

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

## CITY OF WESTMINSTER HOME-AMERICAN RESCUE PLAN (ARP) FUNDS

### BACKGROUND

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.

To address the need for homelessness assistance and supportive services, Congress appropriated \$5 billion in ARP funds to be administered through HOME to perform four activities that must primarily benefit qualifying individuals and families who are 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. The program described in this notice for the use of the \$5 billion in ARP funds is the HOME-American Rescue Plan or “HOME-ARP.”

ARP defines qualifying individuals or families as those that 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; (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; or (5) veterans and families that include a veteran family member that meet the criteria in one of (1)-(4) above.

The City of Westminster’s (City) federal Annual Action Plan details the funding strategy for the Community Development Block Grant (CDBG) and HOME Investment Partnerships (HOME) programs each year. These Annual Action Plans implement the City’s Five-Year Consolidated Plan and are developed through public input, analyses, and planning. This document is a Substantial Amendment to the City’s Fiscal Year 2021-2022 Annual Action Plan, which was submitted to the U.S. Department of Housing and Urban Development (HUD) in May 2021.

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 Notices CPD-21-10 and CPD-22-13, 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 CPD-21-10, and to submit it to HUD as a substantial amendment to its Fiscal Year 2021-2022 annual action plan.

CPD-21-10 and CPD-22-13 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.

Since the required elements of the HOME-ARP allocation plan shall be part of the FY 2021 annual action plan for purposes of the HOME-ARP program, PJs are not required to amend their consolidated plans.

The proposed HOME-ARP Substantial Amendment identifies how the City will undertake a new activity not previously funded from HOME-ARP federal funds in the current Five-Year Consolidated Plan (Fiscal Year 2020/2021-2024/2025) or the Fiscal Year 2021-2022 Annual Action Plan. Pursuant to the City's adopted Citizen Participation Plan, the undertaking of a new activity constitutes a substantial amendment.



**CITY OF WESTMINSTER  
HOME-AMERICAN RESCUE PLAN (ARP)  
ALLOCATION PLAN**

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**DRAFT FOR PUBLIC REVIEW**  
**February 16, 2023 - March 8, 2023**

**CITY OF WESTMINSTER  
GRANTS AND HOUSING DIVISION  
8200 WESTMINSTER BOULEVARD  
WESTMINSTER, CA 92683**

**CITY OF WESTMINSTER**  
**HOME-ARP ALLOCATION PLAN**

**TABLE OF CONTENTS**

<b>SECTION</b>	<b>PAGE</b>
Consultation.....	1
Public Participation .....	5
Needs Assessment and Gap Analysis .....	7
HOME-ARP Activities.....	19
HOME-ARP Production Housing Goals .....	21
Preferences.....	22
Referral Methods .....	24
Limitations in a HOME-ARP Rental Housing or NCS Project.....	25
HOME-ARP Refinancing Guidelines.....	26

# CITY OF WESTMINSTER HOME-ARP Allocation Plan

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## CONSULTATION

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*Describe the consultation process including methods used and dates of consultation.*

The City of Westminster engaged in a consultation process that included meetings with the Orange County Health Care Agency, Office of Care Coordination (local Continuum of Care), which was attended by numerous service agencies that serve homeless, persons at risk of homelessness, seniors, victims of domestic violence, and other qualifying population groups. The City additionally distributed a HOME-ARP questionnaire and received responses from 13 non-profit agencies and 30 Westminster residents. Questionnaires requested the respondent’s opinion on the various activities eligible for HOME-ARP funding. The table below outlines all agencies consulted and their feedback.

*List the organizations consulted.*

Agency/Org Consulted	Type of Agency/Org	Method of Consultation	Feedback
<b>Orange County Health Care Agency, Office of Care Coordination</b>	Continuum of Care	Countywide Grantee Meeting on November 17, 2021	Office of Care Coordination staff provided overview of HOME-ARP eligible activities and CoC consultation, including PIT, HIC, and HMIS data.
<b>Various Agencies</b>	Supportive Service Provider	CoC meeting with Westminster on March 31, 2022 to discuss plans for HOME-ARP projects	<p>On March 31, 2022, the following agencies attended the one-on-one consultation meeting between the City of Westminster and the Orange County CoC to go over Westminster’s proposed HOME-ARP projects. The following agencies were in attendance:</p> <ul style="list-style-type: none"> <li>• <b>2-1-1 Orange County</b> (services for the homeless, at risk of homelessness, veterans, victims of domestic violence)</li> <li>• <b>Brainhealth247</b> (mental health services)</li> <li>• <b>CalOptima</b> (County- Organized Health System)</li> <li>• <b>Collete’s Children’s Home</b></li> <li>• <b>County of Orange</b></li> <li>• <b>Covenant House California</b> (transitional and rapid re-housing for transitional age youth)</li> <li>• <b>Families Forward</b> (homeless children and families TBRA and supportive service provider)</li> </ul>

			<ul style="list-style-type: none"> <li>• <b>EAH Housing</b> (affordable housing not-for-profit organization)</li> <li>• <b>HomeAid Orange County</b> (affordable housing developer for homeless and persons at risk of homelessness)</li> <li>• <b>Human Options</b> (domestic violence services including shelter, housing, legal advocacy, and counseling)</li> <li>• <b>Interval House</b> (domestic violence services, emergency shelters, transitional housing, permanent housing, legal assistance, career development)</li> <li>• <b>Orange County Asian and Pacific Islander Community Alliance (OCAPICA)</b> (serves the Asian and Pacific Islander populations of Orange County through service, education, advocacy, organizing, and research)</li> <li>• <b>Orange County Health Care Agency</b> (homeless, children and family services)</li> <li>• <b>SquareOne Affordable Housing Advocacy &amp; Consulting, Inc</b> (consulting firm specializing in advocacy and affordable housing)</li> <li>• <b>StandUp for Kids</b> (youth homelessness agency offering street outreach, mentoring, and housing)</li> <li>• <b>Volunteers of America Los Angeles</b> (provider of a variety of programs for all qualifying populations)</li> </ul>
<b>Love Westminster</b>	Faith Based Coalition	Questionnaire	Love Westminster serves homeless, transitional aged youth, and low-income households. They reported a significant need for all eligible activities under HOME-ARP with the exception of a non-congregate shelter which they reported as having “some” need.
<b>Westminster Family Resource Center</b>	City Department	Questionnaire	The FRC serves approximately 400-500 households with children in Westminster annually, including families that are homeless, at risk of homelessness, victims of domestic violence, and of low-income. Among those activities identified as having a significant need include all housing assistance type of activities (rental housing, tenant based rental housing, non-congregate shelter, and housing financial assistance). Also of significant need are services for these population groups – food, housing search, counseling, mental health, case management, and others.

