



Annual Action Plan Substantial Amendment HOME-ARP Allocation Plan

**City of Fullerton
FY 2021-22
(July 1, 2021 – June 30, 2022)**

Prepared pursuant to 24 CFR Part 91
Draft Review Period: March 7, 2023 – March 22, 2023

**City Council Approval: March 7, 2023
HUD Approval: Pending**

For more information please contact:
Linda Cordova, Housing Consultant to the City of Fullerton
(714) 738-6878

TABLE OF CONTENTS

	PAGE
Introduction.....	2
Consultation	
Needs Assessment and Gap Analysis.....	
HOME-ARP Activities	
Preferences	
<i>Exhibits</i>	
Exhibit 1-Comments and Survey Results.....	7
Exhibit 2-Orange County Point in Time (PIT) Summary	
Exhibit 3-Orange County Continuum of Care Consultation	
Exhibit 4-Pulic Notices	
Exhibit 5-Fullerton Affordable Housing Chart/Orange County HMIS Inventory List	
Exhibit 6-HOME-ARP Applications and Certifications	

SUBSTANTIAL AMENDMENT TO THE FISCAL YEAR 2021-2022 ANNUAL ACTION PLAN

Introduction

On March 11, 2021, President Biden signed the American Rescue Plan (ARP), into law, which provides over \$1.9 trillion in relief to address the continued impact of the COVID-19 pandemic on the economy, public health, State and local governments, individuals, and businesses.

Congress appropriated \$5 billion to be administered through the HOME Investment Partnerships Program – American Rescue Plan (HOME-ARP) to provide homelessness assistance and supportive services that benefit one of four qualifying homeless populations whether they be individuals or families. Activities to address the issues 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) non-profit operating and capacity building assistance; and (6) program planning and administration.

The four qualifying populations identified in HOME-ARP are (1) homeless, as defined in section 103(a) of the McKinney-Vento Homeless Assistance Act, as amended (42 U.S.C. 11302(a)) (“McKinney-Vento”); (2) at risk of homelessness, as defined in section 401 of McKinney-Vento; (3) fleeing, or attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking; or (4) part of other populations where providing supportive services or assistance would prevent a family’s homelessness or would serve those with the greatest risk of housing instability. Veterans and families that include a veteran family member that meet the criteria in one of the four populations above may be given preference.

The City of Fullerton’s HOME-ARP allocation is \$1,954,345. The City of Fullerton (City) submitted the federal Annual Action Plan (AAP) in May 2021 to the U.S. Department of Housing and Urban Development (HUD) that detailed the funding strategy for the Community Development Block Grant (CDBG) and HOME Investment Partnerships (HOME) programs each year. The AAP implements the jurisdiction’s Five-Year Consolidated Plan goals and is developed through significant public input, analyses, and planning. This document is the required Substantial Amendment to the City of Fullerton’s Fiscal Year 2021-2022 Annual Action Plan.

Title 24 Section 91.505 of the Code of Federal Regulations stipulates that participating jurisdictions shall amend their approved plans whenever they make one of the following decisions:

1. To make a change in its allocation priorities or a change in the method of distribution of funds;
2. To carry out an activity, using funds from any program covered by the Consolidated Plan (including program income) not previously described in the action plan; or
3. To change the purpose, scope, location, or beneficiaries of an activity.

In addition, HUD's, Community Planning and Development Notice CPD-21-10 *Requirements for the Use of Funds in the HOME-American Rescue Plan Program*, instructs Participating Jurisdictions (PJ), that in order to receive its HOME-ARP funds, a PJ must engage in consultation, facilitate the public participation processes, develop a HOME-ARP allocation Plan that meets the requirements established in section V. of the Notice, and to submit it to HUD as a substantial amendment to its Fiscal Year 2021 AAP.

CPD-21-10 stipulates that HUD will be using the waiver and alternative requirement authority provided by ARP to establish requirements for the HOME-ARP Allocation Plan. The HOME-ARP Allocation Plan must describe how the PJ intends to distribute HOME-ARP funds, including how it will use these funds to address the needs of HOME-ARP qualifying populations. A PJ's HOME-ARP Allocation Plan (Plan) must include:

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

All the above required elements of the HOME-ARP Allocation plan shall be part of the FY 2021 AAP for purposes of the HOME-ARP program. Consequently, PJs are not required to amend their consolidated plans.

The Regulation further requires that jurisdictions identify in their citizen participation plans the criteria they will use for determining what constitutes a substantial amendment. The proposed HOME-ARP Allocation Plan undertakes new activities with new funding not previously included in the Consolidated Plan or AAP. Therefore, this qualifies as a substantial amendment.

DRAFT

CONSULTATION

HUD requires each PJ 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 (CoC) serving the jurisdiction'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.

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

The City of Fullerton (City) conducted significant consultation sessions with citizens, elected officials, non-profit agencies, public housing authorities, private developers, governmental agencies, and the Orange County Continuum of Care (CoC) in preparing the HOME-ARP Allocation Plan.

To ensure broad input into the Plan, the City engaged in consultation through a virtual session with the Orange County Continuum of Care (CoC) that took place on February 21, 2023. The session was held in conjunction with the City of Garden Grove in front of the CoC General Membership of public and assisted housing providers and private and governmental health, mental health, and service agencies from across Orange County. During the presentations, the City presented the Plan and time was allowed for feedback and consultation from all attendees. While the CoC could not share the list of attendees, their general membership list is included in Exhibit 3. Thirty-nine participants signed into the session.

Additional consultation sessions were held during the development of the Plan:

January 24, 2023

Public Meeting for all service providers and the public

February 6, 2023

City Homeless Meeting with various City departments working on homeless issues

February 21, 2023

The above-mentioned CoC lead-consultation

February 28, 2023

Community Development Citizens' Committee - open to the public

March 21, 2023

Public Hearing before the City Council – open to the public

The following table is a list of organizations that were consulted as a part of the sessions (CoC session participants are not included). All feedback and comments are attached in Exhibit 1.

Agency/Group/ Organization	Agency/Group/ Organization Type	How Consulted
Curtis Gamble	Activist	1/24/23- In-Person Consultation Workshop
Lutheran Social Services	Non-profit Organization	1/24/23- In-Person Consultation Workshop
Lutheran Social Services	Non-profit Organization	1/24/23 In-Person Consultation Workshop
Lutheran Social Services	Non-profit Organization	1/24/23- In-Person Consultation Workshop
WTLC	Non-profit Organization	1/24/23- In-Person Consultation Workshop
Fair Housing Foundation	Non-profit Organization	1/24/23- In-Person Consultation Workshop
Hope Center of OC	Non-profit Organization	1/24/23- In-Person Consultation Workshop
Hope Center of OC	Non-profit Organization	1/24/23- In-Person Consultation Workshop
Pathways of Hope	Non-profit Organization	1/24/23- In-Person Consultation Workshop
Curtis Gamble	Activist	2/28/23- Public Meeting
Lutheran Social Services	Non-profit Organization	2/28/23- Public Meeting
CARE Housing Services	Non-profit Organization	2/28/23- Public Meeting
CARE Housing Services	Non-Profit Organization	2/28/23- Public Meeting

Public Participation

In accordance with 24 CFR 91.105(c)(3) for local governments, the substantial amendment Public Notice for the use of HOME-ARP funds was released for citizen review and comments on February 16, 2023. During the 15-day public comment period from March 7, 2023, through March 22, 2023, the draft substantial amendment was made available during regular business hours in the offices of the Community and Economic Development Department - Housing Division, 303 W. Commonwealth Avenue, 3rd Floor, Fullerton, CA 92832; the Fullerton Public Library, 353 W. Commonwealth Avenue, Fullerton, CA 92832; and on the City's website. The City Council held a public hearing on March 21, 2023, at 5:30 p.m. at the City Council Chambers, 303 W. Commonwealth Avenue, Fullerton CA 92832.

Efforts to Broaden Public Participation

A public notice advertising the availability of the Program Year 2021 AAP Substantial Amendment for the HOME-ARP Allocation Plan and public hearing was published on February 16, 2023, in the Fullerton Tribune in English, La Opinion in Spanish, and in the Korea Daily in Korean.

Comments and Recommendations Received:

All comments and survey results are attached (Exhibit 1).

Comments and Recommendations Not Accepted and Reasons Why?

No comments were rejected. All comments and survey results are attached (Exhibit 1).

DRAFT

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:

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.

To more accurately identify the unmet needs of the four qualifying populations in Fullerton, at a minimum, the following data was used. The Annual County of Orange 2022 Point in Time (PIT) Summary. The PIT counts the sheltered and unsheltered homeless persons on a single night during the last 10 days of January. The sheltered count includes emergency shelter, transitional housing, and safe haven projects. The updated Comprehensive Housing Affordability Strategy (CHAS) released September 9, 2022, by HUD's Office of Policy Development and Research (PD&R) based on 2015/2019 American Community Survey (ACS) 5-year estimates.

Housing Inventory Count (HIC)

According to the 2022 Orange County Housing Inventory Count, the following resources are available to assist qualifying populations, including congregate and non-congregate shelter units, supportive services, TBRA, and affordable and permanent supportive rental housing.

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.
2. Rapid re-housing 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.

The Orange County Housing Inventory Count reports that the Emergency Bed count shows 634 beds for families and 1,895 beds for individuals with 2,529 provided year-round and 346 overflow and seasonal beds.

Rapid Re-Housing bed count shows 757 beds for families and 340 beds for individuals with 1,097 year-round beds.

The transitional housing bed count has 711 beds for families and 157 beds for individuals with a total of 868 year-round.

Permanent Supportive Housing bed count is 193 beds for families and 763 beds for individuals with a total of 956 year-round.

Other Permanent Housing provides 499 beds for families and 199 for individuals with a total of 698 beds year-round.

Size and Demographic Composition of Qualifying Populations

The May 2022 PIT count of sheltered and unsheltered homelessness is used for this analysis.

The County of Orange is divided into three areas, Fullerton along with Anaheim, Brea, Buena Park, Cypress, La Habra, La Palma, Los Alamitos, Orange, Placentia, Stanton, Villa Park, Yorba Linda, incorporated County areas, and an unknown location for domestic violence victims make up the North Service Planning Area (North SPA). According to the PIT, the City has the second highest concentration of people experiencing homelessness in the North SPA following the City of Anaheim.

For the purposes of the HOME-ARP Allocation Plan, Homeless is defined in 24 CFR 91.5 (1), (2), or (3).

(1) An individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:

(i) An individual or family with a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, including a car, park, abandoned building, bus or train station, airport, or camping ground;

(ii) An individual or family living in a supervised publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, [transitional housing](#), and hotels and motels paid for by charitable organizations or by federal, [state](#), or local government programs for low-income individuals); or

(iii) An individual who is exiting an institution where he or she resided for 90 days or less and who resided in an [emergency shelter](#) or place not [meant](#) for human habitation immediately before entering that institution;

(2) An individual or family who will imminently lose their primary nighttime residence, provided that:

(i) The primary nighttime residence will be lost within 14 days of the date of application for [homeless](#) assistance;

(ii) No subsequent residence has been identified; and

(iii) The individual or family lacks the resources or support networks, [e.g.](#), family, friends, faith-based or other social networks needed to obtain other permanent housing; or

(3) Unaccompanied youth under 25 years of age, or families with children and youth, who do not otherwise qualify as [homeless](#) under this definition, but who:

(i) Are defined as [homeless](#) under section 387 of the [Runaway and Homeless Youth Act \(42 U.S.C. 5732a\)](#), section 637 of the [Head Start Act \(42 U.S.C. 9832\)](#), section 41403 of the [Violence Against Women Act of 1994 \(42 U.S.C. 14043e-2\)](#), section 330(h) of the [Public Health Service Act \(42 U.S.C. 254b\(h\)\)](#), section 3 of the [Food and Nutrition Act of 2008 \(7 U.S.C. 2012\)](#), section 17(b) of the [Child Nutrition Act of 1966 \(42 U.S.C. 1786\(b\)\)](#), or section 725 of the [McKinney-Vento Homeless Assistance Act \(42 U.S.C. 11434a\)](#);

(ii) Have not had a lease, ownership interest, or occupancy agreement in permanent housing at any time during the 60 days immediately preceding the date of application for [homeless](#) assistance;

(iii) Have experienced persistent instability as measured by two moves or more during the 60-day period immediately preceding the date of applying for [homeless](#) assistance; and

(iv) Can be expected to continue in such status for an extended period of time because of chronic disabilities, chronic physical health or mental health conditions, substance addiction, histories of domestic violence or childhood abuse (including neglect), the presence of a child or youth with a disability, or two or more barriers to employment, which include the lack of a high school degree or General Education Development (GED), illiteracy, low English proficiency, a history of incarceration or detention for criminal activity, and a history of unstable employment.

To address homeless, in 2019, the City developed a Fullerton Homeless Planning Committee. In February 2020 the Committee developed a Strategic Plan for Addressing Homelessness. There were four main elements of the Plan:

- Emergency Shelter/Navigation Centers
- Permanent Supportive and Affordable Housing
- Prevention and Diversion Programs
- Public Safety and Outreach Programs

The City provided both capital and operational costs for two North SPA Shelters, in Placentia and Buena Park. The Placentia Homeless Shelter consists of 100-beds and the Buena Park Homeless Shelter consists of 150-beds. In addition to the two regional shelters, the City worked with Illumination Foundation in developing a new creative approach - the Fullerton Navigation Center consists of 90-emergency shelter beds and 60-recuperative care beds. The Navigation Center has

a full clinic on-site which is staffed by doctors and nurses 24 hours a day. A CDBG-CV allocation of \$444,000 was awarded to the Navigation Center to provide additional assistance to the homeless during the COVID-19 pandemic. Fullerton has also contributed to Bridges at Kraemer Place, a 200-emergency bed shelter.

CDBG funds have annually been awarded to the Bridges at Kraemer Place (Mercy House), Pathways of Hope, and to the City Homeless Case Management Program. In 2023, in an effort to be more effective, the City proposes to remove the two part-time Homeless Case Management positions and replace them with one full-time position. This will help the City with recruitment and provide more consistency in meeting and developing trust with the homeless population. CDBG-CV funds were used to assist 94 individuals through Illumination Foundation and 192 individuals through Pathways of Hope.

Additionally, CDBG-CV funds in the amount of \$650,000 were awarded for the building rehabilitation of the new Hope Center located in Fullerton. The newly refurbished building is a central command center for case workers, health and outreach providers, and homeless liaison officers working together to address public health issues with an emphasis on services to homeless people in the North SPA region.

Sheltered Homeless Populations

The Orange County CoC conducts an annual PIT count, to create a census of unsheltered and sheltered individuals experiencing homelessness. From 2019 to 2022, the number of homeless residents in Orange County decreased from 6,860 to 5,718 individuals. The share of sheltered individuals in Orange County decreased by over 200 individuals and the share of unsheltered individuals decreased by 900 individuals. According to the 2022 PIT count, there were 272 people experiencing homelessness in Fullerton. Of these 272 people, 202 people were experiencing unsheltered homelessness and 70 people were experiencing sheltered homelessness. Although the PIT does not breakdown the demographic composition of the 272 people, it does breakdown the 5,718 persons in Orange County that were homeless at the time of PIT count:

	Unsheltered	Sheltered	Total
Homeless	3,057	2,661	5,718
Individuals	2,806	1,704	4,510
Families	94	295	389
Victims of DV	289	226	515
Transitional Age Youth	109	126	235
Seniors	300	418	718
Veterans	145	135	280

The PIT identified 2,661 people experiencing sheltered homelessness in Orange County. The PIT identifies 1,306 sheltered homeless persons in the North SPA with 70 of those being in the City. People are considered sheltered when they are residing in emergency shelter or transitional

housing, but not when they are receiving rapid re-housing assistance or residing in permanent supportive housing. Among individuals experiencing *sheltered* homelessness in the County:

- 56.97% (1,516) were between the ages of 25-61; 4.74% (126) were age to 24; 22.59% (601) were under age 18; and 15.71% (418) were 62 years of age or older;
- 51.48% (1,370) identified as male, 48.10% (1,280) identified as female, 0.15% (4) identified as transgender, and 0.4% (1) identified and gender non-conforming;
- 45.32% (1,206) identified as non-Hispanic and 54.68% (1,455) identified as Hispanic;
- 77.26% (2,056) identified as White, 3.53% (94) identified as multiple races, 11.01% (293) identified as Black or African American, 3.72% (99) identified as Asian, 3.49% (93) identified as American Indian or Alaska Native, and .98% (26) identified as Native Hawaiian or Other Pacific Islander;
- 38.40% (791) met the definition of experiencing chronic homelessness;
- 28.06% (578) were adults with a serious mental illness;
- 26.74% (551) were adults with physical or developmental disabilities;
- 20.19% (416) were adults with a substance use disorder;
- 3.74% (77) were an adult with HIV/AIDS; and
- 10.97% (226) were adult survivors of domestic violence.

