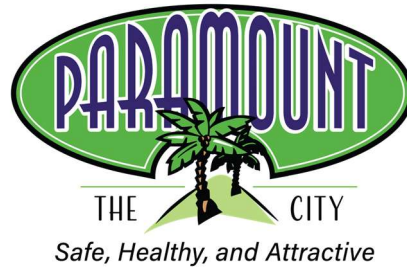


Substantial Amendment
2021 Action Plan HOME-ARP
HOME INVESTMENT PARTNERSHIPS PROGRAM
AMERICAN RESCUE PLAN



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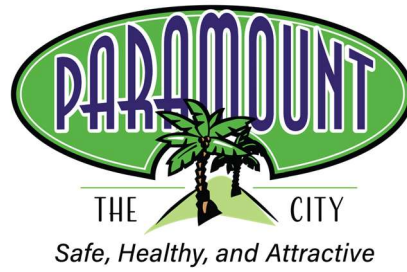


Substantial Amendment to 2021 Annual Action Plan HOME-ARP ALLOCATION PLAN

HOME Investment Partnerships Program
American Rescue Plan



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VERSION HISTORY

No.	Summary of Changes			
1	Published Draft for Public Comment:	1/27/23	Sent to HUD for Approval:	
	Conducted Public Hearing:	2/14/23	Approved by HUD:	
	Original HOME-ARP Allocation Plan.			

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Executive Summary

The City of Paramount has been allocated \$1,087,336 of HOME-American Rescue Plan Act (HOME-ARP) funding from the US Department of Housing and Urban Development (HUD). In order to receive the HOME-ARP allocation, the City must develop a HOME-ARP Allocation Plan that will become part of the City's PY2021 HUD Annual Action Plan by substantial amendment.

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

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

- In February 2022, the annual Point in Time (PIT) count revealed that 180 people were unsheltered on the streets, or in tents or makeshift shelters, or in cars, vans, or RVs.
- The annual Housing Inventory Count found that there were no shelter beds available within the City, although since that count was taken, the City has contracted for available for 12 beds in a shelter in a nearby community.
- The 2015-2019 HUD CHAS data indicates there are 3,610 renter households with an annual income at or below 30% AMI with a cost burden that are at greatest risk of housing instability.
- The CHAS data reports that there are 2,350 households with incomes more than 30 and but equal to or less than 50% AMI that are at risk of homelessness in the City because of at least one of the housing problems as defined by HUD.
- According to the results from the consultation process, the greatest need for supportive services is in the areas of mental health services, landlord/tenant liaison services, housing search/counseling and financial assistance, job training and employment services, and substance abuse treatment.

The City considered all of the eligible activities for this funding and the qualifying populations to be served, and assessed the available resources and the gaps present, in making its decision about how the limited funds would most benefit the community. Both the consultation and the needs assessment found that there was interest in and a need for both

the development of non-congregate shelter and affordable housing, but the available funds were not deemed to be sufficient to adequately address either of those needs.

To address the needs within the community, the City will allocate 60 percent (\$652,402) of its HOME-ARP funds to Supportive Services designed to assist each of the qualifying populations; 20 percent (\$217,467) to a Tenant-based Rental Assistance Program; and 5 percent (\$54,367) to nonprofit assistance. The remaining 15 percent will be used for the administration and planning of the HOME-ARP program.

Introduction

The City of Paramount has been allocated \$1,087,336 of HOME-American Rescue Plan Act (HOME-ARP) funding from the US Department of Housing and Urban Development (HUD). To receive the HOME-ARP allocation the City of Paramount must develop a HOME-ARP Allocation Plan that will become a part of the City's PY2021 HUD Annual Action Plan by substantial amendment. The HOME-ARP Allocation Plan must include the following:

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

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

Table 1 – Responsible Agencies

Agency Role	Name	Department/Agency
HOME Administrator	City of Paramount	Public Safety Department

HOME-ARP Eligible Qualifying Populations and Activities

HUD's CPD Notice 21-10 Requirements for the Use of Funds in the HOME-American Rescue Plan Program establishes the requirements for funds appropriated under section 3205 of the American Rescue Plan Act of 2021 for the HOME Investment Partnerships Program (HOME) to provide homelessness assistance and supportive services.

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

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

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

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

Stakeholder Consultation and Public Participation

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

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

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

Stakeholder Consultation

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

A virtual session was held November 16, 2022. Representatives from multiple agencies, groups, and organizations were invited via email to attend. Those unable to attend were invited to submit written comments via emails or schedule a phone call to share their thoughts.