<b>Asian Americans Advancing Justice - OC</b>	Homeless Provider Victims of Domestic Violence Provider Civil Rights Organization Fair Housing Eviction Defense Immigration Legal Services Provider	Questionnaire	Serving approximately 200-300 persons per year, the Asian American Advancing Justice -OC provides a variety of services available to Westminster residents. They found the most significant need in the City to be rental housing, tenant based rental assistance, health, education, and employment services, fair housing, and counseling.
<b>Abrazar, Inc.</b>	Non-Profit Community Center	Questionnaire	Abrazar, Inc. is a local non-profit community center serving all of the qualifying populations in Westminster. Abrazar sees a significant need in the community for rental housing, rental and other forms of housing assistance, employment and life skills services, mental health, transportation, credit repair, street outreach and case management.
<b>Westminster Police Department</b>	City Department	Questionnaire	Working with the homeless, at risk of homeless, and veteran populations of Westminster, the WPD found that the greatest need for these persons is for a non-congregate shelter, mental, substance abuse, and outpatient health services, street outreach, case management, and homeless prevention.
<b>Westminster High School</b>	Public School	Questionnaire	Working with youth in the public school system, Westminster High School staff determined the highest need to be for additional rental housing, tenant based rental housing, non-congregate shelter, education, employment, and life skills services, mental and substance abuse services, services for homeless youth, and homeless prevention.
<b>Stand Up for Kids OC</b>	Homeless Services Provider	Questionnaire	Serving approximately 11 to 20 homeless youth each year in Westminster, Stand Up for Kids found the most need to be for tenant based rental and other housing assistance, education, employment, and life skills services, mental health and substance abuse services, street outreach, case management, credit repair, homeless prevention, and tenant/landlord liaison services.
<b>Human Options</b>	Services for Victims of Domestic Violence	Questionnaire	Human Options serves approximately 80 victims of domestic violence annually in Orange County. They provide domestic violence services including shelter, housing, legal advocacy, and counseling. Human Options stated rental housing, non-congregate shelter, childcare, food, health, and various homeless services as a significant need in the City.
<b>Fair Housing Foundation</b>	Fair Housing Agency	Questionnaire	The Fair Housing Foundation assists all of the qualifying population groups in

			Westminster. Of the highest need are rental housing, tenant based rental assistance, housing financial assistance, employment and legal services.
<b>Boys &amp; Girls Club of Westminster</b>	Non-Profit Agency	Questionnaire	The Boys & Girls Club of Westminster helps all youth in all of the qualifying population groups. They found all of the eligible activities under the HOME-ARP Program to be of significant need in the City. The only service that was labeled as having “some” need were services for HIV/AIDS persons.
<b>Various Residents</b>	Various Residents	Questionnaire	30 Westminster residents completed the HOME-ARP questionnaire where it was reported that mental health, substance abuse, food, housing search and counseling, outpatient health, street outreach, housing financial assistance, and homeless prevention services were reported as the most significant need among the qualifying populations in Westminster.

***Summarize feedback received and results of upfront consultation with these entities.***

Survey responses from agencies and residents varied considerably from one another. Agencies surveyed reported housing financial assistance and homeless prevention activities as the number one need in Westminster, with rental housing, tenant-based rental housing, and mental health services ranking as the second highest need. On the other hand, residents of Westminster ranked mental health and substance abuse issues as the top two priorities in the community, likely because of the direct influence these matters seemingly have on homelessness.



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## Public Participation

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

- ***Date(s) of public notice: 2/16/2023***
- ***Public comment period: start date - 2/16/2023 end date - 3/8/2023***
- ***Date(s) of public hearing: 3/8/2023***

***Describe the public participation process.***

The City of Westminster provided two opportunities for the public to participate in the HOME-ARP planning process. The City published a public hearing notice in the Westminster Journal on February 16, 2023 to notify the public of the Plan's availability for review and comment through March 8, 2023, and also to invite interested persons to the public hearing to approve the Plan scheduled for March 8, 2023. The public notice provided the following information to the public: description of the HOME-ARP program; amount of funds allocated to the City of Westminster; eligible activities; and the proposed use of funds.

***Describe efforts to broaden public participation.***

In an effort to broaden public participation in the development of the HOME-ARP Allocation Plan, the City followed citizen participation steps outlined in its Citizen Participation Plan. For public review, the Plan was made available at the following locations Monday through Thursday (except for legal holidays) from 7:00 a.m. to 5:00 p.m., or otherwise during the Department's normal business hours:

City Hall Public Service Center  
City of Westminster  
8200 Westminster Boulevard  
Westminster, CA 92683

Westminster Senior Center  
Community Services Building  
City of Westminster  
8200 Westminster Boulevard  
Westminster, CA 92683

The Plan was also available for citizen review on the City's website at:

[www.westminster-ca.gov/home-arp](http://www.westminster-ca.gov/home-arp).

Finally, the public was invited to participate in the March 8, 2023 public hearing in person or virtually via Zoom.

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

To be completed at the end of the public comment period and public hearing.

*Summarize any comments or recommendations not accepted and state the reasons why:*

To be completed at the end of the public comment period and public hearing.