Unsheltered Homeless Populations

The PIT identified 3,057 people experiencing unsheltered homelessness in Orange County, 1,113 in the North SPA and 202 of those being in the City. Among individuals experiencing *unsheltered* homelessness in the County:

- 82.67% (2,527) were between the ages of 25-61; 3.57% (109) were age 18 to 24; 43.96% (121) were under age 18; and 9.81% (300) were 62 years of age or older.
- 73.5% (2,247) identified as male; 25.81% (789) identified as female; .43% (13) identified as transgender; .13% identified as not singularly female or male; and .13% (4) identified as gender non-conforming;
- 67.78% (2,011) identified as non-Hispanic and 34.22% (1,046) identified as Hispanic;
- 65.42% (2,000) identified as White, 20.35% (622) identified as multiple races, 6.22% (190) identified as Black or African American, 3.14% (96) identified as Asian, 3.86% (118) identified as American Indian or Alaska Native; and 1.01% (31) identified as Native Hawaiian or Other Pacific Islander;
- 55.07% (1,617) met the definition of experiencing chronic homelessness;

- 29.53% (867) were adults with a serious mental illness;
- 41.45% (1,217) were adults with a substance use disorder;
- 46.46% (1,364) were adults with physical or development disabilities;
- 1.77% (52) were an adult with HIV/AIDS; and
- 9.84% (289) were adult survivors of domestic violence

A growing segment of individual adults is an increasing share of elderly adults and adult households who are becoming homeless. Adult only households are most likely to be chronically homeless and are most likely to be unsheltered and have a higher duration of days experiencing homelessness. Chronically homeless individuals continue to be a more challenging population to assist, provide services and support in identifying potential housing solutions. Through the City's Homeless Case Manager program working in conjunction with the Police Department's Homeless Liaison Officers, the City will be able to reach more homeless individuals and will be able to provide additional support to help them identify suitable long-term housing.

At-risk of Homelessness

The definition of at-risk of homelessness is defined in 24 CFR 91.5.

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

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

(iii) Meets one of the following conditions:

(A) Has moved because of economic reasons two or more times during the 60 days immediately preceding the application for homelessness prevention assistance;

(B) Is living in the home of another because of economic hardship;

(C) Has been notified in writing that their right to occupy their current housing or living situation will be terminated within 21 days after the date of application for assistance;

(D) Lives in a hotel or motel and the cost of the hotel or motel stay is not paid by charitable organizations or by federal, State, or local government programs for low-income individuals;

(E) Lives in a single-room occupancy or efficiency apartment unit in which there reside more than two persons or lives in a larger housing unit in which there reside more than 1.5 people per room, as defined by the U.S. Census Bureau;

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

(G) Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in the recipient's approved consolidated plan;

(2) A child or youth who does not qualify as “homeless” under this section, but qualifies as “homeless” under section 387(3) of the [Runaway and Homeless Youth Act \(42 U.S.C. 5732a\(3\)\)](#), section 637(11) of the [Head Start Act \(42 U.S.C. 9832\(11\)\)](#), section 41403(6) of the [Violence Against Women Act of 1994 \(42 U.S.C. 14043e-2\(6\)\)](#), section 330(h)(5)(A) of the [Public Health Service Act \(42 U.S.C. 254b\(h\)\(5\)\(A\)\)](#), section 3(m) of the [Food and Nutrition Act of 2008 \(7 U.S.C. 2012\(m\)\)](#), or section 17(b)(15) of the [Child Nutrition Act of 1966 \(42 U.S.C. 1786\(b\)\(15\)\)](#); or

(3) A child or youth who does not qualify as “homeless” under this section, but qualifies as “homeless” under section 725(2) of the [McKinney-Vento Homeless Assistance Act \(42 U.S.C. 11434a\(2\)\)](#), and the parent(s) or guardian(s) of that child or youth if living with her or him.

Households at risk of homelessness are those with incomes below 30% AMI that lack sufficient resources or support networks to prevent homelessness, and 1) have moved more than two times due to economic reasons in the past 60 days, 2) are doubled up with another household due to economic hardship, 3) will be evicted within 21 days, 4) live in a hotel or motel without financial assistance from a nonprofit or government entity, 5) live in an efficient apartment and are overcrowded, or 6) are exiting a publicly-funded institution or system of care.

HUD CHAS 2015-2019 data Table 10 provides information on overcrowding among households that include more than one family, by household income level. This CHAS data indicates there are approximately 9,560 households renting with incomes below 30% AMI that are at risk of homelessness in the City.

[Fleeing or Attempting to Flee Domestic Violence, Dating Violence, Sexual Assault, Stalking or Human Trafficking](#)

For HOME-ARP, this population includes any individual or family who is fleeing, or is attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking. This population includes cases where an individual or family reasonably believes that there is a threat of imminent harm from further violence due to dangerous or life-threatening conditions that relate to violence against the individual or a family member, including a child, that has either taken place within the individual’s or family’s primary nighttime residence or has made the individual or family afraid to return or remain within the same dwelling unit. In the case of sexual assault, this also include cases where an individual reasonably believes there is a threat of imminent harm from further violence if the individual remains within the same dwelling unit that the individual is currently occupying, or the sexual assault occurred on the premises during the

90-day period preceding the date of the request for transfer. Domestic violence, dating violence, sexual assault, and stalking are defined in detail in 24 CFR 5.2003.

Human trafficking includes both sex and labor trafficking, as outlined in the Trafficking Victims Protection Act of 2000 (TVPA), as amended (22 U.S.C. 7102).

Sex Trafficking means the recruitment, harboring, transportation, provision, obtaining, patronizing, or soliciting of a person for the purpose of a commercial sex act, in which the commercial sex act is induced by force, fraud, or coercion, or in which the person induced to perform such act has not attained 18 years of age.

Labor trafficking means the recruitment, harboring, transportation, provision, or obtaining of a person for labor or services, through the use of force, fraud, or coercion for the purpose of subjection to involuntary servitude, peonage, debt bondage, or slavery.

The 2022 PIT identified 515 sheltered (226) and unsheltered (289) adult survivors of domestic violence in the County. The count of sheltered and unsheltered survivors of domestic violence does not include children in families. Providers of services to survivors of domestic violence indicate the number of individuals in need of shelter is likely undercounted as isolation and physical distancing mandates resulted in increased domestic violence concerns while limiting potential flight from unsafe living situations. While the overall County number of victims of domestic violence has seen a slight overall decrease, the sheltered number has increased and the number unsheltered has decreased. Demographic information for this qualifying population is confidential.

For the last several years, CDBG funds have been allocated to Lutheran Social Services of Southern California (LSSSC) for their Victims of Domestic Violence Program. In FY 2021, LSSSC assisted 145 domestic violence victims.

Other Populations

Other populations where providing supportive services or assistance under section 212(a) of NAHA (42 U.S.C. 12742(a)) would prevent the family's homelessness or would serve those with the greatest risk of housing instability. HUD defines these populations as individuals and households who do not qualify under any of the populations above but meet one of the following criteria:

- (1) Other Families Requiring Services or Housing Assistance to Prevent Homelessness is defined as households (i.e. individuals and families) who have previously been qualified as "homeless in 24 CFR 91.5, are currently housed due to temporary or emergency assistance, including financial assistance, serves, temporary rental assistance or some type of other assistance to allow the household to be housed, and who need additional housing assistance or supportive services to avoid a return to homelessness.
- (2) At Greatest Risk of Housing Instability is defined as household who meets either
 - (i) Has annual income that is less than or equal to 30% of the area median income, as determined by HUD and is experiencing severe cost burden (i.e., is paying more than 50% of monthly household income toward housing costs.

- (ii) Has annual income that is less than or equal to 50% of the area median income, as determined by HUD, AND meets one of the following conditions from paragraph (iii) of the “At risk of homelessness” definition established at 24 CFR 915 (See “At Risk of Homelessness” paragraph above).

Currently housed and at risk of repeat homelessness

The Orange County HMIS (Homeless Management Information System) indicates that approximately 7% of individuals exiting emergency shelter, or transitional or permanent housing in any given year will return to homelessness within six months. In 2022, 3,302 people exited homelessness that year, therefore the risk of repeat homelessness is approximately 221 people in six months and an additional 130 (4%) within twelve months.

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

2015-2019 HUD CHAS data indicates there are 9,560 renter households with annual income less than 30% AMI that are at greatest risk of housing instability.

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 between 30% and 50% AMI that lack sufficient resources or support networks to prevent homelessness, and 1) have moved more than two times due to economic reasons in the past 60 days, 2) are doubled up with another household due to economic hardship, 3) will be evicted within 21 days, 4) live in a hotel or motel without financial assistance from a nonprofit or government entity, 5) live in an efficiency apartment and are overcrowded, or 6) are exiting a publicly-funded institution or system of care.

HUD CHAS 2015-2019 data Table 10 provides information on households that include more than one family, household income level and overcrowding. This CHAS data indicates there are approximately 6,190 households with incomes between 30% and 50% AMI that are at risk of homelessness in the City.

Unmet Housing and Service Needs of Qualifying Populations

The greatest unmet *housing* needs of qualifying populations are:

- Permanent rental housing that is affordable to qualifying and other populations; and
- Permanent supportive rental housing that coordinates specialized services with housing that is affordable to qualifying and other populations.

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:

- a. Case management;
- b. Child care;
- c. Education services;
- d. Employment assistance and job training;
- e. Meal or grocery assistance;
- f. Housing search and counseling assistance;
- g. Coordinated service linkage;
- h. Legal services;
- i. Outpatient health services;
- j. Outreach services;
- k. Substance abuse treatment services;
- l. Transportation;
- m. Credit repair
- n. Landlord-tenant liaison services;
- o. Services for special populations, including trauma-informed services; and
- p. Financial assistance to secure stable housing, such as rental application fees, security and utility deposits, and first and last month's rent.

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, and those at greatest risk of housing instability or in unstable housing situations are:

- a. Mental health;
- b. Navigation;
- c. Diversion;
- d. Life skills; and
- e. Vehicle repairs.

Current Resources Available to Assist Qualifying Populations

Although limited, current available resources include:

1. Congregate beds and non-congregate shelter units;
2. Supportive services;
3. Tenant-based rental assistance; and
4. Affordable and Permanent Supportive Rental Housing.

Congregate Beds and Non-congregate Shelter Units

In 2022, there were 3,397 congregate beds and 5,497 beds in non-congregate shelter units. Congregate beds include emergency, safe haven and transitional housing beds and units. Non-congregate shelter includes permanent supportive housing and rapid re-housing.

Supportive Services

The City has the following permanent supportive housing units/projects:

Casa Maria Del Rio	25 units
Fullerton City Lights	137 units
Fullerton Heights	35 units
Harbor View Terrace	25 units

Tenant-based Rental Assistance

The Orange County Housing Authority administers the following tenant-based voucher programs for Fullerton residents (Reported 1/10/23):

Housing Choice Voucher Program (Includes Housing Choice Vouchers, Family Unification, Family Self-Sufficiency, & Veterans Affairs Supportive Housing)*	356
Family Unification*	20
Family Self- Sufficiency*	18
Veterans Affairs Supportive Housing (VASH)*	32
Continuum of Care	55
Portability In	51
Emergency Housing Vouchers	37

A description of each program and the 2021-2022 program accomplishments are as follows:

The Orange County Housing Authority (OCHA) administers the Section 8/Housing Choice Voucher Program within the City of Fullerton. This assistance program is tenant-based rather than project-based. Each tenant may take their assistance and rent any unit within the County that meets the Section 8 Housing Quality Standards and meets the household's family size requirements. As of

July 11, 2022, OCHA was providing 367 Housing Choice Vouchers to Fullerton residents, of which, 86 were families, 72 disabled and 209 elderly. This data includes regular Housing Choice Vouchers, Family Unification Program (FUP), Family Self-Sufficiency (FSS), non-elderly disabled program, and Veterans Affairs Supportive Housing (VASH) program. There are no Fullerton non-elderly disabled households being assisted at this time.

The goal of the FSS program is to identify and remove economic barriers and make each household independent of the housing authority within a five-year period. As of July 2022, 19 households were being assisted (2 disabled household) in the City of Fullerton. Through the FSS program, a network of employers, social service agencies, and educational institutions are developed to provide each participating household with job skills and social services to: 1) Increase the household's income; 2) Make the household self-sufficient; and 3) Eliminate the household's need for rental assistance. The participating household signs an agreement to work over a five-year period toward becoming self-sufficient. In exchange for the household's commitment and work, the Housing Authority evaluates the household's specific needs and determines factors that are detrimental to the family's self-sufficiency.

The FUP program helps reunite families that have been separated by court order. Children have been taken into custody and placed in foster homes because families cannot provide adequate housing. The program operates with the same criteria required for Section 8, but families are given a priority status to avoid the four-five year waiting list. As of July 2022, there were 23 households (16 families, 5 disabled, 2 elderly) in the City of Fullerton.

The VASH program provides permanent housing subsidies and case management services to homeless veterans with mental and addictive disorders through a collaboration of the Department of Housing and Urban Development and Veteran Affairs. Of the active VASH vouchers, 35 are Fullerton residents, of which, 10 are families, 4 disabled, and 21 elderly.

The Emergency Housing Voucher (EHV) Program is funded through the American Rescue Plan Act (ARPA) of 2021. Vouchers assist individuals and families who are experiencing homelessness, those at risk of homelessness, fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking, or were recently homeless, and for when providing rental assistance will prevent the family's homelessness or having high risk of housing instability. Twenty-three households were assisted (8 families, 14 disabled, 1 elderly).

In addition, the County provided Portability-In vouchers to 51 households in Fullerton (21 family, 15 disabled, 15 elderly) and Continuum of Care assistance to 53 households (38 disabled, 15 elderly).

The City provides a TBRA program for seniors living in mobile homes and veterans throughout the city. There are currently 23 residents on the City's TBRA program. The following City operated assistance programs were administered or are proposed to be administered during the current

2020 Consolidated Plan:

PROGRAM	FUNDING SOURCE	FUNDING AMOUNT
TBRA – seniors living in mobile homes & veterans - Active An additional amount is proposed for 2023 - Proposed	HOME	\$600,000 \$300,000
Emergency Rental Assistance Program (ERAP) - Active	CDBG-CV	\$194,760
TBRA – citywide - Proposed	HOME	\$500,000
TBRA – victims of domestic violence - Proposed	HOME-ARP	\$500,000

Shelter, Housing and Service Delivery System Gaps

Shelter Gap

Based on the PIT the need for shelter in the County is high as the report shows 3,057 (202 in Fullerton) individuals were unsheltered. There is an estimated need for 45 additional shelter beds and/or transitional housing beds for the homeless population based on the January 2019 point-in-time count.

