



# **HOME Investment Partnerships Program-- American Rescue Plan**

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

**April 2023**

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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			
3	Published Draft for Public Comment:	3/6/23	Sent to HUD for Approval:	5/2/2023
	Conducted Public Hearing:	3/21/23	Approved by HUD:	
	Revised HOME-ARP Allocation Plan.			

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## Executive Summary

The City of Inglewood has been allocated \$3,108,579 of HOME-American Rescue Plan Act (HOME-ARP) funding from the U.S. Department of Housing and Urban Development (HUD). In order to receive the HOME-ARP allocation, the City must develop a HOME-ARP Allocation Plan that will become part of the City's FY 2021 HUD Annual Action Plan by substantial amendment.

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

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

- In February 2022, the annual Point in Time (PIT) count revealed that 519 people were unsheltered on the streets, in tents or makeshift shelters, or in cars, vans, RVs or campers.
- 2015-2019 Comprehensive Housing Affordability Strategy (CHAS) Data from HUD reported 5,115 households with incomes at or below 30% AMI are at risk of homelessness in the City.
- The CHAS data reports that there are 1,335 households with incomes more than 30% and but equal to or less than 50% AMI that are at risk of homelessness in the City because of at least one of the housing problems as defined by HUD.
- According to service providers, rental vacancies are two percent or less. The current level of housing supply and demand makes it very difficult to find units for qualifying populations.
- The greatest need for supportive services is in the areas of mental health services, homeless case management, and homeless wrap-around services. Service providers also noted the need for providing services for a longer period of time that were catered to the specific needs of the household.

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

## Introduction

The City of Inglewood has been allocated \$3,108,579 of HOME-American Rescue Plan Act (HOME-ARP) funding from the U.S. Department of Housing and Urban Development (HUD). To receive the HOME-ARP allocation, the City of Inglewood is required to develop a HOME-ARP Allocation Plan that will become a part of the City's Fiscal Year 2021 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.

Agency Role	Name	Department/Agency
HOME-ARP Administrator	City of Inglewood	Community Development Block Grant (CDBG) Division

## HOME-ARP Eligible Qualifying Populations and Activities

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

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

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

HOME-ARP funds may be used to 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, individual interviews and a public hearing.

## **Stakeholder Consultation**

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

A virtual consultation session was held on February 15, 2023. Representatives from multiple agencies, groups, and organizations were invited via email to attend. Those unable to attend were invited to submit written comments via emails or schedule a phone call to share their thoughts.

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

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

The Los Angeles Homeless Services Authority (LAHSA), the lead agency for the Los Angeles Continuum of Care (CoC), held a virtual session to provide their recommendations to jurisdictions being allocated funds. That session was held February 9, 2022, and attended by staff and representatives of the City. LAHSA also provided a written memorandum outlining their HOME-ARP funding recommendations.

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

## Organizations Consulted by Type and Method

Organizations Consulted by Type and Methods			
Organization Consulted	Type of Organization	Method of Consultation	Feedback Provided
Catholic Charities of Los Angeles	Nonprofit, addresses needs of qualifying populations including homeless and those at risk of homelessness	Survey	No additional comments beyond the survey
City of Inglewood-Housing Protection	Public, addresses needs of all qualifying populations	Virtual Session Survey	Because of the new rent control laws, owners are allowed to raise rents once every twelve months. In Inglewood, rents could have increased by almost 20% since 2019.
City of Inglewood-Housing Authority	Public, addresses needs of qualifying populations, serves as public housing authority	Virtual Session	Housing has a very low vacancy rate; development is key.
Didi Hirsch Mental Health Services	Nonprofit, addresses needs of all qualifying populations including those with disabilities, providing mental health services	Virtual Session Survey	Biggest challenge is the lack of resources. Believe trafficking is undercounted due to shaming aspect.
Families for Children	Nonprofit, addresses needs of qualifying populations including homeless and those at risk of homelessness, providing housing and behavioral health services	Survey	No additional comments beyond the survey
Harbor Interfaith Services	Nonprofit, addresses needs of qualifying populations including homeless	Virtual Session Survey	Pointed out the bump in homeless count that increased the count for Inglewood by adding Lennox neighborhood to 2021 PIT count

Organizations Consulted by Type and Methods			
Organization Consulted	Type of Organization	Method of Consultation	Feedback Provided
Housing Rights Center	Public, addresses needs of all qualifying populations, including disabled, providing fair housing and civil rights services	Virtual Session	No comments attributed during virtual session
Inglewood Police Department	Public, addresses needs of all qualifying populations	Virtual Session	No comments attributed during virtual session
Inglewood Unified School District	Public, addresses needs of all qualifying populations	Virtual Session Survey	District sees a lot of parents coming through the Resource Center. A lot are Columbian Families; a lot are unaccompanied youth.
Los Angeles Homeless Services Authority (LAHSA)	Nonprofit, addresses needs of qualifying populations including homeless, CoC for the County	Virtual Session Survey Agency Session	Nearly 70% of Inglewood's unhoused population is unsheltered, and in the same year (2022), Inglewood only had enough shelter beds to support 40% of the unhoused population and enough rental assistance for about 17% of the unhoused population. Believes non-congregate shelter is attractive to help bring people inside, and that there needs to be permanent housing on the other side of the shelter experience to make the flow from unsheltered to housed efficient and successful, along with key supportive services to help people make that transition in their communities.

Organizations Consulted by Type and Methods			
Organization Consulted	Type of Organization	Method of Consultation	Feedback Provided
Lennox-Inglewood Tenants' Union	Nonprofit, addresses needs of all qualifying populations including those with housing instability	Survey	No additional comments beyond the survey
Los Angeles County Department of Public Health	Public, addresses needs of all qualifying populations	Survey	Is there a possibility for a Project Home Key facility in the City?
Midnight Mission Homelight Family Living Program	Nonprofit, addresses needs of qualifying populations including homeless and domestic violence victims	Virtual Session Survey	Believes homelessness has gotten worse; agencies need assistance. Affordable housing is a major issue given the rising rents.
St. Margaret's Center	Nonprofit, addresses needs of qualifying populations including homeless and at risk of homelessness	Virtual Session Survey	Believes there is a continuing need for the TBRA program for seniors and permanently disabled residents on fixed incomes
U.S. Vets Inglewood	Nonprofit, addresses needs of qualifying populations including veterans	Virtual Session Survey	Facility offers 180 beds for vets and 40 beds for LAHSA. Currently 74% capacity in vets' beds

## Summary of Feedback Received from Consulted Organizations

Consultation revealed strong support for the following:

**Development and support of affordable rental housing.** Participants in the virtual session discussed the need for additional affordable rental housing. Specific issues mentioned included the shortage of affordable rental housing inventory with a local vacancy rate of two percent; shortage of affordable rental housing available to voucher holders; and rising rents. A participant also noted that new rent control laws allow landlords to raise rents every 12 months. A representative of the Housing Authority reported that when the Section 8 housing voucher waiting list was opened in July 2020, they received 30,000 applications in one week. Of respondents to the survey, 83% believed there was a high need for this activity.

**Provision of supportive services.** Many examples of supportive services were mentioned in the virtual session including substance abuse and mental health services, vocational training, childcare services, and housing services for families with children. Survey respondents were asked to rate what they believed is the current need for various services eligible under HOME-ARP. Of respondents to the survey, 75% believed there was a high need for this activity. The activities with the most ratings for “high need” were mental health services (92%), housing search assistance, substance abuse treatment, case management services (85%), and childcare assistance (77%).