DRAFT

## Needs Assessment and Gaps Analysis

### Homeless Needs Inventory and Gap Analysis Table

HOMELESS													
	Current Inventory					Homeless Population				Gap Analysis			
	Family		Adults Only		Vets	Family HH (at least 1 child)	Adult HH (w/o child)	Vets	Victims of DV	Family		Adults Only	
	# of Beds	# of Units	# of Beds	# of Units	# of Beds	# of Beds	# of Beds	# of Beds	# of Beds	# of Beds	# of Units	# of Beds	# of Units
Emergency Shelter	#	#	#	#	#								
Transitional Housing	#	#	#	#	#								
Permanent Supportive Housing	31	10	#	#	#								
Other Permanent Housing	#	#	48	#	#								
Sheltered Homeless						#	#	#	#				
Unsheltered Homeless						16	143	9	#				
<b>Current Gap</b>										16	#	143	#

**Suggested Data Sources:** 1. Point in Time Count (PIT); 2. Continuum of Care Housing Inventory Count (HIC); 3. Consultation

### Housing Needs Inventory and Gap Analysis Table

Non-HOMELESS			
	Current Inventory	Level of Need	Gap Analysis
	# of Units	# of Households	# of Households
Total Rental Units	13,255		
Rental Units Affordable to HH at 30% AMI (At-Risk of Homelessness)	6,035		
Rental Units Affordable to HH at 50% AMI (Other Populations)	1,965		
0%-30% AMI Renter HH w/ 1 or more severe housing problems (At-Risk of Homelessness)		4,235	
30%-50% AMI Renter HH w/ 1 or more severe housing problems (Other Populations)		1,235	
<b>Current Gaps</b>			2,530

**Suggested Data Sources:** 1. American Community Survey (ACS); 2. Comprehensive Housing Affordability Strategy (CHAS)

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

### ***Homeless as defined in 24 CFR 91.5***

The U.S. Department of Housing and Urban Development (HUD) requires that all Continuum of Care jurisdictions across the country complete a biennial unsheltered count and an annual sheltered count of all individuals experiencing homelessness in the community on a single point in time during the last ten days of January. The Orange County PIT was rescheduled to the last 10 days of February due to the COVID-19 pandemic. Orange County's 2022 Sheltered Point in Time (PIT) Count, therefore, took place the night of Monday, February 21, 2022, with client-level demographic information collected from over 100 emergency shelter and transitional housing programs throughout the County. The 2022 Unsheltered PIT Count took place over two days, Tuesday, February 22 through Thursday, February 24, to ensure the 800 square mile county jurisdiction was canvassed effectively. The 2022 PIT Count used the same methodology used for the 2019 PIT, but also incorporated the use of Survey123, a phone application that captures GIS locations and provides very significant information for tabulating, analyzing, and responding to homelessness in Orange County.

### **City of Westminster and Central Service Planning Area (SPA) Homeless Statistics**

The February 2022 PIT count enumerated 159 unsheltered homeless individuals in the City of Westminster that were found to live in places 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. The unsheltered homeless count remained the same as the 2019 PIT; however, the sheltered count dropped from 25 persons in 2019 to 0 in 2022.

Westminster is one of 10 cities that make up the Central Service Planning Area (SPA). The 2022 PIT reported 2,714 homeless persons in the Central SPA – 1,522 unsheltered and 1,192 were sheltered. This is down 19% from the homeless count of 3,332 in 2019, with 1,827 unsheltered and 1,505 sheltered.

### **Orange County Homeless Statistics**

According to the latest full homeless census (2022 Point in Time Count), there were 5,718 homeless persons in Orange County, down 1,142 persons from the 2019 PIT count of 6,860. Of this total 3,057 (53%) were unsheltered, and 2,661 were sheltered (47%). White persons made up 71% of the total homeless population, 12.5% identified as Other or Multiple Races, 8.5% were Black, and 3.4% were Asian. Hispanic or Latinos made up almost 44% of the 5,718 homeless persons. Additionally, there were 280 veterans, 235 transitional age youth (18-24 years old), and 718 seniors.

The 2022 PIT also contained the following important information about the 4,996 individuals (18+ years of age) that are not part of family unit, see below. Of the 4,996 persons, over 48% reported being chronically homeless, and over 67% of these are unsheltered. Also, nearly one-third of the individual homeless population suffer with substance abuse issues (1,633 persons)

and about 75% of them are unsheltered and are likely not being treated. Individuals with mental health or physical disabilities also represent nearly 30% of the individual homeless population each, and majority of these too are unsheltered. This is important because, in general, adults belonging to a family household are more likely to pursue shelter and are less likely to experience disabling conditions experienced by those who are alone and unsheltered.

**Individual Subpopulation and Disabling Conditions Statistics  
2022 Orange County Point in Time Count**

	Individuals (Not Part of a Family Unit)		
	Unsheltered Persons	Sheltered Persons	Total %
<b>Homeless Persons 18+ Yrs.</b>	<b>2,936 persons</b>	<b>2,060 persons</b>	<b>4,996 persons</b>
<b>Subpopulation*</b>			
<b>Chronically Homeless</b>	1,617 persons	791 persons	2,408 persons 48.20%
<b>Domestic Violence</b>	289 persons	226 persons	515 persons 10.31%
<b>Disabling Condition*</b>			
<b>Developmental Disability</b>	419 persons	39 persons	458 persons 9.17%
<b>HIV/AIDS</b>	52 persons	77 persons	129 persons 2.58%
<b>Mental Health Issues</b>	867 persons	578 persons	1,445 persons 28.92%
<b>Physical Disability</b>	945 persons	512 persons	1,457 persons 29.16%
<b>Substance Abuse Issues</b>	1,217 persons	416 persons	1,633 persons 33.29%

*\*Some individuals may identify with more than one subpopulation or disabling condition.*

***At Risk of Homelessness as defined in 24 CFR 91.5***

To account for persons at-risk of becoming homeless, the most recent (2015-2019) Comprehensive Housing Affordability Strategy (CHAS) data was analyzed. This data contains three particular characteristics of households that meets the definition of “at risk of homelessness” found in 24 CFR Part 91.5. First, the CHAS data breaks down occupied housing units by HUD Area Median Family Income (HAMFI), including 30% and below of HAMFI. Next, the CHAS data provides information on occupied housing units with households that are severely cost burdened; that is, they are spending more than 50% of their income on housing related expenses. For renters, that includes rent and utilities. For homeowners, it includes the mortgage payment, utilities, association fees, insurance, and real estate taxes. And finally, the CHAS data contains information on housing units in which there resides more than 1.5 people per room, which is considered to be severely over-crowded.

