

HOME-ARP Allocation Plan Template

Guidance

- To receive its HOME-ARP allocation, a PJ must:
 - Engage in consultation with at least the required organizations;
 - Provide for public participation including a 15-day public comment period and one public hearing, at a minimum; and,
 - Develop a plan that meets the requirements in the HOME-ARP Notice.
- To submit: a PJ must upload a Microsoft Word or PDF version of the plan in IDIS as an attachment next to the “HOME-ARP allocation plan” option on either the AD-26 screen (for PJs whose FY 2021 annual action plan is a Year 2-5 annual action plan) or the AD-25 screen (for PJs whose FY 2021 annual action plan is a Year 1 annual action plan that is part of the 2021 consolidated plan).
- PJs must also submit an SF-424, SF-424B, and SF-424D, and the following certifications as an attachment on either the AD-26 or AD-25 screen, as applicable:
 - Affirmatively Further Fair Housing;
 - Uniform Relocation Assistance and Real Property Acquisition Policies Act and Anti-displacement and Relocation Assistance Plan;
 - Anti-Lobbying;
 - Authority of Jurisdiction;
 - Section 3; and,
 - HOME-ARP specific certification.

Participating Jurisdiction: City of Oceanside

Date: 4/1/2022

Consultation

Before developing its plan, a PJ must consult with the CoC(s) serving the jurisdiction’s geographic area, homeless and domestic violence service providers, veterans’ groups, public housing agencies (PHAs), public agencies that address the needs of the qualifying populations, and public or private organizations that address fair housing, civil rights, and the needs of persons with disabilities, at a minimum. State PJs are not required to consult with every PHA or CoC within the state’s boundaries; however, local PJs must consult with all PHAs (including statewide or regional PHAs) and CoCs serving the jurisdiction.

Summarize the consultation process:

The Consolidated Plan for the U.S. Department of Housing and Urban Development’s (HUD) Community Development Block Grant (CDBG) and HOME Investment Partnership (HOME) funds relies on multiple planning efforts from a variety of sources to inform the allocations of the Consolidated Plan funds, inclusive of this amendment to the 2021 Annual Action Plan. The

consultation process illustrates how HUD funds are part of a much larger funding picture for housing, human services, and community development in the City of Oceanside. Through the Regional Taskforce on the Homelessness (RTFH), San Diego County Continuum of Care, the City's Housing Advisory Committee, and the City of Oceanside's Onward Oceanside General Plan and Housing Element Update in 2021, the City's planning efforts inform changes and updates to our homelessness prevention and service system, while providing key opportunities for consultation and public input. In addition, the City's FY 2022 Budget included significant general public input and discussion to shape policy and budget priorities. The budget is passed by City Council in May of each year.

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 through direct consultation, meetings, and surveys, a 15-day public comment period, and a public hearing.

Stakeholder Consultation

The City of Oceanside partners with public and private entities to leverage resources in addressing the housing, human services, and community development needs in the City of Oceanside. The City's Housing and Neighborhood Services Department (NSD) conducted individual outreach to the organizations listed below specifically to discuss the best use of HOME-ARP funds and the development of the HOME-ARP Allocation Plan. These consulted stakeholders have relevant knowledge that can speak to the needs, service gaps, and potential activities that would best benefit qualified populations. Stakeholders consulted included fair housing providers, veterans' groups, the region's Continuum of Care and those who work with families or individuals experiencing or at-risk of homelessness, fleeing domestic violence, and other vulnerable qualifying populations.

A community partner survey was conducted as part of the HOME-ARP planning process. Community partners from a number of organizations were invited to participate in the survey. The survey was made available from February 9 – April 1, 2022. Invitations were provided directly by NSD's listserv, as well as through community partners, such as the San Diego Housing Federation, Alliance for Regional Solutions-Connecting North County and Bridge to Housing network, announcing the availability of funds and requesting input through the survey with links and QR codes provided to their member networks. Links to the survey were also made available on the City of Oceanside's official website for the Housing and Neighborhood Services Department at www.OceansideHA.

Information provided and requested from stakeholders included 1) an overview of the HOME-ARP notice to facilitate understanding of qualifying populations and eligible activities, 2) the amounts available to the City of Oceanside and the San Diego County region; 3) an opportunity to ask clarifying questions; and 4) requests for input into needs and gaps, and priority populations and activities.

List the organizations consulted, and summarize the feedback received from these entities.

Agency/Org Consulted	Type of Agency/Org	Method of Consultation	Feedback
Regional Taskforce on the Homeless	Continuum of Care	Survey, meetings to align housing investments with other resources to serve people experiencing homelessness and align with CoC goals to serve people experiencing homelessness.	Prioritizes tenant-based rental assistance and the development of affordable housing, especially programs with low barrier to entry that can aid quickly in emergency situations.
Alliance for Regional Solutions – North County	Collaborative of Advocacy/ Service Agencies	Monthly meeting and email	No direct feedback provided. Disseminated information to their membership/listserve.
San Diego Homeless-Experienced Advocacy Leadership (HEAL) Network	Collaborative of Advocacy/ Service Agencies/Persons with lived experiences	Individual outreach and meeting.	<p>Priority for Quality Case Management</p> <p>Trauma informed caseworkers, outreach workers and front-line staff who are well trained, highly qualified and well paid to provide ongoing, consistent care/support services</p> <p>Holistic community-based approach (don't make people feel like a number)</p> <p>Shallow subsidy assistance</p> <p>Population Groups</p> <p>Rising needs for DV homeless who need services and shelter to keep families intact and seniors</p> <p>Proximity to Camp Pendelton would seem like homeless veterans may be higher</p> <p>Homeless who do not have specific needs like mental illness, disabilities, etc.</p> <p>Activities</p> <p>Lack of affordable housing, particularly with support services</p> <p>Rapid re-housing</p> <p>Mass congregate shelters are not the solution</p>