Rating of Current Need for Supportive Services				
Supportive Services	High Need	Moderate Need	Low Need	No Need
Mental health services	92%	8%	0%	0%
Housing search and counseling services	85%	15%	0%	0%
Substance abuse treatment	85%	15%	0%	0%
Case management services	85%	15%	0%	0%
Childcare assistance	77%	15%	8%	0%
Job training and employment services	62%	38%	0%	0%
Food assistance	62%	38%	0%	0%
Financial assistance costs	62%	38%	0%	0%
Outreach services	54%	38%	8%	0%
Landlord/tenant liaison services	54%	23%	8%	15%
Services for special populations	54%	46%	0%	0%
Education Services	46%	54%	0%	0%

Transportation assistance	46%	46%	8%	0%
Credit repair services	46%	23%	23%	8%
Legal services	38%	54%	0%	8%
Outpatient health services	38%	62%	0%	0%
Mediation services	38%	38%	23%	0%

**Acquisition and development of non-congregate shelter.** The need for additional shelter beds within the City was a frequent subject of comments from those attending the virtual session. Many participants mentioned the need for shelter beds to be available to homeless other than Veterans. Exodus Recovery Safe Landing Shelter is a shelter located approximately six miles from Inglewood in the West Athens neighborhood of South Los Angeles which has 172 new shelter beds. But participants believed that the opening would not meet the current need for shelter. Of respondents to the survey, 58% believed there was a high need, 33% believed there was a moderate need for this activity, and 9% believed there was no need.

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

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

## Public Participation

To provide opportunities for public participation, the City of Inglewood sent emails to stakeholders on its email list notifying them of the opportunity to participate in the virtual consultation session held on February 15, 2023. In addition to attending the virtual consultation session, stakeholders 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 2021-10. Those unable to attend, or who had further comments after the virtual session were invited to email them directly to City staff.

A combined notice of public comment period and public hearing was published in the *South Bay Cities – Inglewood News* on February 16, 2023. The public notice was published in

English and Spanish. *South Bay Cities – Inglewood News* qualifies as a newspaper of general circulation.

### **Efforts to Broaden Public Participation**

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

### **Public Comments and Recommendations Received**

There were no public comments at the public hearing and one public comment received via email during the public comment period. The comment is included in Appendix A.

### **Public Comments and Recommendations Not Accepted and Reasons Why**

All public comments received were accepted.

## 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 Qualifying Populations:

1. Homeless, as defined at 24 CFR 91.5;
2. At risk of homelessness, as defined as defined at 24 CFR 91.5;
3. Fleeing or attempting to flee domestic violence, dating violence, sexual assault, or stalking as defined by HUD; and
4. Other populations, where providing supportive services or assistance under section 212(a) of the National Affordable Housing Act (HAHA) (42 USC 12472(a)) would:
  - a. Prevent a family's homelessness;
  - b. Serve those with the greatest risk of housing instability.

## Housing Inventory Count

The annual Housing Inventory Count (HIC) provides useful context regarding the number and type of beds and units that are available for individuals and families experiencing on any given night. The following tables summarize beds and units available as of January 2022 in the City by bed type.

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

Emergency Housing Beds Available January 2022					
	Family Units	Family Beds	Adult-Only Beds	Child-Only Beds	Total Year-Round Beds
Emergency Shelter <sup>1</sup>	0	0	106	0	106
Transitional Housing	0	0	198	0	198

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<sup>1</sup> Include Safe Haven housing as defined by the Housing Inventory Count.

Total Emergency Housing Beds	0	0	304	0	304
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The Homeless Management Information System (HMIS) Provider for Los Angeles County, Los Angeles Homeless Services Authority (LAHSA), gathers and reports data in the county for rapid rehousing and supportive housing available in the County. While LAHSA operates on a regional basis, the information below is provided for the City.

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

Rapid Rehousing and Permanent Supportive Housing Available January 2022					
	Family Units	Family Beds	Adult-Only Beds	Child-Only Beds	Total Year- Round Beds
Rapid Rehousing <sup>2</sup>	1	3	67	0	70
Permanent Supportive Housing	0	0	58	0	58
Total Year- Round Beds	1	3	125	0	128

## Size and Demographic Composition of Qualifying Populations

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

## Homeless Populations

Any individual experiencing homelessness meeting HUD regulations as defined in 24 CFR 91.5 (1,2,3):

- lacking a fixed, regular, and adequate nighttime residence;

<sup>2</sup> Include Emergency Housing Vouchers administered by the Inglewood Housing Authority

- An individual or family who will imminently lose their primary residence provided it will be lost within 14 days of the date of application for homeless assistance; no subsequent housing identified; lacks individual, family or support networks;
- Unaccompanied youth under 25 years of age, or families with children and youth, who do not otherwise qualify as homeless under this definition but who are defined under section 387 of the Runaway and Homeless Youth Act (42 U.S.C. 5732a), section 637 of the Head Start Act (42 U.S.C. 9832), section 41403 of the Violence Against Women Act of 1994 (42 U.S.C. 14043e-2), Section 330(h) of the Public Health Service Act (42 U.S.C. 254b(h)), section 3 of the Food and Nutrition Act of 2008 (7 U.S.C. 2012), section (b) of the Child Nutrition Act of 1966 (42 U.S.C. 1786(b)), or section 725 of the McKinney-Veto Homeless Assistance Act (42 U.S.C. 11434a);
  - Have not had a lease, ownership interest, or occupancy agreement in permanent housing at any time during the 60 days immediately preceding the date of application for homeless assistance;
  - Have experienced persistent instability as measured by two or more moves during the 60-day period immediately preceding the date of applying for homeless assistance; and
  - Can be expected to continue in such status for an extended period of time because of chronic disabilities, chronic physical or mental health conditions, substance addiction, histories of domestic violence or childhood abuse (including neglect), the presence of a child or youth with a disability, or two or more barriers to employment, which include the lack of high school degree or General Education Development (GED), illiteracy, low English proficiency, a history of incarceration or detention for criminal activity, and a history of unstable employment.

**Sheltered Homeless.** The 2022 Sheltered PIT Count identified 231 people experiencing sheltered homelessness in the City. This included 27 persons in emergency shelter, 49 persons in safe havens, and 155 persons in transitional housing. People are considered sheltered when they are residing in emergency shelter or transitional housing, but not when they are receiving rapid rehousing assistance or residing in permanent supportive housing.

**Unsheltered Homeless.** The 2022 Unsheltered Homeless PIT Count identified 519 people experiencing unsheltered homelessness. This included 199 persons on the street, 147 persons in tents or makeshift shelters, and 173 persons in vehicles. The unsheltered count in 2022 was significantly higher than the previous five years when the count ranged from 221 to 296. During the consultation process, it was noted that a change in the tabulation of the

regional count contributed to a large increase in the homeless count within the City. Specifically, portions of Lennox that have a high concentration of homeless were included in the 2022 count.

Point-In-Time Count 2022			
	Sheltered Homeless	Unsheltered Homeless	Overall Total Homeless
Emergency Shelters	27		
Safe Havens	49		
Transitional Housing	155		
Living on the Streets		199	
Living in Tents		147	
Living in Vehicles		173	
<b>Total Overall Homeless Persons</b>	<b>231</b>	<b>519</b>	<b>750</b>

The 2022 Point-in-Time (PIT) Count of both sheltered and unsheltered homelessness was conducted by the Los Angeles Continuum of Care. The agency publishes the count by city, by service planning areas (SPA), by Los Angeles city council districts, and by Los Angeles supervisorial districts. It only publishes the demographics by service planning areas (SPA), by Los Angeles city council districts, and by Los Angeles supervisorial districts. In order to estimate the gender, race, and ethnicity of the City, the demographics for the smallest related geographic area was used. Requests for additional data were unsuccessful.