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

A survey instrument was designed and available online and invited representatives from multiple agencies, groups, and organizations to rank the qualifying populations and eligible activities and services in order of perceived need, and the best approach for carrying out those activities for the community.

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

The City's virtual session was attended by 14 representatives of 10 agencies. The survey was completed by 16 representatives of seven agencies. All HUD-required agency types and those working with qualifying populations were invited to participate in both the virtual session and the online survey.

Organizations Consulted by Type and Method

Organizations Consulted by Type and Methods		
Organization Consulted	Type of Organization	Method of Consultation
City of Paramount	Public, addresses needs of all qualifying populations	Virtual Session
Fair Housing Foundation	Nonprofit, addresses needs of qualifying populations including those at risk of homelessness, provides fair housing services to the City	Survey
Family Promise of the South Bay	Nonprofit, addresses needs of qualifying populations including homeless and those at risk of homelessness	Virtual Session Survey
Kingdom Causes Bellflower	Nonprofit, addresses needs of qualifying populations including homeless and those at risk of homelessness	Virtual Session Survey
LAHSA (Los Angeles Homeless Services Authority)	Nonprofit, addresses needs of qualifying populations including homeless and those at risk of homelessness	Agency-Sponsored Virtual Session
Little House	Nonprofit, addresses needs of qualifying populations including homeless and those at risk of homelessness who are in recovery	Survey
Paramount Housing Authority	Nonprofit, addresses needs of qualifying populations including homeless and those at risk of homelessness; serves as public housing authority	Virtual Session
Paramount Unified School District	Nonprofit, addresses needs of all qualifying populations including homeless and those at risk of homelessness	Virtual Session
SELACO WDB (Southeast LA County Workforce Development Board)	Nonprofit, addresses needs of all qualifying populations including homeless and those at risk of homelessness	Virtual Session Survey

St Joseph Center	Nonprofit, addresses needs of all qualifying populations	Survey
Su Casa	Nonprofit, addresses needs of qualifying populations including domestic violence victims	Virtual Session
Veteran Peer Access Network (VPAN)	Nonprofit, addresses needs of all qualifying populations who are veterans or their families	Virtual Session Survey

Summary of Feedback Received from Consulted Organizations

Consultation revealed strong support for the following:

Development and support of affordable housing. Participants in the virtual session discussed the need for additional affordable housing. Specific issues mentioned included the shortage of affordable housing inventory considering the current economics of rising rents. Of respondents to the survey, 94% believed there was a high need for this activity.

Provision of supportive services. Many examples of supportive services were mentioned in the virtual session including fair housing, mental health services, credit repair services, housing counseling, substance abuse services, and eviction defense. Survey respondents were asked to rate what they believed is the current need for various services eligible under HOME-ARP. Of respondents to the survey, 44% believed there was a high need for this activity and 50% believed there was a moderate need. The activities with the most ratings for “high need” were mental health services (87%), landlord/tenant liaison services (73%), housing search/counseling and financial assistance (69%), job training and employment services and substance abuse treatment (56%).

Rating of Current Need for Supportive Services				
Supportive Services	High Need	Moderate Need	Low Need	No Need
Mental health services	87%	7%	7%	0%
Landlord/tenant liaison services	73%	27%	0%	0%
Housing search and counseling services	69%	31%	0%	0%
Financial assistance costs	69%	31%	0%	0%
Job training and employment services	56%	38%	6%	0%
Substance abuse treatment	56%	25%	19%	0%
Child Care Assistance	50%	38%	13%	0%

Outpatient health services	50%	25%	25%	0%
Food assistance	44%	38%	19%	0%
Outreach services	44%	31%	25%	0%
Services for special populations	44%	38%	19%	0%
Case management services	38%	56%	6%	0%
Mediation services	38%	50%	13%	0%
Legal services	25%	69%	6%	0%
Transportation assistance	25%	63%	13%	0%
Credit repair services	25%	56%	13%	6%
Education Services	6%	63%	31%	0%

Tenant-based rental assistance (TBRA). In conjunction with affordable housing, many attendees mentioned the need to increase availability of the TBRA program and as a companion to the development of affordable housing. Several expressed the belief that it was more cost effective to keep people housed than to draw them out of homelessness into housing. Of respondents to the survey, 50% believed there was a high need for this activity and 44% believed there was a moderate need.