			Rental assistance programs, like Section 8 or TBRA, may not be the best strategy as it lacks the support services needed.
San Diego Housing Federation	Collaborative of Advocacy or Service Organization	Survey and individual outreach and meeting	Prioritizes development of affordable housing and non-congregate shelter, particularly safe camping, for individuals at-risk or experiencing homelessness. YMCA conveyed growing population of homeless youth that stay hidden that needs to be acknowledged.
Oceanside Housing Authority	Public Housing Agency	Staff consultations	Leverage Emergency Housing Vouchers with HOME-ARP projects; supportive of affordable housing investments in the City of Oceanside.
County of San Diego Office of Homeless Solutions	Public agency that addresses the needs of the qualifying populations	Survey	Prioritizes emergency non-congregate shelter and tenant based rental assistance with low barriers to entry and housing navigation services. Lack of affordable housing, shelters and detox beds. Priority population groups include elderly, veterans and single adults. County of San Diego is developing a HOME-ARP plan concurrently.
Fair Housing Council of San Diego	Fair Housing Provider	Survey and email	Did not respond.
Legal Aid Society of San Diego	Fair Housing Provider	Survey and individual outreach from Oceanside Housing Authority.	Prioritizes development of affordable housing and tenant-based rental assistance for individuals experiencing or at-risk of homelessness, particularly permanent supportive housing.

If additional space is needed, insert image of table here:

List the organizations consulted, and summarize the feedback received from these entities.

Agency/Org Consulted	Type of Agency/Org	Method of Consultation	Feedback
Community Housing Works	Affordable Housing Developer	Survey	Prioritizes supportive services and the development of affordable housing to increase housing supply
National Community Renaissance	Affordable Housing Developer	Survey and individual consultation	Prioritizes development of affordable housing, particularly the construction of new permanent supportive housing with retention programs and services.
San Diego Community Housing Corporation	Affordable Housing Developer	Survey and individual consultation	Prioritizes development of affordable housing with supportive services, particularly project based rental assistance for extremely low-income households.
Community Resource Center	Homeless Service Provider	Survey	Did not respond.
Corporation for Supportive Housing	Homeless Service Provider/Supportive Housing	Survey	Prioritizes development of affordable housing and acquisition of non-congregate shelter. Ongoing, empathetic supportive services and case management with follow through is lacking and necessary for sustainability.
Interfaith Community Services	Homeless Service Provider	Survey and individual consultation	Prioritizes development of affordable housing and acquisition of non-congregate shelter.
Interfaith Shelter Network	Homeless Service Provider	Survey	Prioritizes tenant-based rental assistance, particularly rental payments and security deposits.
Operation HOPE North County	Homeless Service Provider	Survey	Prioritizes non-congregate shelter and supportive services. Meaningful transitional programs and affordable rental housing with support services are needed. Long term programs that go beyond 28 days or even 4 months.
San Diego Rescue Mission	Homeless Service Provider	Individual meetings to discuss efforts and strategies	Prioritizes shelter with supportive services and accountability. Meaningful transitional programs and affordable rental housing with support services are needed for the long term.
Solutions for Change	Homeless Service Provider	Survey	Did not respond.
Women's Resource Center	Service Provider - Domestic Violence	Survey	Did not respond.

Public Participation

PJs must provide for and encourage citizen participation in the development of the HOME-ARP allocation plan. Before submission of the plan, PJs must provide residents with reasonable notice and an opportunity to comment on the proposed HOME-ARP allocation plan of **no less than 15 calendar days**. The PJ must follow its adopted requirements for “reasonable notice and an opportunity to comment” for plan amendments in its current citizen participation plan. In addition, PJs must hold **at least one public hearing** during the development of the HOME-ARP allocation plan and prior to submission.

For the purposes of HOME-ARP, PJs are required to make the following information available to the public:

- The amount of HOME-ARP the PJ will receive,
- The range of activities the PJ may undertake.

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

- *Public comment period: start date - 4/1/2022 end date - 4/20/2022*
- *Public hearing: 4/20/2022*

The City carried out a broad, multifaceted community engagement effort in accordance with the Citizen Participation Plan, which is designed to facilitate and encourage the involvement of Low- and Moderate-Income (LMI) populations and outlines requirements for the following processes and events:

- Location and publication of public notices;
- 15 or 30-day public review period, as applicable;
- Availability of the documents;
- Public hearings and public meetings;
- Public comment process;
- Required approval; and
- Deadlines.

As part of the public participation process, NSD announced the availability of \$2,248,491 in HOME-ARP funds from the City of Oceanside specifying its use to primarily benefit Qualified Populations through funding of certain eligible activities. As part of all discussions, current efforts to address the housing and service needs of the homeless and those at-risk of homeless were presented.

A community partner survey was conducted as part of the HOME-ARP planning process. Community partners from a number of organizations were invited to participate in the survey. The survey was made available from February 9 – April 1, 2022. Invitations were provided directly by NSD’s listserv, as well as through collaborative community partners with memberships, such as the San Diego Housing Federation, Alliance for Regional Solutions-Connecting North County and Bridge to Housing, announcing the availability of funds and

requesting input through a survey with links and QR codes provided to their member organizations. Links to the survey were also made available on the City of Oceanside's official website for the Housing and Neighborhood Services Department at www.OceansideHA.com.

The City held three community meetings, particularly in its more economically diverse neighborhoods, related to its CDBG, HOME, HOME-ARP funding availability and community needs, inclusive of those homeless or at-risk of homelessness. These community meetings were held on February 10, 2022 (Libby Lake), February 21, 2022 (John Landes), and March 7, 2022 (Civic Center Library Community Rooms). As part of the community participation process for the CDBG/HOME/HOME-ARP funds, a community survey was also made available from February 9, 2022 through April 10, 2022.

To provide opportunities for public participation, the City distributed an invite to all individuals on its email list notifying them of the opportunity to participate in meetings and a community/community partner surveys. Announcement of community meetings and the community survey was also made through the City's official website and social media.

A public meeting to hear about HOME-ARP and community needs was held by the City's Housing Advisory Commission on February 22, 2022. Anyone wishing to comment on the best use of HOME-ARP funds was invited to do so.