The area of Los Angeles County defined as SPA 8 South Bay includes Carson, Gardena, Manhattan Beach, and Inglewood. The gender, race, and ethnicity, as well as the population 55 and over and veterans, were calculated using the percentages for SPA 8.

Point-In-Time Count 2022						
	Sheltered SPA 8	% of SPA 8 total	Sheltered Inglewood (applied)	Unsheltered SPA 8	% of SPA 8 total	Unsheltered Inglewood (applied)
Total population	1,044		231	3,401		519
American Indian/ Alaska Native	5	<1%	1	88	3%	13
Asian	16	2%	4	5	<1%	1
Black/African American	438	42%	97	741	22%	113

Native Hawaiian/Other Pacific Islander	4	<1%	1	0	0%	0
White	200	19%	44	531	16%	81
Mixed or Multiple Races	14	<1%	3	8	<1%	1
Hispanic/Latino	367	35%	81	2,028	60%	310
Persons 55 and Older	309	30%	68	1,273	37%	194
All Veterans	189	18%	42	151	4%	23
Male	647	62%	143	2,447	72%	373
Female	397	38%	88	909	27%	139
Gender Non-Binary Questioning Transgender	1	<1%	0	80	2%	10

## At-risk of Homelessness

Households at risk of homelessness as defined in 24 CFR 91.5 are any individual or family with incomes at or below 30% AMI that lack sufficient resources or support networks to prevent homelessness, and meets one of the following conditions:

- Has moved more than two times due to economic reasons in the past 60 days immediately preceding the application for homelessness prevention assistance, or
- Is living in the home of another due to economic hardship;
- Has been notified in writing that their current housing will be terminated within 21 days after the date of application for assistance;
- Lives in a hotel or motel without financial assistance from a nonprofit, government entity or charitable organization for low-income individuals;
- Live in a single-room occupancy or efficiency apartment in which more than two persons resides or lives in a larger housing unit in which more than 1.5 people per room reside, as defined by the U.S. Census Bureau;
- Is exiting a publicly-funded institution or system of care (such as a health-care facility, or correction program or institution);
- Otherwise lives in housing that has characteristics associated with instability and increased risk of homelessness, as identified in the approved consolidated plan;
- Child/youth who does not qualify a “homeless” under this section but qualifies a “homeless” under the Runaway and Homeless Youth Act; Head Start Act; Violence Against Women Act of 1994; Public Health Service Act; Food and Nutrition Act of

2008; Child Nutrition Act of 1966 or the McKinney-Vento Homeless Assistance Act per government regulations.

The CHAS 2015-2019 Data indicates that there are approximately 7,260 renter households and 1,630 owner households with incomes at or below 30% AMI in the City. With 35,995 households in the city, 20% of all renter households and 5% of all households in the City are in this income level. Of these households, 6,110 renter households and 1,165 owner households are cost burdened, meaning the household pays more than 30% of their income toward housing costs. Any disruption to household income or significant unplanned expense, such as car repair or medical care, may result in eviction and possibly homelessness. Seven out of every ten renter households and more than six out of ten owner households with incomes at or below 30% AMI are considered to have a severe cost burden.

At-Risk of Homelessness: At or Below 30% AMI				
	Renter Households		Owner Households	
At or below 30% AMI	7,260		1,630	
Cost burden >30%	6,110	84%	1,165	71%
Cost burden >50%	5,115	70%	995	61%

Among the conditions of households at risk of homelessness, as defined HOME-ARP notice is households that live in a single-room occupancy or efficiency apartment in which more than two persons resides or lives in a larger housing unit in which more than 1.5 people per room reside, as defined by the U.S. Census Bureau. According to CHAS 2015-2019 Data, 510 renter households and 20 owner households have more than 1.5 persons per room.

At-Risk of Homelessness: At or Below 30%		
	Renter Households	Owner Households
More than 1.5 persons per room	510	20
Elderly Family	350	205
Small Family	2,750	500
Large family	735	110
Elderly Non-Family	1,765	610
Other	1,655	1,680

The race and ethnicity breakdown for renter and owner households at or below 30% AMI breaks down as follows, according to the CHAS 2015-2019 Data.

At-Risk of Homelessness: At or Below 30% AMI Race and Ethnicity				
	Renter Households		Owner Households	
White, non-Hispanic	575	6%	805	10%
Black of African America, non-Hispanic	4,690	49%	4050	49%
Asian, non-Hispanic	110	1%	225	3%
American Indian or Alaska Native, non-Hispanic	55	1%	0	0%
Pacific Islander, non-Hispanic	30	0%	0	0%
Other, including multiple races, non-Hispanic	255	3%	240	3%
Hispanic, any race	3,915	41%	2875	35%

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

This population includes cases where an individual or family reasonably believes that there is a threat of imminent harm from further violence due to dangerous or life-threatening conditions that relate to violence against the individual or family member, including a child, that has either taken place within the individual's or family's primary nighttime residence or has made the individual or family afraid to return or remain within the same dwelling unit. In the case of sexual assault, this also includes cases where an individual remains within the same dwelling unit that the individual is currently occupying, or the sexual assault occurred on the premises during the 90-day period preceding the date of the request for transfer.

**Domestic violence**, which is defined in 24 CFR 5.2003 includes felony or misdemeanor crimes of violence committed by:

- A current or former spouse or intimate partner of the victim (the term "spouse of intimate partner of the victim" includes a person who is or has been in a social relationship of romantic or intimate nature with the victim, as

determined by the length of the relationship, the type of the relationship, and the frequency of the interaction between the persons involved in the relationship;

- A person with whom the victim shares a child in common;
- A person who is cohabitating with or has cohabitated with the victim as a spouse or intimate partner
- A person similarly situated to a spouse of the victim under the domestic or family violence laws of the jurisdiction receiving HOME-ARP funds; or
- Any other person against an adult or youth victim who is protected from that person's acts under the domestic or family violence laws of the jurisdiction.

**Dating violence** which is defined in 24 CFR 5.2003 means violence committed by a person:

- Who is or has been in a social relationship of a romantic or intimate nature with the victim; and
- Where the existence of such a relationship shall be determined based on a consideration of the following factors:
  - The length of the relationship
  - The type of relationship; and
  - The frequency of interaction between the persons involved in the relationship

**Sexual assault** which is defined in 24 CFR 5.2003 means any nonconsensual sexual act proscribed by Federal, Tribal, or State law, including when the victim lacks capacity to consent.

**Stalking** which is defined in 24 CFR 5.2003 means engaging in a course of conduct directed at a specific person that would cause a reasonable person to:

- Fear for the person individual safety or the safety of others; or
- Suffer substantial emotional distress

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

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

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

**Domestic Violence**, also called intimate partner violence, is abuse that occurs in a close relationship with a current or former spouse or dating partner. Domestic violence refers to a range of behaviors that include physical, sexual, verbal, emotional, and psychological abuse. Economic control is also a form of DV, as it can be used against a current or former partner in an attempt to exercise power and authority. These behaviors can result in a destructive, harmful effect on individuals, the family, and the community.

