Filed

Jurisdiction	Population	Evictions	Eviction Rate
State of California	39.1 million	147,000	0.38%
County of Riverside	2.38 million	10,500	0.44%
City of Moreno Valley	204,308	956	0.47%

Source: Eviction Lab

Since the COVID-19 pandemic began in 2020, households, especially those of extremely low-income minorities, were put at greater risk as the U.S. economy was "shuttered in place", and many families lost their jobs and became delinquent in housing payments. The national and statewide moratoriums on eviction protection for renters helped delay families from losing their residence for almost two years, but only created an accumulation of rent delinquency as families redirected limited resources to basic needs over rent.

This accumulation of delinquent rent became a national crisis that was partially mitigated by programs such as the CARES Act Emergency Solutions Grants (ESG-CV) for homelessness and homeless prevention, and U.S. Treasury Department "Emergency Rental Assistance" (ERA) programs, which were funded through American Rescue Plan legislation. With grant funding from both ESG-CV and ERA, the City was able to cure delinquencies for over 2,300 households in the City between 2021 and 2022, as shown in Table 5. Of the assisted households, 1,308 (56%) were households with annual income at 50% or less than the Average Median Income (AMI) for Riverside County and paid 50% or more of household income in rent.

Table 5
City of Moreno Valley
Rental Assistance Provided
2021-2022

CITY OF MORENO VALLEY					
Household (HH) % AMI	Total Served	HH that pay 50% of Reported Income in Rent	% of Total Served		
below_30	827	661	80%		
between_30_50	741	647	87%		
between_50_80	736	679	92%		
Total	2,304	1,987	86%		

Source: Inland SoCal United Way

However, since September 30, 2022, both federal and California COVID related eviction protections expired, and ESG-CV and ERA funds have been nearly exhausted, elevating the

number of households at risk of eviction in the City. Inland SoCal United Way (ISCUW), the City's ERA sub-grantee, has received hundreds more applications for additional rental assistance from residents in the City that may not be served with the limited ESG-CV and ERA resources remaining, leaving a gap in helping those families most "At-Risk of Homelessness".

With a reported 2023 population of 213,574 per the website www.movalvalleybusiness.com and assuming the City's eviction rate is steady at .47% as shown in Table 4, the number of households "At-Risk of Homelessness" through eviction is currently estimated at a minimum of 1,004. With the 2023 demographics for the City showing 64% Hispanic and 15% Black, that translates to potentially **793** minority households "At Risk of Homelessness" due to eviction in the City.

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

Consultation by the County of Riverside with SAFE Family Justice Centers revealed that families or individuals fleeing domestic or dating violence need increased safety measures to minimize the risk of returning to unsafe residential environments. QP3 has a critical need for temporary shelter for safe harboring, and supportive services (i.e., legal advocacy, childcare, employment services, and case management) to help them transition to permanent supportive housing. Based on the 2011 Executive Management Report produced by SAFE Family Justice Centers of Riverside County, there has been an increase in domestic violence following the COVID-19 pandemic, increasing the need to provide families with safe housing opportunities and supportive services.

Table 6 below shows 2021 crime statistics for the City as reported by the Riverside County Sheriff for sexual assault, rape, domestic violence and child abuse. Clearly domestic violence (DV) and sexual assault are the most significant with a total of 781 (37 + 744) cases reported.

Table 6
City of Moreno Valley
2021 Domestic Violence Cases

	SEXUAL		DOMESTIC	CHILD
City	ASSAULT	RAPE	VIOLENCE	ABUSE
MORENO VALLEY	37	22	744	262

Source: Riverside County Sheriff Department

Furthermore, Table 7 below shows the 2022 unsheltered PIT identified 23 (43%) of the respondents experiencing unsheltered homelessness in the City, became homeless as a result of family disruption. Family disruption could be caused by domestic violence, or sexual assault among other causes resulting in homelessness for the fleeing victim. 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.

Table 7
City of Moreno Valley
2022 PIT Reasons for Homelessness

Reasons for Homelessness (interview, not mutually exclusive)			
Reason	#	%	
Family Disruption	23	43%	
Jail Release	0	0%	
Lack of Income	7	13%	
Medical Discharge	0	0%	
Mental Illness	2	4%	
Runaway	0	0%	
Substance Abuse	3	6%	
Unemployment	2	4%	
Other	15	28%	

Source: Riverside County 2022 Point In Time Homeless Count

Assuming only 10% of these DV cases reported in Table 6 resulted a Family Disruption/homelessness situation for the fleeing victim(s), it is estimated that a minimum of 74 (74 x 10%) persons fleeing domestic violence could result in homelessness.

The 2021 NNEDV Domestic Violence Counts Report-California Summary reported the underfunded needs for victims of DV included emergency shelter, housing, transportation, childcare and legal representation, among other services.