Shelter Gap Methodology

The shelter gap methodology utilized the 2022 PIT of unsheltered individuals and families in the County. The number of unsheltered individuals and families equaled 3,057 individuals on the streets with 202 of them in Fullerton with only 70 in shelters.

Tenant-based Rental Assistance Gap

There is an estimated gap of 15,158 tenant-based rental assistance vouchers for households with income less than 50% AMI and paying more than 50% of household income for rent, including utilities. There are 15,750 renter households with income less than 50% AMI paying more than 50% of income for rent, including utilities with only 592 vouchers and TBRA slots.

Tenant-based Rental Assistance Gap Methodology

Below shows the number of renter households with income less than 50% of AMI and paying more than 50% of household income for rent, including utilities that could not be covered by a voucher

Tenant-based Rental Assistance Gap		
	OCHA Vouchers + HOME-TBRA	Gap
Renter Households with Income <50% AMI paying more than 50% of income for rent, including utilities	592	15,158

Affordable Rental Housing Gap

There is an estimated gap of 1,950 rental units affordable to renter households with income less than 30% AMI. In addition, there is an estimated gap of 4,165 rental units affordable to renter households with income between 30% and 50% AMI.

Affordable Rental Housing Gap Methodology

The number of Affordable Rental Units was calculated using HUD CHAS Data Table 10 and is equal to the number of renter households in each income category paying more than 50% of household income for rent, including utilities.

Affordable Rental Unit Gap	
Renter Households with Income <30% AMI paying more than 50% of income for rent, including utilities	9,560
Renter Households with Income 30% to 50% AMI paying more than 50% of income for rent, including utilities	6,190
<i>Total Affordable Rental Unit Need</i>	<i>15,750</i>

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 increased risk of homelessness throughout the City.

Priority Needs for Qualifying Populations

Priority needs for qualifying populations are:

- Non-congregate shelter;
- Affordable rental housing, including permanent supportive housing;

- Supportive services including:
 - Housing navigation;
 - Case management;
 - Child care;
 - Education services;
 - Employment assistance and job training;
 - Meal or grocery assistance;
 - Housing search and counseling assistance;
 - Coordinated service linkage;
 - Legal services;
 - Life skills training;
 - Mental health services;
 - Outpatient health services;
 - Outreach services;
 - Substance abuse treatment services;
 - Transportation, including vehicle repairs and bus passes;
 - Credit repair;
 - Landlord-tenant liaison services;
 - Services for special population, including trauma-informed services; and
 - Financial assistance to secure stable housing, such as rental application fees, security and utility deposits, and first and last month's rent.

Other resources available to qualifying populations in the City

Every five years, the City must submit its Five-Year Consolidated Plan to the HUD in order to receive funding for the Community Development Block Grant (CDBG) and the HOME Investment Partnerships (HOME) programs. These federal funds provide for the development of affordable housing, street improvements, park and public facilities improvements, economic development, code enforcement, public services, the expansion and retention of businesses, and for the delivery of services for individuals experiencing homelessness.

Funding for Homeless populations

The CDBG program provides funds annually to programs that assist sheltered and unsheltered homeless individuals, as well as those at risk of homelessness, to quickly regain stability in permanent housing after experiencing a housing crisis and/or homelessness.

Funding for At Risk of Homelessness populations

The HOME program provides funds for a wide range of housing-related activities including building, buying, and/or rehabilitating affordable housing for rent or homeownership, or providing direct tenant-based rental assistance to low-income residents. The program's flexibility

allows HOME funds to be used for grants, direct loans, loan guarantees or other forms of credit enhancements, or tenant-based rental assistance or security deposits to prevent homelessness.

The City is in negotiations with a local developer to add an additional twelve HOME-assisted affordable rental housing units in the City.

Funding for Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking populations

The City’s CDBG funds are used to provide financial assistance to Lutheran Social Services of Southern California. This organization provides services that assist victims of domestic violence.

Funding for Other populations

The City’s TBRA provided assistance to seniors who live in mobile homes and pay more than 30% of their income to housing costs. The need was recognized when the City was doing home improvements on the mobile homes and realized that many of these seniors were living on very limited incomes.

CDBG-CV funds were awarded to food programs during the pandemic to assist those who had been impacted. Seniors were assisted through the Meals on Wheels – Fullerton (\$7,000) and Meals on Wheels – OC (\$7,000). Additional senior found themselves in need of assistance as they could not leave their homes and had not one to provide food for them. Feed Fullerton received \$268,131 and provided a food voucher program for individuals and families who were financially impacted.

Fullerton receives an annual allocation of approximately \$1.3 million. The FY 2020-2021, 2021-2022, and 2022-2023 CDBG funds included funding allocations for administration and planning, code enforcement in low- to moderate-income areas of the city to address health and safety violations, fair housing, non-profit and city public services, city capital improvement projects, and single-family rehabilitation grants. Funds were available for economic development to provide small business grants, but no applications were submitted. Funds were provided for small business loans under economic development through CDBG-CV in the amount of \$194,760. The following programs are being funded to provide services to numerous populations in the community (administration and capital improvement projects are not shown in this table):

Public Service Organizations	2020 Con Plan awards to date
AIDS Services Foundation of OC (dba Radiant Health Centers) – <i>HIV Care Services</i>	\$ 7,500
Boys & Girls Club of Fullerton – <i>After School/Youth Development</i>	\$ 97,841
CARE Housing Services – <i>Fullerton City Lights Social Services</i>	\$ 15,000
Community SeniorServ (dba Meals on Wheels Orange County)– <i>Lunch Café Program</i>	\$ 46,273
Fair Housing Foundation – <i>Fair Housing Services</i>	\$ 60,000

City of Fullerton – <i>Homeless Case Management Program</i>	\$ 95,988
City of Fullerton – <i>Housing Rehabilitation Program/CDBG HOME funding</i>	\$649,090 \$300,000
City of Fullerton – <i>Special Code Enforcement</i>	\$420,000
Hart Community Homes – <i>Monkey Business Cafe</i>	\$ 45,000
ICNA Relief USA Programs, Inc. – <i>Crescent Clinic</i>	\$ 7,500
Lutheran Social Services of So. Cal. – <i>Victims Intervention Program</i>	\$ 39,273
Meals on Wheels Fullerton – <i>Maintenance of Meals/Supportive Services</i>	\$ 66,562
Mercy House Living Centers – <i>Bridges at Kraemer Place</i>	\$ 44,273
Pathways of Hope – <i>Regional Homeless Services Coordination</i>	\$ 85,803
Wound Walk – <i>Fullerton Street Medic Program</i>	\$ 14,273
YMCA of Orange County – <i>Youth Achievers</i>	\$ 32,370

HOME- ARP Activities

Describe the method for soliciting applications for funding and/or selecting developer's, service providers, subrecipients and/or contractors and whether the PJ will administer activities directly.

HOME-ARP will be administered by the Housing Division of the City of Fullerton (under the direct supervision of the Housing Division Manager, the direction of the Executive Director of Community and Economic Development, and the general supervision of the City Manager).

The City will follow the CDBG application process. Applications will be solicited for funding and/or selecting service providers, subrecipients and/or contractors. The City may administer programs such as the TBRA programs and will be subject to the same application process as non-profit agencies. An application period will be announced. Proposed projects may be for any of the identified activities allowed by HOME-ARP regulations. After all applications are received, staff will review them to determine they are within the HOME-ARP requirements of CPD Notice 21-10. Applications will be presented to the CDCC for review, presentations by the applicants will be heard, and recommendation for funding will be forwarded to the City Council for final approval.

If additional funding is identified and a project includes acquisition, rehabilitation, or new construction of permanent supportive housing or the development of non-congregate shelter units, the City will issue a Request for Proposals (RFP).

The RFP process will be used to select developers and approve a site. Funding amount is unknown as no other funding has been identified. If the RFP process is needed an announcement will be

made to the following parties:

- Interested Developers and Non-profit Organizations on the Housing Division’s List.
- Developers and Non-profit Organizations interested in being added to the RFP Process Database can do so by contacting the City’s Housing Division at any time.
- Other affordable housing membership association resources (e.g. Southern California Association of Nonprofit Housing, Kennedy Commission, 2-1-1 OC)
- Public Notice in the local newspaper
- Published on www.Planetbids.com

A Qualified Developer shall complete and submit to the Housing Division the RFP for HOME-ARP funds and prepare all required attachments and exhibits, including, but not limited to, the project proforma, budget, sources and uses, project management plan, tenant selection and marketing plan, relocation plan (if applicable), signed purchase agreement and escrow instructions, preliminary title report, and limited partnership documents (if applicable).

After the deadline for the RFP, the Housing Division staff shall review the proposal(s) to determine that the minimum program and RFP requirements are met (minimum threshold review) and the proposal(s) is eligible under CPD Notice 21-10. Proposals that do not meet the minimum threshold review will be considered non-responsive. If the proposal(s) meets the minimum threshold review, the Housing Division will present the submissions to the CDCC for review. The CDCC’s recommendation will then be presented to City Council for final approval.

If any portion of the PJ’s HOME-ARP administrative funds were 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:

NOT APPLICABLE

PJs must indicate the amount of HOME-ARP funding that is planned for each eligible HOME-ARP activity type and demonstrate that any planned funding for nonprofit organization operating assistance, nonprofit capacity building, and administrative costs is within HOME-ARP limits. The following table may be used to meet this requirement.

Use of HOME-ARP Funding

Eligible Activities	Funding Amount
Acquisition and Development of Non-Congregate Shelters	\$ 0
Development of Affordable Rental Housing	
Tenant-based Rental Assistance	\$ 550,000
Provision of Supportive Services	\$1,208,911
Nonprofit Capacity Building	\$ 0

Administration and Planning (15% max)	\$ 195,434 (10% of allocation)
Total HOME-ARP Allocation	\$1,954,345

Additional Narrative:

If applications are not submitted to use the full amount of any particular eligible activity category or if the CDCC and/or the City Council determines that valid applications would better address the unmet needs as described, funds may be moved to meet the eligible activities requests.

HOME-ARP funds may be allocated to either Acquisition and Development of Non-Congregate Shelters or for the Development of Affordable Rental Housing if additional funding is identified.

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

The 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 TBRA and Supportive Services to address the need to prevent additional homelessness in the City. Although physical shelters and housing units are needed, the City cannot financial support these activity.

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:

No new affordable rental housing units are expected to be produced. However, TBRA and supportive services for people at risk of homelessness will be assisted with HOME-ARP. TBRA funding will help keep 45 households from experiencing homelessness and supportive service will assist 134 households from experiencing homelessness or returning from homelessness.

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

Although the City does not anticipate production of affordable rental housing units with HOME-ARP funds, the City does expect to provide support services to units that house residents who are at risk of becoming or returning to homelessness. It is anticipated that a minimum of 134 household will possibly be supported at Fullerton City Lights.

Preferences

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

- 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).
- PJs are not required to describe specific projects to which the preferences will apply.

All four qualifying populations will be assisted. The funds will not be restricted to one qualifying population. Preferences may be made to seniors, veterans, female victims of domestic violence, and/or other eligible preference categories, but funding will not be exclusive to these subpopulations and will be open to all applicants if funds are available after the preferenced categories are assisted.

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 category of qualifying population, consistent with the PJ's needs assessment and gap analysis:

Based on the City's gap analysis it was a local decision to use HOME-ARP funds to assist all four qualifying populations. No population will be excluded from funding consideration. If funds are allocated and go unspent, then City will re-evaluate the use of such funds and may reallocate them to another qualifying population.

If a preference was identified, describe how the PJ will use HOME-ARP funds to address the unmet needs or gaps in benefits and services of the other qualifying populations that are not included in the preference:

Not Applicable

DRAFT

EXHIBIT 1

COMMENTS AND SURVEY RESULTS

(TO BE INSERTED BEFORE SUBMISSION TO HUD)

EXHIBIT 2

ORANGE COUNTY POINT IN TIME SUMMARY (PIT)



EVERYONE COUNTS

2022 POINT IN TIME SUMMARY

May 2022



EVERYONE COUNTS

2022 POINT IN TIME COUNT TOTALS

2022 POINT IN TIME COUNT BY THE NUMBERS

5,718
Persons

North: 2,419 Persons

Central: 2,714 Persons

South: 585 Persons

SUBPOPULATIONS

280

VETERANS

Persons who served in the U.S. Armed Forces, National Guard or Reserves

235

TRANSITIONAL AGED YOUTH

Persons ages 18 to 24

718

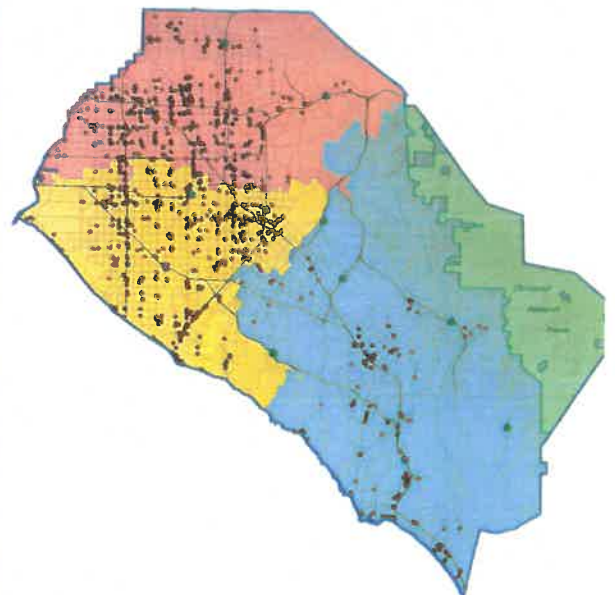
SENIORS

Persons ages 62 and older

METHODOLOGY

The U.S. Department of Housing and Urban Development (HUD) requires that all Continuum of Care (CoC) jurisdictions across the nation complete a biennial unsheltered count and an annual sheltered count of all persons experiencing homelessness in the community on a single point in time during the last ten days of January. The Orange County CoC is among several CoC in California that were approved by HUD to reschedule the 2022 Point In Time to the last 10 days of February due to the impacts of COVID-19 pandemic and in an effort to safeguard the health of volunteers and vulnerable persons experiencing homelessness.

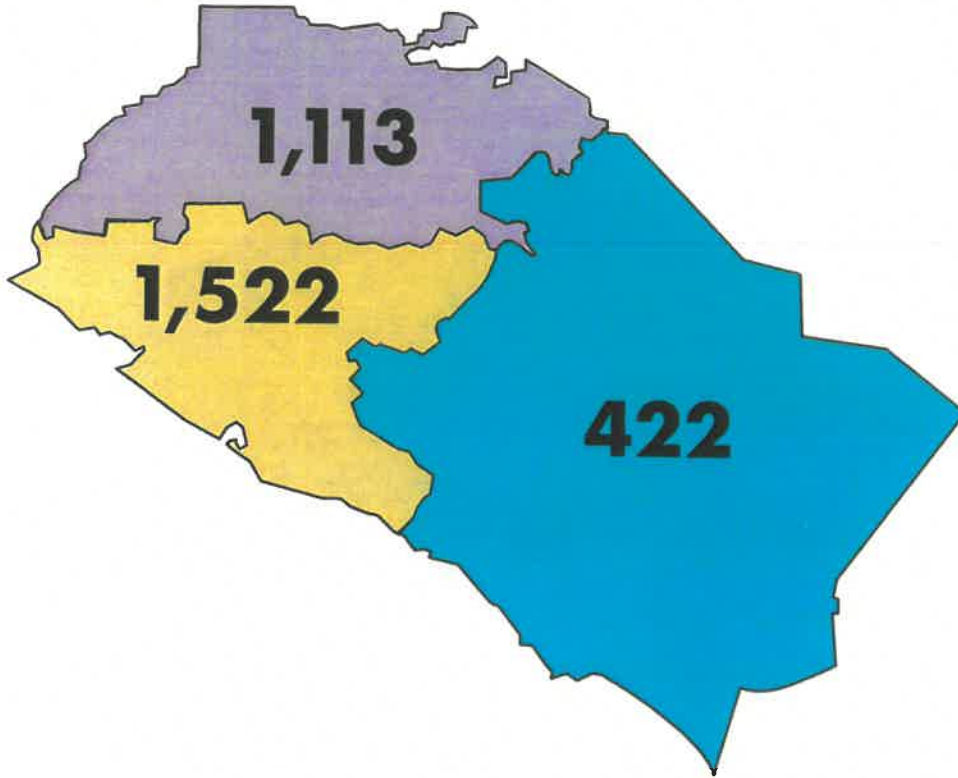
The County of Orange and Orange County CoC conducted the sheltered count the night of Monday, February 21, 2022. Emergency Shelters and Transitional Housing Programs collected participant-level demographic information from individuals and families staying the night in each program. The 2022 Unsheltered Count process took place over three days - Tuesday, February 22 through Thursday, February 24 - to ensure the 800 square mile Orange County jurisdiction was canvassed effectively. This methodology allowed the count teams to collect unique ID data points that were used to deduplicate records for the three-day street count process. The survey data was collected with ArcGIS Survey 123, a phone application that captures GIS locations and provides vital information that guides the way the County responds to homelessness in Orange County. The methodology for the 2022 Everyone Counts process provides the most accurate data on the scope of homelessness in Orange County, ensuring that Everyone Counts.