A combined notice of the public comment period and public hearing was published in the San Diego Union Tribune, a newspaper of general circulation. In addition, the public notice was posted on the City's www.OceansideHA.com website and was distributed to the City's Housing and Neighborhood Services Department's mailing list. The draft of the Substantial Amendment to the 2021 Annual Action Plan was publicized and made available for public comment for a minimum 15- day public comment period beginning April 1, 2022 through April 20, 2022. The City Council conducted a public hearing on April 20, 2022. All comments received during the public meetings, hearings, and the review and comment period are summarized in this report; no comments were rejected.

Describe any efforts to broaden public participation:

In addition to standard legal notice placements in the San Diego Union Tribune, the City utilized the City of Oceanside's official web page and social media platforms (e.g. Facebook, Twitter and Instagram) to help broaden the participation process. The City is providing an extended period for public comment and five public meetings/hearings; the first public meeting on February 9, 2022 with the community and 2 additional meetings through March 7, 2022, a meeting on February 22, 2022 before the City's Housing Commission, and a public hearing before the City Council on April 20, 2022. Council must approve the substantial amendment before its submission to HUD.

A PJ must consider any comments or views of residents received in writing, or orally at a public hearing, when preparing the HOME-ARP allocation plan.

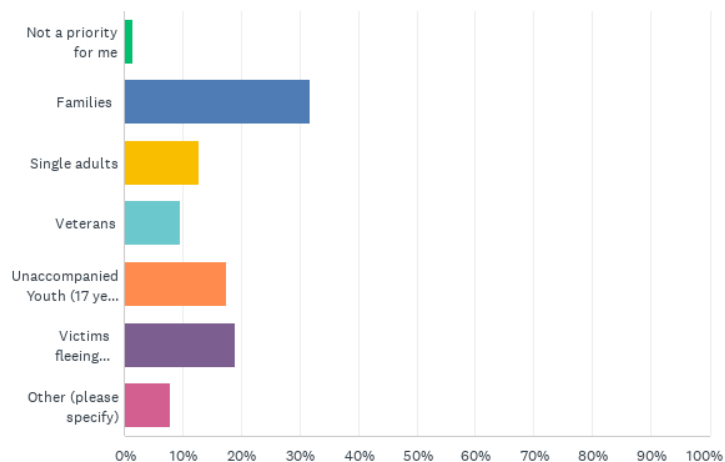
Summarize the comments and recommendations received through the public participation process:

YMCA of San Diego County stated the growing and sometimes hidden need for homeless transitional age youth, who often times are couch surfing and staying below the radar but are there.

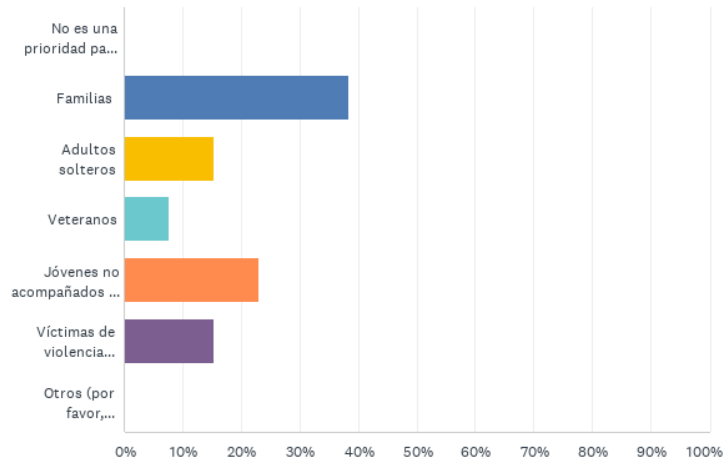
Through the three community meetings for the public held in Oceanside's more economically diverse neighborhoods, public comments emphasized the unaffordability of housing in Oceanside and a need for more affordable housing and any programs that would assist to lessen the cost burden, particularly affordable rental housing. Sheltering for the homeless was of concern, with services for the homeless including food, mental health services, wraparound services and employment.

The following represents the results from the community survey. Families facing homelessness for both the English and Spanish speaking community are considered the highest priority. In terms of eligible activities that could be funded to assist, all options are considered a priority for the respondents. A total of 101 responses were received in English and 49 in Spanish.

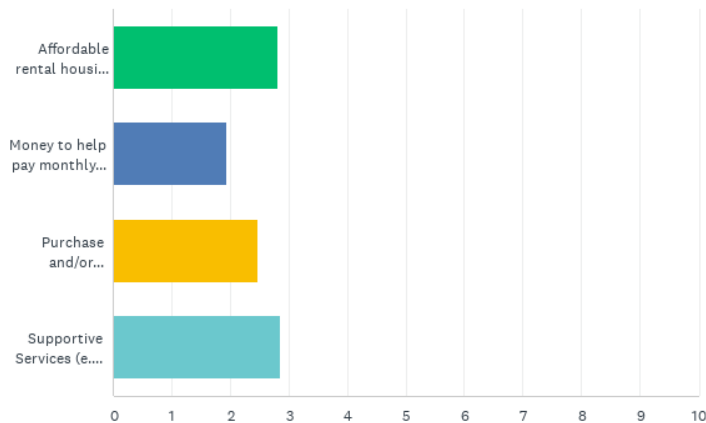
Q21 HOMELESS PRIORITY GROUPS: From the list below please select the most important homeless population group the City should focus on? (Choose only 1)



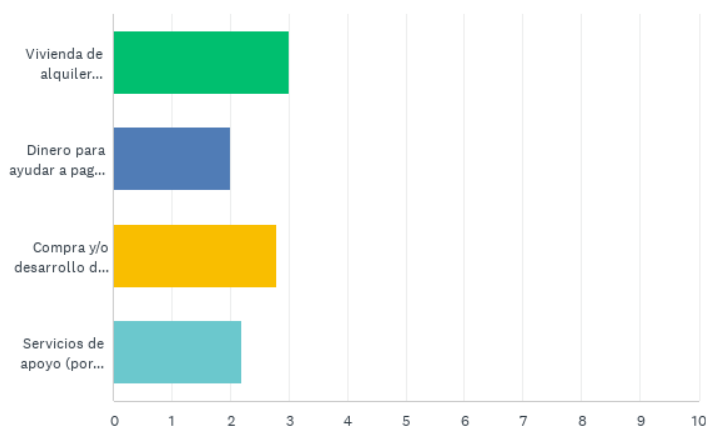
Q21 GRUPOS PRIORITARIOS PARA PERSONAS SIN HOGAR: De la lista a continuación, seleccione el grupo de población sin hogar más importante en el que la ciudad debe centrarse. (elija 1 solamente)



Q22 HOUSING FOR HOMELESS: What do you think is most important to help our homeless residents get out of homelessness. Please rank the following in order of priority with 1= highest need and 5=lowest need



Q22 VIVIENDA PARA PERSONAS SIN HOGAR: ¿Qué crees que es más importante para ayudar a nuestros residentes sin hogar a salir de la falta de vivienda? Por favor, clasifique lo siguiente en orden de prioridad de 1 = mayor necesidad y 4 = menor necesidad



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

All comments are included and no comments were rejected.