According to DoSomething.org, nationally:

- 85% of domestic violence victims are women.
- 1/4 of women worldwide will experience domestic/dating violence in their lifetime. Women between the ages of 20 to 24 are at greatest risk of becoming victims of domestic violence.
- Domestic violence is most likely to take place between 6 pm and 6 am.
- The costs of domestic violence amount to more than \$37 billion a year in law enforcement involvement, legal work, medical and mental health treatment, and lost productivity at companies.
- As many as 324,000 women each year experience intimate partner violence during their pregnancy.
- Boys who witness domestic violence are 2 times as likely to abuse their own partners and children when they become adults.
- Domestic violence is the leading cause of injury to women – more than car accidents, muggings, and rapes combined.
- 1/2 of all homeless women and children in the U.S. are fleeing from domestic violence.
- Every 9 seconds in the US a woman is assaulted or beaten.
- In 60% to 80% of intimate partner homicides, no matter which partner was killed, the man physically abused the woman before the murder.

According to the California Department of Public Health, Domestic violence is a public health issue in California that affects all age and socioeconomic groups. In California:

- 1 in 5 women and 1 in 7 men report having experienced severe physical violence from an intimate partner in their lifetime.
- 1 in 6 homicide victims are killed by an intimate partner.

- Domestic violence can result in injury or death. Victims/survivors face negative health outcomes such as conditions affecting heart, reproductive, nervous systems that can have long-term effects.
- Victims can also experience mental health problems such as depression and posttraumatic stress disorder and can engage in risky behaviors such as smoking, binge drinking, and sexual risk behaviors.

According to the National Coalition Against Domestic Violence (NCADV):

- 34.9% of women in California experience physical violence, sexual violence, or stalking by an intimate partner in their lifetime.
- 31.1% of men in California experience physical violence, sexual violence, or stalking by an intimate partner in their lifetime.
- In one year alone there were over 160,000 domestic violence-related calls to law enforcement.
- Nearly half of those calls involved a weapon.
- Domestic violence hotlines receive approximately 13 calls every minute.

The Midnight Mission in Los Angeles operates Homelight Family Living program serving families that are victims of domestic violence, human trafficking, and other crisis issues. It operates 11 furnished apartment units as a safe haven within the City. (The location is undisclosed.)

The Midnight Mission provided the following statistics for their Inglewood program currently:

Midnight Mission	
Current population:	15 families
Female Head of Household	12
African American, Black	6
Asian	1
White	1
Hispanic	7
Income level	<30% AMI

Rainbow Services is a nonprofit assisting domestic violence survivors in Inglewood with a mission to end the cycle of domestic violence. Rainbow Services is based in San Pedro but offers services in Inglewood and other communities in the South Bay/Harbor area of Los Angeles County. It provided the following statistics for the adult survivors it assisted in 2022:

Rainbow Services		
	Not Hispanic	Hispanic
African American, Black	75	
Asian	19	
Native Hawaiian/Pacific Islander	4	
Native America/ Alaska Native	8	
Multi Race	1	
White	89	154
Declined to Answer	4	
Other	52	
Unknown	90	
Did not answer	20	
Gender		
Female	525	
Male	92	
Other	1	
Transgender Female	1	
Unknown	31	
Did not answer	20	
Income Levels		
Low income	37	
Other	12	
Poverty	329	
Very low income	48	
Did not answer	244	

The State of California Department of Justice maintains statistics on domestic violence statewide by jurisdiction. In 2021, the Inglewood Police Department responded to a total of 273 calls related to domestic violence in the City. Of these calls:

- 235 of these domestic incidents did not involve a weapon
- 38 calls involved a weapon
  - 1 domestic incident involved a firearm
  - 3 domestic incidents involved a knife or cutting instruments
  - 13 domestic incidents involved other dangerous weapons
  - 21 domestic incidents involved personal weapons (i.e. feet or hands, etc.)

Inglewood Domestic Violence Calls 2021		
Total Calls	Calls Involved a Weapon	Calls Did Not Involve a Weapon
273	38	235
<i>As a percentage of total</i>	<i>14%</i>	<i>86%</i>

Therefore, if each one of these calls represented a household with a member(s) who required housing assistance, it can be estimated that there were up to 273 households in 2021 who were in need of some form of housing assistance. Although this qualifying population does not require a lack of housing and resources or support networks, the form of housing assistance required may vary depending on the specific circumstances of each case.

**Human Trafficking** is among the world's fastest growing criminal enterprises and is estimated to be a \$150 billion-a-year global industry. It is a form of modern-day slavery that profits from the exploitation of our most vulnerable populations. One common misperception is that human trafficking requires movement across borders. In reality, it involves controlling a person or group through force, fraud, or coercion to exploit the victims for forced labor, sexual exploitation, or both. This can occur entirely within a single country, or it can cross borders. Human trafficking strips victims of their freedom and violates our nation's promise that every person in the United States is guaranteed basic human rights. It is also a crime. According to the State of California Department of Justice, the Attorney General's Office is focused on combating the pervasive issue of human trafficking in California and has made it one of his top priorities.

The International Labor Organization estimates that there are more than 24.9 million human trafficking victims worldwide at any time. This includes 16 million victims of labor exploitation, 4.8 million victims of sexual exploitation, and 4.1 million victims of state imposed forced labor. The victims of human trafficking are often young girls and women. Young girls and women are 57.6% of forced labor victims and 99.4% of sex trafficking victims.

The National Human Trafficking Hotline works closely with service providers, law enforcement, and other professionals in California to serve victims and survivors of trafficking, respond to human trafficking cases, and share information and resources. It operates a hotline to receive reports of human trafficking, which it calls “signals”, received as calls, texts, and online chats and tips.

In 2021:

- 50,123 signals were received
- 5,257 signals were from California
  - 1,999 signals were from victims or survivors of human trafficking
- 1,334 cases were identified from California
  - 2,122 victims were involved in these cases

Of these cases identified:

- 978 were adults
- 246 were minors
- 1,108 were females
- 164 were males
- 12 were gender minorities
- 130 were foreign nationals
- 111 were US citizens

The victim count, as a percentage of the state population, when applied to the population to the City finds there could be 6 cases and 14 signals originating in Inglewood.

Applied Calculation of Human Trafficking		
	California	Inglewood
Population	39,029,342	106,961
Victims	2,122	6
Signals	5,257	14

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

## Other Populations

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

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 of more than 30% and at or below 50%

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

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

Income level of Households		
	Renter Households	Owner Households
Income at or below 30% AMI	25	1,590
Income 31% - 50% AMI	29	1,570
Income more than 50% AMI	400	8,930

At Greatest Risk of Housing Instability				
	Renter Households		Owner Households	
At or below 30% AMI	7,260		12,900	
With Cost burden >30%	6,110	84%	9,630	75%
With Cost burden >50%	5,115	70%	6,280	49%

The CHAS 2015-2019 Data reports the levels of cost burden by race and ethnicity between owners and renters as reported in the table below. The CHAS data does not break the data out further by income levels.

Cost Burden At All Income Levels With Cost Burden				
	All Renters (Occupied Housing Units)		All Owners (Occupied Housing Units)	
Cost Burden	31% to 50%	greater than 50%	31% to 50%	greater than 50%
White	195	240	295	75
Black or African-American	3,045	3,325	1,250	1,055
Asian	80	115	95	35
American Indian or Alaska Native	4	120	0	0
Pacific Islander	55	0	0	0
Other (including multiple races)	215	245	55	70
Hispanic, any race	2,685	2,535	815	805

According to the 2022 Census Estimates, the population of the City is 105,181 and the majority are female.