EVERYONE COUNTS

UNSHELTERED COUNT



3,057
UNSHELTERED TOTAL

145

VETERANS

Persons who served in the U.S. Armed Forces, National Guard or Reserves

109

TRANSITIONAL AGED YOUTH

Persons ages 18 to 24

300

SENIORS

Persons ages 62 and older

MAPS & VOLUNTEERS

982

Community volunteers, nonprofit and faith-based service providers including representatives from law enforcement, all 34 cities and County government.

208

Field teams of volunteers deployed into the community to canvas maps and survey people experiencing homelessness.

412

Maps were canvassed at least twice during the 2022 Point In Time Count effort.





EVERYONE COUNTS

SHELTERED COUNT

135

VETERANS

Persons who served in the U.S. Armed Forces, National Guard or Reserves

126

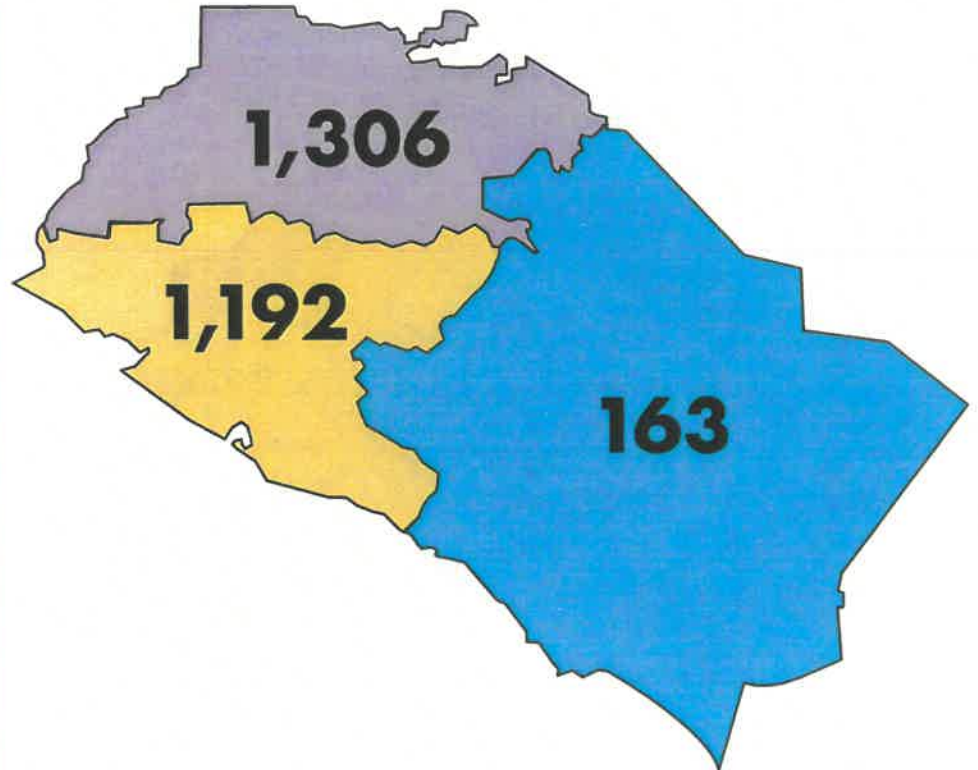
TRANSITIONAL AGED YOUTH

Persons ages 18 to 24

418

SENIORS

Persons ages 62 and older



2,661

SHELTERED TOTAL



THANK YOU TO ALL THOSE INVOLVED

- **County of Orange** – including Health Care Agency, Social Services Agency, OC Community Resources, OC Parks, OC Public Works, OC Information & Technology, OC Sheriff's Department
- **Continuum of Care Agencies**
- **Nonprofit and faith-based service providers**
- **34 Cities and law enforcement agencies**
- **Community volunteers from every part of Orange County**
- **Commission to End Homelessness**
- **Hub for Urban Initiatives** – HUD methodology and survey tool design
- **City Net** – lead agency for unsheltered count
- **2-1-1 Orange County** – lead agency for sheltered count



EVERYONE COUNTS

SUBPOPULATIONS & DISABLING CONDITIONS

	UNSHELTERED	SHELTERED
ADULTS	2,936	2,060
CHRONIC HOMELESSNESS	55.07% 1,617 Adults	38.40% 791 Adults
SUBSTANCE USE ISSUES	41.45% 1,217 Adults	20.19% 416 Adults
PHYSICAL DISABILITY	32.19% 945 Adults	24.85% 512 Adults
MENTAL HEALTH ISSUES	29.53% 867 Adults	28.06% 578 Adults
DEVELOPMENTAL DISABILITY	14.27% 419 Adults	1.89% 39 Adults
DOMESTIC VIOLENCE	9.84% 289 Adults	10.97% 226 Adults
HIV/AIDS	1.77% 52 Adults	3.74% 77 Adults

Some adults may identify with more than one subpopulation and/or report more than one disabling condition

Data only includes adults, persons age 18 and older



EVERYONE COUNTS

DEMOGRAPHICS

Age	Unsheltered 3,057 Persons	Sheltered 2,661 Persons
Under 18	3.96% 121 Persons	22.59% 601 Persons
18-24	3.57% 109 Persons	4.74% 126 Persons
25-39	33.40% 1,021 Persons	21.01% 559 Persons
40-49	20.22% 618 Persons	14.09% 375 Persons
50-54	12.69% 388 Persons	7.82% 208 Persons
55-61	16.36% 500 Persons	14.05% 374 Persons
62+	9.81% 300 Persons	15.71% 418 Persons

Gender	Unsheltered 3,057 Persons	Sheltered 2,661 Persons
Female	25.81% 789 Persons	48.10% 1,280 Persons
Male	73.50% 2,247 Persons	51.48% 1,370 Persons
Transgender	0.43% 13 Persons	0.15% 4 Persons
Gender not singularly Female or Male	0.13% 4 Persons	0.23% 6 Persons
Questioning	0.13% 4 Persons	0.04% 1 Person



EVERYONE COUNTS

DEMOGRAPHICS

Race	Unsheltered 3,057 Persons	Sheltered 2,661 Persons
American Indian or Alaska Native	3.86% 118 Persons	3.49% 93 Persons
Asian	3.14% 96 Persons	3.72% 99 Persons
Black or African American	6.22% 190 Persons	11.01% 293 Persons
Native Hawaiian Or other Pacific Islander	1.01% 31 Persons	0.98% 26 Persons
White	65.42% 2,000 Persons	77.26% 2,056 Persons
Multiple Races or Other	20.35% 622 Persons	3.53% 94 Persons

Ethnicity	Unsheltered 3,057 Persons	Sheltered 2,661 Persons
Hispanic or Latino	34.22% 1,046 Persons	54.68% 1,455 Persons
Non- Hispanic or Non-Latino	65.78% 2,011 Persons	45.32% 1,206 Persons



EVERYONE COUNTS

HOUSEHOLD STATUS



HOUSEHOLD STATUS

Households	Description	Unsheltered (3,057)	Sheltered (2,661)	Total (5,718)
Individuals	Individuals ages 18+	2,806	1,704	4,510
Families	Households with at least one adult and one child	94 Families 251 persons in households: 130 Adults 121 Children	295 Families 950 persons in households: 356 Adults 594 Children	389 Families 1,201 persons in households: 486 Adults 715 Children
Unaccompanied Youth	Minors (17 and younger without parent/guardian)	0	7	7



EVERYONE COUNTS

2022 POINT IN TIME COUNT: CITY BY CITY

City	Unsheltered	Sheltered	Total
Anaheim	485	589	1,074
Brea	24	0	24
Buena Park	85	181	266
Cypress	28	0	28
Fullerton	202	70	272
La Habra	45	0	45
La Palma	8	0	8
Los Alamitos	4	9	13
Orange	134	116	250
Placentia	31	167	198
Stanton	62	148	210
Villa Park	0	0	0
Yorba Linda	4	0	4
County Unincorporated	1	0	1
Domestic Violence Programs		26	26
North Service Planning Area	1,113	1,306	2,419

City	Unsheltered	Sheltered	Total
Costa Mesa	150	58	208
Fountain Valley	38	0	38
Garden Grove	278	113	391
Huntington Beach	188	142	330
Newport Beach	96	0	96
Santa Ana	508	482	990
Seal Beach	8	0	8
Tustin	86	232	318
Westminster	159	0	159
County Unincorporated	11	36	47
Domestic Violence Programs		129	129
Central Service Planning Area	1,522	1,192	2,714

City	Unsheltered	Sheltered	Total
Aliso Viejo	13	4	17
Dana Point	27	0	27
Irvine	60	0	60
Laguna Beach	28	55	83
Laguna Hills	12	0	12
Laguna Niguel	29	0	29
Laguna Woods	7	0	7
Lake Forest	65	11	76
Mission Viejo	26	2	28
Rancho Santa Margarita	7	0	7
San Clemente	81	50	131
San Juan Capistrano	65	0	65
County Unincorporated	2	0	2
Domestic Violence Programs		41	41
South Service Planning Area	422	163	585



EVERYONE COUNTS

2019 & 2022 RESULTS COMPARISON

COMPARISON OF 2019 AND 2022 POINT IN TIME COUNT TOTALS

Year	Unsheltered Count		Sheltered Count		Total	
	#	%	#	%	#	%
2019	3,961	57.74%	2,899	42.26%	6,860	100%
2022	3,057	53.46%	2,661	46.54%	5,718	100%
Difference	-904	-22.82%	-238	-8.21%	-1,142	-16.65%

COMPARISON OF 2019 AND 2022 UNSHELTERED COUNTS BY SERVICE PLANNING AREA

Service Planning Area	2019 Unsheltered		2022 Unsheltered		Difference	
	#	%	#	%	#	%
North	1,596	40.29%	1,113	36.41%	-483	-30.26%
Central	1,827	46.12%	1,522	49.79%	-305	-16.69%
South	538	13.59%	422	13.80%	-116	-21.56%
Total	3,961		3,057		-904	-22.82%

COMPARISON OF 2019 AND 2022 SHELTERED COUNTS BY SERVICE PLANNING AREA

Service Planning Area	2019 Sheltered		2022 Sheltered		Difference	
	#	%	#	%	#	%
North	1,169	40.32%	1,306	49.08%	137	11.72%
Central	1,505	51.92%	1,192	44.79%	-313	-20.80%
South	225	7.76%	163	6.13%	-62	-27.56%
Total	2,899		2,661		-238	-8.21%



COMPARISON OF 2019 AND 2022 POINT IN TIME COUNT - SUBPOPULATIONS AND DISABLING CONDITIONS

	2019 Unsheltered 3,714 Adults	2022 Unsheltered 2,936 Adults
Chronic Homelessness	52.02% 1,932 Adults	55.07% 1,617 Adults
Substance Use Issues	33.74% 1,253 Adults	41.45% 1,217 Adults
Physical Disability	31.18% 1,158 Adults	32.19% 945 Adults
Mental Health Issues	26.82% 996 Adults	29.53% 867 Adults
Developmental Disability	14.03% 521 Adults	14.27% 419 Adults
Domestic Violence	9.50% 353 Adults	9.84% 289 Adults
HIV/AIDS	1.80% 67 Adults	1.77% 52 Adults

	2019 Sheltered 2,166 Adults	2022 Sheltered 2,060 Adults
Chronic Homelessness	26.27% 569 Adults	38.40% 791 Adults
Substance Use Issues	26.64% 577 Adults	20.19% 416 Adults
Physical Disability	14.82% 321 Adults	24.85% 512 Adults
Mental Health Issues	31.21% 676 Adults	28.06% 578 Adults
Developmental Disability	4.85% 105 Adults	1.89% 39 Adults
Domestic Violence	8.54% 185 Adults	10.97% 226 Adults
HIV/AIDS	1.80% 39 Adults	3.74% 77 Adults

Some adults may identify with more than one subpopulation and/or report more than one disabling condition

Data only includes adults, persons age 18 and older



EVERYONE COUNTS

2019 & 2022 RESULTS COMPARISON

COMPARISON OF 2019 AND 2022 POINT IN TIME COUNT HOUSEHOLD INFORMATION

	2019 Unsheltered	2022 Unsheltered	Comparison	
	#	#	#	%
Individuals	3,562	2,806	-756	-21.22%
Families	110 Families 396 persons in households 152 Adults 244 Children	94 Families 251 persons in households 130 Adults 121 Children	-16	-14.55%
			-145	-36.62%
			-22	-14.47%
			-123	-50.41%
Unaccompanied Youth	3	0	-3	-100.00%

	2019 Sheltered	2022 Sheltered	Comparison	
	#	#	#	%
Individuals	1,734	1,704	-30	-1.73%
Families	356 Families 1,154 persons in households 432 Adults 722 Children	295 Families 950 persons in households 356 Adults 594 Children	-61	-17.13%
			-204	-17.68%
			-76	-17.59%
			-128	-17.73%
Unaccompanied Youth	11	7	-4	-36.36%

	2019 Total	2022 Total	Comparison	
	#	#	#	%
Individuals	5,296	4,510	-786	-14.84%
Families	466 Families 1,550 persons in households 584 Adults 966 Children	389 Families 1,201 persons in households 486 Adults 715 Children	-77	-16.52%
			-349	-22.52%
			-98	-16.78%
			-251	-25.98%
Unaccompanied Youth	14	7	-7	-50.00%

Descriptions:

Individuals: Individuals ages 18+

Families: Households with at least one adult and one child

Unaccompanied Youth: Minors (17 and younger without parent/guardian)



North Service Planning Area

COMPARISON OF 2019 AND 2022 POINT IN TIME COUNT

	2019 Unsheltered		2022 Unsheltered		Comparison		2019 Sheltered		2022 Sheltered		Comparison		2019 Total		2022 Total		Comparison	
	#	%	#	%	#	%	#	%	#	%	#	%	#	%	#	%	#	%
Anaheim	694		485	-30.12%	508		589		81	15.94%	1,202		1,074		-128	-10.65%		
Brea	30		24	-20.00%	0		0		0		30		24		-6	-20.00%		
Buena Park	142		85	-40.14%	145		181		36	24.83%	287		266		-21	-7.32%		
Cypress	39		28	-28.21%	0		0		0		39		28		-11	-28.21%		
Fullerton	308		202	-34.42%	165		70		-95	-57.58%	473		272		-201	-42.49%		
La Habra	45		45	0%	0		0		0		45		45		0			
La Palma	9		8	-11.11%	0		0		0		9		8		-1	-11.11%		
Los Alamitos	1		4	300.00%	21		9		-12	-57.14%	22		13		-9	-40.91%		
Orange	193		134	-30.57%	148		116		-32	-21.62%	341		250		-91	-26.69%		
Placentia	55		31	-43.64%	108		167		59	54.63%	163		198		35	21.47%		
Stanton	71		62	-12.68%	45		148		103	228.89%	116		210		94	81.03%		
Villa Park	0		0	0%	0		0		0		0		0		0			
Yorba Linda	1		4	300.00%	0		0		0		1		4		3	300.00%		
County Unincorporated	8		1	-87.50%	0		0		0		8		1		-7	-87.50%		
DV Programs					29		26		-3	-10.34%	29		26		-3	-10.34%		
North Service Planning Area Total	1,596		1,113	-30.26%	1,169		1,306		137	11.72%	2,765		2,419		-346	-12.51%		