The CHAS data shows that of the 13,255 renter households in the City of Westminster, 6,035, or 46%, are occupied by households earning 30% or less of the HAMFI. Further, of these households, 80% (4,840) have one or more housing problems, defined as housing units that: 1) lack complete kitchen facilities; 2) lack complete plumbing facilities; 3) are over

overcrowded; and 4) are cost burdened. A household is said to have a housing problem if they have any one or more of these four problems. The CHAS data shows that Asian households make up an overwhelming share of households that meet both criteria (earn 30% or less of HAMFI and have one or more housing problems) at 65%, with Hispanic households ranked second at 20%, and White households third at 11%. Black or African American households constitute 2% of these households.

With regard to age, 57% of renter households earning less than 30% of the HAMFI and with one or more housing problems fall under the non-elderly category, which represents persons between the ages of 18 and 61. This is the City’s working-class households and families. Seniors (62+ years of age), on the other hand, represent the remaining 43% of renter households that are both extremely low-income and have one or more housing problem. This category of seniors has a higher risk of homelessness due to the ever-increasing cost of living in California (rising housing, utility, food, and gas prices) while at the same time living on fixed incomes.

Finally, the CHAS data revealed that of the 6,035 households earning less than 30% HAMFI, 64% (3,855 households) are, in fact, severely cost-burdened, and 6% are severely overcrowded. Severely cost burdened households are spending more than 50% of their income on housing related expenses, leaving the remaining 50% or less of their income available for other daily necessities such as food, gas, child and healthcare. Together, these make up 3,690 households that specifically meet the definition of “at risk of homelessness” at 24 CFR Part 91.5.

<b>Renter-Occupied Housing Units with Households Earning &lt;= 30% HAMFI</b>		<b>6,035</b>	
<b>One or More Housing Problems*</b>		<b>4,840</b>	<b>80%</b>
<b>Race/Ethnicity</b>	White	515	11%
	Black or African American	90	2%
	Asian	3,145	65%
	American Indian or Alaska Native	15	< 1%
	Pacific Islander	10	< 1%
	Other Race/Multiple Races	85	2%
	Hispanic	980	20%
<b>Age</b>	Non-Elderly	2,780	58%
	62-74 Years Old	1,075	22%
	75+ Years Old	985	20%
<b>Housing Problem</b>	Households with No Kitchen or Plumbing Facilities	300	6%
	Households with 1.5+ Persons per Room	375	8%
	Households with 1 – 1.5 Persons per Room	440	9%
	Households Over 50% Cost Burdened	3,115	64%
	Households 30-50% Cost Burdened	605	13%

\* 1) lack complete kitchen facilities; 2) lack complete plumbing facilities; 3) are over overcrowded; and 4) are cost burdened

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

The City has seen a substantial increase in domestic violence-related calls for assistance to the Westminster Police Department. From 2011-2015, there was an average of 289 domestic violence-related calls per year while the most recent data (2016-2020) shows an average of 432 calls per year, an increase of 33%, according to the State of California Department of Justice Statistics Center (CJSC) (<https://openjustice.doj.ca.gov/exploration/crime-statistics/domestic-violence-related-calls-assistance>). Another alarming statistic is the increase in the number of domestic violence related calls involving weapons. On average, during the period of 2011-2015, 62 calls involved a weapon, compared to the 2016-2020 period where the average number of calls involving a weapon jumped to 251 per year. The CJSC does not report demographic data for these calls on domestic violence incidences.

The 2022 Orange County Point in Time count reported 129 homeless individuals living in units designated for victims of domestic violence in the Central SPA, which includes the City of Westminster, compared to 104 individuals in 2019. The 2022 Orange County Housing Inventory Count shows no housing projects dedicated to persons fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking in Westminster; however, in the Central SPA 24 housing units comprising 70 beds for households with children, and 72 beds for households without children are available.

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

Other Families Requiring Services or Housing Assistance to Prevent Homelessness

The HOME ARP Notice (CPD Notice CPD-21-10) describes *Other Families Requiring Services or Housing Assistance to Prevent Homelessness* as currently sheltered households that will become homeless if not for the assistance they are currently receiving. As discussed above, the 2022 Point in Time Count reported 0 sheltered individuals in the City of Westminster.

At Greatest Risk of Housing Instability

Persons at greatest risk of housing instability are those that: 1) are earning 30% or below the HAMFI and are severely cost-burdened (paying 50% or more on housing); or 2) are earning 50% or less of HAMFI and meet one of the following conditions:

1. Has moved two or more times in the two months immediately preceding their application for homelessness prevention assistance.
2. Is living in the home of another because of economic hardship.
3. Has been formally notified of eviction within 21 days after the date of application for assistance.
4. Lives in a hotel or motel and the cost of staying at the hotel or motel is not borne by a federal, state, or local government program.
5. 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 persons reside per room, as defined by the U.S. Census Bureau.

6. Is exiting a publicly funded institution, or system of care (health care facility, mental health facility, foster care or other youth facility, or correction program or institution).
7. 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.

For the first group of persons/households at greatest risk of instability, that is, they earn less than or equal to 30% of HAMFI *and* are severely cost-burdened, the 2015-2019 CHAS data reports that there are 5,040 owner and renter households that meet this criterion. Of these, 76% or 3,855 are households that rent, making them more vulnerable to housing instability and homelessness.

Information on each of the conditions listed above for the second category of persons at greatest risk of housing instability is not readily available, with the exception of data on overcrowding. The 2015-2019 CHAS data described 815 households earning 50% or less of HAMFI living in overcrowded conditions, 77% of which were renter households. Worse, the data showed an additional 685 households experiencing severe overcrowding, and 90% of them were renters.

#### Veterans and Families that Include a Veteran Family Member

According to the 2021 American Community Survey (ACS), Westminster currently has a population of 2,500 veterans in the city. Information on the number of veterans that are homeless was not available as part of the 2022 Point in Time Count. However, in Orange County, a total of 280 homeless veterans were counted. Of this, 145 were unsheltered and 135 were sheltered. Review of the 2022 Orange County Housing Inventory Count listed no specific housing for veterans in Westminster.