Total Population of Inglewood 2022 Census Estimates					
Male	49.2%	51,749	Female	50.8%	53,432

**Other Populations: At greatest risk of housing instability – Households with incomes 30-50% AMI that meet HUD’s 24 CFR §91.5 definition of at risk of homelessness**

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

- Have moved more than two times due to economic reasons in the past 60 days, or
- Are doubled up with another household due to economic hardship, or

- Will be evicted within 21 days, or
- Live in a hotel or motel without financial assistance from a nonprofit or government entity, or
- Live in an efficiency apartment and are overcrowded, or
- Are exiting a publicly-funded institution or system of care, or
- Otherwise lives in housing that has characteristics associated with instability and increased risk of homelessness.

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

At Greatest Risk of Housing Instability				
	Renter Households		All Households	
>30-50% AMI	5,370		7,050	
Cost burden	5,370	100%	1,680	24%
Severe cost burden (>50%)	1,335	25%	1,995	28%
At Least 1 Housing Problem	4,815	90%	5,925	84%

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

## Unmet Housing Needs of Qualifying Populations

The greatest unmet housing need of qualifying populations is the availability of affordable rental housing. As the table below shows, only 18% of rental units in the City are affordable to households with incomes at or below 50% AMI. Of these, even fewer are available to households with incomes at or below 30% AMI. Based on the number of additional units needed so that low-income rental households do not have a cost burden, there is a need for 6,200 additional rental units according to HUD CHAS data for 2015-2019.

Housing Needs Inventory and Gap Analysis				
	Available Units	Cost Burdened	HH with at least 1 Housing Problem	GAP (units-cost burdened)
Total Rental Units	23,410			
Less than 30% AMI	905	6,110	7,260	5,205
>30 to 50% AMI	3,335	4,330	5,370	995
Total less than 50% AMI	4,240	10,440	12,630	6,200

**Homeless.** Based on the 2022 PIT count there were 750 households which were currently experiencing homelessness, 231 were sheltered and 519 households were unsheltered (although this count includes an area of a neighboring city as noted earlier). The unmet housing needs include lack of affordable rental housing, lack of shelter space (although the recent opening of the nearby shelter will lessen that need) and a need for permanent supportive housing.

**At risk of homelessness.** For at risk of homelessness, the unmet housing needs include the lack of affordable rental housing and the need for short-term rental assistance and “shallow” subsidies to address fluctuations in income that put the families at risk of homelessness.

**Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking, as defined by HUD.** For families and individuals attempting to flee domestic violence and related situations, there is an unmet need for shelter space and additional affordable housing. Per the consultation, domestic violence shelter space is always full. A rising need to address trafficking victims was also cited.

**Other populations.** For other populations, the largest unmet need is the lack of affordable rental housing. In the consultation process stakeholders cited the need to be creative with funding and to think of alternative ways to address the shortage of affordable housing units, such as shared housing, master leasing, and projects that are being funded from California’s Project Home Key.

## Unmet Service Needs of Qualifying Populations

Based on consultation with service providers in the City, the greatest unmet service needs of qualifying populations are:

- Mental health services
- Housing search and counseling services

- Substance abuse treatment
- Case management services
- Childcare assistance
- Job training and employment services
- Food assistance
- Financial assistance costs

**Homeless.** The most critical service gaps are in the areas of financial assistance costs, substance abuse treatment, mental health services, case management and wrap-around services. In the consultation, stakeholders also cited meaningful vocational training and employment support services like childcare. Housing search and counseling/case management were also frequently cited.

**At risk of homelessness.** Unmet services needs for at-risk of homeless include housing counseling services, case management, and employment related services, such as job training, vocational training, and childcare.

**Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking, as defined by HUD.** Unmet service needs for this QP include housing services, childcare, and legal services. In the consultation, stakeholders also cited the need to better understand the size of this QP, as local numbers are not tracked human trafficking.

**Other populations.** For those facing housing instability, additional housing search and housing counseling services are needed to address the causes of the instability and assistance to stabilize their housing.

## **Current Resources Available to Assist Qualifying Populations**

Current available resources include:

- Congregate beds and non-congregate shelter units;
- Supportive services;
- Tenant-Based Rental Assistance;
- Affordable and permanent supportive housing
- Housing vouchers

## **Current Resources: Congregate Beds and Non-congregate Shelter Units**

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

## **Current Resources: Supportive Services**

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

## **Current Resources: Tenant-Based Rental Assistance**

Tenant-Based Rental Assistance is a HOME-funded program that provides assistance to individual households to help them afford the housing costs of market-rate units. The City has used HOME funds in recent years to provide Tenant-Based Rental Assistance but the program ended December 31, 2022.

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

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

## Current Resources: Housing Vouchers

The Inglewood Housing Authority operates the Housing Choice Voucher program for the City. According to the current Consolidated Plan, there are 1218 Housing Choice Vouchers being used by households within the City. Those include:

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

## Shelter, Housing and Service Delivery System Gaps

### Shelter Gap

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

### Tenant-Based Rental Assistance Gap

The number of Tenant-Based Rental Assistance vouchers is calculated using HUD CHAS data and is equal to the number of renter households with income at or below 50% AMI and paying more than 50% of household income for rent, including utilities.

Tenant-Based Rental Assistance Gap	
Renter Households with Income at or below 50% AMI paying more than 50% of income for rent, including utilities	6,450
TBRA vouchers available	0
<i>TBRA gap</i>	<i>6,450</i>

There is an estimated gap of 6,450 Tenant-Based Rental Assistance vouchers for households with income at or below 50% AMI and paying more than 50% of household income for rent, including utilities. Another metric for the need of TBRA is demand for Housing Choice Vouchers administered by the Inglewood Housing Authority. The housing authority

received more than 30,000 applications the last time it opened its waiting list. The housing authority added 5,000 households to the waiting list.

While Tenant-Based Rental Assistance can provide an immediate short-term solution to affordability, this gap can also be addressed by the development of additional affordable rental housing units.

### **Affordable Supportive Rental Housing Gap**

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

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

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

### **Permanent Supportive Rental Housing Gap**

Permanent supportive rental housing is a subset of the affordable rental housing gap, primarily for households with income at or below 30% AMI. In addition to affordable rent, permanent supportive housing provides an array of services necessary to help people with disabilities and/or experiencing chronic homelessness to retain housing stability. There is an estimated gap of 285 permanent supportive housing units in the City.

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

Permanent Supportive Housing Gap	
Population of Inglewood Census 2020	107,762
Per capita estimate of permanent supportive housing need	.003183
Estimated need for Permanent Supportive Housing	343
Permanent Supportive Housing Available	58
<i>Total Permanent Supportive Housing Gap</i>	<i>285</i>

## Housing Voucher Gap

There are currently 1,218 Housing Choice Vouchers in use in the City. There are approximately 4,281 applicants currently on the Housing Authority waiting list. The Housing Authority opened a waiting list for Good Shepard Apartments in March 2022 receiving 206 project-based voucher applications and an additional waitlist was opened in April 2022 for Beach Terrace Apartments receiving 3,446 project-based voucher applications. The overall total of project-based voucher applications received were 3,652.

## Service Delivery System Gap

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

The stakeholders also believed there was a need for assistance with general administrative costs among the service providers serving the City's qualifying populations.

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

For other populations, severe housing cost burden, or paying more than 50% of household income for rent and utilities is the primary characteristic of housing associated with the risk of homelessness in the City. The HUD CHAS Data indicates there are households 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](https://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.

**Other populations: 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 U.S. Department of Health and Human Services, those affected by housing instability may live in substandard housing subjecting them to health and safety risks, live in overcrowded units, or forced moves that may result in homelessness.