Acquisition and development of non-congregate shelter. Many participants mentioned the need for shelter in general and for specific populations including families, those fleeing domestic violence and other dangerous situations. Of respondents to the survey, 19% believed there was a high need for this activity and 75% believed there was a moderate need.

Nonprofit capacity building and operating assistance. In the survey, respondents were asked if they believed there was a need for nonprofit capacity building and operating assistance. Of respondents to the survey, 94% responded affirmatively that there was a need in the nonprofit sector for general operating assistance and for capacity building assistance.

In their memorandum and their agency sponsored virtual session, the Los Angeles Homeless Services Authority (LAHSA) recommendations for the use of HOME-ARP funds within Los Angeles County. They advocated that a “balance of resources to within the homeless services system is critical to ensure effective operations” and recommend a ratio of five permanent housing resources for every interim housing bed. That balance informs their recommendations:

1. Acquisition of permanent housing resources if other funds are available to leverage for the purchase of multi-unit buildings, scattered sites properties, or individual units.
2. Master leasing, which is not outlined in the HOME-ARP guidance but is being explored through conversations between LAHSA and HUD.

3. Supportive services that support emergency housing vouchers and services based in problem solving, prevention and diversion to prevent the need for interim housing or accessing the homeless services system.

Public Participation

To provide opportunities for public participation, the City of Paramount sent an email to all agencies and individuals on its email list notifying them of the opportunity to participate in the virtual consultation session held on November 16, 2022. In addition to attending the virtual consultation session, participants were asked to complete an online survey regarding their views of the level of need for the eligible activities and qualifying populations as described by the CPD Notice 21-10. Those unable to attend, or who had further comments after the virtual session were invited to email them directly to City staff.

A combined public notice of a public comment period and a public hearing was published in the *Long Beach Press-Telegram* on January 27, 2023. The public notice was published in both English and Spanish. The *Long Beach Press-Telegram* qualifies as a newspaper of general circulation.

Efforts to Broaden Public Participation

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

Public Comments and Recommendations Received

A summary of comments and recommendation received during the public comment period and at the public hearing will be included prior to the submission of this Allocation Plan to HUD.

Public Comments and Recommendations Not Accepted and Reasons Why

A summary of comments and recommendation received during the public comment period and at the public hearing will be included prior to the submission of this Allocation Plan to HUD.

Needs Assessment and Gap Analysis

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

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

Housing Inventory Count

The annual Housing Inventory Count (HIC) provides useful context regarding the number and type of beds and units that are available for individuals and families experiencing homelessness on any given night.

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

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

The Los Angeles Homeless Services Authority (LAHSA) conducts the annual HIC each year in the County. The count includes project data reported to LAHSA by participating organizations in the Los Angeles Continuum of Care. The HIC is not representative of all housing resources available in Los Angeles County.

The 2022 HIC reported no emergency housing units or beds, no transitional housing units or beds, no rapid rehousing units or beds, and no permanent supportive housing units or beds in the City. City staff agrees with that HIC finding.

Size and Demographic Composition of Qualifying Populations

At the end of February 2022, LAHSA conducted the annual Point-in-Time (PIT) count of both sheltered and unsheltered homeless throughout the county.

The City contracted with City Net to conduct a more in-depth Homeless Census within the City in order to gather more information than the PIT process allows. That census took place in the early morning of May 24, 2022, and the late evening of May 26, 2022.

Sheltered Homeless Populations

People are considered sheltered when they are residing in emergency shelter or transitional housing, but not when they are receiving rapid rehousing assistance or residing in permanent supportive housing.

The 2022 Sheltered Point-in-Time count did not identify anyone experiencing sheltered homelessness in the City at the end of February 2022. This finding uses the same project data collected for HIC for the same time period.

The City Net Homeless Census did not include sheltered homeless in their project.

Unsheltered Homeless Populations

The 2022 Unsheltered Point-in-Time Count conducted by LAHSA identified 180 people experiencing unsheltered homelessness at the end of February 2022. Among individuals experiencing unsheltered homelessness:

- 103 (57.2%) were on the street
- 25 (14%) were in cars
- 11 (6%) were in vans
- 13 (7.1%) were in RVs
- 2 (1.3%) were in tents
- 26 (14.4%) were in makeshift shelters
- 0 (0%) were in safe parking

In May, the City Net Homeless Census identified 59 people experiencing unsheltered homelessness. Among individuals experiencing unsheltered homelessness, 43 were willing to be interviewed for the census:

- 24 (55.8%) were sleeping outdoors
- 19 (44.2%) were sleeping in a vehicle or RV

The interviews (43 completed) also found the following:

- 11 had been homeless for less than a year
- 32 were between the ages of 35 and 64
- 33 were male
- 18 were Hispanic
- 33 spoke English as their primary language
- 3 were Veterans
- 19 had some sort of monthly income
- 26 had health insurance
- 14 had been living in Paramount when they became homeless

The City has requested additional information from LAHSA regarding the 2022 PIT Count. Given that the PIT Count varies drastically from the City's contracted census by City Net (180 versus 50) the City would like to understand the methodology behind the PIT and the geographic data. For the purposes of this Allocation Plan, the PIT Count of 180 is being used for consideration.

At-risk of Homelessness

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

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

The CHAS 2015-2019 Data Table 10 indicates that there are approximately 3,610 households with incomes at or 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

The State of California Department of Justice maintains statistics on domestic violence statewide by jurisdiction. In 2020, the Los Angeles County Sheriff's Department responded to a total of 200 calls related to domestic violence in the City. Of these calls:

- 41 of these domestic incidents did not involve a weapon
- 159 calls involved a weapon
 - 1 domestic incident involved a firearm
 - 1 domestic incident involved a knife or cutting instruments
 - 5 domestic incidents involved other dangerous weapons
 - 152 domestic incidents involved personal weapons (i.e. feet or hands, etc.)

Therefore, if each one of these calls represented a household with member(s) who required housing assistance, it can be estimated that there were up to 200 households in 2020 who were in need of some form of housing assistance. The form of housing assistance required may vary depending on the specific circumstances of each case.

Other Populations

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

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

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

The 2015-2019 HUD CHAS data indicates there are 3,610 renter households with an annual income at or below 30% AMI with a cost burden that are at greatest risk of housing instability.

These renter households include:

- Two-person households, one or both of whom are age 62 or older: 0
- Small families with 2-4 non-elderly people: 125
- Large families with 5 or more people: 0

- People living alone or with non-relatives who are age 62 or older: 45
- People living alone or with non-relatives, none of whom are age 62 or older: 0

Other Populations: At greatest risk of housing instability – Households with incomes 30-50% AMI that meet HUD’s §91.5 definition of at risk of homelessness

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

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

HUD Comprehensive Housing Affordability Strategy (CHAS) 2014-2018 Data Table 10 provides information on households that include more than one family, household income level and overcrowding. The CHAS data indicates that there are approximately 525 households with incomes between 30 and 50% AMI that are at risk of homelessness in the City because of at least one of the housing problems as defined by HUD. In addition, 89 are living in households with more than one family.

Unmet Housing Needs of Qualifying Populations

The greatest unmet housing need of qualifying populations is the availability of affordable rental housing. As the table below shows, less than 3% of the more than 8,000 rental units in the City are available to households with incomes at or below 50% AMI. Of these, less than 1% of the more than 15,000 rental units in the City are available to households with incomes at or below 30% AMI.

Housing Needs Inventory and Gap Analysis					
		Available Units	Level of Need	HH with at least 1 Housing Problem	GAP (units-level of need)
Total Rental Units	8,755				
<=30% AMI		50	2,625	2,350	(2,575)

>30% to <=50% AMI		210	2,040	1,760	(1,830)
Total <=50% AMI		260	4,665	4,110	(4,405)

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

Unmet Service Needs of Qualifying Populations

Based on consultation with service providers in the City, the greatest unmet service needs of qualifying populations including sheltered and unsheltered homeless populations, currently housed populations at risk of homelessness, other families requiring services or assistance to prevent homelessness, those fleeing or attempting to flee domestic violence, dating violence, sexual assault, or stalking, or human trafficking, and those at greatest risk of housing instability or in unstable housing situations are:

- Mental health services
- Job training and employment services
- Housing search and housing counseling services
- Substance abuse treatment
- Financial assistance

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

- Education services
- Food assistance
- Outreach services
- Legal services
- Outpatient health services
- Transportation assistance
- Mediation services
- Credit repair services

- Landlord/tenant liaison services
- Services for special populations

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

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

Current Resources Available to Assist Qualifying Populations

Current available resources include:

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

Current Resources: Congregate Beds and Non-congregate Shelter Units

As of August 2022, the City has a contract with a Salvation Army shelter in another city for 12 shelter beds to serve homeless in the City. The shelter is located approximately six miles from the City center and is accessible by public transportation. Those temporarily housed at the shelter are able to maintain relationships with their family, friends and professional contacts without disruption.