Notes

- The thirteen cities in the North Service Planning Area jointly fund two regional shelters located in the Cities of Buena Park and Placentia to serve individuals experiencing homelessness in the North Service Planning Area
- The City of Stanton hosts two Homekey Program sites that currently operate as emergency shelter and will transition to permanent housing starting September 2022



**EVERYONE
COUNTS**

**2019 & 2022 RESULTS
COMPARISON**

Central Service Planning Area

COMPARISON OF 2019 AND 2022 POINT IN TIME COUNT – CITY BY CITY

	2019 Unsheltered		2022 Unsheltered		Comparison		2019 Sheltered		2022 Sheltered		Comparison		2019 Total		2022 Total		Comparison	
	#	%	#	%	#	%	#	%	#	%	#	%	#	%	#	%	#	%
Costa Mesa	187		150	-19.79%	-37		6	866.67%	58		52		193		208		15	7.77%
Fountain Valley	28		38	35.71%	10		14	-100.00%	0		-14		42		38		-4	-9.52%
Garden Grove	163		278	70.55%	115		62		113		51		225		391		166	73.78%
Huntington Beach	289		188	-34.95%	-101		60		142		82		349		330		-19	-5.44%
Newport Beach	64		96	50.00%	32		0		0		0		64		96		32	50.00%
Santa Ana	830		508	-38.80%	-322		939		482		-457		1,769		990		-779	-44.04%
Seal Beach	8		8	0.00%	0		0		0		0		8		8		0	0.00%
Tustin	95		86	-9.47%	-9		264		232		-32		359		318		-41	-11.42%
Westminster	159		159	0.00%	0		25		0		-25		184		159		-25	-13.59%
County Unincorporated	4		11	175.00%	7		31		36		5		35		47		12	34.29%
DV Program							104		129		25		104		129		25	24.04%
Central Service Planning Area Total	1,827		1,522	-16.69%	-305		1,505		1,192		-313		3,332		2,714		-618	-18.55%

Note

- The Cities of Newport Beach and Costa Mesa jointly fund the Costa Mesa Bridge Shelter to serve those experiencing homelessness in their cities



**EVERYONE
COUNTS**

**2019 & 2022 RESULTS
COMPARISON**

South Service Planning Area

COMPARISON OF 2019 AND 2022 POINT IN TIME COUNT - CITY BY CITY

	2019 Unsheltered		2022 Unsheltered		Comparison		2019 Sheltered		2022 Sheltered		Comparison		2019 Total		2022 Total		Comparison	
	#		#		#	%	#	%	#	%	#	%	#	%	#	%	#	%
Aliso Viejo	1		13		12	1200.00%	0		4		4		1		17		16	1600.00%
Dana Point	32		27		-5	-15.63%	0		0		0		32		27		-5	-15.63%
Irvine	127		60		-67	-52.76%	3		0		-3	-100.00%	130		60		-70	-53.85%
Laguna Beach	71		28		-43	-60.56%	76		55		-21	-27.63%	147		83		-64	-43.54%
Laguna Hills	24		12		-12	-50.00%	0		0		0		24		12		-12	-50.00%
Laguna Niguel	7		29		22	314.29%	3		0		-3	-100.00%	10		29		19	190.00%
Laguna Woods	5		7		2	40.00%	0		0		0		5		7		2	40.00%
Lake Forest	76		65		-11	-14.47%	36		11		-25	-69.44%	112		76		-36	-32.14%
Mission Viejo	22		26		4	18.18%	9		2		-7	-77.78%	31		28		-3	-9.68%
Rancho Santa Margarita	15		7		-8	-53.33%	0		0		0		15		7		-8	-53.33%
San Clemente	96		81		-15	-15.63%	49		50		1	2.04%	145		131		-14	-9.66%
San Juan Capistrano	62		65		3	4.84%	0		0		0		62		65		3	4.84%
County	0		2		2		0		0		0		0		2		2	
Unincorporated																		
DV Program							49		41		-8	-16.33%	49		41		-8	-16.33%
South Service Planning Area Total	538		422		-116	-21.56%	225		163		-62	-27.56%	763		585		-178	-23.33%



EVERYONE COUNTS

2022 POINT IN TIME SUMMARY

EXHIBIT 3

ORANGE COUNTY CONTINUUM OF CARE CONSULTATION

HOME-ARP Project Consultation Cities of Garden Grove and Fullerton

Meeting Date: February 21, 2023

Meeting Time: 1:00 p.m. – 2:00 p.m.

Meeting Link: <https://ocgov.webex.com/ocgov/j.php?MTID=m03d7f01f2fea43e7b5a807e5f4c61f7f>

Event Number (Access Code): 2467 825 6258

Password: VmJDHhP2i83

Agenda

- 1. Welcome and Introductions**
- 2. HOME-ARP Overview**
 - a. Purpose
 - b. Consultation Process
- 3. HOME-ARP Allocation Plans**
 - a. City of Garden Grove
 - b. City of Fullerton
- 4. Feedback and Q & A**

HOME-ARP Project Consultation Cities of Garden Grove and Fullerton

Meeting Date: February 21, 2023

Meeting Time: 1:00 p.m. – 2:00 p.m.

Meeting Link:

<https://ocgov.webex.com/ocgov/j.php?MTID=m03d7f01f2fea43e7b5a807e5f4c61f7f>

Event Number (Access Code): 2467 825 6258

Password: VmJDHhP2i83

Minutes

1. Welcome and Introductions

- Staff from the Office of Care Coordination, City of Garden Grove, and City of Fullerton introduced themselves.

2. HOME-ARP Overview

- Purpose
 - Zulima Lundy of the Office of Care Coordination provided an overview of HOME-ARP.
 - ARP funds to be administered through HOME to perform four activities that must primarily benefit qualifying individuals and families who are experiencing homeless, at risk of homelessness, or in other vulnerable populations.
 - These activities include: (1) development and support of affordable housing, (2) tenant-based rental assistance (TBRA), (3) provision of supportive services; and (4) acquisition and development of non-congregate shelter units.
- Consultation Process
 - The HOME-ARP Allocation Plan (Plan) requires applicants to consult with and gather data from the Continuum of Care (CoC).
 - The consultation process allows applicants to gather information from a diverse group of community stakeholders about the needs, challenges, and gaps in resources for the qualifying populations.
 - Applicants must engage in the consultation and public participation processes and develop a Plan. The Plan must describe how the applicant intends to distribute HOME-ARP funds, including how it will use these funds to address the needs of HOME-ARP qualifying populations.

3. HOME-ARP Allocation Plans

- City of Garden Grove

- Timothy Throne of the City of Garden Grove provided an overview of the Garden Grove’s Plan.
- The City of Garden Grove was allocated \$3,037,211 in HOME-ARP Funds. The City of Garden Grove plans to use HOME-ARP funds for the following eligible uses: TBRA, Development of Affordable and Supportive Housing, and Administration. Regarding the Affordable Housing Developer and the TBRA Service Provider, the City of Garden Grove has proposed to release a Request for Proposals (RFP) in the coming months during Summer 2023.
- Using surveys and nonprofit interviews, the City of Garden Grove was able to identify TBRA and Development of Affordable and Supportive Housing as the highest needs in their community.
- The public review period of City of Garden Grove’s Plan will be available from February 24, 2023, to March 14, 2023. The public hearing of the Plan will be on March 14, 2023, at 6:30 p.m., in the City of Garden Grove City Council Chambers. The Plan is due to HUD on March 31, 2023.
- City of Fullerton
 - Linda Cordova of the City of Fullerton provided an overview of Fullerton’s HOME-ARP plan.
 - The City of Fullerton was allocated \$1,954,345 in HOME-ARP Funds. The City of Fullerton has not identified HOME-ARP activities at this time. The City of Fullerton will likely not acquisition/development or operating/capacity building.
 - The City of Fullerton’s HOME-ARP survey is available to agencies, service providers, and interested individuals and can be completed at <https://www.cityoffullerton.com/government/departments/community-and-economic-development/housing-neighborhood-services/home-american-rescue-plan>. Survey deadline is February 28, 2023.
 - The public review period of the City of Fullerton’s Plan will be available from March 7, 2023, to March 22, 2023. The final public hearing of the Plan will be on February 28, 2023, at 6:30 p.m. in the City of Fullerton City Hall Council Chamber. The Plan is due to HUD on March 31, 2023.

4. Feedback and Q & A

- Neeta Patel asked a question for the City of Garden Grove - The funds for development of Affordable Housing units - is the \$1.29M intended to be awarded for a single project or will the funds be spread across multiple projects?
 - i. The City of Garden Grove stated the funds will likely be allocated to a single project.
- Stephani Ehrig of the City of Costa Mesa asked a question for the City of Garden Grove - Will the Affordable Housing units be prioritized for the City of Garden Grove residents through Coordinated Entry System (CES) or will the units be available for residents of other regions?

- i. The City of Garden Grove responded by stating the prioritization of the affordable housing units has not yet been finalized but are looking to considering CES prioritization.
- Alejandra Guerrero asked a question for Garden Grove - What is the proposed grant term for the HOME-ARP funds?
 - i. The City of Garden Grove noted that projects funded through HOME-ARP will likely have a one-year grant contract term and will utilize a contract evaluation process for renewal each year.

5. Conclusion

- Felicia Boehringer of the Office of Care Coordination thanked participants and noted that presentation materials would be shared for reference with meeting registrants and attendees.



Orange County
Continuum of Care
HOME-ARP Project Consultation
February 21, 2023

Agenda

- 1. Welcome and Introductions**
- 2. HOME-ARP Overview**
 - a. Purpose
 - b. Consultation Process
- 3. HOME-ARP Allocation Plan**
 - a. City of Garden Grove
 - b. City of Fullerton
- 4. Feedback and Q & A**

HOME-ARP Purpose

The \$5 billion in HOME-ARP funding provides HOME grantees, in collaboration with other community stakeholders, a chance to make targeted, strategic investments in housing and other assistance for people experiencing homelessness and other vulnerable populations.

Participating Jurisdictions (applicants) may use HOME-ARP funds for the following eligible activities:

- Affordable Rental Housing (HOME-ARP Rental Housing)
- Tenant-Based Rental Assistance (HOME-ARP TBRA)
- Supportive Services (HOME-ARP Supportive Services)
- Non-congregate Shelter (HOME-ARP NCS)

Eligible Activities – HOME-ARP Rental Housing

Rental Housing Eligible Activities:

- Acquisition of standard rental housing
- Construction of rental housing
- Rehabilitation of rental housing
- Includes conversion of nonresidential buildings to housing

Rental Housing Eligible Costs:

- Development hard and soft costs
- Relocation
- Operating cost assistance/reserves

Eligible Activities – HOME-ARP TBRA

HOME-ARP TBRA allows applicants to assist qualifying households with payments for housing related costs.

TBRA Eligible Costs:

- Rental assistance
- Security deposit payments
- Utility payments, as part of rental assistance
- Utility deposit payments, as part of rental assistance or security deposit assistance

Eligible Activities – HOME-ARP Supportive Services

HOME-ARP funds may be used to provide a broad range of supportive services:

- Qualifying individuals or families
- Separate activity or in combination with other HOME-ARP activities
- Not already receiving these services through another program

There are three categories of eligible supportive services under HOME-ARP:

- McKinney Vento
- Homelessness Prevention
- Housing Counseling

Eligible Costs – Non-Congregate Shelter (NCS)

For purposes of HOME-ARP, NCS is defined as one or more buildings that:

- Provide private units or rooms for temporary shelter
- Serve individuals and families that meet one or more of the qualifying populations
- Do not require occupants to sign a lease or occupancy agreement

Eligible Costs:

- Acquisition costs
- Development hard and soft costs
- Replacement reserve (for costs identified in capital needs assessment)

Ongoing Operating Costs of NCS cannot be paid for HOME-ARP

Role of the Continuum of Care (CoC)

Consultation

- The consultation process allows applicants to gather information from a diverse group of community stakeholders about the needs, challenges and gaps in resources for the qualifying populations.
- Provide technical assistance to the applicant to identify and consider the current resources available to assist qualifying populations and potential collaborations for administering HOME-ARP funds.

HOME-ARP Allocation Plan

Applicants must engage in the consultation and public participation processes and develop a HOME-ARP allocation plan. The plan must describe how the applicant intends to distribute HOME-ARP funds, including how it will use these funds to address the needs of HOME-ARP qualifying populations.

- City of Garden Grove
- City of Fullerton



GARDEN GROVE



HOME-ARP Allocation Plan

City of Garden Grove CoC Consultation Presentation

February 21, 2023

Background

In March 2021, the American Rescue Plan Act of 2021 (ARP) was signed into law. To address the need for homeless assistance and supportive services, \$5 billion was appropriated through the HOME Program to perform activities that must primarily benefit qualifying individuals and families who are **homeless, at risk of homelessness or in other vulnerable populations.**

- The City of Garden Grove was allocated **\$3,037,211** in HOME-ARP Funds
- The City intends to use HOME-ARP funds for the following eligible uses:
 - **Tenant-Based Rental Assistance**
 - **Development of Affordable and Supportive Housing**
 - **Administration**

Proposed Activities

Tenant-Based Rental Assistance

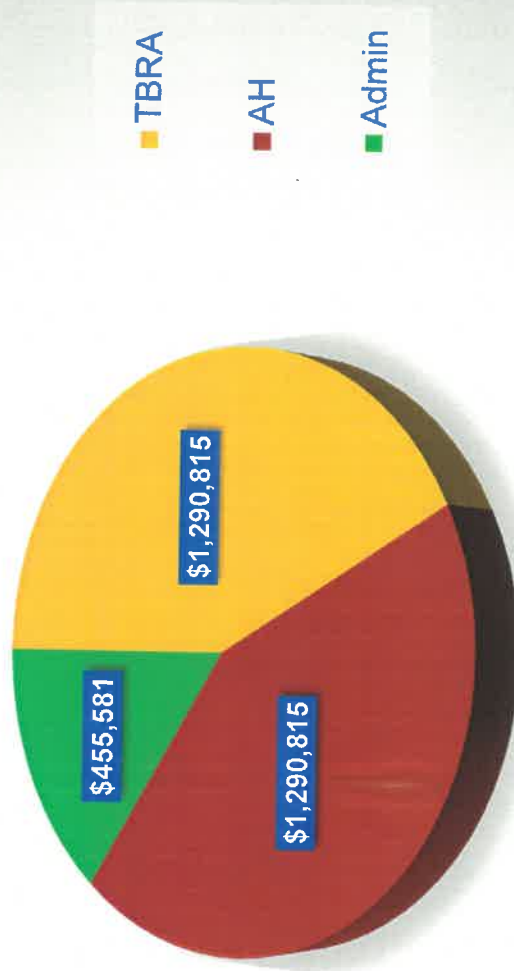
- TBRA Program will assist individuals exiting the City's Navigation Center
- Rental assistance, security deposits, and utility payments
- \$175,000 in low-mod funds will be allocated annually for case management and essential services
- Qualifying Population – Homeless

Affordable Housing

- Development of affordable and supportive housing
- At least 70% of the units will be designated to a Qualifying Population
- No more than 30% of the units will be designated to low-income residents
- Qualifying Population – Homeless and At-Risk of Homelessness

Budget Breakdown

HOME-ARP Budget



Total HOME-ARP Budget - \$3,037,211

Identified Activities

The City of Garden Grove identified two HOME-ARP eligible activities based on a survey, nonprofit interviews, and an analysis of the services currently provided or anticipated in the City.