Needs Assessment and Gaps Analysis

PJs must evaluate the size and demographic composition of qualifying populations within its boundaries and assess the unmet needs of those populations. In addition, a PJ must identify any gaps within its current shelter and housing inventory as well as the service delivery system. A PJ should use current data, including point in time count, housing inventory count, or other data available through CoCs, and consultations with service providers to quantify the individuals and families in the qualifying populations and their need for additional housing, shelter, or services. The PJ may use the optional tables provided below and/or attach additional data tables to this template.

OPTIONAL Homeless Needs Inventory and Gap Analysis Table

Homeless													
	Current Inventory					Homeless Population				Gap Analysis			
	Family		Adults Only		Vets	Family HH (at least 1 child)	Adult HH (w/o child)	Vets	Victims of DV	Family		Adults Only	
	# of Beds	# of Units	# of Beds	# of Units	# of Beds					# of Beds	# of Units	# of Beds	# of Units
Emergency Shelter	33	7	2	1	0								
Transitional Housing	57	22	21	#	47								
Permanent Supportive Housing	0	0	30	30	100								
Other Permanent Housing						0	0	0	0				
Sheltered Homeless						84	158	48	#				
Unsheltered Homeless						1	165	5	#				
Current Gap										0	0	305	x

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

OPTIONAL Housing Needs Inventory and Gap Analysis Table

Non-Homeless			
	Current Inventory	Level of Need	Gap Analysis
	# of Units	# of Households	# of Households
Total Rental Units	26,923		
Rental Units Affordable to HH at 30% AMI (At-Risk of Homelessness)	893		
Rental Units Affordable to HH at 50% AMI (Other Populations)	1,467		
0%-30% AMI Renter HH w/ 1 or more severe housing problems (At-Risk of Homelessness)		5,880	
30%-50% AMI Renter HH w/ 1 or more severe housing problems (Other Populations)		5,900	
Current Gaps			9,420

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

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

Homeless Population

In accordance with HUD's definition of homeless under the HOME-ARP grant, the City of Oceanside will consider a homeless family or individual to generally include:

- An individual or family who lacks a permanent and adequate permanent home;
- A person or family who will imminently lose their permanent home due to a lack of resources or support; and,
- A youth under the age of 25, even if accompanied by an adult, that does not have a permanent home.

The San Diego Regional Taskforces on Homelessness (RTFH) is a collaborative effort to prevent and end homelessness in the San Diego region. The Continuum of Care (CoC) for San Diego County is led by the RTFH. Due to the coronavirus pandemic, there was no street count conducted in 2021 to identify unsheltered homeless populations. The January 2020 point-in-time (PIT) count of both sheltered and unsheltered homelessness is used for this analysis. According to the 2020 Point in Time Count, organized by the RTFH, conducted on January 23, 2020 beginning at 4 am, 408 individuals in Oceanside CA were experiencing homelessness. 242 of those individuals or 59% of those experiencing homelessness were living without shelter.

Countywide: 2020 We All Count Report, San Diego Regional Taskforce on Homelessness

Compared to the overall population of San Diego County, homelessness disproportionately impacts people of color, most strikingly among Black/African Americans according to the 2020 count. Black/African Americans comprise 4.7% of the general population but 21% of population experiencing homelessness and for those American Indian/Alaska Natives representing 0.4% of the general population; 3.4% of population are experiencing homelessness. While San Diego County's general population is comprised of 34% Hispanic/Latinx individuals (of any race), they make up only 28% of individuals experiencing homelessness in 2020.

From 2017-2020, males experience higher rates of homelessness compared to female, transgender, and gender non-conforming groups. However, the rate of females experiencing homelessness has continued to increase since 2018 to 41% of the 2020 count. In Oceanside, for 2020 PIT, approximately 33% of those homeless were female.

381 Families with Children in San Diego County representing 1,216 adults and children were experiencing homelessness on the early morning of January 23, 2020. Approximately, 96% of individuals in families with children were sheltered, and 4% were unsheltered. In Oceanside, there was one family unsheltered and 84 unsheltered, representing 16% of the homeless.

940 individual experiencing homelessness are **veterans**, with 66% sheltered on the morning of January 23, 2020 in San Diego County. 317 individuals or 8% of the unsheltered homeless are veterans. This is a 12% decline in veterans experiencing homelessness from 2019. In Oceanside, there were 5 unsheltered veterans, with 48 sheltered, representing 13% of the homeless population and 2% of the unsheltered.

323 individuals or 8% of the unsheltered **homeless are youth** in San Diego County. There was 16% decline in unaccompanied youth experiencing homelessness from 2019. In Oceanside, there were 25 unsheltered youth, with 39 sheltered, representing 16% of the homeless population.

At-risk of Homelessness

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

Based on the City's 2020 Con Plan and HUD Comprehensive Housing Affordability Strategy (CHAS) data Table 10 provides information on overcrowding among households that include more than one family, by household income level. This CHAS data indicates there are approximately 480 renter households with incomes below 30% AMI in overcrowded conditions that are at risk of homelessness in Oceanside.

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

According to the San Diego County Continuum of Care's Stella P report, 14% of those homeless in the County are domestic violence survivors. Of those survivors, 21% are currently fleeing. With a 2020 PIT count of 408 homeless persons, approximately 57 persons would be adult survivors of domestic violence, with 12 fleeing. The count of sheltered and unsheltered survivors of domestic violence does not include children in families. In calendar year 2021, based upon information from the San Diego County Continuum of Care Homeless Management Information System (HMIS), there were approximately 20 persons with domestic violence history and in 6 of these instances they were persons fleeing domestic violence.