***Identify and consider the current resources available to assist qualifying populations, including congregate and non-congregate shelter units, supportive services, TBRA, and affordable and permanent supportive rental housing.***

The City of Westminster is a recipient of the annual Community Development Block Grant (CDBG) and HOME Investment Partnership Act Program (HOME). Together, the City receives approximately \$1.5 million from these entitlement programs to address affordable housing and low- and moderate-income community development needs. The City also received a special allocation of CARES Act CDBG in 2019 as a response to the COVID-19 pandemic in the sum of almost \$1.34 million.

Westminster uses its federal funding on a variety of projects and programs that serve the qualifying populations already. For example, the CDBG program funds some supportive services for qualifying populations. The Senior Outreach Center and the Home Delivered Meals Program provide various forms of assistance to Westminster's elderly population, most of which are extremely low to low-income residents. Services include free classes, referrals, food, and meals delivered to the homes of seniors. The Family Resource Center also provides much needed services to families with children. Recipients of this program are connected with providers of free food,



rental assistance, youth programs, parenting classes, financial management classes, and other critical services that help to prevent homelessness. CDBG funds are also eligible to be used for other supportive services not currently funded such as homeless services, operations of homeless facilities, childcare, mental and general health, substance abuse, and employment training for persons who are homeless or at risk of homelessness. CDBG funds may also be used for the development of public facilities including those that serve the various qualifying populations.

The City's HOME program has historically been used for the development of affordable housing and residential rehabilitation. Since 2015, 14 affordable rental housing units were added to the City's HOME-funded housing inventory. The units were made available to low- and moderate-income Westminster families. Home improvement grants and loans were also made available to income-eligible Westminster households to make necessary health and safety repairs that would have otherwise gone unrepaired but for the City's assistance. HOME funds continue to be the primary source of funding for the development of affordable and permanent rental housing that could be made available to households within the qualifying populations.

The third federal funding source was a one-time special allocation of CDBG funding from the Coronavirus Aid, Relief, and Economic Security (CARES) Act. Westminster received \$1.34 million which was used for a range of services to assist households affected by COVID-19. The City funded a tenant-based rental assistance program with nearly \$1 million. The program prevented 221 households from entering homelessness when they suffered income losses caused by COVID-19. CDBG-CV funds are allocated to the Westminster Homeless Rapid-Rehousing Program which provides overnight motel/hotel stays, food, bus tickets, and other necessary costs to help homeless persons from being exposed to COVID-19. Assistance is temporary, but critical. CDBG-CV funds are also being used for the Senior Center COVID-Relief Program which provides meals to elderly persons who fear contracting COVID-19 by attending congregate meal sites. Remaining CDBG-CV funds are currently being allocated to a food assistance program for low- and moderate-income households.

The City of Westminster is also the recipient of two State-funded housing revenue sources: the Supplemental Educational Revenue Augmentation Fund (SERAF) and the Permanent Local Housing Allocation (PLHA). SERAF was recently used on two permanent supportive housing projects benefitting homeless persons. In April 2018, the Westminster Housing Authority (WHA) executed a loan agreement with developer Meta Housing Corporation for \$5.5 million in SERAF funds. The funds were utilized for the construction of 65 new apartments affordable to households with a mix of extremely low-, very-low-, and low-income levels. Westminster Crossing, located at 7122 Westminster Boulevard, also includes 20 permanent supportive housing units for chronically homeless persons, with partnered funding from the County of Orange. The project helps to address the lack of safe, spacious, and well-amenitized affordable rental housing in Westminster.

The WHA also executed a loan agreement with developer, Affirmed Housing Group, for \$2.4 million of SERAF funds to develop Della Rosa located at 14800 Beach Boulevard. The project entailed 50 new apartments affordable to households with a mix of extremely low-, very low-, and low-income levels. The units are within easy walking distance to transit and some retail, and less than a mile from schools, a grocery store, banks, parks, and a library. The County of Orange

partnered in the project, committing 25 project-based vouchers for homeless persons and \$1.2 million in funding.

The California Legislature approved Senate Bill 2 (SB 2), known as the Building Homes and Jobs Act (Act), which established a \$75 recording fee on real estate documents to increase the supply of affordable housing. The Act established the Permanent Local Housing Allocation (PLHA) program administered by the California Department of Housing and Community Development (HCD). The PLHA provides a permanent source of funding to cities and counties to help meet the unmet need for affordable housing and increase the supply of affordable housing units. On August 12, 2020, the Westminster City Council approved the use of Permanent Local Housing Allocation Program funds to implement the Westminster Tenant-Based Rental Assistance (TBRA) Program. The main goal of the TBRA Program is to assist households experiencing or at risk of experiencing homelessness achieve self-sustainability via rental assistance and supportive services. A qualified service provider, Interval House, administers the housing and supportive services components of the TBRA Program. The primary sources of referrals come from, but are not limited to, the Westminster School District, the Westminster Family Resource Center, and the Westminster Police Department to focus assistance on Westminster households that fall under the definition of homelessness or at risk of homelessness.

Finally, the City of Westminster has an Affordable Housing Program consisting of multifamily apartment complexes throughout the City that include affordable units. The City has agreements with the owners of these units to maintain rents at levels below regular market rent rates. In total, the City currently has a portfolio of 213 rental units affordable to family households, 377 units affordable to Westminster seniors, and 59 single room occupancy units.