Other Populations –Instability of Households Paying 50% in Rent

Table 5 above highlights those rental unit households that that are paying over 50% of the reported family income in rent and are at the greatest risk of housing instability, especially those at the Extremely Low Income (ELI) 30% or below AMI for Riverside County, which accounted for 661 (27%) of the 2,304 households assisted by the City's ERA program. Table 8 below shows that there were 19,496 rental units in Moreno Valley in 2022 of which 5,264 (19,496 x 27%) households are estimated to be earning 30% or less of the AMI and paying over 50% of their income in rent. When combined with households estimated to earn 50% of less AMI, that population of households at risk of housing instability increases to 11,211 (58%) of total rental units in the City.

Through its ESG-CV grant Rapid Rehousing program, the City has also assisted 34 households with household incomes at 50% or less AMI for Riverside County. These households may need additional assistance to maintain housing stability that could be provided with HOME-ARP funds.

Table 8
City of Moreno Valley
Housing Units by Type

	CITY OF MORENO VALLEY	
Housing Type	Units	% of Total Housing
Rental Units	19,496	37.8%
Owner Occupied Units	32,049	62.2%
Total	51,545	100.0%

Source: Point2Homes.com, as of October 2022

Describe the unmet housing and service needs of qualifying populations:

Homeless as defined in 24 CFR 91.5:

Table 2 above shows the number of unsheltered homeless in the City to be 77 based on the 2022 PIT count. The need for emergency sheltering in the City is currently limited to hotel and motel vouchers issued through the City's ESG-CV grant as there are no shelter beds in the City according to Table 3 Housing Inventory Count. The need for transitional housing beds to provide both shelter and other supportive services leading the homeless to sustainability is a minimum of 75 transitional housing beds (77 unsheltered less 2 transitional beds available) based on the previous analysis.

Furthermore, the lack of affordable housing in the City is hindering current efforts by the City's subgrantees, to find affordable permanent housing for displaced families. Families are being forced to move out of the City to find affordable housing in other areas and even outside of Riverside County, where units are available and rents more affordable.

At Risk of Homelessness as defined in 24 CFR 91.5:

Based on the analysis under **At-Risk of Homelessness** and **Other Populations** above, the City estimates 770 of the renters in the City are facing eviction and 5,264 (27%) of renters in the City could be experiencing housing instability that leads to eviction.

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

According to a survey response by Reset Project, a non-profit provider of services to the homeless, particularly families of domestic violence, at least 50 affordable rental units are needed in the City for this QP.

Furthermore, the analysis of the data in Tables 6 and 7 above estimates that as many as 289 of those fleeing domestic violence in the City could become homeless and in need of temporary shelter and/or permanent housing.

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

The HUD 2015-2019 Comprehensive Housing Affordability Strategy ("CHAS") report released September 2022 reported that 21% of renters in the City were ELI households. Table 5 shows 33% (661/1,987) of ELI households served under the City's ERAP program paid over 50% of household income toward rent. With the total rental units in the City of approximately 19,500 as shown in Table 7, the City potentially has 1,351 (19,500 x 21% x 33%) ELI households paying over 50% of household income in rent.

Currently, the City has unspent ESG-CV and ERA grant funds of just under \$550,000 to provide rental assistance. The average rent in the City for a two-bedroom apartment is about \$2,217 according to PointHomes.com. If the City provides approximately three months rental assistance at the average rental rate, it is estimated that 82 ELI households could be served with the remaining ESG-CV and ERA grant funds. That leaves just under 1,270 (1,351-82) ELI households facing housing instability without any rental assistance from the City.

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

See analysis under **Homeless** on page 13 above.

Identify priority needs for qualifying populations:

Based on the consults and surveys, the QP's with the greatest needs gap are the homeless, those fleeing domestic violence, and those experiencing housing instability. For the homeless, transitional housing units that include 18-24 months of sheltering and supportive services (i.e. mental and drug rehab service, job training, transportation, etc.) leading to sustainability were the greatest need. For those fleeing violence, sheltering and eventual affordable permanent housing and counseling services were a priority. For those facing housing instability, the need for more rental assistance was the highest priority.

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

See analysis under **Homeless** on page 13 above.

HOME-ARP Activities

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

The City will publish public notices of Request for Proposals in English and Spanish, and accept applications through Planet Bids. Subrecipients will be selected based on meeting the objectives.

Describe whether the PJ will administer eligible activities directly:

The City intends to have subrecipients selected administer the eligible activities.

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

The City has contracted with Willdan Financial Services to consult with City staff and stakeholders in the community and to draft the HOME-ARP Allocation Plan for the public hearing and submission to HUD. The contract is based on time and materials not to exceed \$45,000.

Uses of HOME-ARP Funding

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

As shown in Table 9 below, the City intends to provide Supportive Services to the QP's primarily in the form of homeless prevention and related support services as detailed in the Preferences section below.