Providers of services to survivors of domestic violence indicate the number of individuals in need of shelter is likely undercounted as isolation and physical distancing mandates resulted in increased domestic violence concerns while limiting potential flight from unsafe living situations. Demographic information for this qualifying population is confidential.

Other Populations

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

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

Currently housed and at risk of repeat homelessness

The Continuum of Care's Homelessness Crisis Response System 2020 Data and Performance narrative indicates that approximately 26% of individuals exiting emergency shelter, or transitional or permanent housing in any given year over a 24-month period returned to homelessness. In

calendar year 2021, based upon information from the San Diego County Continuum of Care Homeless Management Information System (HMIS), for Oceanside there were approximately four clients who exited to programs into permanent destinations and two to emergency shelters.

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

HUD CHAS 2014-2018 data indicates there are 5,035 renter households with annual income less than 30% AMI that are at greatest risk of housing instability. All of these renter households are experiencing a housing cost burden, with 66% (3,030 households) facing a severe housing cost burden.

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

Households in this category are those with incomes between 30% and 50% AMI that lack sufficient resources or support networks to prevent homelessness, and 1) have moved more than two times due to economic reasons in the past 60 days, 2) are doubled up with another household due to economic hardship, 3) will be evicted within 21 days, 4) live in a hotel or motel without financial assistance from a nonprofit or government entity, 5) live in an efficiency apartment and are overcrowded, or 6) are exiting a publicly-funded institution or system of care. The City's 2020 Con Plan and HUD CHAS data Table 10 provides information on households that include more than one family, household income level and overcrowding. This CHAS data indicates there are approximately 655 renter households with incomes between 30% and 50% AMI in overcrowded conditions that are at risk of homelessness in Oceanside. In addition, beginning March 2, 2021, income eligible Oceanside residents have been able to submit applications for rental assistance to avoid eviction through the County of San Diego's Emergency Rental Assistance Program through March 31, 2022. During the past year 5,365 households submitted applications for assistance with 1,602 households assisted, all of whom with incomes less than 50% AMI. A total of \$16,322,719 in ERAP funds have been awarded.

Describe the unmet housing and service needs of qualifying populations, including but not limited to:

- ***Sheltered and unsheltered homeless populations;***
- ***Those currently housed populations at risk of homelessness;***
- ***Other families requiring services or housing assistance or to prevent homelessness;***
- ***and,***
- ***Those at greatest risk of housing instability or in unstable housing situations:***

As reported in the most recent Point in Time Count, Oceanside is home to approximately 166 people experiencing homelessness with shelter, and 242 people experiencing homelessness without shelter. It is largely believed that we will see an increased count of people living without shelter as a result of the COVID-19 pandemic, which has negatively impacted hundreds of households in Oceanside. According to the U.S. Census 2014-2018 ACS 5-year Estimates, 55% of Oceanside renter households are cost burdened, paying more than 30% of their income toward rent. The sample size in this ACS Estimate is over 100,000 households. The cost burdens are more serious for those 5,035 renter households with the lowest incomes (at or below 30% of Area

Median Income), with 66% severely cost burdened (paying more than 50% of their income toward rent). These significant housing cost burdens affect over 6,085 extremely low- and very low-income Oceanside renters. The majority of San Diego County residents living with cost burdens have incomes below 50% of Area Median Income, are disproportionately people of color, and are more often older adults (65 or older) or younger adults (25 or younger).

The greatest unmet housing needs of qualifying populations are:

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

The greatest unmet service needs of qualifying populations, including sheltered and unsheltered homeless populations, currently housed populations at risk of homelessness, other families requiring services or assistance to prevent homelessness, and those at greatest risk of housing instability or in unstable housing situations are:

- Mental health;
- Navigation;
- Diversion;
- Life skills; and
- Vehicle repairs.

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

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

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

The City of Oceanside offers a variety of resources to individuals at-risk of homelessness and experiencing homelessness through federal, state, and local programs. These programs range from vouchers for low-income families to emergency shelters for persons experiencing homelessness. Below is a summary of each of these resources through the City's Housing and Neighborhood Services Department:

- CDBG/HOME funding;
- Housing Choice Vouchers/Emergency Housing Vouchers;
- Congregate beds and non-congregate shelter units;
- Supportive services;
- Tenant-based rental assistance; and
- Affordable and Permanent Supportive Rental Housing.

Community Development Block Grant (CDBG) – Federal

As an entitlement grantee, the City of Oceanside receives approximately \$1.4 million annually in Community Development Block Grant (CDBG) funding, which is intended to provide community infrastructure and resources in low-income neighborhoods. Through its CDBG Cares funds, Oceanside expended \$460,568 for its emergency Motel Voucher Program.

HOME Investment Partnership (HOME) – Federal

The HOME Investment Partnership (HOME) aims to provide direct housing solutions through housing development and tenant-based rental assistance (TBRA). HOME is the second of the federal entitlement programs provided by HUD to the City. As an entitlement grantee, the City of Oceanside receives approximately \$620,000 annually in HOME funds. In FY 2020-21, the City of Oceanside committed approximately \$1.1 million in HOME funding to provide tenant-based rental assistance for persons at-risk of homelessness. Additionally, \$1.1 million in FY 2020-21 and FY 2022-23 HOME funds are allocated for tenant-based rental assistance for those very low-income seniors to bridge the gap until they are able to receive assistance through the Housing Choice Voucher program.

Housing Choice Voucher Program (HCV) – Federal

The Oceanside Housing Authority's (OHA) Housing Choice Voucher (HCV) Program provides approximately \$23 million in federal funding to help low-income families and individuals with the cost of their rent and prevent homelessness. Typically, the tenant pays 30 percent their adjusted monthly income for rent and utilities and OHA makes housing assistance payments directly to the landlord. The purpose of the program is to assist low-income individuals and families and ensure they are living in healthy, safe housing. Approximately 1,585 HCV vouchers are allocated by HUD.