Current Resources: Supportive Services

The lead agency on coordinated entry system (CES), is the Los Angeles Homeless Services Authority (LAHSA). It works to assist the large volume of people experiencing homelessness in the county and maintains a network of service providers available to assist those experiencing homelessness and at risk of homelessness. In addition, there are other

networks, both formal and informal, of organizations addressing the needs of the qualifying populations being addressed with this funding. Most are regional, serving many communities and cities in the greater Los Angeles area, offering services to homeless families and individuals, those at risk of homelessness, victims of domestic violence and other dangerous situations, veterans, and many other issues and concerns.

Current Resources: Tenant-Based Rental Assistance

There are currently no TBRA or rental assistance programs sponsored by the City.

Current Resources: Affordable and Permanent Supportive Rental Housing

The City is aware of 30 affordable rental units available in the City. A search of www.rent.com finds 19 complexes within the City the list their properties as affordable. There are no permanent supportive housing units available in the City.

Current Resources: Housing Vouchers

According to HUD data, Los Angeles County administered 463 Housing Choice Vouchers in the City of Paramount in 2020. Each unit houses about two people. The average household income is \$20,319 and about 37 percent of households have children present. The vouchers assist 928 individuals. About a quarter of households report the head of household with a disability, and the majority (69 percent) of those householders are over 62 years of age. The racial and ethnic breakdown is as follows: 57 percent Black Non-Hispanic, 32 percent White Hispanic, six percent White Non-Hispanic, one percent Black Hispanic, one percent White Hispanic, and three percent Asian Pacific Islander Non-Hispanic.

The City does not sponsor any Housing Choice Vouchers.

Shelter, Housing and Service Delivery System Gaps

Shelter Gap

There is an estimated need for 162 additional shelter beds based on the 2022 PIT Count. The PIT Count found that there were 180 unsheltered persons in a variety of situations, including on the street, in tents or makeshift shelters, or in cars, vans or RVs. The City recently contracted for twelve shelter beds in a nearby shelter dedicated to homeless from the City.

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

Tenant-based Rental Assistance Gap

There is an estimated gap of 2,255 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.

The number of tenant-based rental assistance vouchers was calculated using HUD CHAS data Table 7 and is equal to the number of renter households with income at or below 50% AMI and paying more than 50% of household income for rent, including utilities.

Tenant-based Rental Assistance Gap	
Renter Households with Income at or below 50% AMI paying more than 50% of income for rent, including utilities	2,255
TBRA vouchers available	0
<i>TBRA gap</i>	<i>2,255</i>

Affordable Supportive Rental Housing Gap

There is an estimated gap of 1,830 rental units affordable to renter households with income at or below 30% AMI and an estimated gap of 425 rental units affordable to renter households with income above 30% and up to 50% AMI.

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

Affordable Rental Unit Gap	
Renter Households with Income at or below 30% AMI paying more than 50% of income for rent, including utilities	1,830
Renter Households with Income 30% to 50% AMI paying more than 50% of income for rent, including utilities	425
<i>Total Affordable Rental Unit Need</i>	<i>2,255</i>

Permanent Supportive Rental Housing Gap

Permanent supportive rental housing is a subset of the affordable rental housing gap, primarily for households with income at or below 30% AMI. In addition to affordable rent, permanent supportive housing provides an array of services necessary to help people with disabilities and/or experiencing chronic homelessness to retain housing stability. There is an estimated gap of 171 permanent supportive housing units in the City.

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

Permanent Supportive Housing Gap	
Population of Paramount Census 2020	53,733
Per capita estimate of permanent supportive housing need	.003183
Estimated need for Permanent Supportive Housing	171
Permanent Supportive Housing Available	0
<i>Total Permanent Supportive Housing Gap</i>	<i>171</i>

Housing Voucher Gap

The size of the housing voucher gap is unknown; information on the number of Paramount residents on the list is not available. With 100,000 names on the waiting list, in a county of 9.8 million, it is conceivable that with .5 percent of the population living in Paramount, there could be 500 names on the waiting list currently residing in Paramount.

Service Delivery System Gap

To identify gaps in the service delivery system, the City relied on its consultation with stakeholders and experience working with the organizations working in the City. The stakeholders believe that the most critical service gaps are in the areas of mental health services; job training and employment services; housing search and housing counseling services; childcare services; substance abuse treatment; and financial assistance.