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

## **HOME-ARP Activities**

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

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

## Uses of HOME-ARP Funding

Activity	Funding Amount	Percent of Allocation	Statutory Limit
Non-congregate Shelter			
Affordable Rental Housing	\$2,020,576	65%	
Tenant-Based Rental Assistance	\$155,429	5%	
Supportive Services	\$155,429	5%	
Nonprofit Operating Assistance	\$155,429	5%	5%
Nonprofit Capacity Building	\$155,429	5%	5%
Administration and Planning	\$466,287	15%	15%
<b>Total HOME-ARP Allocation</b>	<b>\$3,108,579</b>		

## Rationale for Uses of HOME-ARP Funding

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

**Affordable Rental Housing.** As a part of the affordable rental housing project funded with HOME-ARP funds, the City intends to consider the creation of permanent supportive housing units. 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 can provide an array of services necessary to help individuals and families with disabilities or experiencing chronic homelessness to retain housing stability. There is an estimated gap of 973 permanent supportive housing units in the City. This housing will be developed for occupancy by individuals and families that meet the qualifying populations as defined in the CPD Notice 2021-10.

**Tenant-Based Rental Assistance.** During the consultation process many attendees to the virtual session mentioned the need to increase availability of the TBRA program. Of respondents to the survey, 50% believed there was a high need for this activity and 42% believed there was a moderate need for this activity. The City has allocated funds to the activity to increase the number of families at-risk of homelessness and other vulnerable

populations where assistance would prevent a family's homelessness or greatest risk of housing instability.

**Nonprofit Operating Assistance and Nonprofit Capacity Building.** In the survey done of stakeholders, 92 percent of those respondents believed that there was a need to fund both of these eligible activities. The funds will be used to assist nonprofit organizations that will carry out activities with HOME-ARP funds.

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

**Non-congregate Shelter.** The need for additional shelter beds within the City was a frequent subject of comments from those attending the virtual session. However, with the opening of the new Exodus Recovery Safe Landing Shelter located approximately six miles from Inglewood which has 172 shelter beds, the City anticipates the HOME-ARP funds would best be utilized by the development of affordable housing which would increase the number of affordable rental housing units.

**Outreach.** Upon the development and availability of the affordable rental and permanent supportive housing units, an outreach effort will be conducted by the City to inform the qualifying populations of the availability of units and how to participate in the rental application process.

Local participating homeless service agency such as LAHSA, the Continuum of Care (CoC) and administrator of the Coordinated Entry System (CES), along with other homeless service providers, will conduct a city-wide application process for all qualifying populations to apply and how to participate in the rental application process. All qualifying populations will be outreached and invited to participate in the rental application process.

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

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

## **Preferences**

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

## **HOME-ARP Refinancing Guidelines**

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



## **APPENDIX A**

### **Citizen Participation**

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## **Summary of Citizen Participation Comments**

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

There was one public comment received via email during the public comment period. The comment is included in Appendix A.

Public Hearing before City Council:  
March 21, 2023

There were no public comments during the public hearing.

Email received from Constituent Marvin McCoy [REDACTED]  
2023:

on 3-20-

Dear Mrs Thompson,

My name is Marvin McCoy and your name was listed on the staff report regarding any questions that or comments the public may have and I'm copying the City Clerk on this email as a matter of concern and urgency as I have questions to the legality of what the Staff report is proposing as this action on the surface allows as I should say a " fudging " of numbers as this action if I'm reading this correctly seeks to ask the council to take actions to that would make this vote null and void and this public hearing a " charade" so to speak because this is a vote in voted in the affirmative is in essence a retroactive vote with implications as it also appears to the 2021 fiscal year

Additionally I have grave concerns as to the distribution and percentage of funding to affordable housing rentals as the distribution of these funds fails to address a growing and chronic homeless crisis that the City has experienced and surprisingly despite over 700 houseless folks in Inglewood there are no funds set aside to operate a year around homeless shelter in Inglewood.

Additionally I have grave concerns that the City of Inglewood is manipulating application and use of Biden funds and in addition to a public report from staff I look forward to hearing in conjunction with this report any and all monies recovered under the ARA ( Biden Money ) as it is my understanding that the City has received 31 million dollars with only officially accounting or allocation of expenditures of I believe of 15 million.

Also if we could hear from legal counsel from this matter I would feel comfortable because this vote appears illegal.

Marvin C McCoy



Herald Publications  
531 Main St., #1160  
El Segundo, CA 90245  
(310) 322-1830 • Fax (310) 322-2787

## PROOF OF PUBLICATION

(2015.5 C.C.P.)

STATE OF CALIFORNIA,  
County of Los Angeles,  
I declare, that I am a citizen of the United States and a resident of the County aforesaid; I am over the age of eighteen years, and not a party to or interested in the above-entitled matter. I am the principal clerk responsible for accepting, formatting and publishing legal notices in the **Inglewood Daily News** a newspaper of general circulation, printed and published **weekly** in the City of **Inglewood**, County of Los Angeles, and which newspaper has been adjudged a newspaper of general circulation by the Superior Court of the County of Los Angeles, State of California, under the date of **July 31, 1952**, Case Number **601550**; that the notice, of which the annexed is a printed copy (set in type not smaller than nonpareil), has been published in each regular and entire issue of said newspaper and not in any supplement thereof on the following dates, to-wit:

2/16/2023

All in the year **2023**

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

Dated at **Inglewood**, California,

this **16** day of **February 2023**

  
Signature

Code # HI-27917

This space is for the County Clerk's Filing Stamp

CITY CLERKS OFC ROVD  
FEB 23 2023 PM 12:10

Proof of Publication of:

usado puede enviar sus comentarios por escrito al Ayuntamiento de la Ciudad de Inglewood, Cuadros Subidos Globales para el Desarrollo Comunitario, 1 West Manchester Blvd., Suite 750, Inglewood, CA 90301. Un resumen de los comentarios recibidos durante la audiencia pública y el período de revisión puede incluirse en la versión final de la Enmienda Sustancial al Plan de Desarrollo Anual, presentada a HUD antes del 31 de marzo de 2023. El Ayuntamiento de la Ciudad tiene como objetivo cumplir con la Ley de Estadísticas con Desapropiaciones (ADA) en todos los aspectos. Si, como asistente o participante en esta Audiencia Pública, necesita asistencia especial más allá de lo que normalmente se proporciona, el Ayuntamiento de la Ciudad intentará satisfacer su solicitud dentro de todas las medidas razonables. Constatase con la Oficina del Secretario Municipal del Ayuntamiento de la Ciudad al (310) 412-6280 o FAX (310) 412-6633, 1 West Manchester Boulevard, First Floor, Inglewood City Hall, Inglewood, California, 90301. Todas las solicitudes de adaptaciones especiales deben recibirse 72 horas antes del día de la reunión del Consejo Municipal. En el caso de que la Audiencia Pública no se lleve a cabo durante la Reunión del Consejo Municipal, continuará hasta la próxima Reunión del Consejo Municipal programada regularmente.