Table 9
City of Moreno Valley
HOME-ARP Funding Allocation

HOME-ARP Funding Allocations				
Activity	Funding	Percent of	Statutory Limit	
Activity	Amount	Allocation		
Supportive Services	\$2,063,401			
Non-congregate Shelter	\$0			
Tenant-based Rental Assistance	\$0			
Develop Rental Housing	\$0			
Non-profit Operating		0%	5%	
Non-profit Capacity Building		0%	5%	
Administration and Planning	\$364,000	15%	15%	
Total HOME-ARP Allocation	\$2,427,401			

Supportive Services

The City intends to allocate up to \$2,063,401 (85%) of the HOME-ARP funds to local non-profits to provide Supportive Services. Supportive Services may include:

- 1. Homeless Prevention Services, including:
 - a. Financial Assistance (Rent application fees, Security Deposits, Utility deposits and payments, moving costs, first and last month's rent, and payments in arrears up to 6 months including late fees).
 - b. Short-term (up to 3 months) and medium term (up to 24 months) rental assistance.
 - c. Case management.
 - d. Child Care.
 - e. Educational services.
 - f. Employment assistance and job training.
 - g. Food.
 - h. Housing search and counseling services.
 - i. Legal services.
 - j. Life skill training.
 - k. Mental health services.
 - I. Outpatient health services.
 - m. Outreach services.
 - Substance abuse treatment services.
 - o. Transportation.
 - p. Mediation.
 - q. Credit repair.
 - r. Landlord/tenant liaison.
- 2. Housing Counseling consistent with the definition of housing counseling and housing counseling services defined at 24 CFR 5.100 and 5.111, respectively.

The City may set limits on the amount of HOME-ARP funds allocated to each Supportive Service and to each eligible person/household of a QP served.

Administration:

The City intends to allocate up to \$364,000 (15%) of the HOME-ARP funds to program management, coordination, monitoring, and evaluation of the HOME-ARP activities. Costs may include reasonable salaries and wages, travel, administration under a third party and other cost allowable under *Requirements of the Use of Funds in the HOME-American Rescue Plan Program CPD 21-10*.

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

Through the consultation and public participation described above, the City was able to determine the major gaps in services to the QP's related to availability of affordable housing and supportive services. The County of Riverside and City of Riverside will be allocating over \$11 million in HOME-ARP funds to leverage the construction of 154 permanent affordable housing units in the County that may be eligible to the QP's in the City. These new rental units will alleviate some of the need for more affordable housing but will take time to construct. As such, the City has elected to provide more immediate gap relief to the QP's through Supportive Services.

HOME-ARP Production Housing Goals

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

The City does not intend to produce any additional units. The County of Riverside and City of Riverside will be allocating over \$11 million in HOME-ARP funds to leverage the construction of 154 permanent affordable housing units in the County that could potentially benefit the City's QPs

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

The City does not intend to produce any additional units. The County of Riverside and City of Riverside will be allocating over \$11 million in HOME-ARP funds to leverage the construction of 154 permanent affordable housing units in the County that could potentially benefit the City's QPs

Preferences & Prioritization

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

Preferences cannot violate any applicable fair housing, civil rights, and nondiscrimination requirements, including but not limited to those requirements listed in 24 CFR 5.105(a). With this understanding and with identification of those QPs most in need at this time, the City has established preferences for QP applicants.

The City will give preference to the following QP's with regard to Supportive Services:

- 1. Those Fleeing violence, dating violence, stalking and human trafficking (QP3); and
- 2. Those at greatest risk of housing instability or unstable housing situations (QP4).

If a preference was identified, explain how the use of a preference or method of prioritization will address the unmet need or gap in benefits and services received by individuals and families in the qualifying population or subpopulation of qualifying population, consistent with the PJ's needs assessment and gap analysis:

Supportive Service will be provided to applicants qualifying under these priorities. .

- 1. Households with children fleeing domestic violence.
- 2. Households with annual income that is less than or equal to 30% of the area median income, as determined by HUD and experiencing severe cost burden (i.e., is paying more than 50% on monthly household income toward housing cost.)

Within these priorities, applicants will be served on a first come, first served basis and then to all other QP's on a first in basis until the HOME-ARP funds are exhausted.

Referral Methods

Identify the referral methods that the PJ intends to use for its HOME-ARP projects and activities. PJ's may use multiple referral methods in its HOME-ARP program. (Optional):

The City will determine referral method based on projects that are identified for funding.

If the PJ intends to use the coordinated entry (CE) process established by the CoC, describe whether all qualifying populations eligible for a project or activity will be included in the CE process, or the method by which all qualifying populations eligible for the project or activity will be covered. (Optional):

Not applicable

If the PJ intends to use the CE process established by the CoC, describe the method of prioritization to be used by the CE. (Optional):

Not applicable

If the PJ intends to use both a CE process established by the CoC and another referral method for a project or activity, describe any method of prioritization between the two referral methods, if any. (Optional):

Not applicable

Limitations

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

The City has no intention of establishing limitations.

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

The City has no intention of establishing limitations.

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

The City has no intention of establishing limitations.