Affordable and permanent supportive housing developments in Westminster have long wait lists for entry. The Orange County Coordinated Entry generally assesses thousands of people each year, and offers housing to a small fraction. With 159 people experiencing homelessness and hundreds more experiencing rental cost burden, additional affordable and permanent supportive housing is desperately needed for all of the qualifying populations. The 2021-2029 Regional Housing Needs Allocation (RHNA) for the City of Westminster echoes this sentiment. The RHNA reports that the City of Westminster has a total housing need of 9,759 units (updated July 2021). After credits for units constructed or under construction (469), approved units (127), and projected accessory dwelling units or junior accessory dwelling units (528) are taken into consideration, the City of Westminster has a remaining 2021-2029 RHNA of 8,635 units. From this allocation, the RHNA designates:

- 1,729 units affordable to extremely to very low-income households
- 1,202 units affordable to low-income households
- 1,626 units affordable to moderate-income households
- 4,078 units affordable to above moderate-income households

***Describe the unmet housing and service needs of qualifying populations:***

***Homeless as defined in 24 CFR 91.5***

Many factors contribute to homelessness including poverty, unemployment, and the lack of affordable housing. Compounding this are personal challenges such as mental and substance abuse disorders, trauma and violence, domestic violence, serious illness, divorce, death of a family member, or disabilities. The 2022 Point in Time reports that the City of Westminster has 159 unsheltered homeless in the City. While the City does have 86 designated year-round beds available for homeless persons pursuant to the 2022 Housing Inventory Count maintained by the Orange County Continuum of Care, none are vacant and available for the 159 homeless persons. This creates an unmet housing need for additional rental units for the City's homeless population. Further, wrap around services to support homeless persons newly housed help to make the transition successful and permanent.

***At Risk of Homelessness as defined in 24 CFR 91.5***

According to the 2015-2019 Comprehensive Housing Affordability Strategy ("CHAS"), of the 13,255 renter households in the City, 34% (4,485 households) are paying the normal or expected 30% or below of their income on housing related expenses; however, that means that the remaining 66% of all renter households are experiencing some level of cost burden. The cost burdens are more serious for households with the lowest incomes (at or below 30% of Area Median Income). Of the 6,035 renter households earning less than or equal to 30% AMI, 4,660 of them (77%) are cost burdened (paying more than 30% of their income toward rent), and 64% of them are severely cost burdened (paying more than 50% of their income toward rent) making them more at risk of homelessness. These significant housing cost burdens affect thousands of Westminster residents; and with an inventory of only 649 affordable units in the City, there exists an exponential shortage of housing options for those at risk of homelessness. It is critical that the City continue developing new affordable housing for people with the lowest incomes in the community. Free supportive services in the areas of childcare, transportation, and food could greatly relieve those at risk of homelessness by making more of their income available for rising rental costs. Additional funding towards tenant based rental assistance could also be of considerable benefit to those cost burdened households at risk of homelessness.

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

As stated earlier in this report, the number of domestic violence related calls has increased in in the last five years to an average of approximately 432 calls per year. Half of these calls reportedly involved the use or threatened use of a weapon. To keep these victims safe, it is imperative that there be sufficient programs and housing shelters available to help them.

The 2022 Orange County Point in Time count reported 129 homeless individuals living in units designated for victims of domestic violence in the Central SPA, which includes the City of Westminster. The 2022 Orange County Housing Inventory Count shows no housing projects dedicated to persons fleeing, or attempting to flee, domestic violence, dating violence, sexual

assault, stalking, or human trafficking in Westminster; however, in the Central SPA 24 housing units comprising 70 beds for households with children, and 72 beds for households without children are available.

While not funded by the City of Westminster directly, a number of agencies serving this qualifying population exist in nearby cities of Garden Grove, Tustin, Anaheim, and Long Beach.

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

Persons/households at greatest risk of instability, that is, they earn less than or equal to 30% of HAMFI and are severely cost-burdened, total 5,040 owner and renter households, according to the 2015-2019 CHAS. Of these, 76% or 3,855 are households that rent, making them more vulnerable to housing instability and homelessness. The 2015-2019 CHAS data also described 815 households earning 50% or less of HAMFI living in overcrowded conditions, 77% of which were renter households. Worse, the data showed an additional 685 households experiencing severe overcrowding, and 90% of them were renters.

Veterans also fall within the “Other Qualifying Populations” category. While the number of homeless veterans in Westminster is not available, the American Community Survey does report 2,500 veterans in the City; however, review of the 2022 Orange County Housing Inventory Count listed no specific housing for veterans in Westminster.

With the thousands of severely cost burdened, overcrowded, severely overcrowded, and veteran households in the City, a priority need for additional affordable rental housing exists. Supportive services such as childcare, transportation, food, employment training, and tenant based rental assistance could benefit these households as well.

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

As presented earlier in this Plan, the number of individuals and families that meet the criteria of a qualifying population under the HOME-ARP guidance exceeds the number of available units to house them. The City has 159 homeless individuals when last counted in 2022, all of which are unsheltered. The number of homeless reveals the need for additional housing units, along with services to support them. Moreover, the thousands of renter households that are both living in poverty and are severely cost burdened or severely overcrowded are indications of the serious deficit of homes affordable and available to all of the qualified populations, including victims of domestic violence and veterans. This housing shortage in Westminster demonstrated above by the CHAS and RHNA data, shows the dire need for additional homeless housing opportunities such as emergency shelters, permanent supportive housing, and non-congregate shelter options, including through opportunistic acquisitions of existing multifamily buildings, hotels, and motels.

***Under Section IV.4.2.ii.G of the HOME-ARP Notice, a PJ may provide additional characteristics associated with instability and increased risk of homelessness in their HOME-***

***ARP allocation plan. These characteristics will further refine the definition of “other populations” that are “At Greatest Risk of Housing Instability,” as established in the HOME-ARP Notice. If including these characteristics, identify them here.***

Not applicable.

***Identify priority needs for qualifying populations:***

Analysis of the 2022 Point in Time Count, CHAS data, American Community Survey data, and consultation with the various agencies conducted as part of this Plan reveal the need for more affordable housing and housing-related supportive services for all qualifying populations, homeless, in particular. People without homes, need homes. The high and rapidly escalating housing costs combined with the COVID-19 pandemic and economic displacement in Orange County creates harmful instability for the qualified populations. It is difficult for members of the qualified populations to find affordable housing of any kind in Westminster. Personal needs and challenges become exponentially worse if you are in poverty, or worse, homeless. Investing in any kind of housing (transitional, permanent, non-congregate shelter) allows services to be accessed and for individuals in all qualifying populations to begin to recover.

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

The City of Westminster analyzed several data sources to determine the needs and gaps in the City’s shelter and housing inventory and in the service delivery systems. First, the City extracted Westminster-specific data, Central SPA data, and Orange County data from the 2022 Orange County Point in Time Count. The PIT provided valuable data on the number of sheltered and unsheltered homeless, families and individual homeless persons, and transitional aged youth, senior, and veteran homeless persons. Further, data on the number of homeless persons fleeing domestic violence was provided on a countywide basis.