Fecha de publicación del aviso: 02/16/2023  
Inglewood Daily News Pub. 2/16/23  
HI-27917

de quedarse en hogar y otras poblaciones vulnerables a reducir la tasa de vivienda y aumentar la estabilidad de la vivienda. Los posibles tipos de actividades que se describen con más detalle en el borrador pueden incluir: adquisición y desarrollo de unidades de vivienda no congregate, desarrollo y apoyo de vivienda de alquiler asequible, asistencia de alquiler para inmigrantes (IRRA), por sus siglas en inglés) y prestación de servicios de apoyo. En cumplimiento con el Plan de Participación Ciudadana y el Plan Consolidado aprobado por la Ciudad que implementa la regulación 24 CFR 91.105, por la presente se da este aviso de que el Ayuntamiento de la Ciudad de Inglewood ha propuesto el Borrador del Plan de Asignación HOME-APP. Se requiere que una copia del Plan de Asignación HOME-APP esté disponible para que el público revise y comente durante un período de quince (15) días. El Borrador del Plan de Asignación HOME-APP estará disponible para revisión pública del 6 al 21 de marzo de 2023 en el sitio web oficial del Ayuntamiento de la Ciudad de Inglewood en [www.ingledailynews.com](http://www.ingledailynews.com), en la página de inicio bajo "Últimas noticias" ("Latest News"). Además de comentar durante la Audiencia Pública, los comentarios sobre el Borrador del Plan de Asignación HOME-APP pueden dirigirse al Sr. Roberto Crevez, Gerente de los Programas de HUD del Ayuntamiento de la Ciudad de Inglewood, enviando un correo electrónico a [robcrevez@ingledailynews.com](mailto:robcrevez@ingledailynews.com) o llamado al Sr. Crevez al (310) 412-8844; o

**AVISO DE AUDIENCIA PÚBLICA Y**  
período de revisión DE 15 DÍAS  
El Alcalde y los Consejeros de la Ciudad de Inglewood, California, llevarán a cabo una audiencia pública el 21 de marzo de 2023, en la Cámara del Consejo Municipal, noveno piso, Ayuntamiento de Inglewood, para considerar los comentarios sobre una enmienda sustancial al Plan de Desarrollo Anual 2021-2022, para presentar el Plan de Asignación HOME-APP. Las personas interesadas pueden dirigirse al Consejo Municipal sobre el tema durante la audiencia pública por teléfono utilizando las instrucciones en la página web del Ayuntamiento de la Ciudad de Inglewood.  
Fecha: Martes, Marzo 21, 2023  
Hora: 2:00 p.m.  
Ubicación: Cámara del Consejo Municipal o  
En vivo en línea a través de Facebook Live, con audio y video limitado, en <http://facebook.com/cityofinglewood>  
Las opciones de acceso en línea brindan al público la oportunidad de observar y escuchar la reunión.  
El Plan de Asignación HOME-APP establece los programas y actividades que se llevarán a cabo utilizando los fondos de HOME-APP a partir del 1 de julio de 2023 y hasta el 30 de septiembre de 2030. La Ciudad anticipa recibir \$3,106,579 en fondos HOME-APP para el período del programa.  
Los fondos de HOME-APP ayudarán a los individuos y familias sin hogar, en riesgo



Herald Publications  
531 Main St., #1160  
El Segundo, CA 90245  
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(2015.5 C.C.P.)

STATE OF CALIFORNIA,  
County of Los Angeles,  
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2/16/2023

All in the year **2023**

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

Dated at **Inglewood**, California,

this **16** day of **February** **2023**

  
Signature

Code # HI-27916

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attached to this document by calling Mr. Chavez at 310-412-8844; or you may submit your written comments to the City of Inglewood, Community Development Block Grant Division, 1 West Manchester Blvd., Suite 750, Inglewood, CA 90301. A summary of the comments received during the public hearing and review period may be included in the final version of the Substantial Amendment to the Action Plan, submitted to HUD by March 31, 2023. It is the intention of the City to comply with the Americans with Disabilities Act (ADA) in all respects. If, as an attendee or participant at this Public Hearing, you will need special assistance beyond what is normally provided, the City will attempt to accommodate your request in every reasonable manner. Please contact the Office of the City Clerk at (310) 412-8280 or FAX (310) 412-8533, 1 West Manchester Boulevard, First Floor, Inglewood City Hall, Inglewood, California, 90301. All requests for special accommodations must be received 72 hours prior to the day of the Council Meeting. In the event the Public Hearing is not held during the City Council Meeting, it will be continued to the next regularly scheduled City Council Meeting.

Notice Publish Date: 02/16/2023  
Inglewood Daily News P.O. 27916 HI-27916

HOME-APP funding will assist individuals or households who are homeless, at risk of homelessness, and/or vulnerable populations to reduce homelessness and increase housing stability. The potential types of activities that will be further outlined in the draft may include acquisition and development of non-congregate shelter units, development and support of affordable rental housing, Tenant-Based Rental Assistance (TBRA), and provision of supportive services. In compliance with the City's approved Citizen Participation Plan and the Consolidated Plan Implementing regulation 24 CFR 91.105, this notice is hereby given that the City of Inglewood has prepared the Draft HOME-APP Allocation Plan. A copy of the Draft HOME-APP Allocation Plan is required to be made available to the public for review and comment for a 15-day period. The Draft HOME-APP Allocation Plan will be available for public review from March 6 to March 21, 2023 on the City's official website at [www.cityofinglewood.org](http://www.cityofinglewood.org), on the homepage under "Latest News". In addition to commenting during the Public Hearing, comments on the Draft HOME-APP Allocation Plan can be directed to Mr. Roberto Chavez, HUD Programs Manager for the City of Inglewood, by sending an email to [rob@cityofinglewood.org](mailto:rob@cityofinglewood.org).

**NOTICE OF PUBLIC HEARING AND 15-Day Review Period**  
The Mayor and Council Members of the City of Inglewood, California, will conduct a Public Hearing on March 21, 2023, in the City Council Chambers, 8th floor, Inglewood City Hall, to consider comments on a Substantial Amendment to the 2021-2022 Annual Action Plan. Interested persons may address the City Council on the issue during the public hearing via phone using the instruction on the City of Inglewood's Agenda webpage by visiting [www.cityofinglewood.org](http://www.cityofinglewood.org).  
Date: Tuesday, March 21, 2023  
Time: 2:00 p.m.  
Location: City Council Chambers or Live online through Facebook Live, with audio and limited video, at <https://www.facebook.com/cityofinglewood>.  
The above access options provide the public with the opportunity to both observe and listen to the meeting.  
The HOME-APP Allocation Plan establishes the programs and activities to be undertaken using HOME-APP funds beginning July 1, 2022 and ending September 30, 2030. The City anticipates receiving \$3,108,579 in HOME-APP funds for the program period.



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

**Application for Federal Assistance SF-424**

**\* 1. Type of Submission:**

☐ Preapplication  
☒ Application  
☐ Changed/Corrected Application

**\* 2. Type of Application:**

☒ New  
☐ Continuation  
☐ Revision

**\* If Revision, select appropriate letter(s):**

**\* Other (Specify):**

**\* 3. Date Received:**

03/03/2023

**4. Applicant Identifier:**

M-21-MP-06-0516

**5a. Federal Entity Identifier:**

**5b. Federal Award Identifier:**

M-21-MP-06-0516

**State Use Only:**

**6. Date Received by State:**

**7. State Application Identifier:**

**8. APPLICANT INFORMATION:**

**\* a. Legal Name:** City of Inglewood

**\* b. Employer/Taxpayer Identification Number (EIN/TIN):**

95-600728

**\* c. UEI:**

YCN3V7DLSFG1

**d. Address:**

\* Street1: 1 W. Manchester Blvd., Suite #750

Street2:

\* City: Inglewood

County/Parish: Los Angeles

\* State: CA: California

Province:

\* Country: USA: UNITED STATES

\* Zip / Postal Code: 90301-1764

**e. Organizational Unit:**

**Department Name:**

Housing

**Division Name:**

CDBG Division

**f. Name and contact information of person to be contacted on matters involving this application:**

Prefix:

Mr.