Survey and Interview Results

- **Highest priority** – Supportive services for Qualifying Populations
- **Secondary priority** – Development of affordable housing
- **Largest gap** – Lack of affordable housing opportunities for Qualifying Populations

Garden Grove Homeless Support System

Central Cities Navigation Center

- 85-beds
- Full service
- Anticipated to be operational by Fall 2023

8 Units of Permanent Supportive Housing

- 11742 Stuart Drive
- Development was completed in October 2022

HUD Entitlement Grants

- ESG - HMIS, street outreach, homeless prevention, rapid rehousing, emergency shelter
- HOME - TBRA
- CDBG - Street outreach (SRT)

HUD CARES Act Funding

- ESG-CV - HMIS, street outreach, homeless prevention, rapid rehousing, emergency shelter
- CDBG-CV - Be-Well Mobile Response Unit and workforce development

Next Steps

- Finalize Draft Allocation Plan
- Public Review of Draft Allocation Plan
 - **February 24 – March 14**
- City Council Public Hearing - HOME-ARP Allocation Plan
 - **March 14 @ 6:30 pm** in the City Council Chambers
- HOME-ARP Plan is due to HUD on **March 31, 2023**
- Release RFP for TBRA service provider and Affordable Housing Developer
 - **Summer 2023**



GARDEN GROVE



Thank You!

Questions or Comments?

FULLERTON
HOME-ARP

\$1,954,345



FULLERTON HOME-ARP

- Current plan is to assist all four qualifying populations
- Allocation to each population is to be determined
 - Amounts will be determined by need
- Activities have not been identified
 - Will most likely not include acquisition/development or operating/capacity building

FULLERTON HOME-ARP

- Final listening session/conversation will be held
 - Fullerton City Hall
Council Chamber
Community Development Citizens' Committee
February 28, 2023
6:30 p.m.
- Open to the public

FULLERTON HOME-ARP

- HOME-ARP Survey available to agencies, service providers, and interested individuals
- HOME-ARP Survey is available at www.cityoffullerton.com
- Survey deadline is February 28, 2023

FULLERTON HOME-ARP

- Substantial Amendment to the 2021-22 Annual Action Plan
- March 7-22, 2023, draft will be available for public review and comment
- Draft will be available online at www.cityoffullerton.com and during regular business hours: Fullerton City Hall- 3rd Floor Housing Division and Fullerton Public Library.

Feedback and Q&A

Questions to Consider:

- What are the needs, challenges, and gaps in resources in your community?
- Do the proposed projects support current efforts to improve housing outcomes for individuals experiencing homelessness and reduce the likelihood of homelessness?

Contact Information

City of Garden Grove

Timothy Throne

Senior Program Specialist

TimothyT@ggcity.org

(714) 741-5144

City of Fullerton

Linda Cordova

Housing Specialist

LCordova@cityoffullerton.com

(714) 738-2858

Orange County Office of Care Coordination

Zulima Lundy

Director of Operations

CareCoordination@ocgov.com

(714) 834-5000



CoC General Memberships

Agency	Authorized CoC Representative	Alternate #1	Alternate #2
American Family Housing	Milo Peinemann Executive Director	Carolina Cortazar	
Anaheim Supportive Housing	Jimmy Gaston	Lou-Anne Keith	Kathy Ramsey
Build Futures	Kevin O'Grady Executive Director	Beth Brown	
CalOptima Health	Danielle Cameron Director	Sarah Nance Project Manager	Jasmine Awadallah Project Manager
CHAT – H / HCA Comprehensive Health Assessment Team- Homeless	Cathy Martinez Administrative Manager	Bertha Hernandez Supervising Public Health Nurse	Larry Pritchett Public Health Nurse
Choices in Action	La Fawn Brito CEO		
Christian Services	Cheryl Garcia	Curtis Listerman	Dave Lewis
Chrysalis	Michael Graff-Weisner VP Strategy	Kami Winfrey	Bianca Smith
City of Anaheim	Grace Stepter	Sandra Lozeau	Linda Ly
City Net	Matt Bates VP Advancement	Brad Fieldhouse Executive Director	
City of Huntington Beach	Jason Austin Deputy Director of Homelessness and Behavioral Health	Catherine Jun Assistant	
City of Mission Viejo	Leslie McDonald Community Services Supervisor	Sarah Gibson Community Resources Assistant	
Colette's Children's Home	William O'Connell	Deby Wolford	
Community Action Partnership of Orange County	Curtis Gibbs Director of Planning	Carolyn Coleman Community Engagement Liaison	Dolores Barrett CPSD
Covenant House California	Polly Williams Director of OC Programs	Bill Bedrossian CEO	
Dayle McIntosh Center	Maggie Downs	Jose Pena	Shafira Roslan
EAH Housing	Tim Koehler Director, PSH	Alicia Grant Lead Resource Coordinator	

CoC General Memberships

Agency	Authorized CoC Representative	Alternate #1	Alternate #2
Families Forward	Madelynn Hirnise Executive Directors	Nishtha Mohendra Chief Program Officer	Rosalinda Bermudez Director of Programs
Families Together of Orange County	Soledad Rivera Director of Business Development	Izabella Sahakian Director of Operations	David Becerra Director of Programs
Family Assistance Ministries	Elizabeth Andrade Executive Director		
Family Promise of Orange County	Cynde Albertson Executive Director	Malia Cary Community Impact Manager	
Family Solutions Collaborative	Katherine Rodriguez Family Systems Director	Amanda Sanchez Administrative/Operations Manager	Roxana Garcia Family Systems Administrator
Fresh Beginnings Ministries	Bill Nelson Executive Director	Muriel Ullman	Cathy Nelson
Friendship Shelter	Dawn Price Executive Director	Rick Scott Director of Programs	Mia Ferreira Program Manager
Fullerton Interfaith Emergency Services aka Pathways of Hope	David Gillanders Executive Director	Mychael Blinde	
Grandma's House of Hope	Jenet Kreitner Executive Director	Taylor Montano	Virginia DePaola
Guardians of Life Foundation	Heidi Echeverria Director of Business	Jay Tukhi Executive Director	
Helping HandUps	Donald Dermit		
HIS House – Homeless Intervention Shelter	Carrie Buck Executive Director	Christine Stellino Program Director	Kim Rios-Ramos Housing Navigator
HomeAid Orange County	Yvette Ahlstrom Director of Housing	Gina Scott Executive Director	
Hope 4 Restoration	Tim Houchen Executive Director		
Human Options	Maricela Rios Faust Chief Executive Officer	Sara Behmerwohld Chief Operations Officer	April Hunter Residential Manager
Illumination Foundation	Jack Toan COO	Deby Wolford Director of Housing Services	Pooja Bhalla Executive Director of Healthcare Services
Innovative Housing Opportunities	Emilie Dang Director, Comm Impact and Programs	Brenda Walters	

CoC General Memberships

Agency	Authorized CoC Representative	Alternate #1	Alternate #2
International Sports Regional Center LLC	Larisa Evioeva	Ruslan Evloev	Makhmud Evloev
Interval House	Sharon Wie Director of Programs	Christine Delabre Operations Director	Adrianna Guerrero Client Services Coordinator
Jamboree Housing	George Searcy COO	Helen Cameron Community Outreach Director	Danielle Latteri
League of Women Voters of Orange County	Susan Guilford President, Orange County	Kristina Fruneaux President, North Orange County	Chris Collins Member – Orange Coast
Lutheran Social Services of Southern California	LaSharnda Beckwith CEO	Darren Veracruz EVP	Ellen Waild EVP
Mary's Kitchen	Gloria Suess	Sue Strozewski	
Mercy House	Larry Haynes Executive Director	Patti Long Operations Director	Allison Davenport Development Director
Mental Health Association of Orange County	Pam Presnall Director of Development	Jeff Thrash CEO	
New South Development Corporations	Joy Thompson-Webb	Shameria Phillips	
Orange County Department of Education	Elida Sanchez Program Specialist	Jeanne Awrey	
Orange County Health Care Agency, Mental Health and Recovery Services	Christina Weckerly Ramirez Division Manager	Jennifer Dinicola	Jennifer Behoteguy
Orange County Housing Authority (OCHA)	Candy Halamuda	Marie Vu	
One Church in Orange	Ric Olson	Diane Ferrante	
One Step Ministry	Jackie Jordan Executive Director	Martha Tillman	Pat Railey
Orange County Equality Coalition	Felicity Figueroa, Chair	Anna Barvir-Boone Secretary	Hamid Nazish Treasurer
Orange County United Way	Becks Heyhoe ED, United to End Homelessness	Kristine Peters CFRE	
Orangewood Foundation	Chris Simonsen CEO	Dr. Shay Sorrells CPO	

CoC General Memberships

Agency	Authorized CoC Representative	Alternate #1	Alternate #2
Our Father's Table	Gina Seriel Founder & CEO	Kyle Miller COO	
People Assisting the Homeless (PATH)	Tescia Uribe CPO	Jennifer Hark Dietz CEO	Melanie McQueen Regional Director, Orange County
People for Irvine Community Health dba 2-1-1 Orange County	Karen Williams President & CEO	Erin DeRycke Vice President, Data Analytics	Elizabeth Duong HMIS Program Manager
People's Homeless Task Force Orange County	David Duran Secretary	Linda Lehnkering Treasurer	Michael Robbins President
Precious Life Shelter, Inc.	Theresa E. Murphy President & CEO	Wanda Crawford Case Manager	Martha Alejandre Director
Project Hope Alliance	Jennifer Friend CEO	Rachel Cardenas Director of Behavior Health	Bonita Vecchio Program Manager
Project Kinship	Madeline Rodriguez	Steven Kim	
Providence St. Joseph Health		Cecilia Bustamante-Pixa	Christy Cornwall
Salvation Army OC	Renay Panoncialman Director or Social Services	Shannon Lamb Director of Quality Assurance	Neptalid Varona Site Manager
Santa Ana Housing Authority	Judson Brown Housing Division Manager	Maria Hodson Senior Housing Specialist	
Santa Ana Unified School District	Jenny Shumar Program Specialist, McKinney-Vento Liaison		
Serving People In Need	Stephanie Smolkin Executive Director	Sandra Lopez Sr. Case Manager	
Sisters of St. Joseph Healthcare Foundation	Barry Ross		
South County Outreach	LaVal Brewer President & CEO	Renee Stevenson COO	Beata Wilson Director of Housing
Stand Up For Kids	Justine Palmore Executive Director	Carlia Oldfather Director	
The Eli Home	Lorri Galloway	Kim Tulleners	

CoC General Memberships

Agency	Authorized CoC Representative	Alternate #1	Alternate #2
Thomas House Temporary Shelter / dba Thomas House	Shakoya Green Long Executive Director		
VA Community Resource & Referral Center	Natalie Bui	Sofia Nava	Jennifer Vallejo
Volunteers of America Orange County	Eric Richardson Program Manager	Alfonso Ceja Housing Coordinator	Carmen Goss Housing Coordinator
WISEPlace	Brateil Aghasi Executive Director	Heidi Herrera Director of Programs	
Women's Transitional Living Center	Gigi Tsontos Executive Director	Mark Lee	Kiana Porter
Young Lives Redeemed	Robert K. Brown		
1736 Family Crisis Center	Ed Gonzalez Director of Veteran Programs	Tobi Quintiliani Senior Director	

CoC General Memberships

Individual Membership

Authorized CoC Representative
Amber Evans
Ashleigh Reyes
Callie Rutter
Erasto Arango
Greg Walgenbach
James R. Aced
Jason Phillips
Justina Ryan-Baldwin
Lubna Hamad
Lydia Nationalesta
Mark Richard Daniels
Nichole Gideon
Pat Davis
Patrick Cahill
Paul G. Kaiser
Rebecca Kovacs-Stein
Robert Morse
Tim Shaw

EXHIBIT 4

PUBLIC PARTICIPATION

PUBLIC NOTICE
PROOF OF PUBLICATION

- *FULLERTON TRIBUNE*
- *LA OPINION*
- *KOREA DAILY*

**PUBLIC NOTICE
NOTICE OF PUBLIC HEARING AND 15-DAY PUBLIC COMMENT PERIOD
CITY OF FULLERTON
SUBSTANTIAL AMENDMENT TO THE 2021-22 ANNUAL ACTION PLAN**

TO ALL INTERESTED AGENCIES, GROUPS AND PERSONS:

The public is encouraged to participate in the development of Fullerton's HOME Investment Partnership – American Rescue Plan (HOME - ARP) which will be addressed in the Substantial Amendment to the FY 2021-22 Annual Action Plan (Substantial Amendment).

To participate: A survey regarding the use of HOME-ARP funds is available on the City's website at www.cityoffullerton.com. The survey must be completed by February 28, 2023.

Also, on Tuesday, March 7, 2023, the City of Fullerton will make available its draft Substantial Amendment for public review and comment. The draft will be available for public review and comment through March 22, 2023. The draft will be available for public review during normal business hours at City Hall, Housing Division 3rd Floor, 303 W. Commonwealth Avenue, Fullerton, CA and the Main Library at 353 W. Commonwealth Avenue, Fullerton, CA. The draft will also be available on the City's website at www.cityoffullerton.com.

PURPOSE

Fullerton anticipates receiving and will be applying for \$1,954,354 of HOME – ARP funds. The Substantial Amendment will serve as the formal application to HUD for program funding and includes the proposed program budget to assist the four eligible qualifying populations: homeless; at-risk of homelessness; those fleeing/attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking; and other populations where assistance would prevent homelessness.

PUBLIC COMMENTS

All written comments regarding the Substantial Amendment draft must be received on or before March 22, 2023, at 5:00 p.m. All comments should be addressed as follows:

**City of Fullerton
Housing Division
Attn: Linda Cordova, Housing Consultant
303 W. Commonwealth Avenue 3rd Floor
Fullerton, CA 92832**

Or emailed to:

LCordova@cityoffullerton.com

PUBLIC HEARING

A public hearing to discuss the Substantial Amendment will be held on March 21, 2023, at 5:30 p.m. before the City of Fullerton City Council at its regular meeting. The public hearing will take place in the City Council Chambers located at 303 W. Commonwealth Avenue, Fullerton, CA 92832. The public is invited to attend and to provide input regarding the Substantial Amendment. The final version of the Substantial Amendment will be submitted to HUD on or about March 31, 2023.

Any person who requires translation accommodations as required by Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d et seq.) or any person who requires a disability-related modification or accommodation as required by Section 202 of the Americans with Disabilities Act of 1990 (42 U.S.C. Sec. 12132), may request such reasonable modification, accommodation, aid, or service by contacting Jessica Cuevas at (714) 738-6544 or Jessica.Cuevas@cityoffullerton.com. Special accommodations must be requested, at least 72 hours prior to the meeting.

Fullerton News Tribune
1920 Main St. Suite 225
Irvine, California 92614
(714) 796-2209

303 West Commonwealth Avenue
Fullerton, California 92832

AFFIDAVIT OF PUBLICATION
STATE OF CALIFORNIA

County of Orange County

I am a citizen of the United States and a resident of the County aforesaid; I am over the age of eighteen years, and not a party to or interested in the above-entitled matter. I am the principal clerk of the Fullerton News Tribune, a newspaper that has been adjudged to be a newspaper of general circulation by the Superior Court of the County of Orange County, State of California, on February 29, 1952, Case No. A-21215 in and for the City of Irvine, County of Orange County, State of California; that the notice, of which the annexed is a true printed copy, has been published in each regular and entire issue of said newspaper and not in any supplement thereof on the following dates, to wit:

02/16/2023

I certify (or declare) under the penalty of perjury under the laws of the State of California that the foregoing is true and correct:

Executed at Anaheim, Orange County, California, on
Date: Feb. 16, 2023.