Under the HCV program, OHA administers special programs to target specific populations with disproportionate risk of homelessness. These programs include the Family Unification Program, which targets families for whom the lack of housing is the primary factor prohibiting in the imminent placement of a family's child or foster and homeless youth. Additionally, as part of HCV

funding, the OHA administered the Veterans Assistance Supportive Housing (VASH) program vouchers. The VASH program is a collaborative program between HUD and the U.S. Department of Veteran Affairs (VA) to provide rental assistance to homeless veterans and offer ongoing VA case management and supportive services. 100 VASH vouchers are allocated by HUD. OHA provides a preference for 30 HCVs for those that are characterized as chronically homeless, known as the Open-Door program. For OHA's 103 Mainstream vouchers, participants must be permanently disabled and either homeless or at-risk of homelessness. Finally, the OHA targets homeless individuals with serious mental illness through the Project One for All (POFA) program. POFA is an extensive effort by the City of Oceanside and its partners to provide intensive wraparound services, including mental health counseling and housing, to homeless individuals with serious mental illness. 60 HCV vouchers have been committed for POFA.

Lastly, the project-based component of the HCV Program allows rental assistance to be attached to a specific unit and/or project instead of to a particular eligible assisted family. The project may be owned by any individual, corporation, trust, partnership, non-profit entity, as well as by the OHA, excluding those sanctioned from participation. A total of 207 project-based vouchers (PBVs) have been allocated throughout the City. New project-based vouchers will be prioritized for units that will be designated for elderly or disabled families, homeless persons or families receiving supportive services, and for projects in which all PBV units in the project will be newly constructed housing.

Emergency Housing Voucher Program (EHV) – Federal

The Emergency Housing Voucher (EHV) program is funded through the American Rescue Plan Act and assists individuals and families who are experiencing homelessness; at risk of experiencing homelessness; fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking; or were recently homeless and for whom providing rental assistance will prevent the family's homelessness or having high risk of housing instability. Referrals come from a partnership with the local Continuum of Care, Regional Task Force on Homelessness (RTFH). Housing search assistance is a required component. 43 vouchers are allocated for EHV.

Congregate Beds and Non-congregate Shelter Units

There were 166 beds in congregate shelter units (35 emergency shelter beds and 131 transitional housing beds) and no non-congregate shelters. Congregate beds include emergency, safe haven and transitional housing beds and units. The City operates a Motel Voucher program providing 30 available rooms and with a goal of developing a housing plan during the stay. In 2021, there were 198 participants in the Motel Voucher program. Additionally, the City operates a Bridge Shelter Program, which provides communal living in an apartment setting for up to 12 persons. The length of stay is from 30-90 days and is intended to be a bridge to an appropriate housing alternative. Participants must have an executable housing plan. Non-congregate shelter includes permanent supportive housing and rapid re-housing.

Supportive Services

The City of Oceanside is a smaller jurisdiction encompassing approximately 42 square miles with approximately 61,111 households (American Community Survey 5-year estimates 2016-2020).

Supportive service availability within Oceanside is limited. The availability of such resources is based on funding availability primarily through the County of San Diego and partnerships with local social service providers, such as McAlister Institute and Interfaith Community Services (ICS), and other non-profit providers, such as Brother Benno Foundation, Solutions for Change, San Diego Rescue Mission, Women's Resource Center, YMCA, and Mental Health Systems.

The City currently contracts with McAlister Institute for case management and administration of its Motel Voucher program and its Sobering Center. The City also provides funding for ICS for two case managers/housing navigators in its Housing and Neighborhood Services Department, two licensed clinical social workers in conjunction with the City's homeless street outreach team, and administration and case management of its 12-bed/3-unit Bridge Shelter program for the homeless.

Tenant-based Rental Assistance

In addition to the OHA's Section 8 Housing Choice Voucher program, the Housing and Neighborhood Services Department has also allocated \$1.1 million in HOME funds for tenant based rental assistance, specifically for those families at-risk of becoming homeless. The program is administered by ICS who also provides program participants with supportive services aimed at facilitating housing stability and sustainability. Additionally, \$1.1 million in FY 2020-21 and FY 2022-23 HOME funds are allocated for tenant-based rental assistance for those very low-income seniors to bridge the gap until they are able to receive assistance through the Housing Choice Voucher program.

Affordable and Permanent Supportive Rental Housing

There are an estimated 1,803 affordable rental housing units funded with HOME, LIHTC, and Section 8 project-based assistance in Oceanside. Affordable and permanent supportive housing developments in Oceanside have long wait lists and typically conduct lotteries for affordable units or lease units to Qualified Populations through Coordinated Entry System and the Oceanside Housing Authority waiting list.

In January 2020, there were 154 permanent supportive housing beds, including 100 for Veterans and their families. In addition, according to HUD's 2021 Picture of Subsidized Households, there are 310 public housing units located throughout San Diego County.

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

Shelter Gap

There is an estimated need for 2,332 additional shelter beds for individuals.

Shelter Gap Methodology

The shelter gap methodology utilized the January 2020 point-in-time count of sheltered individuals. Based on the PITC data, there appears to be no gap of shelters for families. The number of sheltered individuals in emergency shelter and transitional housing were separately multiplied by the average stay in each shelter type and added to identify the total nightly need for beds.

Shelter Gap

Sheltered in Emergency Beds (35) x 4-month average stay	140
Individuals Sheltered in Transitional Housing Beds (131) x 18-month average stay	2,358
Total Nightly Need for Individual Beds	2,498
Existing Individual Bed Capacity (Emergency Shelter + Transitional Housing)	166
<i>Net Nightly Need for Individual Beds</i>	<i>2,332</i>

Tenant-based Rental Assistance Gap

There is an estimated gap of 6,085 tenant-based rental assistance vouchers for households with income less than 50% AMI and paying more than 50% of household income for rent, including utilities. The number of tenant-based rental assistance vouchers was calculated using HUD CHAS Data Table 7 and is equal to the number of renter households with income less than 50% of AMI and paying more than 50% of household income for rent, including utilities.