\* First Name:

Artie

Middle Name:

\* Last Name:

Fields

Suffix:

Title: City Manager

**Organizational Affiliation:**

\* Telephone Number: 310-412-5301

Fax Number: 310-330-5756

\* Email: afields@cityofinglewood.org

**Application for Federal Assistance SF-424**

**\* 9. Type of Applicant 1: Select Applicant Type:**

C: City or Township Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

\* Other (specify):

**\* 10. Name of Federal Agency:**

U.S. Department of Housing and Urban Development

**11. Catalog of Federal Domestic Assistance Number:**

14.239

CFDA Title:

HOME Investment Partnerships Program (HOME)

**\* 12. Funding Opportunity Number:**

M-21-MP-06-0516

\* Title:

HOME Investment Partnerships Program

**13. Competition Identification Number:**

N/A

Title:

N/A

**14. Areas Affected by Project (Cities, Counties, States, etc.):**

Add Attachment

Delete Attachment

View Attachment

**\* 15. Descriptive Title of Applicant's Project:**

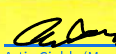
2021-2022 Action Plan Substantial Amendment to add HOME-ARP funds under the American Rescue Plan Act.

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

<b>Application for Federal Assistance SF-424</b>	
<b>16. Congressional Districts Of:</b>	
* a. Applicant: <input type="text" value="43"/>	* b. Program/Project: <input type="text" value="HOME"/>
Attach an additional list of Program/Project Congressional Districts if needed.	
<input type="text"/>	<input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/>
<b>17. Proposed Project:</b>	
* a. Start Date: <input type="text" value="10/01/2021"/>	* b. End Date: <input type="text" value="09/30/2030"/>
<b>18. Estimated Funding (\$):</b>	
* a. Federal	<input type="text" value="3,108,579.00"/>
* b. Applicant	<input type="text" value="0.00"/>
* c. State	<input type="text" value="0.00"/>
* d. Local	<input type="text" value="0.00"/>
* e. Other	<input type="text" value="0.00"/>
* f. Program Income	<input type="text" value="0.00"/>
* g. TOTAL	<input type="text" value="3,108,579.00"/>
<b>* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?</b>	
<input type="checkbox"/> a. This application was made available to the State under the Executive Order 12372 Process for review on <input type="text"/>	
<input type="checkbox"/> b. Program is subject to E.O. 12372 but has not been selected by the State for review.	
<input checked="" type="checkbox"/> c. Program is not covered by E.O. 12372.	
<b>* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)</b>	
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
If "Yes", provide explanation and attach	
<input type="text"/>	<input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/>
<b>21. *By signing this application, I certify (1) to the statements contained in the list of certifications** and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 18, Section 1001)</b>	
<input checked="" type="checkbox"/> ** I AGREE	
<small>** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.</small>	
<b>Authorized Representative:</b>	
Prefix: <input type="text" value="Mr."/>	* First Name: <input type="text" value="Artie"/>
Middle Name: <input type="text"/>	
* Last Name: <input type="text" value="Fields"/>	
Suffix: <input type="text"/>	
* Title: <input type="text" value="City Manager"/>	
* Telephone Number: <input type="text" value="310-412-5301"/>	Fax Number: <input type="text" value="310-330-5756"/>
* Email: <input type="text" value="afields@cityofinglewood.org"/>	
* Signature of Authorized Representative:	* Date Signed:
 Artie Fields (Mar 6, 2023 21:30 PST)	<input type="text"/>

## ASSURANCES - NON-CONSTRUCTION PROGRAMS

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0040), Washington, DC 20503.


**PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.**

**NOTE:** Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the awarding agency. Further, certain Federal awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:

1. Has the legal authority to apply for Federal assistance and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project cost) to ensure proper planning, management and completion of the project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, through any authorized representative, access to and the right to examine all records, books, papers, or documents related to the award; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
4. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
5. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards for merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
6. Will comply with all Federal statutes relating to nondiscrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681-1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended, relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee-3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and, (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.
7. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal or federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
8. Will comply, as applicable, with provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.

9. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333), regarding labor standards for federally-assisted construction subagreements.
10. Will comply, if applicable, with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
11. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) Implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
12. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
13. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq.).
14. Will comply with P.L. 93-348 regarding the protection of human subjects involved in research, development, and related activities supported by this award of assistance.
15. Will comply with the Laboratory Animal Welfare Act of 1966 (P.L. 89-544, as amended, 7 U.S.C. §§2131 et seq.) pertaining to the care, handling, and treatment of warm blooded animals held for research, teaching, or other activities supported by this award of assistance.
16. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
17. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
18. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
19. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL  Artie Cields (Mar 6, 2023 21:30 PST)	TITLE City Manager
APPLICANT ORGANIZATION City of Inglewood	DATE SUBMITTED 

## ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4040-0009  
Expiration Date: 02/28/2025

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0042), Washington, DC 20503.


**PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.**

**NOTE:** Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the Awarding Agency. Further, certain Federal assistance awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:

1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
8. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards of merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
9. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
10. Will comply with all Federal statutes relating to non-discrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681 1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee 3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.

11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
12. Will comply with the provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.
13. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding labor standards for federally-assisted construction subagreements.
14. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
16. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
17. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq.).
18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
20. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

<b>SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL</b>  Artie Cields (Mar 6, 2023 21:30 PST)	<b>TITLE</b> City Manager
<b>APPLICANT ORGANIZATION</b> City of Inglewood	<b>DATE SUBMITTED</b> 

## **HOME-ARP CERTIFICATIONS**

In accordance with the applicable statutes and the regulations governing the consolidated plan regulations, the participating jurisdiction certifies that:

**Affirmatively Further Fair Housing** --The jurisdiction will affirmatively further fair housing pursuant to 24 CFR 5.151 and 5.152.

**Uniform Relocation Act and Anti-displacement and Relocation Plan** --It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, (42 U.S.C. 4601-4655) and implementing regulations at 49 CFR Part 24. It will comply with the acquisition and relocation requirements contained in the HOME-ARP Notice, including the revised one-for-one replacement requirements. It has in effect and is following a residential anti-displacement and relocation assistance plan required under 24 CFR Part 42, which incorporates the requirements of the HOME-ARP Notice. It will follow its residential anti-displacement and relocation assistance plan in connection with any activity assisted with funding under the HOME-ARP program.


**Anti-Lobbying** --To the best of the jurisdiction's knowledge and belief:

1. No Federal appropriated funds have been paid or will be paid, by or on behalf of it, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement;
2. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, it will complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions; and
3. It will require that the language of paragraph 1 and 2 of this anti-lobbying certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

**Authority of Jurisdiction** --The consolidated plan is authorized under State and local law (as applicable) and the jurisdiction possesses the legal authority to carry out the programs for which it is seeking funding, in accordance with applicable HUD regulations and program requirements.

**Section 3** --It will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u) and implementing regulations at 24 CFR Part 75.

**HOME-ARP Certification** --It will use HOME-ARP funds consistent with Section 3205 of the American Rescue Plan Act of 2021 (P.L. 117-2) and the CPD Notice: *Requirements for the Use of Funds in the HOME-American Rescue Plan Program*, as may be amended by HUD, for eligible activities and costs, including the HOME-ARP Notice requirements that activities are consistent with its accepted HOME-ARP allocation plan and that HOME-ARP funds will not be used for prohibited activities or costs, as described in the HOME-ARP Notice.

  
Artie Cields (Mar 6, 2023 21:30 PST)

\_\_\_\_\_  
Signature of Authorized Official

\_\_\_\_\_  
Date

\_\_\_\_\_  
City Manager

\_\_\_\_\_  
Title