Next, the City accessed data from the Comprehensive Housing Affordability Strategy (“CHAS”). CHAS data is provided annually from the U.S. Department of Housing and Urban Development (HUD) and includes custom tabulations of American Community Survey (ACS) data from the U.S. Census. The data demonstrates the extent of housing problems and needs, particularly for low-income households. CHAS data was used by Westminster to determine housing tenure by the various income levels, the number of households experiencing cost burden and/or overcrowded conditions, race and ethnicity statistics of extremely low-income households, and other data needed to characterize households at risk of homelessness.

Third, the City retrieved data from the City’s 2020-2024 Consolidated Plan, the Regional Housing Needs Allocation (RHNA), and the Orange County Housing Inventory Count to gather information on housing needs, current housing available in Westminster, and current service programs offered with federal and state funding.

Finally, the City consulted with various stakeholders via virtual meetings and through a homeless questionnaire that was completed by 13 different agencies and 30 Westminster residents.

Stakeholders included the Orange County CoC, the Fair Housing Foundation, Families Forward, Interval House, Volunteers of America Los Angeles, 2-1-1 Orange County, Abrazar, Inc., StandUp for Kids, Westminster High School, the Westminster Police Department, and more to find out what they felt are the priority needs of their clientele (homeless persons, veterans, elderly persons, persons with disabilities, and victims of domestic violence).

Overall, the City found that the highest need for the qualifying populations in Westminster was for additional affordable housing with wrap-around supportive services. A decent and affordable place to live, coupled with supportive services, helps homeless and those at risk of homelessness by freeing them from such physical and mental hardships and placing them on a path of new opportunity and increased confidence and self-reliance. This finding was determined by review of statistical data that reveals a significant shortage of rental housing for homeless persons and those at risk of homelessness. The results of the questionnaires completed by non-profit agencies that work directly with the qualifying populations found that housing financial assistance and homeless prevention activities were the number one need in Westminster, with rental housing, tenant-based rental housing, and mental health services ranking as the second highest need. Residents of Westminster ranked mental health and substance abuse issues as the top two priorities in the community, likely because of the direct influence these matters seemingly have on homelessness.

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## HOME-ARP Activities

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

The City of Westminster is proposing to utilize HOME-ARP funding to support the development of new affordable rental units. The City released a Request for Proposals in November 2022 and received one response from the local Community Housing Development Organization (CHDO), American Family Housing (AFH). AFH is proposing to acquire property located at 14125 Goldenwest Street, Westminster and develop a new construction project with 28 one-bedroom units. Approximately nine units will be HOME-restricted to low- and moderate-income households earning 60% or below of area median income, and 18 units will be HOME-ARP restricted to persons experiencing homelessness. The project proposes to include open space, a gym, and a recreation/community room where tenants can receive free wrap around services. Wrap around services, at a minimum, could include onsite counseling, financial literacy, healthy living, resume assistance, and job search. Further, the project will include office space for staff of supportive service providers. The project will meet GreenPoint Rater standards for a sustainable, efficient, durable, and healthier home.

***Describe whether the PJ will administer eligible activities directly:***

The City of Westminster will provide oversight of any new affordable housing development projects, with the planning, engineering, architectural and other soft development activities, as well as construction, to be carried out by the chosen development organization. The CHDO is also proposing to apply for funding with the County of Orange and CalOptima, therefore, administration of eligible activities will be conducted by the lead agency which could be the County or American Family Housing.

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

The City of Westminster is proposing to retain the statutory 15% maximum for administration, with remaining funds of \$1,371,141 allocated to the development of affordable rental housing.

***In accordance with Section V.C.2. of the Notice (page 4), 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.***

**Use of HOME-ARP Funding**

	<b>Funding Amount</b>	<b>Percent of the Grant</b>	<b>Statutory Limit</b>
Supportive Services	\$ #		
Acquisition and Development of Non-Congregate Shelters	\$ #		
Tenant Based Rental Assistance (TBRA)	\$ #		
Development of Affordable Rental Housing	\$ 1,371,141		
Non-Profit Operating	\$ #	# %	5%
Non-Profit Capacity Building	\$ #	# %	5%
Administration and Planning	\$ 241,966	15 %	15%
<b>Total HOME ARP Allocation</b>	<b>\$ 1,613,107</b>		

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

The needs assessment and gap analysis show that there are 159 homeless persons in Westminster coupled with thousands of households who are at risk of homelessness due to extremely low incomes and high rents leaving little to fund other necessary costs such as food, gas, and health care. Westminster has insufficient housing that is both affordable and available for these qualifying populations. Therefore, the City has identified the development of affordable rental housing to assist both low-income households and homeless as a priority need in Westminster. Further, there is a need for wrap around supportive services to assist the homeless to be more successful in stable housing. The City of Westminster has opted to use \$1,371,141 of its HOME-ARP allocation to help alleviate this growing problem.

***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 City continues to make a considerable effort to increase its inventory of affordable housing units. The City developed 14 new units between the years of 2015-2020, and also assisted over 200 families with tenant based rental assistance in 2020 and 2021. However, the demand for the available units far outstrips the supply as shown in the tables above. Based on the Point in Time Count, there were 159 total homeless persons in Westminster in 2022, all of which were unsheltered despite the efforts of the City, County, and non-profit industry to house and provide needed support services to them. Additionally, there are nearly 4,000 renter households at risk of homelessness. They are reportedly making equal to or less than 30% HAMFI while at the same time, spending over 50% of their incomes on housing related expenses. The RHNA further indicates a need for 1,729 units for extremely to very low-income families, and 1,202 units for low-income households.

In regard to emergency shelter beds, none exist in Westminster, however 866 shelter beds exist in the Central Service Planning Area which includes the cities of Costa Mesa, Fountain Valley, Garden Grove, Newport Beach, Huntington Beach, Santa Ana, Seal Beach, Tustin, and Westminster. In June 2022, the Cities of Garden Grove, Fountain Valley and Westminster entered into a Memorandum of Understanding to acquire and develop a future Navigation Center located



in the City of Garden Grove. The Navigation Center will comprise of 85 beds to provide emergency housing and wrap-around services to individuals experiencing homelessness.