Affordable and Permanent Supportive Rental Housing Gap

There is an estimated gap of 3,330 rental units affordable to renter households with income less than 30% AMI. In addition, there is an estimated gap of 2,755 rental units affordable to renter households with income between 30% and 50% AMI. The number of Affordable Rental Units needed was calculated using HUD CHAS Data Table 7 and is equal to the number of renter households in each income category paying more than 50% of household income for rent, including utilities. Two-bedroom units for renters with income less than 30% AMI will generally have rent, including utilities that does not exceed \$642/month. Units for renters with income between 30% and 50% AMI will generally have rent, including utilities that does not exceed \$1,070/month. Permanent supportive rental housing is a subset of the affordable rental housing gap, primarily for households with income less than 30% AMI. In addition to an 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 418 permanent supportive housing units in Oceanside. The number of Permanent Supportive Housing Units needed was calculated by multiplying the ACS 2020 5-year population estimates for Oceanside (175,694) by the per capita need (.002381) as calculated by the Corporation for Supportive Housing.

The serious deficit of homes affordable and available to the qualified populations is both the root cause of the problem, as well as a massive hinderance to strategies focused on connecting qualified populations to housing and shelter. In response to the pandemic, the shelter and housing

ecosystem in Oceanside/San Diego County has been attempting to rapidly expand Permanent Supportive Housing and non-congregate shelter options, including through opportunistic acquisitions of existing multifamily buildings, hotels, and motels.

Service Delivery System Gaps and Methodology

To identify gaps in the service delivery system, the Oceanside Housing and Neighborhood Services Department consulted with stakeholders and drew on its experience working with organizations in the San Diego County region. Consultation with stakeholders revealed numerous service delivery system gaps including navigation and case management, connecting individuals and families with employment opportunities with sufficient income to afford housing, too few rental units in general, transportation, move-in assistance, adequate affordable child care, landlord outreach and liaison services. In addition, stakeholders discussed challenges securing consistent operating funds for general administrative costs and building capacity to undertake development activities.

Identify the characteristics of housing associated with instability and an increased risk of homelessness if the PJ will include such conditions in its definition of “other populations” as established in the HOME-ARP Notice:

In accordance with the Oceanside’s adopted Consolidated Plan for 2020-2025, the City of Oceanside does not maintain unique definitions or estimates of at-risk populations. The City uses the ACS and CHAS estimates provided by HUD to identify households living at or below 50% AMI who experience housing problems as a proxy to identify at-risk populations and subpopulations within the City. Based on 2014-2018 ACS data, 11,780 renter households meet this characteristic of increased risk of homelessness, with 1 of four housing problems. 7,635 face a cost burden of paying more than 30% of their income towards housing and another 6,085 paying more than 50% of their income towards housing costs.

Based on input from stakeholders as well as the data gathered in this needs assessment, the greatest characteristic linked with instability and an increased risk of homelessness is extremely low-income (less than 30% AMI) renters who are experiencing at least one housing problem. 3,755 households meet this characteristic of increased risk of homelessness.

Living in over-crowded housing and staying with friends or family are often the form of housing instability that can escalate to staying in a car, tent, or shelter.

Identify priority needs for qualifying populations:

High and rapidly escalating housing costs combined with rapid economic displacement in Oceanside create harmful instability for the qualified populations. It is difficult for members of qualified populations to find affordable housing of any kind in Oceanside. Whatever personal needs or challenges they were facing become exponentially worse on the streets, adding trauma and stress to individuals surviving outside, and further overwhelming the system of programs and providers. Data and experience show that investing in permanent supportive housing allows

services to be accessed and for individuals to begin their own path to recovery. Without safe, quality, affordable housing, our qualified populations are unable to thrive.

Based on the data presented above, the priority housing needs for qualifying populations is the development of affordable rental housing. Specifically, there is an urgent need for the development of both permanent supportive housing with wraparound services dedicated to persons experiencing homelessness and subsidized rentals dedicated to households earning less than 30% AMI.

Priority needs for qualifying populations are:

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

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

The City of Oceanside utilized federal, publicly available data such as the American Community Survey, the Comprehensive Housing Affordability Strategy and its adopted 2020 Consolidated Plan. Specifically, the Point in Time Count and the Housing Inventory Count provide a picture of the Oceanside's and the San Diego County region's acute homelessness needs, specifically with regards to long-term housing options. Permanent supportive housing and emergency shelter beds are at full capacity. Additionally, the City's affordable development inventory highlights the need for additional units restricted to 30% AMI or below. The need for increased rental inventory that support the extremely low-income and very low-income households in San Diego is critical. A significant evidence base, data, and experience demonstrate that investing in permanent supportive housing allows services to be accessed and for individuals to recover.

In conversations with both the public and stakeholders through the consultation and public comment process, concerns regarding supportive services in all development projects were raised. Though these groups echoed the data regarding the highest need for further overall unit development but this must go hand in hand with supportive services. All groups shared that permanent supportive housing is the key to keeping individuals housed for the long-term.

Without safe, quality, affordable housing, our qualified populations are unable to thrive.

HOME-ARP Activities

Describe the method for soliciting applications for funding and/or selecting developers, service providers, subrecipients and/or contractors and whether the PJ will administer eligible activities directly:

The Oceanside Housing and Neighborhood Services Department will solicit applications from developers, service providers, and/or subrecipient organizations to administer eligible activities and/or develop shelter and housing. A Notice of Funds Available (NOFA) will be issued. The NOFA will, at a minimum, specify eligible applicants, eligible activities, minimum and maximum funding amounts, application thresholds and underwriting criteria, and will provide instructions on how to submit an application. In addition to soliciting applications through a HOME-ARP NOFA, the Oceanside Housing and Neighborhood Services Department may provide HOME-ARP funding to applicants that previously applied for CDBG/HOME and other available housing funding for shelter and housing for homeless and those at risk of homelessness to best leverage the availability of State, County and local housing funding. The Oceanside Housing and Neighborhood Services Department will not directly administer HOME-ARP activities beyond program administration and planning and no subrecipients or contractors are responsible for program administration and planning on behalf of the City.