Signature

PROOF OF PUBLICATION
(2015.5C.C.P)

La Opinión

PO Box 71847, Los Angeles, CA 90071
Tel: (213)896-2260 • Fax: (213)896-2260

STATE OF CALIFORNIA

I am a citizen of the United States and a resident of the county aforesaid; I am over the age of eighteen years, and not a party to or interested in the above-entitled matter. I am the principal clerk of the printer of La Opinión a newspaper of general circulation, printed and published daily in the city of Los Angeles, county of Los Angeles, and which newspaper has been adjudged a newspaper of general circulation by the Superior Court of the County of Los Angeles, State of California, under the date of July 28, 1969, Case Number: 950176; that the notice, of which the annexed is a printed copy, has been published in each regular and not in any supplement thereof on the following dates, to wit:

February 16

all in the year 2023

I certified (or declared) under penalty of perjury that the foregoing is true and correct.

Dated at Los Angeles, California, this

16 day of February, 2023

Rosa Benitez
Signature

This space is for the County Clerk's filing Stamp

**AVISO PÚBLICO
Y PERIODO DE COMENTARIOS PÚBLICOS DE 15 DÍAS
CIUDAD DE FULLERTON
ENMIENDA SUSTANCIAL AL PLAN DE ACCIÓN ANUAL 2021-22**

A TODAS LAS AGENCIAS, GRUPOS Y PERSONAS INTERESADAS:

Se alienta al público a participar en el Desarrollo de la Asociación de Inversión HOME-Plan de Rescate Estadounidense (HOME - ARP) de Fullerton, que será abordado en la Enmienda Sustancial del Plan de Acción Anual del AF 2021-22 (Enmienda Sustancial).

Para participar: Una encuesta con respecto al uso de los fondos de está disponible en el sitio web de la Ciudad en www.cityoffullerton.com. La encuesta debe completarse antes del 28 de febrero de 2023.

Además, el martes 7 de marzo de 2023, la Ciudad de Fullerton pondrá a su disposición su anteproyecto de Enmienda Sustancial para revisión y comentarios públicos. El anteproyecto estará disponible para revisión y comentarios públicos hasta el 22 de marzo de 2023. El anteproyecto estará disponible para revisión pública durante el horario normal de negocios en el Ayuntamiento, División de Vivienda 3er Piso, 303 W. Commonwealth Avenue, Fullerton, CA y en la Biblioteca Principal en 353 W. Commonwealth Avenue, Fullerton, CA. El anteproyecto también estará disponible en el sitio web de la Ciudad en www.cityoffullerton.com.

PROPÓSITO

Fullerton anticipa recibir y aplicará para \$1,954,354 de fondos de HOME - ARP. La Enmienda Sustancial servirá como la solicitud formal a HUD para el Financiamiento del programa e incluirá el presupuesto del programa propuesto para ayudar a las cuatro poblaciones elegibles que califiquen: personas sin hogar; personas en riesgo a perder su hogar; aquellos que huyen/intentan huir de la violencia doméstica; violencia en el noviazgo, agresión sexual, acoso, o tráfico de personas; y otras poblaciones donde la asistencia evitaría el desamparo.

COMENTARIOS PÚBLICOS

Todos los comentarios por escrito concernientes al anteproyecto de Enmienda Sustancial deben recibirse en o antes del 22 de marzo de 2023, a las 5:00 p.m. Todos los comentarios deberán estar dirigidos de la siguiente forma:

**Ciudad de Fullerton
División de Vivienda
Attn: Linda Cordova, Consultor de Vivienda 303 W. Commonwealth Avenue 3er Piso
Fullerton, CA 92832**

O enviar un correo electrónico a:

LCordova@cityoffullerton.com

AVISO DE AUDIENCIA PÚBLICA

Una audiencia para discutir la Enmienda Sustancial será celebrada el 21 de marzo de 2023, a las 5:30 p.m. ante el Ayuntamiento de la Ciudad de Fullerton en su reunión ordinaria. La audiencia pública se llevará a cabo en las Cámaras del Ayuntamiento ubicadas en 303 W. Commonwealth Avenue, Fullerton, CA 92832. El público está invitado a asistir y dar su opinión sobre la Enmienda Sustancial. La versión final de la Enmienda Sustancial será enviada a HUD en o alrededor del 31 de marzo de 2023.

Cualquier persona que requiera adaptaciones de traducción según lo exige el Título VI de la Ley de Derechos Civiles de 1964 (Título 42 de U.S.C. 2000d et seq.), o cualquier persona que requiera una modificación o adaptación relacionada con una discapacidad según lo requerido por la Sección 202 de la Ley de Estadounidenses con Discapacidades de 1990 (Título 42 de U.S.C. Sec. 12132), puede solicitar dicha modificación, adaptación, ayuda o servicio razonable comunicándose con Jessica Cuevas al (714) 738- 6544 o Jessica.Cuevas@cityoffullerton.com. Las adaptaciones especiales deben ser solicitadas con al menos 72 horas antes de la reunión.

Publicar: La Opinión
16 de febrero de 2023

EXHIBIT 5

FULLERTON AFFORDABLE HOUSING INVENTORY AND ORANGE COUNTY HMIS INVENTORY

CITY ASSISTED PROJECTS- DESCRIPTION													
City Assisted Projects	Location	Type	Total Units	Total Assisted	ELI (0 < 30%)				Very Low to Low-Income			Low to Median Income	Moderate Income
					<30%	35%	45%	50%	60%	80%	100%		
A Community of Friends	1220 E Orangethorpe	H	36	36	18 1-Bdrm			6-2- Bdrm 11 3-Bedrm					
Allen Hotel (Jose Zepeda)	412 S. Harbor	F	16	16			16 SRO (studios)						
Casa Maria Del Rio (RIO)	2200 E. Chapman	H	25	25	20 1-Bdrm 3 2-Bdrm			1 1-Bdrm 1 2-Bdrm					
Downpayment Assistance Program (DAP)	Various	F	212	212									
East Fullerton Villas	2200 E. Chapman	F	27	27	3 2-Bdrms 1 3-Bdrms 1 4-Bdrms			13 2-Bdrms 7 3-Bdrms 1 2-Bdrms					
Franklin Garden Apartment Homes (NHS)	3810 & 3830 Franklin Avenue	F	15	11			2-1 Bdrms			8-2 Bdrms			
Fullerton City Lights (A.D.I.)	224 E. Commonwealth	SO	137	116	20 studios		48 studios	48 studios					
Fullerton Courtyard Apts (Kaufman & Broad)	4119 W. Valencia	F	108	108	9 2-Bdrms 9 3-Bdrms		17 2-Bdrms 18 3-Bdrms	34 2-Bdrms 17 3-Bdrms 4 4-Bdrms					
Fullerton Family Housing (Related)	336 Santa Fe		55	54	6	2	9	22	15				
Garnet Lane Apts "A" (Civic Center Housing Corp)	1512-1518 N. Piacentia 3012-3024 Garnet	F	20	20		4 2-Bdrms	14 2-Bdrms			2 2-Bdrms			
Garnet Lane Apts "B" (La Habra NHS) – Rehab	3125-3249 Garnet Lane	F	18	18		4 2-Bdrms	7 2-Bdrms 4 3-Bdrms	1 3-Bdrms		2 3-Bdrms			
Harbor View Terrace (The House of Triumph)	2205 N. Harbor	H	25	25		20 1-Bdrms 3 2-Bdrms		1 1-Bdrm 1 2-Bdrms					
Klimpel Manor	221 E. Amerige Ave.	S	59	59		22 1-Bdrms 2-Bdrms	36 1-Bdrms 2-Bdrms						
New Vista Shelter	504 W. Amerige Ave.	T	8	8				2 1-Bdrm 4 2-Bdrm 2 3-Bdrms 1 2-Bdrms					
Oxford Condo	2007 Oxford Avenue # 3	F	1	1									
Richman Court	466 W. Valencia Drive	F	16	16				16 1-Bdrm					
Richman Park Housing Partners (Jamboree Housing)	400 Valencia, Ford, West	F	46	45	4 1-Bdrm 5 2-Bdrms 5 3-Bdrms		5 1-Bdrm 2 2-Bdrms	5 1-Bdrm		12 2-Bdrms 7 3-Bdrms			
Richman Park Village I	436/442 W. Valencia	F	8	8				8 2-Bdrms					
Richman Park Village II	461 West	F	4	4				4 2-Bdrms					
Roberta Apartments	2320 Roberta Avenue	F	16	16				8 1-Bdrms 8 2-Bdrms					
Ventana	345 W. Commonwealth Ave.	S	95	94				8 1-Bdrm 2 2-Bdrms 13 2-Bdrms		71 1-Bdrm 13 2-Bdrms			
CITY ASSISTED PROJECTS- DESCRIPTION			911	883	20 studios	48 studios	48 studios	16 studios					

Heritage Walk	400-500 Block of W. West	F	34	34							28 3-Bdrms 6 4-Bdrms			
3801 Franklin	3801 Franklin	F	6	1							1			
Subsidized Affordable Housing - OWNERSHIP PROJECTS - TOTAL														
			66	61							3 2-Bdrms 2 3-Bdrms 3 4-Bdrms	1 2-Bdrms 1 3-Bdrms 1 4-Bdrms	28 3-Bdrms 6 4-Bdrms	1 4-Bdrms

2022 Inventory List - Orange County
Orange County HMIS

Year	Proj. Type	Organization Name	Project Name	Housing Type	Total Beds
2022	RRH	1736 Family Crisis Center	Calworks HSP	Tenant-based – scattered site	124
2022	ES	1736 Family Crisis Center	CalWORKs HSP Emergency Shelter	Tenant-based – scattered site	2
2022	RRH	1736 Family Crisis Center	Rapid Re-housing for Homeless Veterans	Tenant-based – scattered site	1
2022	ES	1736 Family Crisis Center	SSVF EHA	Tenant-based – scattered site	18
2022	RRH	1736 Family Crisis Center	SSVF Rapid ReHousing	Tenant-based – scattered site	5
2022	PSH	American Family Housing	AFH Stuart Drive	Site-based – single site	30
2022	PSH	American Family Housing	Permanent Housing 2	Site-based – clustered / multiple sites	38
2022	PSH	American Family Housing	Permanent Housing Collaborative	Site-based – clustered / multiple sites	44
2022	ES	American Family Housing	Stanton Inn	Site-based – single site	70
2022	ES	American Family Housing	Tahiti Motel Operations	Site-based – single site	58
Page		Anaheim Housing Authority	AHA Emergency Housing Vouchers	Tenant-based – scattered site	538
2022	PSH	Anaheim Housing Authority	Buena Esperanza	Site-based – single site	49
2022	PSH	Anaheim Supportive Housing	Tyrol Plaza	Site-based – single site	12
2022	ES	APAIT - HIV	Short Term Supportive Housing	Tenant-based – scattered site	21
2022	ES	Build Futures	Emergency Housing for Youth	Site-based – clustered / multiple sites	9
2022	ES	Casa Teresa	Casa Teresa Parenting Program	Site-based – single site	14
2022	TH	Casa Teresa	Casa Teresa Transformation I Program	Site-based – single site	4
2022	TH	Casa Teresa	Casa Teresa Transformation II Program	Site-based – single site	5
2022	ES	Casa Teresa	Emergency Maternity Shelter	Site-based – clustered / multiple sites	17
2022	ES	Casa Youth Shelter	Basic Center Group	Site-based – single site	12
2022	ES	City Net	Project Tool Belt - North and Central	Tenant-based – scattered site	10
2022	TH	Colette's Children's Home	CCH Ariel Place/Anaheim	Site-based – single site	18
2022	TH	Colette's Children's Home	CCH Cypress Street #2/Placentia	Site-based – single site	10
2022	TH	Colette's Children's Home	Colette's Children's Home #1	Site-based – single site	24
2022	TH	Colette's Children's Home	Colette's Children's Home #2	Site-based – single site	18
2022	TH	Colette's Children's Home	Colette's Children's Home #3	Site-based – single site	18
2022	TH	Colette's Children's Home	Cypress/Placentia III	Site-based – single site	9
2022	TH	Colette's Children's Home	Dairyview	Site-based – single site	24
2022	ES	Colette's Children's Home	Placentia Emergency Shelter [GG ESG-CV]	Site-based – single site	19

2022 Inventory List - Orange County
Orange County HMIS

2022 ES	Colette's Children's Home	Placentia Hope Emergency Shelter	Site-based – single site	24
2022 ES	Covenant House California	Covenant House TAY Emergency Shelter	Site-based – single site	25
2022 RRH	Families Forward	Anaheim ESG CV RRH	Tenant-based – scattered site	0
2022 RRH	Families Forward	Anaheim ESG-CV EHV	Tenant-based – scattered site	4
2022 RRH	Families Forward	Garden Grove ESG-CV EHV	Tenant-based – scattered site	5
2022 RRH	Families Forward	Garden Grove ESG-CV RRH	Tenant-based – scattered site	5
2022 RRH	Families Forward	HUD Rapid Re-housing	Tenant-based – scattered site	47
2022 TH	Families Forward	I-Transitional Housing - Irvine	Site-based – single site	4
2022 TH	Families Forward	I-Transitional Housing- Lake Forest	Tenant-based – scattered site	12
2022 ES	Families Forward	Santa Ana ESG CV Motel Vouchers	Tenant-based – scattered site	37
2022 TH	Family Assistance Ministries	Aliso Viejo Condominium	Site-based – single site	5
2022 ES	Family Assistance Ministries	FAM/MH Short Term Housing	Tenant-based – scattered site	5
2022 ES	Family Assistance Ministries	Family House	Site-based – single site	44
2022 ES	Family Assistance Ministries	Gilchrist House - Families	Site-based – single site	6
2022 TH	Family Assistance Ministries	Gilchrist House - Individuals	Site-based – single site	6
2022 ES	Family Assistance Ministries	Project Room Key	Tenant-based – scattered site	11
2022 ES	Family Promise of Orange County	Family Promise of Orange County Emergency Shelter	Site-based – clustered / multiple sites	14
2022 RRH	Family Promise of Orange County	Family Promise Rapid Re-Housing	Tenant-based – scattered site	6
2022 TH	Family Promise of Orange County	Jacob House	Site-based – single site	9
2022 TH	Family Promise of Orange County	Kramer House	Site-based – single site	9
2022 RRH	Family Solutions Collaborative	CARES Diversion	Tenant-based – scattered site	2
2022 RRH	Family Solutions Collaborative	CARES Rapid Rehousing	Tenant-based – scattered site	175
2022 ES	Friendship Shelter	Alternate Sleeping Location	Site-based – single site	30
2022 ES	Friendship Shelter	Alternate Sleeping Location Drop-Offs	Site-based – single site	5
2022 ES	Friendship Shelter	Bridge Housing Program	Site-based – single site	30
2022 PSH	Friendship Shelter	Henderson House Permanent Supportive Housing	Tenant-based – scattered site	35
2022 ES	Grandma's House of Hope	Bridge Re-Entry	Site-based – clustered / multiple sites	18
2022 ES	Grandma's House of Hope	Emergency Shelter CESH	Site-based – single site	13
2022 ES	Grandma's House of Hope	GHH Men's Recovery Residence	Site-based – single site	6