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

For other populations, severe housing cost burden, or paying more than 50% of household income for rent and utilities is the primary characteristic of housing associated with the risk of homelessness in the City. The HUD CHAS Data Table 7 indicates there are 2,255 household at or below 50% AMI who are spending more than 50% of the household income on rent and utilities.

Priority Needs for Qualifying Populations

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

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

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

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

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

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

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

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

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

HOME-ARP Activities

The City will solicit applications from developers, service providers, and/or nonprofits to administer eligible activities and/or develop shelter and housing. A Notice of Funds Available (NOFA) will be issued. The NOFA will, at a minimum, specify eligible activities, eligible applicants, minimum and maximum funding amounts, application thresholds, and will provide instructions on how to submit a proposal.

Uses of HOME-ARP Funding

Activity	Funding Amount	Percent of Allocation	Statutory Limit
Non-congregate Shelter			
Affordable Rental Housing			
Tenant-based Rental Assistance	\$217,467	20%	
Supportive Services	\$652,402	60%	
Nonprofit Operating Assistance	\$54,367	5%	5%
Nonprofit Capacity Building			5%
Administration and Planning	\$163,100	15%	15%
Total HOME-ARP Allocation	1,087,336	100%	

Rationale for Uses of HOME-ARP Funding

The City considered all of the eligible activities for this funding and the qualifying populations to be served, and assessed the available resources and the gaps present, in making its decision about how the limited funds would most benefit the community. Both the consultation and the needs assessment found that there was interest in and a need for both the development of non-congregate shelter and affordable housing, but the available funds were not deemed to be sufficient to adequately address either of those needs.

To address the needs within the community, the City will allocate 60 percent (\$652,402) of its HOME-ARP funds to Supportive Services designed to assist each of the qualifying populations. The City will consider the services currently available in more detail to determine where the greatest need is currently and focus the funding in those areas.

The City will allocate 20 percent (\$217,467) of the available funding to a Tenant-based Rental Assistance Program. The needs assessment found that there are 2,255 households with an AMI at or below 50 percent with a rent burden of more than 50 percent. The TBRA program will be designed to serve those at risk of homelessness needing assistance with their rent.

In the consultation, there was near unanimous support for assisting nonprofits engaged with the City on activities funded by the HOME-ARP funds with operating assistance. Small, local nonprofits often lack the depth of organization to develop and implement new programs and services. The City intends to be able to support these organizations in their work with the City by allocating 5 percent (\$54,367) to nonprofit assistance.

The remaining 15 percent will be used to administer the HOME-ARP program.

Administration and planning. HOME-ARP administration and planning funds were used to pay City staff working on this allocation plan. HOME-ARP administrative and planning funds were not used to hire consulting services in the preparation of this plan. After the Allocation Plan is approved, administration and planning funds will be used for standard expenses in managing the HOME-ARP program, including the costs of City staff, and hired consultants. Consultants may assist also with administrative tasks such as grant administration, monitoring, and reporting.

HOME-ARP Housing Production Goals

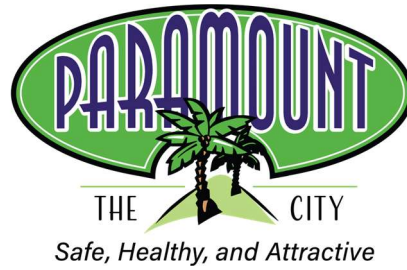
The City of Paramount will not produce any housing units with the HOME-ARP funds.

Preferences

The City of Paramount will not provide preferences to any population or subpopulation.

HOME-ARP Refinancing Guidelines

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



APPENDIX A

Citizen Participation

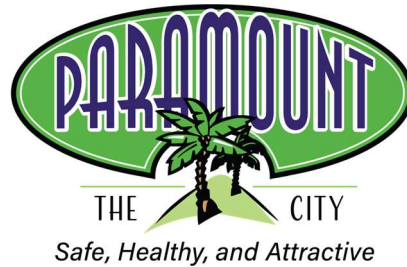
Summary of Citizen Participation Comments

**Allocation Plan Public Review and Comment Period:
January 30 to February 14, 2023**

A summary of comments and recommendation received during the public comment period will be included prior to the submission of this Allocation Plan to HUD.

**Public Hearing before City Council:
February 14, 2023**

A summary of comments and recommendation received during the public hearing will be included prior to the submission of this Allocation Plan to HUD.



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