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## **HOME-ARP Production Housing Goals**

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

Westminster has solicited proposals from qualified Community Housing Development Organizations (CHDO's) to develop a new affordable rental housing project in the City. The Request for Proposals was released in November 2022 and at the end of January 2023, one proposal was received from American Family Housing (AFH), the City's local community housing development organization (CHDO). The proposal includes the acquisition of property located at 14125 Goldenwest Street, demolition, and new construction of 28 one-bedroom units for both low- and moderate-income households (9 units) and persons experiencing homelessness (18 units), with one manager unit. Amenities will include an outdoor garden space, gym, onsite offices for wrap around supportive service providers, and a recreation room with computers for all tenants to enjoy.

It is important to realize that many households may fall into overlapping categories of qualifying populations. For example, someone experiencing homelessness may also be a victim of domestic violence, a senior, or a veteran. Likewise, a low-and-moderate income household could also meet the definition of at-risk of homelessness under 24 CFR Part 91.5 if they earn under 30% of area median income and currently reside in overcrowded conditions. Therefore, all of the qualifying populations could potentially be eligible for tenancy at the 14125 Goldenwest Street Project.

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

In partnership with a qualified CHDO, Westminster hopes to develop 28 units of affordable rental housing for both low-income households and households experiencing homelessness. The production of these units will address Westminster's priority needs by developing additional housing with restricted rents in order to be affordable to 28 households.

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## Preferences

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***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:***

The City of Westminster intends to give a preference to low-income households and households experiencing homelessness. Data from the Comprehensive Housing Affordability Strategy (“CHAS”) reveals that Westminster currently has 3,855 renter households that are earning less than 30% AMI and are severely cost burdened. The CHAS further shows that another 360 renter households in the same income limit are severely overcrowded. As housing rents continue to rise in Orange County, the City intends to prevent more homelessness by developing additional rental units that will be made affordable these households who are low income and potentially at risk of homelessness.

Further, with 159 persons living on the streets of Westminster pursuant to the 2022 Point in Time Count, a preference for these persons will be made for them as well. It should be noted, however, that the City will not restrict access to other qualifying populations. In fact, homeless persons may very well also be victims of domestic violence, veterans, or seniors. American Family Housing has proposed to offer supportive services at the project site to assist persons from the various qualifying populations.

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

The City’s needs assessment and gap analysis show the highest need is for additional renter housing for households at risk of homelessness and persons experiencing homelessness. Thousands of Westminster renter households are earning less than 30% AMI and are paying over 50% of their extremely low income on housing related expenses. There are also 159 homeless persons living in Westminster that do not have a home. By giving priority to these households in HOME-ARP funded units, the City hopes to alleviate some of this problem. However, units will not be restricted to the other qualifying populations as they are often a subset of the ‘homeless’ category of qualifying populations.

Additionally, the American Family Housing teams are experts in providing comprehensive services to homeless individuals and families, so that residents can achieve stability and contribute to their community. AFH will offer Life Skills, Health and Wellness workshops to all residents annually, free of charge. Monthly calendars will be posted in the community area and are provided to all residents. Participation is voluntary and AFH offers a wide array of services to meet the unique needs of the residents. Services include substance abuse and mental health counseling, budgeting and tenant education, community reintegration, in home life skills, employment training and volunteer activities, and linkage to healthcare and other mainstream entitlements and programs. All services are targeted at ensuring the long-term housing success of each individual.

Life Skills, Health and Wellness workshops also may include art therapy, walks in the parks, yoga, meditation, financial services such as money management and credit counseling, parenting classes, and essential life skills classes focused on topics such as health, hygiene, nutrition, and meal preparation. Parent/child interaction, parental disciplinary practices and child developmental stages are also included as training and are provided for the non-custodial parent who may seek to recover custody of their children. AFH encourages and facilitates the reunification process by assisting with navigating the court process and attending court hearings.

These services will help to meet the need for all qualifying population groups.

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## Referral Methods

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

The referral method to be utilized at this project is still to be determined. The City of Westminster will work with American Family Housing to develop a referral mechanism to ensure that priority is given to households who are homeless. Second priority will be given to any of the other qualifying populations.

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

To be determined. The City will work with American Family Housing to determine if using the Coordinated Entry system will be beneficial for this project.

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

To be determined.

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

To be determined.

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## **Limitations in a HOME-ARP Rental Housing or NCS Project**

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

The City of Westminster does not intend to limit tenancy in a HOME-ARP funded affordable housing project to any of the qualifying populations; however, priority will be given to persons experiencing homelessness and households earning under 60% area median income. Any vacant units may be made available to the other qualifying populations.

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

Not applicable. The City of Westminster does not propose to implement any limitations for participation in any HOME-ARP funded projects.

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

Not applicable.

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## HOME-ARP Refinancing Guidelines

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*If the PJ intends to use HOME-ARP funds to refinance existing debt secured by multifamily rental housing that is being rehabilitated with HOME-ARP funds, the PJ must state its HOME-ARP refinancing guidelines in accordance with [24 CFR 92.206\(b\)](#). The guidelines must describe the conditions under which the PJ will refinance existing debt for a HOME-ARP rental project, including:*

- *Establish a minimum level of rehabilitation per unit or a required ratio between rehabilitation and refinancing to demonstrate that rehabilitation of HOME-ARP rental housing is the primary eligible activity*

Not applicable. The City of Westminster does not intend to use HOME-ARP funds on refinancing any existing debt secured by multifamily rental housing.

- *Require a review of management practices to demonstrate that disinvestment in the property has not occurred; that the long-term needs of the project can be met; and that the feasibility of serving qualified populations for the minimum compliance period can be demonstrated.*

Not applicable.

- *State whether the new investment is being made to maintain current affordable units, create additional affordable units, or both.*

Not applicable.

- *Specify the required compliance period, whether it is the minimum 15 years or longer.*

Not applicable.

- *State that HOME-ARP funds cannot be used to refinance multifamily loans made or insured by any federal program, including CDBG.*

Not applicable.

- *Other requirements in the PJ's guidelines, if applicable:*

Not applicable.