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

n/a

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

Use of HOME-ARP Funding

	Funding Amount	Percent of the Grant	Statutory Limit
Supportive Services	\$ 0		
Acquisition and Development of Non-Congregate Shelters	\$ 0		
Tenant Based Rental Assistance (TBRA)	\$ 0		
Development of Affordable Rental Housing	\$ 2,023,642		
Non-Profit Operating	\$ 0	# %	5%
Non-Profit Capacity Building	\$ 0	# %	5%
Administration and Planning	\$ 224,849	# %	15%
Total HOME ARP Allocation	\$ 2,248,491		

Additional narrative, if applicable:

N/A

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

As demonstrated by the data herein and consultations with the public and interested stakeholders, as well as in innumerable other reports, the shortage of permanent, affordable, and/or supportive housing options in Oceanside is one of the primary causes of homelessness and the primary impediment to helping individuals and families exit homelessness. As documented in the City of Oceanside's 2020 Consolidated Plan and 2021 Housing Element, home prices and rents rose sharply beginning in 2015 as demand for housing increased due to in-migration and the economic recovery. Both rental and purchase affordability have continued to decline during the COVID-19 pandemic as supply cannot keep pace with the demand generated by continued in-migration and investor interest. According to the San Diego Region Spring 2021 Vacancy & Rental Rate Survey by the Southern California Rental Housing Association, the Oceanside vacancy rate is at 2.4%, indicative of a tight rental market. Growing demand for housing, coupled with labor and supply shortages have continued to push housing costs beyond the reach of the lowest income households.

HUD 2014-2018 CHAS data identified 3,330 renters with income less than 30% AMI who were severely cost burdened. An additional 2,755 renters with income between 30% and 50% are severely cost burdened. The volume of severely cost burdened renters could be reduced through the use of HOME-ARP funds for either tenant-based rental assistance or rental housing production.

Given the shortage of available units resulting from increased demand generated by continued immigration and investor interest, implementing a new tenant-based rental assistance program is unlikely to meet the needs of Oceanside's most vulnerable renters. The City has already committed HOME funding for tenant based rental assistance. Considering the recent infusion of emergency housing vouchers directly from HUD to local public housing authorities, adding new vouchers could also create unnecessary competition for scarce units.

The addition of HOME-ARP rental units, coupled with services, will help to ease the burden of housing costs for Oceanside's lowest-income renters who are at high risk of housing instability

and homelessness or are currently experiencing homelessness and seeking opportunities for housing stability. Permanent supportive rental housing will help to address the needs of Oceanside's growing population of people experiencing chronic homelessness, seniors, people with disabilities who need supportive services coupled with affordable housing and those lowest income households from falling into homelessness. Ensuring that rental housing offers appropriate services will support long-term housing stability and decrease the likelihood of a return to homelessness.

Accordingly, the plan to fund eligible activities focuses on the acquisition, construction, preservation, and/or rehabilitation of housing serving the Qualified Populations.

HOME-ARP Production Housing Goals

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

The City of Oceanside Housing and Neighborhood Services Department estimates approximately 50 households will be served through this allocation. These units will be maintained for occupancy by target populations for 15 years, at a minimum.

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

The City estimates the HOME-ARP grant allocation can support the development of approximately 50 permanent housing units by providing gap financing to projects leveraging other funding sources, such as the 4% and 9% Low-Income Housing Tax Credit programs, regular HOME Investment Partnership funding, and other state and local affordable housing trust funds or programs. While Projects may be funded solely with HOME-ARP dollars, this is an unlikely to provide financial feasibility for most development opportunities. HOME-ARP funding is intended to provide gap financing to facilitate the development of units affordable and accessible to homeless individuals with limited incomes.

Preferences

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

- Preferences cannot violate any applicable fair housing, civil rights, and nondiscrimination requirements, including but not limited to those requirements listed in 24 CFR 5.105(a).
- PJs are not required to describe specific projects to which the preferences will apply.

There will be no additional preferences. Working with the San Diego Regional Taskforce on Homelessness, Oceanside Housing Authority, and community housing partners, projects funded by these HOME-ARP dollars will use project-specific affirmative marketing and waitlists, and

they will serve Qualified Populations by utilizing Coordinated Entry for All to enroll households with Housing Choice Vouchers or Emergency Housing Vouchers.

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

n/a

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

n/a

HOME-ARP Refinancing Guidelines

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

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

The City will not utilize HOME-ARP funds to refinance existing debt secured by multifamily housing as described in the question, and therefore we do not have any refinancing guidelines for that activity.

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

n/a

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

n/a

- *Specify the required compliance period, whether it is the minimum 15 years or longer.*
n/a
- *State that HOME-ARP funds cannot be used to refinance multifamily loans made or insured by any federal program, including CDBG.*
n/a
- *Other requirements in the PJ's guidelines, if applicable:*
n/a

Additional organizations consulted and feedback provided.

Agency/Org Consulted	Type of Agency/Org	Method of Consultation	Feedback
Mental Health Services	Service Provider	Survey	Prioritizes development of affordable housing, particularly permanent supportive housing, and rental assistance. Priority for those with severe mental illness. For services, prioritize housing counseling, case management, life skills and job training.
VA and PHA's VASH coordination	Public agencies that address the needs of the qualifying populations	Survey, individual outreach and meetings	Prioritizes development of affordable housing and supportive services (housing counseling, case management, life skills and job training). A need for emergency shelter in the North County and affordable housing or housing that takes Section 8. The current housing inventory and market rents are too high. Prioritize veterans.
Access to Independence	Advocacy and service provider for independent living for persons with disabilities	Survey	Prioritizes rental assistance, development of affordable housing and supportive services. A need for affordable for persons on fixed incomes housing. Prioritize all persons with disabilities.
Disability Rights California	Advocacy for Persons with Disabilities	Survey	Did not respond.
North County LGBTQ Resource Center	Advocacy for LGBTQ community and service provider	Survey	Prioritizes development of affordable housing, non-congregate shelter and transitional housing, particularly for queer community and veterans, and inclusive and affirming support services.
Showing up for Racial Justice	Advocacy for racial and economic justice.		Prioritizes non-congregate shelter and supportive services. A need for affordable and transitional housing with support services for long term housing solutions. Prioritize single adult households.