2022 Inventory List - Orange County
Orange County HMIS

2022 ES	Grandma's House of Hope	GHH Men's Transitional Short Term Housing	Site-based -- single site	6
2022 TH	Grandma's House of Hope	Healing House	Site-based -- single site	12
2022 ES	Grandma's House of Hope	Men's Bridge	Site-based -- single site	10
2022 ES	Grandma's House of Hope	VOCA XH	Site-based -- single site	11
2022 ES	Grandma's House of Hope	Women's Bridge	Site-based -- clustered / multiple sites	20
2022 ES	Grandma's House of Hope	Women's Emergency Shelter	Site-based -- single site	25
2022 TH	HIS-OC	CHESS - TAY	Site-based -- single site	9
2022 TH	HIS-OC	HIS House Transitional	Site-based -- clustered / multiple sites	40
2022 RRH	HIS-OC	HIS-OC EHV-AHA Supportive Services	Tenant-based -- scattered site	19
2022 ES	HIS-OC	HIS-OC Emergency Shelter	Site-based -- clustered / multiple sites	6
2022 OPH	Housing for Health Orange County	HHOC CalAIM	Tenant-based -- scattered site	120
2022 ES	Human Options - DV	Family Healing Center	Site-based -- single site	16
2022 PSH	Human Options - DV	Human Options Emergency Housing Voucher	Tenant-based -- scattered site	57
2022 ES	Human Options - DV	Human Options Emergency Shelter	Site-based -- single site	26
2022 TH	Human Options DV	Second Step	Site-based -- single site	45
2022 TH	Human Options DV	Third Step	Site-based -- single site	17
2022 RRH	Illumination Foundation	ANA EHV Supportive Services	Tenant-based -- scattered site	14
2022 ES	Illumination Foundation	Carnegie Hall	Site-based -- single site	60
2022 RRH	Illumination Foundation	Chronically Homeless Individual Pilot Program	Tenant-based -- scattered site	6
2022 ES	Illumination Foundation	Emergency Shelter Program	Tenant-based -- scattered site	24
2022 ES	Illumination Foundation	Fullerton Navigation Center	Site-based -- single site	30
2022 RRH	Illumination Foundation	GG CARES ESG RRH	Tenant-based -- scattered site	50
2022 ES	Illumination Foundation	Gilbert House	Site-based -- single site	15
2022 RRH	Illumination Foundation	HAPP Rapid Re-housing	Tenant-based -- scattered site	49
2022 ES	Illumination Foundation	La Mesa Emergency Shelter	Site-based -- single site	98
2022 ES	Illumination Foundation	Murphy House	Site-based -- single site	28
2022 ES	Illumination Foundation	Plumeria House	Site-based -- single site	18
2022 ES	Illumination Foundation	Recuperative Care Program - Broadway	Tenant-based -- scattered site	51
2022 ES	Illumination Foundation	Recuperative Care Program - Fullerton	Site-based -- single site	57
2022 OPH	Illumination Foundation	Senior Micro Communities	Site-based -- single site	17

2022 Inventory List - Orange County
Orange County HMIS

2022 PSH	Illumination Foundation	SHP Stanton Multi-Service Center	Site-based – clustered / multiple sites	28
2022 PSH	Illumination Foundation	Street 2 Home	Site-based – clustered / multiple sites	107
2022 ES	Illumination Foundation	Temporary Isolation Shelter - Orange/Anaheim	Tenant-based – scattered site	100
2022 ES	Illumination Foundation	Theriault House	Site-based – single site	40
2022 ES	Illumination Foundation	Unity House	Site-based – single site	20
2022 RRH	Interval House - DV	Anaheim ESG-CV Rapid Re-Housing	Tenant-based – scattered site	6
2022 TH	Interval House - DV	DV Transitional Housing	Site-based – single site	13
2022 ES	Interval House - DV	Emergency Shelter	Site-based – single site	71
2022 RRH	Interval House - DV	Garden Grove ESG Rapid Re-Housing	Tenant-based – scattered site	2
2022 RRH	Interval House - DV	Garden Grove ESG-CV Rapid Re-Housing	Tenant-based – scattered site	2
2022 RRH	Interval House - DV	Rapid Re-housing	Tenant-based – scattered site	23
2022 RRH	Interval House - DV	Rapid Re-Housing (DV Bonus)	Tenant-based – scattered site	67
2022 RRH	Interval House - DV	State ESG-CV2 Rapid Re-Housing	Tenant-based – scattered site	8
2022 ES	Jamboree	Anaheim House	Site-based – single site	6
2022 PSH	Jamboree	Diamond Apartments	Site-based – single site	42
2022 PSH	Jamboree	Doria Apartment Homes	Site-based – single site	24
2022 PSH	Jamboree	Heroes Landing	Site-based – single site	85
2022 ES	Laura's House - DV	Laura's Domestic Violence Emergency	Site-based – single site	24
2022 TH	Laura's House - DV	Laura's Domestic Violence Transitional Housing Program	Site-based – single site	10
2022 RRH	Mercy House	AFH HHOC COVID-19 Response	Tenant-based – scattered site	13
2022 PSH	Mercy House	AFH PSH Collaboration II	Tenant-based – scattered site	7
2022 RRH	Mercy House	Anaheim CHIPP	Tenant-based – scattered site	6
2022 RRH	Mercy House	Anaheim CHIPP II	Tenant-based – scattered site	4
2022 RRH	Mercy House	Bridges at Kraemer Place - RRH	Tenant-based – scattered site	11
2022 ES	Mercy House	Bridges at Kramer Place	Site-based – single site	142
2022 ES	Mercy House	Buena Park Emergency Shelter	Site-based – single site	103
2022 RRH	Mercy House	CA State ESG	Tenant-based – scattered site	5
2022 PSH	Mercy House	CCH PSH Collaboration II	Tenant-based – scattered site	1
2022 PSH	Mercy House	CCH PSH Collaborative	Tenant-based – scattered site	1

2022 Inventory List - Orange County
Orange County HMIS

2022	PSH	Mercy House	CoC Leasing	Tenant-based – scattered site	27
2022	ES	Mercy House	Costa Mesa Bridge Shelter	Site-based – single site	72
2022	RRH	Mercy House	ESG Santa Ana RRP	Tenant-based – scattered site	1
2022	PSH	Mercy House	FAM PSH Collaboration II	Tenant-based – scattered site	13
2022	ES	Mercy House	Family Care Center	Site-based – single site	51
2022	RRH	Mercy House	FSI HHOC COVID-19 Response	Tenant-based – scattered site	28
2022	PSH	Mercy House	FSI PSH Collaboration	Tenant-based – scattered site	39
2022	PSH	Mercy House	FSI PSH Collaboration II	Tenant-based – scattered site	16
2022	RRH	Mercy House	Garden Grove ESG-CV RRP	Tenant-based – scattered site	13
2022	RRH	Mercy House	HEAP - RRP	Tenant-based – scattered site	3
2022	ES	Mercy House	Huntington Beach Navigation Center	Site-based – single site	124
2022	RRH	Mercy House	MCY HHOC COVID-19 Response	Tenant-based – scattered site	42
2022	PSH	Mercy House	MCY PSH Collaboration II	Tenant-based – scattered site	31
2022	PSH	Mercy House	MCY PSH Collaborative	Tenant-based – scattered site	122
2022	PSH	Mercy House	Mills End and PSH Leasing Consolidation	Tenant-based – scattered site	16
2022	PSH	Mercy House	POH PSH Collaboration II	Tenant-based – scattered site	18
2022	RRH	Mercy House	Release to Lease - RRH	Tenant-based – scattered site	31
2022	PSH	Mercy House	The Aqua	Site-based – single site	62
2022	RRH	Orange County Asian and Pacific Islander Community Alliance	OAPICA Irvine Rapid Rehousing	Tenant-based – scattered site	1
2022	RRH	Orange County Asian and Pacific Islander Community Alliance	OAPICA Rapid Re-Housing	Tenant-based – scattered site	0
2022	PSH	Orange County Housing Authority	#1 Consolidated Shelter Plus Care TRA	Tenant-based – scattered site	276
2022	PSH	Orange County Housing Authority	#2 Consolidated CoC TRA	Tenant-based – scattered site	123
2022	PSH	Orange County Housing Authority	#3 Consolidated CoC TRA	Tenant-based – scattered site	183
2022	PSH	Orange County Housing Authority	#4 Consolidated CoC TRA	Tenant-based – scattered site	152
2022	PSH	Orange County Housing Authority	Altrudy Senior Apartments	Site-based – single site	8
2022	PSH	Orange County Housing Authority	Avenida Project Based Vouchers	Site-based – single site	36
2022	PSH	Orange County Housing Authority	Buena Esperanza	Site-based – single site	20
2022	PSH	Orange County Housing Authority	Capestone	Site-based – single site	9
2022	OPH	Orange County Housing Authority	CE HCV	Tenant-based – scattered site	161

2022 Inventory List - Orange County
Orange County HMIS

2022 PSH	Orange County Housing Authority	Orange County Housing Authority	Cotton's Point Senior Apartments	Site-based – single site	6
2022 OPH	Orange County Housing Authority	Orange County Housing Authority	Della Rosa	Site-based – single site	28
2022 PSH	Orange County Housing Authority	Orange County Housing Authority	Doria 2 Apartments	Site-based – single site	12
2022 PSH	Orange County Housing Authority	Orange County Housing Authority	Jackson Aisle Shelter Plus Care PRA Renewal	Site-based – single site	29
2022 OPH	Orange County Housing Authority	Orange County Housing Authority	Mainstream Voucher Program (MVP)	Tenant-based – scattered site	100
2022 OPH	Orange County Housing Authority	Orange County Housing Authority	Oakcrest Heights	Site-based – single site	16
2022 OPH	Orange County Housing Authority	Orange County Housing Authority	OCHA Emergency Housing Vouchers	Tenant-based – scattered site	557
2022 PSH	Orange County Housing Authority	Orange County Housing Authority	Placentia Veterans Village	Site-based – single site	57
2022 PSH	Orange County Housing Authority	Orange County Housing Authority	Potter's Lane PB VASH	Site-based – single site	8
2022 PSH	Orange County Housing Authority	Orange County Housing Authority	Prado	Site-based – single site	8
2022 OPH	Orange County Housing Authority	Orange County Housing Authority	Salerno HCV	Site-based – single site	50
2022 PSH	Orange County Housing Authority	Orange County Housing Authority	Salerno VASH	Site-based – single site	31
2022 PSH	Orange County Housing Authority	Orange County Housing Authority	VASH	Tenant-based – scattered site	971
2022 PSH	Orange County Housing Authority	Orange County Housing Authority	VASH Project-Based Vouchers - Newport	Tenant-based – scattered site	6
2022 OPH	Orange County Housing Authority	Orange County Housing Authority	Veteran's Housing	Site-based – single site	20
2022 ES	Orange County Rescue Mission	Orange County Rescue Mission	Westminster Crossing	Site-based – single site	66
2022 TH	Orange County Rescue Mission	Orange County Rescue Mission	ES Village of Hope	Site-based – single site	65
2022 TH	Orange County Rescue Mission	Orange County Rescue Mission	Hope Family Housing-Buena Park	Site-based – single site	45
2022 TH	Orange County Rescue Mission	Orange County Rescue Mission	House of Hope	Site-based – single site	23
2022 TH	Orange County Rescue Mission	Orange County Rescue Mission	Pearl House	Site-based – single site	196
2022 ES	Orange County Rescue Mission	Orange County Rescue Mission	TH Village of Hope	Site-based – single site	57
2022 TH	Orange County Rescue Mission	Orange County Rescue Mission	Tustin Temporary Emergency Shelter	Site-based – single site	81
2022 RRH	PATH	PATH	Tustin Veteran's Outpost	Tenant-based – scattered site	59
2022 ES	PATH	PATH	PATH Rapid Re-Housing	Site-based – single site	100
2022 RRH	Pathways of Hope	Pathways of Hope	Placentia Navigation Center	Site-based – single site	250
2022 RRH	Pathways of Hope	Pathways of Hope	Yale Navigation Center	Tenant-based – scattered site	0
2022 RRH	Pathways of Hope	Pathways of Hope	Anaheim ESG Rapid Re-housing	Tenant-based – scattered site	10
2022 ES	Pathways of Hope	Pathways of Hope	Anaheim Housing Authority Emergency Housing Voucher Supportive Services	Site-based – single site	44
2022 RRH	Pathways of Hope	Pathways of Hope	New Vista Emergency	Tenant-based – scattered site	30
2022 RRH	Pathways of Hope	Pathways of Hope	Paths Together Collaborative		

2022 Inventory List - Orange County
Orange County HMIS

2022 ES	Pathways of Hope	Via Esperanza	Site-based – single site	52
2022 ES	Precious Life Shelter	Emergency Shelter	Site-based – single site	5
2022 TH	Precious Life Shelter	Transitional Program	Site-based – single site	25
2022 ES	Radiant Health Centers - HIV	Short Term Supportive Housing	Tenant-based – scattered site	10
2022 ES	Salvation Army	Anaheim Emergency Shelter	Site-based – single site	259
2022 ES	Salvation Army	Hospitality House	Site-based – single site	75
2022 TH	Salvation Army	Transitional Housing - Tustin	Site-based – single site	9
2022 RRH	Serving People in Need	GAPP CoC Rapid Re-housing	Tenant-based – scattered site	18
2022 RRH	South County Outreach	SCO Rapid Re-Housing Irvine ESG	Tenant-based – scattered site	7
2022 RRH	South County Outreach	SCO Rapid Re-Housing Irvine ESG-CV	Tenant-based – scattered site	3
2022 TH	South County Outreach	SCO Transitional Housing - Lake Forest	Site-based – clustered / multiple sites	7
2022 TH	South County Outreach	SCO Transitional Housing - Mission Viejo	Site-based – clustered / multiple sites	2
2022 RRH	StandUp for Kids	StandUp For Kids EHV Supportive Services	Tenant-based – scattered site	8
2022 ES	StandUp for Kids	TAY Emergency Shelter - ANAHEIM	Tenant-based – scattered site	2
2022 RRH	StandUp for Kids	TAY Rapid Re-housing - ANAHEIM	Tenant-based – scattered site	3
2022 RRH	StandUp for Kids	TAY Rapid Re-housing - IRVINE	Tenant-based – scattered site	1
2022 RRH	StandUp for Kids	TAY Rapid Re-housing IRV - CV	Tenant-based – scattered site	1
2022 RRH	StandUp for Kids	TAY Rapid Rehousing - GARDEN GROVE	Tenant-based – scattered site	1
2022 ES	The Eli Home - DV	The Eli Home CARP Residential Recovery Shelter Program	Site-based – single site	18
2022 TH	Thomas House	2nd Step	Site-based – clustered / multiple sites	25
2022 TH	Thomas House	Thomas House Homeless Family Shelter #10	Site-based – clustered / multiple sites	64
2022 ES	US Veterans Initiatives	SSVF EHA	Tenant-based – scattered site	28
2022 RRH	US Veterans Initiatives	SSVF Rapid Re-housing	Tenant-based – scattered site	5
2022 ES	Volunteers of America	Santa Ana Cold Weather Winter Shelter (SEASONAL)	Site-based – single site	80
2022 ES	Volunteers of America	SSVF EHA	Tenant-based – scattered site	72
2022 RRH	Volunteers of America	SSVF Rapid Re-Housing	Tenant-based – scattered site	84
2022 ES	Waymakers	Huntington Beach Youth Shelter	Site-based – single site	8
2022 ES	WISEPlace	ES - WISEPlace	Site-based – single site	19
2022 ES	WISEPlace	Positive Steps Emergency Shelter	Site-based – single site	5

2022 Inventory List - Orange County
Orange County HMIS

2022 ES	DV	45 Day Emergency Shelter	Site-based – single site	45
2022 RRH	DV	Key Housing	Tenant-based – scattered site	89
2022 ES	DV	Safety Net	Tenant-based – scattered site	2
2022 TH	DV	Transitional Housing	Site-based – single site	5

ES - Emergency Shelter

TH - Transitional Housing

OPH -Other Permanent Housing

PSH - Permanent Supportive Housing

RRH - Rapid Re-Housing

EXHIBIT 6

HOME-ARP APPLICATIONS AND CERTIFICATIONS

(TO BE INSERTED BEFORE SUBMISSION TO HUD)